

Dear Buckinghamshire Council,

PLANNING APPLICATION 16/01040/AOP WOODLANDS

COMMENTS FROM HAMPDEN FIELDS ACTION GROUP HFAG

HFAG strongly OBJECT to this application. We have scrutinised a wide range of aspects including taking independent professional advice and believe that the application in its current form cannot be granted permission to proceed. Set out below are our detailed comments under the following headings:

1. Prematurity
2. Alignment of Eastern Road (South)
3. Flood risk
4. Phasing
5. Financial viability
6. Water services infrastructure
7. Transport

We will be happy to clarify or provide further information on any of these points. Please contact me at gandbwhite@btinternet.com or by phone to 07584 249440.

Dr G P White, Secretary, HFAG

By email

8 January 2021

Attachments:

- Jones-Parry Associates email to AVDC 17 October 2017
- Transport Planning Practice report into Local Model Validation Report, April 2020
- Transport Planning Practice report into SEALR Transport Assessment, June 2020

Prematurity:

1) The application is premature to the Vale of Aylesbury Local Plan. Whilst the bar is rightly set very high on refusing an application on the basis of prematurity, there is no doubt that in this case it is reached.

2) The 2019 NPPF states:

Local planning authorities may give weight to relevant policies in emerging plans according to:

a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)²².

(N.B bullet 22 refers the reader to the 2012 NPPF for Local Plans already submitted before 2019. This does apply to VALP, but the identical paragraph can be found at para 216 of the 2012 NPPF)

3) Accordingly, bullet point 2 is of particular relevance here. If the council were to rely on any part of the Transport element of the VALP when considering this application, it would prejudice its own Plan. We would draw your attention to the following

a) the level of objection received to the initial consultation,

b) the controversial road alignment and its impact on Floodzone 3a

c) the Inspector Interim comments on Transport published August 2018

d) further main modifications to policies T3, T4 and T4 and publication of significant amounts of new information (including a new model run)

- e) a further public consultation period considered
 - f) the Inspector's letter outlining his plans to hold further hearing sessions on the VALP.
- 4) In these circumstances any reasonable conclusion would be that there are significant unresolved issues which prevent any weight being given the VALP when determining this application, the main benefit of which is to provide part of the VALP infrastructure.
- 5) The definition of the 'high bar' is detailed in the following paragraph:

However, in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:

- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and*
 - b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.*
- 6) In this case both parameters are clearly met. The application is premature and the council would be at risk of challenge if they were to prejudice it in such an obvious and unjustified manner.

Alignment of Eastern Link Road (South)

- 7) The claims over sequential and exception testing for flood risk in the FRA Addendum are flawed. The greatest level of risk applies to the route of the ELR(S). A full and detailed critique of the testing claims for this was provided to the Strategic Development Management Committee ahead of their meeting in October 2017, and the recent whole-site sequential test does not invalidate that critique (see attached).
- 8) The three options for the ELR(S) route that are now stated to have been considered in the Design and Access stage of the application are basically the same route with very minor variations, all across Flood Zone 3. This strongly suggests they were not created to provide a genuine assessment of reasonable, valid alternatives. Nor were options referenced in the Officer

Report to the Strategic Development Management Committee in October 2017. At least one valid alternative route across Flood Zone 1 was ignored even though it was identified in the VALP and shown by this Action Group to the SDMC.

- 9) On this point, the VALP Examination Inspector commented (Interim Findings August 2018 para 52): “In whatever way the Council chooses to represent this proposal [D-AGT3 ELR route] within VALP it needs to be clear that it has complied with the relevant regulations and explicit as to its reasons.” In their response, the Council accept that ‘the highest test of least effect on the floodplain will need to be undertaken to satisfaction of both the Environment Agency and lead local flood authority.’ The EA have not yet commented on the Woodlands application, and the question remains open.
- 10) In the light of these factors, the application cannot be approved.

Flood risk

- 11) We note that the updated FRA Addendum has been produced by the same consultancy who wrote the previous versions in 2016 and 2017 (FRA Addendum para 1.1.1). Much of the text is identical. This raises questions over the true level of objectivity in the current document.
- 12) Even at this late stage and after four years of applicant work, a significant gap has been identified by the Lead Local Flood Authority. It is concerning to read that the surface water drainage calculations, needed by the LLFA to be able to assess the proposals, are missing (letter from BC Sustainable Drainage dated 15 Dec 2020). This lack of due diligence on the part of the applicant raises serious questions about the quality of work done to support this application, and the degree of confidence that can be placed on it.
- 13) Comparing the Flood Zones maps from 2020 and 2018, it is difficult to accept the claimed reduction in flood risk for the site. Especially as the attenuation facility has been reduced. We share the Weston Turville Parish Council’s concern about this crucial factor.
- 14) Maps in the FRA Addendum (Appendix C Figures 32113/34001/M1402 and M1404 attached) show that the 2020 ELR(S) Flood Mitigation Scheme will only shift the flood risk between different parts of the site. To the areas showing ‘Detriment’ and ‘Was Dry Now Wet’ must be added the substantial areas to the north east and the west where there is forecast to be ‘Negligible Impact’ on Flood Zones 3 and 2. At best, the mitigation only creates a residential location at the cost of surrounding it with flood-prone areas.

- 15) In order to avoid applying the higher H++ standard to the flood risk assessment, Woodlands is “*not considered to be a large-scale urban extension*” (FRA Addendum para 2.1.5). This is a staggering assertion. The development was clearly described as ‘an urban extension to Aylesbury’ and ‘sizeable’ in the Officer report to the SDMC (para 9.8). It covers no less than 200 hectares and includes not only 1,000 houses but also substantial other commercial, employment, leisure and other facilities running to many tens of thousands of square metres. Part of the longstanding case for D-AGT3 is that it is large enough to contribute substantially to the overall plan for Aylesbury. This cannot be disowned now. Woodlands is a large-scale urban extension and the H++ standard must be applied here. The assessment cannot be relied upon unless this is done.
- 16) A careful analysis has revealed that almost a quarter of the Woodlands site (22%) lies in national flood zone 3. Not all of this is covered by the ELR(S) route and so those areas cannot be accounted as ‘essential infrastructure’. For this reason, the site as a whole must be judged as failing the exception test.
- 17) In a single short period (2016 to 2018), assessments of the site’s flood risk at Drayton Mead Ditch changed so much that new flood management measures are now required. As the current problems in Bedford have graphically demonstrated, it is sadly possible to underestimate the risk of flooding in the lifetime of a settlement, let alone two to three years. This reinforces the arguments against developing in a location that is widely agreed to be subject to significant threat of flooding (Flood Zones 3 and 2). There is also a question over whether homes and other properties on Woodlands will be able to obtain flood insurance, or if they are, at what cost, which may affect take-up on the site.
- 18) The proposed sports facilities “will be at risk of flooding” (5.1.72), with “flood response and evacuation procedures prepared for the sports facilities prior to them becoming operational.” It is very difficult to see how any organisation could be attracted to pay to build and run these facilities in such a location. Flood risk thus translates directly into a threat to the financial viability of the Woodlands site (see also point 5 below).

Phasing:

- 19) The FRA Addendum now states that the Phase 1 (commercial) construction may progress in advance of the construction of the ELR(S) (para 5.1.63). But this is an important change from the Environment Agency comment reported to the SDMC (officer report para 7.1) which stated that “In terms of flood risk the eastern link road and the flood compensation will need to

implemented first on site in order to prevent flooding in the commercial use area or indeed the 'Later subsequent phases'." This is an unjustified change of approach, not known by the SDMC when they considered this application. Furthermore, it goes against the infrastructure-led intention of the VALP.

- 20) In their statement to the VALP public hearing on D-AGT3 (July 2018), the Woodlands applicant, Buckinghamshire Advantage, said that detailed discussions between them and the two councils were "now nearing completion" and they hoped that planning permission could be granted "in the next few weeks" (Statement on Matter 15c, policy AGT3 for Bucks Advantage). Yet we are not "a few weeks" but *2½ years* beyond that. What have been the difficulties causing such a long delay? The statement indicates a level of unjustified, inaccurate optimism that is highly concerning when it was made by a major, well-resourced applicant in possession of all the relevant information to a government-appointed Inspector charged by law with objectively assessing the soundness of this major component in the local plan. It follows that other statements in the current application cannot be depended upon.
- 21) The phasing of this development directly affects the assumptions and calculations on which the Standalone transport case is based. This crucial point is developed under Transport below, paras 29 – 37.

Financial viability.

- 22) BC Affordable Housing confirms that the proposal cannot meet the requirement for affordable housing. *“Schemes of 25 dwellings or over (or 1ha or more) are currently required to have 30% affordable housing, unless a Neighbourhood Plan indicates a greater percentage, or that level of provision is unviable. The applicant has advised that 30% affordable housing is unviable.”* (17.12.20 letter to LPA). This challenges the financial viability of this scheme.
- 23) It also sets a precedent for other components of the Aylesbury Garden Town plan: if the Council as the major stakeholder in Bucks Advantage can allow that applicant to evade Council standards, how can it hold other developers of even larger sites to that standard? Which will reduce the benefit to the local community across the whole of the town.

Water services infrastructure

24. It has been alarming to read the statement from Thames Water dated 11 December 2020 saying that they cannot accommodate this development without network upgrades to water, foul water and sewage treatment that will also add further costs. Even though this problem can doubtless be fixed, how is it possible that such a major development in preparation for more than four years could still run into this basic problem?
25. It goes without saying that the issues covered in Thames Water’s letter must be fully addressed and resolved before any planning permission could be granted.

Transport

The 2020 Aylesbury Transport Model with 2017 Base Year

24. In developing the revised Transport Addendum Stantec (previously Peter Brett Associates) have been asked to use the updated Aylesbury Transport Model (“ATM”) with a base year of 2017.
25. We are pleased that after nearly ten years of trying to convince Bucks Council to improve their modelling they have finally agreed with us.

24. Whilst the new ATM is an improvement on the previous model there are still some serious reservations which cast doubt on the effectiveness of the model to be used in determining planning applications. Accordingly, we ask that this submission is read in conjunction with the Transport Planning Practice (“TPP”) report into the Local Model Validation Report (April 2020 - attached) and the TPP report in the SEALR Transport Assessment (June 2020 - attached) that were sent to the Council at the time.
25. It should be noted that we have not received any correspondence at all regarding these reports and in particular to our request for more information, critical to the assessment of the Aylesbury Transport Model. We repeat those requests which can be found on page 19 (paragraphs 81-83) of the SEALR report.
26. Whilst we ask the reports to be considered as a whole particular concerns regarding the modelling are briefly highlighted below:
- a) The lack of specific detail on the performance of the ATM model in representing flows at the Walton Street gyratory is a serious omission from the LMVR. This junction is critically important. But the gyratory observed flows are not validated in the ATM LMVR or the TA. Therefore, there cannot be any confidence in the assertion that future year problems at the gyratory have been solved.
 - b) TPP recommend that BC’s consultants provide some details of the demand and actual flows, particularly at the Walton Street gyratory. Without this information, the interpretation of the ATM model results can be difficult. This is particularly the case for the 2036 model runs, where a substantial increase in traffic (over 40% above the Base Year volumes) at an already congested location is being modelled.
 - c) The ATM model base year has changed the model peak time periods. The modelled morning peak is now 07.00 to 08.00, not 08.00 to 09.00. Despite seeking clarification, no explanation has been given for this potentially very significant change. Especially when considering that the Walton Street Gyratory has the highest concentration of secondary students heading for the three schools in close proximity to it, all of which start at 08.45. The model needs to be representative of the busiest weekday hours and as such an explanation is again required if this is not to be judged incorrect.
 - d) Jacobs have compared modelled junction turning movements with observed data at two locations – A41/Aylesbury Road and A41/Bedgrove/Broughton Lane. Whilst

these junctions are important to the assessment of the Woodlands and Hampden Fields junctions, it is very surprising that no comparison was carried out for the Walton Street Gyrotory and the A413/Camborne Avenue roundabout, both of which will be affected by the changes proposed.

e) Regarding the ATM's "Fitness for purpose" Jacobs comment as follows:

"As evidenced by the overall calibration/validation statistics, it is considered that the model provides a good overall representation of current travel conditions for those areas included within the modelled network and is therefore appropriate for the purposes of assessing smaller scale schemes and developments. For larger scale schemes, (i.e., those of a similar size to SEALR and the other orbital link road schemes) an initial assessment of the extent of the scheme's impact in terms of reassignment (potentially through the use of the existing Countywide model) and a detailed assessment of the model's validation in the vicinity of the scheme should be undertaken before the model can be said to be fit for purpose for use as an evidence base for a major scheme appraisal of the given scheme."

24) To our knowledge, no such assessment of the wider impact and validation has been performed for a scenario that includes ELR(S), SLR, SEALR, SMRR and SWALR and the associated land use developments. Therefore it has not been demonstrated that the current version of the ATM Model is fit for purpose for examining the cumulative impact scenarios reported in the TAA. We want to make this overarching reservation clear, even though we have had to work with the modelled data in order to make our scrutiny comments that now follow.

The Standalone Case for Woodlands

25) The choice of 2022 as the forecast year for the Standalone case is unreasonable. NPPG requires that Transport Assessments are based on scenarios that will reasonably come to light. It is simply not possible that the Woodlands development will be completed by 2022 and as such the Standalone assessment cannot be given any merit.

26) Even the developer acknowledges that this will not happen. Paragraph 2.2.7 of the Transport Addendum, states that *"construction of the ELR(S) and its associated flood mitigation works are now due to commence in 2022, with completion expected by the end of 2024. The remainder of Phase 1 of Woodlands (consisting primarily of employment*

land) will commence in 2023 with completion scheduled for the end of 2024.”

- 27) It is important to note the developer is only talking about phase 1 being completed by 2024 and not the full standalone scheme that should be considered in any recognisable Transport Assessment.
- 28) The phasing and lack of trip generation in the standalone year is utterly misleading with none of the housing or any of the leisure facilities included in the standalone scenario. The authors of the TAA and the Highways Authority are fully aware that residential, hotel and school developments will generate significant traffic which has been erroneously excluded from the standalone assessment.
- 29) The Local Planning Authority will be aware that 2022 is the same forecast year used in the March 2016 initial Transport Assessment. This year was just about acceptable then as it was six years away, but not now when there is only a matter of months before 2022.
- 30) What was never acceptable, and never will be, is the exclusion of such significant trip generating parts of the development.

31) The table below shows exactly how the level of development being considered in Phase 1 is a very limited proportion of the whole scheme and how it excludes the largest traffic generators (the office and residential development):

	2022 Standalone	Full 2036 Scheme
Residential		1,100 dwellings 60 Residential Care home
Employment	B1 office 3,070 sqm B2 light Industry 39,850 sqm B8 warehousing 32,800 sqm	B1 office 25,600 sqm B2 light industrial 44,400 sqm B8 warehousing 32,800 sqm Mixed use 4,000 sqm
Local centre		
Leisure facilities	-	5,000 sqm hotel 3,500 sqm leisure centre 16 ha sports village/pitches and athletes' accommodation
Schools	-	2 primary schools
Other	-	Eastern Link Road (South)

32) The standalone case must reflect the full Woodlands development and currently does not. It is therefore completely invalidated and must be changed to accurately reflect a more reasonable and realistic scenario before the Highways Authority could possibly consider it.

33) The 'explanation' at paragraph 1.2.4 was, and still is, unconvincing. The Council is well aware that the whole development is unviable if the ELR(S) and employment areas are built on their own. They cannot simply design a scenario where selective planning

permission can be given 'until the SLR is completed'. A standalone assessment must reasonably reflect the scheme that is before the Council to determine.

- 34) The current Standalone assessment would only be valid if the application before the council for determination was for the ELR(S) and the Employment areas alone. It is not.
- 35) The Hampden Fields s106 suggests that the Southern Link Road does not need to be delivered until "5 years after development" has begun. For Hampden Fields development to commence it still has to go through outline planning, get an agreed s106, face legal challenge, go through detailed planning, face another potential legal challenge, and then begin. Even in the unlikely event of this all going in favour of development it is very unlikely that development would begin before 2023/24. This would mean that the SLR may not be in place until 2028/9. Again, this significantly brings into question the 2022 standalone year as anything like a reasonable scenario. It seems extremely strange that the Council are accepting a 2022 forecast year for a Standalone Assessment which even the developer admits is not realistic.
- 36) A further cause for confusion is that some individual junction assessments in the TAA do have a 2036 do minimum (i.e. junction 22) but not a 2036 standalone. Any reasonable member of the public would find it incredibly difficult to follow this "mix and match", "apples and pears", approach. A standalone 2036 scenario is essential before any objective assessment can begin.
- 37) Finally, the standalone scenario does not include the presence of the Stoke Mandeville Relief Road yet this is regarded by the council in all other scenarios and applications as a committed scheme. This error needs to be corrected.
- 38) Overall the standalone 2022 scenario is significantly erroneous. It appears, from the developer TAA that the Council accept this. The council's agreement to an unrealistic scenario is an unfortunate reflection that it has lost objectivity and is open to challenge if not corrected.

Standalone Junction Assessments

- 39) Notwithstanding the clear and obvious flaws in the standalone case, there are a number of critical junctions that have not been assessed in the standalone scenarios at all including:

- Junction 22 Bedgrove/Broughton Crossing
- Junction 98 New Road/A41
- Junction 116 Marroway/Main Street/Brook End, Weston Turville

40) Given the very close proximity to the development site, this omission needs correcting. It is very likely that flows through Weston Turville, for example, will increase with development even given the flawed standalone scenario.

Cumulative Assessments

41) It would have been helpful to have had the same comparator year as the VALP (2033) to allow meaningful comparisons.

42) The addition of an extra 3 years of background growth traffic (to 2036) of course has the effect of increasing background traffic which is helpful to the scenarios presented by the developer. It is very disappointing that some base year comparisons are not given to allow decision makers to see the overall effect of the traffic growth around Aylesbury between 2017 and 2036. This would show the full impact of the growth and demonstrate that in virtually all cumulative situations, the traffic in, around and at key junctions in Aylesbury will be demonstrably worse than it is today, or in the base year.

43) Given that the cumulative scenarios are based on 3 years after VALP it is strange that full analysis has not been carried out for the key junctions based on the full VALP case. Only two existing junctions have been modelled and this does not reflect a realistic scenario. Critically, given the significance of the gyratory system (Junction 99), it is a substantial omission not to have included this in the full VALP Sensitivity analysis. This must be done before any final assessment can be objectively delivered.

44) It also only requires one of these developments such as the SLR or SEALR not to come forward for the cumulative scenarios to become unfit for purpose. We accept it would be unreasonable to have countless scenarios. However, several of the developments included in the Cumulative scenarios cannot be delivered by the Woodlands developers (SLR, SEALR and SWALR). These schemes require various levels of public funding and are subject to their own planning processes. They are not committed schemes.

- 45) But, given the uncertainty and controversy of some of these proposals, especially with regards to Hampden Fields, a scenario without some of these major developments is highly desirable.
- 46) The development has never been modelled without Hampden Fields (except in the 2022 'standalone'). It is essential that this is done, or it will require the Council to accept that 16/01040/AOP cannot proceed at all.
- 47) Finally, all the 2036 scenarios include the Stoke Mandeville Relief Road, which is now considered a committed scheme. To reiterate the point above if it is a committed scheme it should also have been included in a realistic standalone scenario in the Transport Assessment.

Annual Average Daily Traffic (AADT) forecasts

- 48) AADT's have been published in the Environmental Assessment Addendum within the Air Quality Assessment with the raw numbers and at Table 5.7 a percentage change table has been included.
- 49) Although there are some % change figures published in Table 5.7 of the ES Addendum, for many links the forecast AADT flows are not published and many key junctions are missing. For example, the Walton Street Gyratory (Link 2.4) and Camborne Avenue (Link 5.6). It should also be noted that the Cumulative 1 forecasts appear not to have been published. Such significant omissions make it extremely difficult to properly examine the material and accordingly prejudice the public. This should be corrected and the full AADT forecasts published so as to be available for public scrutiny.
- 50) All junctions appear to be contained in Table 5.7: Link Analysis but only as percentage changes and not actual data flows. This is most unhelpful.
- 51) There is no specific analysis of the AADT's in the Transport Addendum other than very few passing comments without any specific data. This is despite very significant issues which can be identified by doing so.

52) We have combined these two data sources to allow the public to better understand and scrutinise the impact of the proposed Transport Case. The full analysis is contained in Appendix A, with urgent and major concerns highlighted in Red and summarised below:

53) Link 10.4 : A41 Westbound Off slip -- “Crow’s Nest Roundabout/Tring Hill”

There is a significant increase in forecast flows at in Link 10.4. An increase of 5,000 vehicles per day.

Ref	Description	AADT (thousands)					
		2022			2036		
		Without Dev	With Dev	%Diff	Full Dev Without	Full Dev With Dev	%Diff
10.4	A41 WB Off Slip SE of B488/B4009/B4635 Int	8.7	8.1	-6.9%	8.2	13.2	61.0%

In turn this leads to significant increases in flows at Link 10.4, Crows Nest, Tring Hill exit. Vehicle. An increase of 5,000 vehicles per day.

Where does all the traffic exiting this junction go? Given that flows are forecast to significantly fall by 3,000 vehicles (12%) on Link 8.1, (further down Tring Hill) and only slightly increase at link 8.3 (Icknield Rd), there appears to be is a likelihood that this will re-route through Halton and Wendover. The concern is the use of the ATM which is not adequately validated to cover the Wendover / Halton area (see section on Wendover/Halton below). An explanation is essential before the TAA can be objectively assessed. Mitigation may be required to prevent rat running and the overloading of the Halton Lane / Aylesbury road junction in Wendover.

54) Links 1.4, 1.5, 1.6: A41 Aston Clinton Road (see also Link 1.7 Tring Road at para 54)

Ref	Description	AADT (thousands)					
		2022			2036		
		Without Dev	With Dev	%Diff	Full Dev Without	Full Dev With Dev	%Diff
1.4	A41 East of A41 / Aston Clinton Road Roundabout	32.0	31.4	-1.9%	38.2	41.0	7.3%
1.5	A41 Aston Clinton Rd W of Aston Clinton Road Rbout	34.4	30.4	-11.6%	38.2	43.5	13.9%
1.6	A41 East of Aston Clinton MDA Western Access	40.2	34.4	-14.4%	44.7	26.8	-40.0%

The rationale for building a series of link roads around the town is to reduce traffic along the congested radial routes into the town. However, along this key route, traffic increases so that the A41 West of the Aston Clinton roundabout (Link 1.5) increases to 43,500 vehicles a day in the fully built out 2036 scenario. This is counter to the objective as this is still, despite recent widening in some places, a single carriageway road. There is a serious concern about the capacity of this road to carry even even more traffic. Its susceptibility to breakdown would increase still further and this is very unlikely to be acceptable to the Highways Authority or the public.

Furthermore, link 1.6 shows a decline in volume by 40% from 44,700 vehicles to 26,800 vehicles. Link 1.5 and 1.6 are a matter of few hundred yards apart. There are only two possibilities for traffic to turn off from this road between these two points. One is New Road and one will be the not yet constructed junctions of the MDA. The MDA flows do not appear to be modelled at all.

Analysis of the potential turn off junctions show a small increase along New Road of 300 vehicles (Link 7.6) leaving over 16,000 vehicles unaccounted for.

The other possibility is that some may re-route through Bedgrove (Link 5.5) but this again shows a reduction of 48.9% in traffic (or c. 6,600 vehicles) using the same like for like comparison. The final possibility of diverting through Broughton encounters significant problems.

Where do 16,700 vehicles “disappear” to between link 1.5 and 1.6? This must be explained.
55) [Link 5.3 Broughton Lane](#)

Ref	Description	AADT (thousands)					
		2022			2036		
		Without Dev	With Dev	%Diff	Full Dev Without	Full Dev With Dev	%Diff
5.2	Broughton Lane N of Stocklake Junction	2.2	1.7	-22.7%	1.6	1.5	-6.3%
5.3	Broughton Lane S of Stocklake Junction	5.6	3.0	-46.4%	4.7	4.2	-10.6%

There is a claimed reduction in Broughton Lane traffic from 4,700 to 4,200 vehicles but this needs significant explanation. The background traffic using the road is forecast to drop from 5,637 vehicles to 4,715 vehicles a day between 2022 and 2036. The 2036 do minimum includes significant new developments close to the area and we can find no other links where the background traffic reduces over the 2022-2036 period. It seems extremely odd that such a notorious rat running location would reduce in traffic without the Eastern Link Road in place.

This needs an explanation and/or correction.

Further, as it might be hoped, the introduction of the ELR(S) then leads to substantial reductions in the forecast flows of 46.4% in the standalone case and 10.6% in cumulative two scenario.

Yet, the developer, and for that matter the Hampden Fields developer, have committed to a review of Broughton Lane traffic one year after the opening of the ELR(S) and the SLR. This is in both draft s106 documents.

It is envisaged that there could still be 'rat running' along Broughton Lane even after millions of pounds have been invested to build these two 'strategic link roads'. The result as set out in the draft S106s could be further expensive and disruptive mitigation on Broughton Lane itself, paid for principally by Woodlands, i.e. basically taxpayer-funded.

One explanation could of course be that the AADT scenario in the ES appears to be based on the full Cumulative Two scenario, which won't come to fruition until 2036. There appears to be no analysis of AADT's in the Cumulative One scenario with Hampden Fields and Woodlands.

It is surprising to note how little confidence the applicant has that its major road scheme will solve the local traffic problems, and indeed might even contribute to them. The seeming error in the background traffic using Broughton Lane is even more worrying in this context.

The developer is clearly unsure about the effect their development will have on Broughton Lane. As well as being extremely concerning to local residents it shows that the Transport Assessment is incomplete.

Broughton Lane needs closer examination before permission can be granted and mitigation must be identified upfront along with associated costs appropriately attributed to developers and included in the S106 agreement(s).

56) Link 1.7 Tring Road (see also Link 1.4 etc Aston Clinton Rd at para 54 above)

Ref	Description	AADT (thousands)					
		2022			2036		
		Without Dev	With Dev	%Diff	Full Dev Without	Full Dev With Dev	%Diff
1.7	A41 Tring Rd W of Bedgrove/Broughton Lane	23.6	22.1	-6.4%	29.9	32.1	7.4%

As can be seen, Tring Road increases vehicular traffic from 29,900 in the 2036 Without Woodlands scenario to 32,100. The stated aim of reducing traffic on this key arterial route is clearly missed.

As you will see from the section below analysing the Bedgrove/Broughton crossing junction it appears that closure of the Richmond Road and diversion of Akeman Road only encourages more traffic to use the Tring Road. This is completely counter to policy and must be extremely concerning to promoters of this scheme and the Highways Authority.

The Highways Authority should not consider granting a scheme that creates increased use of the Tring Road. This will lead to an increase from 23,600 vehicles to 32,100 vehicles in the full development scenario, a dramatic increase on one of Aylesbury's PPTCs adjacent to an air quality management areas. Highly undesirable and needs to be reconsidered.

57) Stocklake/Cambridge Street Corridor/Area

Ref	Description	AADT (thousands)					
		2022			2036		
		Without Dev	With Dev	%Diff	Full Dev Without	Full Dev With Dev	%Diff
3.6	Park Street S of A418 / Cambridge Street Rbout	10.0	10.7	7.0%	15.1	12.0	-20.5%
3.7	Vale Park Drive	18.4	20.4	10.9%	27.3	23.9	-12.5%
4.2	A4157 Douglas Road N of Stocklake Junction	13.4	14.7	9.7%	16.2	17.8	9.9%
4.3	A4157 Elmhurst Road NW of A418 Roundabout	17.9	18.3	2.2%	20.7	20.8	0.5%

There are significant increases in the standalone case scenario. Mitigation is required at Cambridge Street/New Road junction in any case. It appears the ELR will merely shift traffic around the ring so they come in along another radial route. This might be acceptable if it were not for the increases on the Tring Road corridor as well.

58) New Southern Link Road

Of significant concern are the flows along the new Southern Link Road. These are unacceptably high for a road that serves as an access road to a major development area. As can be seen from the table below the volume of traffic will exceed any other road in the Aylesbury area and is comparable to a major trunk road, not a link road through a residential development area.

Ref	Description	AADT (thousands)					
		2022			2036		
		Without Dev	With Dev	%Diff	Full Dev Without	Full Dev With Dev	%Diff
15.1	SLR S of A41	0	0		0	43.8	
15.4	SLR E of A413	0	0		0	48.8	
15.5	SLR W of A413	0	0		0	37.5	

There will be 48,802 vehicles per day (to quote precisely from the developer document) using the Southern Link Road by the time the developments of Hampden Fields and Woodlands have been built out. It will be far the busiest road in the Aylesbury area. It is

counter to policy and unacceptable given the location and use of this road with many pedestrian crossing points.

59) Although we have previously covered the point about using the VALP as the policy platform in this case, we note the VALP Vision for Aylesbury Garden Town states that:

"The impacts of climate change will have been minimised, especially by building exemplar new developments and increasingly sustainable travel choices. As a result, local carbon emissions will be low relative to UK averages."

60) Aylesbury's CO2 emissions are already below the UK average (6.2 tonnes per person compared with 7.1) We note that no analysis of CO2 emissions have been included as part of the Environmental Addendum Assessment.

61) It is unlikely that constructing a new road through a residential area which is forecast to carry in excess of 48,000 vehicles could be classified as in line with any reasonable assessment against the Garden Town's policy or stated objectives.

Junction Assessments

62) Given the very limited time available and the amount of data published the Hampden Fields Action Group has been unable to resource expert analysis of the technical junction data. Many scenarios have not been published in a format that a member of the public could reasonably scrutinise, others have been missed completely. This has prejudiced the public and HFAG.

63) Junction 9 A41 Woodlands Roundabout

Standalone Scenarios

It is common ground this is currently an overloaded junction. The do minimum scenario at table 3.11.2 of the TTA page 39 demonstrates this, with delays so large that they simply lack credibility.

A queue of 1444 vehicles and a delay of 5073 seconds is equal to 1 hour 24 minutes. Firstly, it is longer than the model period of an hour and secondly is highly unlikely that this traffic would not re-route. This is clearly a significant error.

In the 2022 Do Something, the effect of building the ELR(S) and the employment area is to significantly reduce congestion at this junction. For example the A41 East Arm (coming from the Tring direction) is reduced from a queue of 1444 vehicles in the Do Minimum in the pm peak to 12 in the Do Something (i.e., the partial development of Woodlands and the full signalisation of the Woodlands roundabout).

As explained above, this is not a true standalone scenario and in this case it is even less plausible as it includes mitigation being brought forward as a result of a cumulative development with Hampden Fields. As the developer and the Highways Authority know it is impossible to include mitigation being brought forward as part of cumulative development in a fair standalone scenario. Unless the Woodlands application on its own is to pay for the signalisation of this junction on its own, in which case the Woodlands developer should have this total contribution clearly as part of the S106 and the signalisation in place before the ELR(S) is completed, it cannot be included in the standalone. It is not.

It is critical that decision makers see how this junction would operate in a true standalone scenario.

Cumulative Scenarios

In all cumulative scenarios delays on critical approaches are higher than they are in the 2022 Do Something Standalone. This means the addition of Hampden Fields (in Cumulative 1) and the SEALR + SWALR (Cumulative 2) make the situation worse than the standalone and the congestion at critical junctions is increased.

PM Peak Junction Capacity

(In this table, the do minimum scenarios are assessed differently because in the do minimum these are roundabouts not signalised junctions. Therefore, capacity is expressed as a decimal Ratio to Flow Capacity (above 0.85 RFC being problematic) in the Do Minimum scenarios and as a percentage Degree of Saturation (above 85% being problematic) in the Do Something and Cumulative scenarios).

	2022 Do-Minimum	2036 Do Minimum	Standalone 2022 Do Something	Cumulative One	Cumulative Two	Cumulative Three

A41 East	Not publish – PLEASE PUBLISH	2.44 RFC	83%	98%	104%	101%
ELR(N)	Not publish – PLEASE PUBLISH	Not in existence	26%	87%	99%	100%
SLR (S)	Not publish – PLEASE PUBLISH	Not in existence	Not Given/Not in existence.	90%	83%	88%

The developer’s explanation at paragraph 3.11.11 does not make sense. They argue “*these results should be compared to the forecast 2036 Do Minimum results as a standard roundabout.*” Table 3.11.2 makes no sense and is wrongly labelled at best, with one label suggesting this is a 2022 Do Minimum and one suggesting 2036 Do Minimum. If indeed they are trying to compare the published do minimum of 2022 with a cumulative scenario of 2036 this is a meaningless comparison using “apples and pears”. If they are trying to compare the 2036 do minimum with the cumulative scenarios we also need to be able to compare the 2036 Do Something standalone.

Overall Practical Reserve Capacity for the junction would also be a useful comparator in all scenarios and has been done for other key link junctions. You would have imagined that for one of the most important junctions for the whole of the Aylesbury network that basic modelling would have been presented, free of error, to give the public at least a reasonable attempt to scrutinise it. This section is so poor that the public is severely prejudiced with no hope of realistic input being possible.

Considerable work needs to be done to produce a realistic 2036 Standalone and this needs to be published for scrutiny before the Highways Authority can assess this application.

64) Junction 22 Bedgrove / Broughton Crossing

Standalone Scenarios for Junction 22 Bedgrove/Broughton Crossing

There are no junction assessments accessible for public scrutiny published. Please publish and allow the public sufficient time to scrutinise the standalone scenarios for this junction. It is our strong recommendation that this is done in line with a “fully built out” scenario as is required under NPPG guidance.

There is no 2036 Do Something (i.e. Woodlands standalone). Only a 2036 Do minimum so no comparison can be made versus the Do something? Quite possibly this junction could be made worse between Do Minimum and Do Something.

Without this it is not possible to comment on the standalone case so the Highway Authority has no evidence from which to take a decision.

Cumulative Scenarios

All cumulative scenarios show a significant deterioration in the overall Practical Reserve Capacity of the junction in the PM peak.

	AM Peak	PM Peak
2036 Do Minimum	-57.9%	-3.3%
2036 Cumulative One	-44.2%	-26.5%
2036 Cumulative Two	-37.6%	-24.8%

This would not be acceptable so the developer is proposing a mitigation scheme, the closure of the Richmond Road arm and re-direction of Akeman Road (the practicality and legality of this is extensively covered below).

Just considering the mitigation itself, along with changes in the cycle time, it appears to have significant benefits to the operation of the junction. Looking at this from the other side it is clear that without this mitigation granting of planning permission for Woodlands (and indeed Hampden Fields) would be highly unlikely.

Overall RFC at Junction 22 Bedgrove/Broughton Crossing

	AM Peak	PM Peak
2036 Do Minimum	-57.9%	-3.3%
2036 Cumulative One	-44.2%	-26.5%
2036 Cumulative Two	-37.6%	-24.8%

2036 Cumulative One plus Richmond Road Closure	+24.7	+41.7
2036 Cumulative Two plus Richmond Road closure	+25.5	+42.3

This increase in performance is significant. It should be noted mitigation has allowed the cycle time in the AM peak to change significantly, thus flows through the junction would be dramatically increased. It would also have the effect of “encouraging” more traffic to use the A41 Tring Road corridor, which as previously stated, is against policy.

Analysis of the AADT data (above) show an increase of 2,200 vehicles a day using the Tring road in the 2036 comparison and an increase of 8,500 vehicles a day from 2022 to 2036.

This is not acceptable to local residents and it cannot be reasonably acceptable to the highways authority.

Given the impact of the proposed mitigation schemes in reducing delays, the Highways Authority should insist the full mitigation be run through the ATM model again to assess whether the flows at this junction, and other junctions, will increase. This could have wide-ranging impacts elsewhere in the network.

Clearly, as the flows will be increased this traffic has to go somewhere. It will have the effect of more traffic meeting the King Edward Avenue/Oakfield Road junction, Woodlands, New Road junctions during peak am and pm periods. It appears that none of the surrounding junctions have been modelled taking into account the impact of the Richmond Road mitigation scheme.

65) Tring Road Traffic Flows and impact on Air Quality

Average Annual Traffic Data (AADT’s) published in the Air Quality Appendices of the 2020 Environmental Statement show dramatic increases in traffic flows along the Tring Road.

It is unclear as to which AADT scenarios (analysed above) have been compiled using the mitigated Richmond Road closure. Can this please be urgently clarified.

2022 AADT’s suggest flows of 23,617 vehicles without the development. The underlying traffic growth pushes the overall flows to 29,880 without the scheme. However, with the scheme the growth is even higher at 32,148.

Such increases in traffic volumes along the A41 corridor is counter the strategy of the “ring road” and is very likely to be met with strong disapproval by local residents.

66) Impact on junction modelling

It appears none of the surrounding junctions have been modelled with the Broughton Crossing mitigation (Richmond Road closure) in place. They appear to have all been modelled using the non-mitigated road layout, despite the developer [wrongly] stating this is a committed scheme.

Could the Highways Authority please urgently confirm if the published junction assessments have been completed using the Richmond Road closure as well as other mitigation.

This urgently needs to be addressed, if the current scenarios do not include the Richmond Road closures/mitigation the scenarios must be done for key junctions with the mitigation for the Broughton Crossing junction included, both standalone and cumulative, and the public must be given sufficient time to scrutinise these.

As a minimum we suggest the following junctions require further assessment:

Junction Number	
9	Woodlands Roundabout
23	Bellingham Way / A4157 Stocklake
26	Park Street Roundabout
28	A418 Park Street
30	Broughton Avenue Priority Junction
31	A418 Cambridge Street
36	A41 King Edward Avenue

Without adequate junction assessments in all scenarios, with adequate mitigation being fully considered, the Highways Authority could not grant planning permission for application 16/01040/APP.

67) Richmond Road Diversion - Proposed Mitigation – Implications for Decision Makers

68) To overcome the very clear problems that exist with the junction it is clear that mitigation is required in published scenarios. Once again we need to stress that a standalone scenario has not been published. As it has been well documented by others the Council will be aware of the land ownership dispute that exists regarding the Richmond Road green area. However, land ownership does not directly have any influence on the planning merits of the case.

69) What does, however, is a planning decision being made that would be subject to a “different consenting regime” in relation to Highways changes, which the decision maker was unable to guarantee. The diversion of Richmond Road requires a number of legal procedures which are outside the control of decision makers in this planning application. Namely the publication and approval of a Traffic Regulation Order changing the layout of the Richmond Road area and the closure of Akeman Road. Such changes will no doubt be very heavily contested by local residents and are very uncertain to get approval even if land ownership issues can be overcome.

70) It is an error of fact and very misleading indeed to suggest, as the developer does at 3.21.5, that “*This junction was the subject of a committed scheme of improvement which*

was agreed with Buckinghamshire Council as part of the 2017 technical work for Aylesbury Woodlands and Hampden Fields”. [Emphasis added]

This statement is so erroneous, it merits an immediate correction of its own.

71) If this were a committed scheme, then all transport assessments would have to be done with it included. It is not a committed scheme and what makes it worse is that it is being brought forward as joint mitigation for both Hampden Fields and Woodlands. Despite what it says at 3.21.8 of the TAA there still appears to be some confusion between the TAA's / draft s106 agreements for Woodlands and Hampden Fields as to who will deliver or contribute to it.

72) Regarding the granting of planning permission for a scheme that requires mitigation under a “different consenting regime” there is a notable precedent for Bucks Council. Having agreed with the Hampden Fields developer in 2013 that they would not object to their proposals an independent planning inspector and the Secretary of State disagreed and refused planning permission.

73) Paragraph 27 of the Secretary of State's decision letter 25th January 2015 repays reading in full:

27. Like the Inspector, the Secretary of State has taken account of the fact that a scheme of mitigation has evolved for the Walton Street gyratory, but that its final form leaves a number of matters uncertain and any such scheme could only be implemented, and any prior planning permission for the Appeal B scheme realised, consequent on the confirmation of a Traffic Regulation Order which would be subject to its own consent regime. The Secretary of State agrees with the Inspector at IR9.586 that the benefits of such a scheme would be substantial. However, he also agrees (IR9.645) that it would not make sound planning sense to approve a major urban extension with known highway deficiencies, an incomplete solution and uncertainties about deliverability until it can be demonstrated that the full effects of the appeal scheme can be mitigated, managed and implemented. [Emphasis added]

When read in full it is clear the Secretary of State is referring to:

- A planning decision where it was common ground that mitigation was required,
- That the mitigation would be subject to its own consent regime,
- The mitigation related to off site works

- The mitigation requires changes to established road layout*
- It relates to a “major urban extension”,
- It has known highways deficiencies and
- Planning should not be granted until it can be “demonstrated that the full effects of the scheme can be mitigated, managed and implemented”

*N.B The mitigation the SoS was referring to in his decision was the proposed closure of the “Aristocrat link” arm at the Walton Street gyratory.

74) There needs to be certainty about how and when the mitigation will be achieved. Failure to provide certainty will leave the Council open to challenge to from the public.

75) Junction 99 – The Walton Street Gyratory

The lack of validation using observed flows at the gyratory system is a major omission which undermines the model and consequently the TAA. It cannot have escaped the HA at the most senior level that this junction is both the busiest and most controversial in the whole of the Aylesbury network.

In addition, it forms part of an AQMA and a previous Highways Authority decision to allow planning permission for the original HF development was overturned by the SoS because of concerns about this junction. In this context, it is inconceivable that this junction has not been properly considered when developing this model.

All comments regarding the gyratory should be taken in consideration with the inadequacies of the Aylesbury Transport Model validation in relation to the gyratory system as outlined above and contained within the TPP reports on the LMVR and the SEALR modelling.

We also request again, as a matter of urgency, an explanation as to why the modelling time period in the AM peak has been changed to 07.00 to 08.00 from 08.00 to 09.00. This is wholly unrepresentative of the busiest period at this junction. Given the significance of this junction to the whole Aylesbury Road network a credible explanation needs to be given.

It is also not possible for us to conduct a full assessment of the merits of this scheme as a full development 2036 standalone scenario has not been produced. This point of course applies to all other junction assessments.

The developer does not appear to mention the Secretary of State's 2015 decision relating to Hampden Fields and the gyratory. It has conveniently been airbrushed from the analysis yet it provides significant insight into this crucial junction. It merits consideration and considerable weight must be placed upon it by the decision makers.

At the time of Secretary of State's decision the Practical Reserve Capacity at the gyratory in 2031 was as follows

	AM Peak	PM Peak
2031 Do Minimum	-29.7	-3.3%
2031 Do Something (with Hampden Fields)	-31.8	-2.7%

*from Inspector's Report para 9.501 – 9.503

The practical reserve capacity (PRC) of a traffic signal junction is a commonly used measure of its available space capacity. The PRC is related to the degree of saturation of a traffic signal junction. A positive PRC indicates that a junction has spare capacity and may be able to accept more traffic. A negative PRC indicates that the junction is over capacity and is suffering from traffic congestion. As can be seen there was a small decrease in PRC in the am peak, when congestion was shown to be particularly severe, and an actual increase in PRC in the pm peak, yet the inspector concluded

9.504 Although the increased percentage total flow within the junction would be less than 5% in the morning peak and less than 1% in the afternoon peak, the significance of such seemingly minor increases would be heightened by the sensitivity of the junction in its already congested operation and its enhanced susceptibility to breakdown

Even given the wholly inadequate 2022 scenarios several arms and entry points on the gyratory suffer from a worsening:

In the AM peak:

Stoke Road Lane Entry left Degree of Saturation (DoS) increased from 134.3% to 134.5%,

Walton Road entry DoS increased from 79.6% to 82.1%,

Stoke Road entry left the queue increases from 201 vehicles to 207 vehicles.

Overall the junction worsens marginally, but it does worsen.

In the PM peak:

Stoke Road 12/3 worsens from a DoS of 105.6% to 106.1%.

Several junction approaches remain significantly over capacity:

Walton Street Entry at 102.4%

Stoke Road entry 106.8%

Walton Street Stopline 104.5%

There is an overall minor worsening of the junction performance in the AM peak and an overall minor improvement in the PM peak (-21% to -19%) but significantly the junction continues to operate way over capacity.

Whilst the developer will no doubt argue that these minor movements are not significant it would be completely at odds with the conclusions of the Secretary of State who regarded

“the significance of such seemingly minor increases would be heightened by the sensitivity of the junction in its already congested operation and its enhanced susceptibility to breakdown”.

Accordingly, the standalone case, even given the inadequate 2022 scenarios, is not made.

Cumulative Scenarios

The cumulative scenarios are as follows:

Practical Reserve Capacity 2036 at the gyratory system

	AM Peak	PM Peak
Inspector 2015 with Hampden Fields	-31.8%	-2.7%
2036 Cumulative One	-31.2%	-19.3%
2036 Cumulative Two	-26.9%	-17.0%

It is clear that the gyratory is operating significantly worse in the PM peak than the scenarios the inspector rejected in 2015. Whatever is claimed by developers, we will have a dramatically worsening situation at the gyratory in the coming years in the PM peak.

Developers of Hampden Fields, Woodlands and SEALR will claim that it is not their development that is making the gyratory system worsen and therefore they cannot be required to provide mitigation for it. However, the Highways Authority have a duty to reduce congestion and especially at this Air Quality Management Area. Overall from 2015 to 2036 the performance of this junction significantly worsens so the overall strategy, which the full cumulative 2/3 should be addressing but demonstrably fails.

It is also worth noting that when the Inspector made his comments the junction was 'only' forecast to be operating at -31.8% (am peak) and -2.7% (pm peak) in the 2036 Cumulative 2 scenario. Now it is operating in the very best case at -17% in the PM peak in the Cumulative Two scenario. The gyratory issues highlighted by the Secretary of State have not been answered either in the standalone or the cumulative scenarios.

76) Wendover & Halton

Analysis of AADT's show a significant increase in the A41 Westbound exit slip on the A41 from 8,165 in the 2036 Do minimum to 13,180 in the fully built out 2036 Cumulative Two. Although no forecast flows are published for Halton or W Road it appears probable that this will result in increased traffic rat running through Halton, Wendover and ending up at the Halton Lane/Aylesbury Road junction.

We know from the VALP Countywide model run 1a (published December 2020) this junction becomes problematic and overloaded in 2033.

It is a known weakness that the Aylesbury Transport Model is not validated to cover Wendover and Halton sufficiently well (if at all). Regardless of this, no attempt at modelling the effects of major network changes have been made. The effects on Wendover and Halton could be dramatic and it is very likely mitigation would be required at the Halton Lane / Aylesbury Road junction and other areas.

At the very least the Highway Authority has to ensure that appropriate analysis of this area is made before any objectively based decision could be made.

Transport Summary

- 77) Our requests and concerns over the Aylesbury Transport Model have gone unanswered – they have been repeated here. Significant issues remain over the change in peak hours and the lack of validation at the Walton Street Gyratory system.
- 78) Given the fact that the cumulative impact case includes four major road schemes and associated developments, Jacobs' own recommendation is that it should be run back through the Countywide Model. Key Garden Town Principles are not achieved. These proposals encourage the use of cars and in key locations create by far the busiest roads in the town, encouraging yet greater use of vehicular transport. Key modal shift initiatives as part of the Cumulative Assessment, like the Park and Ride scheme along the A41 corridor are now to be reviewed rather than brought forward.
- 79) New roads, particularly the Southern Link Road operate at volumes 250% higher than the average Urban A road would, based on Department for Transport data.
- 80) There appear to have been no greenhouse gases (GHG) or CO2 calculations made as part of the Environmental Assessment. For a cumulative impact road scheme of this size, the Planning Authority should want to know what the impact of increased traffic will be on GHGs and CO2.
- 81) The Transport Assessment Addendum contains significant omissions in data which prejudice the public; forecast traffic flows have not been published on key links.
- 82) Mitigation is proposed but these proposals have not been remodelled at key junctions. The complete model needs to be rerun and republished with the full mitigation schemes in place.
- 83) The standalone using 2022 as the base year is unrealistic even by the developer's own admission. It is so far outside of NPPG that it is almost certain open to challenge.
- 84) A 2036 Standalone assessment is essential.

- 85) Broughton Lane mitigation, required in all scenarios, is subject to a separate consenting regime over which the Council and developer cannot guarantee success.
- 86) The Richmond Road closure / mitigation scheme attracts more traffic to the Tring Road corridor when the stated aim of the scheme is to reduce use of the Tring Road. This will be a major concern for residents.
- 87) The Walton Street gyratory remains considerably overloaded in all scenarios. Even in the best case cumulative scenarios it is considerably worse than the scenario rejected by the Secretary of State in 2015.
- 88) The claimed improvements in the gyratory performance are only achieved by adopting a wholly unrealistic earlier peak AM time of 07.00 to 08.00 when very few schoolchildren/parents/school buses will be present.
- 89) These points taken together need much closer scrutiny with more analysis as required. The Highways Authority will be well aware they cannot allow a scheme to be approved with incomplete information, unrealistic and unreasonable scenarios demonstrating beyond any doubt that there significant highways deficiencies associated with amended Transport Assessment.

Overall Submission Summary and Conclusion

It is clear that many, significant issues must be addressed not only in the realm of transport but also in many other areas of this proposal. We therefore believe we are entirely justified in OBJECTING to application 16/01040/AOP and invite the Planning Authority to REJECT the application.

END OF HFAG SUBMISSION