COMMENTS ON 16/00424/AOP JANUARY 2021

This Action Group has considered the latest application and amendments and OBJECTS to it on the grounds set out below:

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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)\(^2\)

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

3. Accordingly, point (b) above 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 Inspector Interim comments on Transport published August 2018

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

   d. a further public consultation period considered
e. 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 to 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:

   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

   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.
Coalescence

7. This latest iteration of the application continues a history of problems arising out of the threat of coalescence.

8. In 2015, the Secretary of State ruled against the first ‘Hampden Fields’ application from 2012. Coalescence and the loss of settlement identity was one of the factors in that decision, as stated in his letter of 26 Jan 2015, para 23. Having given careful consideration to the Inspector’s discussion and reasoning on coalescence, the Secretary of State agreed with his conclusions. In particular, while the appeal site could be regarded as an intended garden suburb for Aylesbury, it would draw the appeal site together with the two established settlements of Stoke Mandeville and Weston Turville. This would result in a fundamental change to the eastern part of Stoke Mandeville through coalescence and some weakening of the northern edge of Weston Turville, with the wider loss of open countryside as part of its setting. He also agreed that the scheme would conflict with the saved policy at the time, Policy RA.2 of AVDLP, and would be at odds with the Landscape Character Area guidelines.

9. Despite the failure of that application in 2015, an almost identical proposal came forward just one year later. The proposals included no meaningful separation: the only change was an ‘offer’ to Tamarisk Way residents of a mere 15 m of extra land. This was lip service to the point made in the Secretary of State’s ruling.

10. Ironically, the risk of Severance (see Transport below) means that it is the two or three different parts of the Hampden Fields development itself that will be separate. There will undoubtedly be problems in creating a true sense of place and community across the tide of 2-way traffic that will flow all day along the busy dual carriageway Southern Link Road and the Marroway Link. This has been recognised in the 2020 Aylesbury Garden Town Masterplan when it stated that, “the Link Road effectively splits the development into two large sub-neighbourhoods” (page 140). They are not wrong. The latest AADT’s show flows in excess of 48,800 vehicles per day will use the Southern Link Road. That makes it by far the busiest road in the Aylesbury area. Note,
the flow for the SLR is published in 16/01040/AOP Woodlands not Hampden Fields cumulative assessment AADT’s (see below).

11. The threats of coalescence in 16/00424/AOP, as well as the continuing relevance of the 2015 ruling, were clearly acknowledged in the Officer Report to the SDMC in October 2017: “The proposal would also result in the coalescence with the eastern edges of Stoke Mandeville and would have a material impact on the western edges of Weston Turville that would result in some limited harm to the settlement character (of both Stoke Mandeville and Weston Turville)... Given the proposals result in major adverse impacts on the Southern Vale Landscape Character Area and localised harm to visual receptors as a result of the urbanising effect of the development, it is considered that this matter should be afforded significant negative weight in the planning balance. The level of harm and how this is weighted in the planning balance reflects the weight given by the Planning Inspector and Secretary of State in this respect, in the previous appeal” (para 1.9)

12. Only late last year, our MP Rob Butler expressed his own misgivings about the local threat posed by coalescence. In his reply to the Government White Paper ‘Planning for the Future’ he pointed out that his constituency “has very little protected land”. “Urban extensions should not lead to a coalescence of villages. If an area is marked for urban extension, existing villages should not be merged with a larger settlement in one conurbation. In my constituency, villages such as Weston Turville and Aston Clinton would be at risk of conurbation with Aylesbury should endless urban expansion continue.” Yet, of course, this is what is proposed here as acknowledged by the Council’s own planners.

13. Most recently, Natural England made the same point directly about the current application. In their letter of 18 December, they commented that “The proposal would significantly extend the built environment of Aylesbury south eastwards, giving the appearance of urban sprawl".
14. The negative effects of the proposed development on landscape and visual impact have been well assessed and reported by the Council’s own experts in this area. The earlier Landscape and Visual Impact assessment (LVIA) has been endorsed in January 2021 as follows: “the proposed scheme will result in significant adverse landscape and visual impacts as set out in the ES and appropriate negative weight should be given to these impacts in the planning balance.” By “appropriate” this must mean significant. Add to that the very real Severance issues within the development which would lead to even greater negative weight that outweighs any benefits of additional housing over inflated benefits of the Southern Link Road (See Transport below).

15. The weight of almost ten years of judgement, discussion and decisions over the very real threat of area coalescence from the various Hampden Fields proposals cannot be disregarded and should count for much more. The Council continues to not put significant negative weight on this in the planning balance.
Transport

16. Analysis of the Transport Assessment Addendum (TAA) will include some areas that have not been addressed or are not sufficiently answered since our submission in March 2016 and subsequent supplementary Reports from Transport Planning Practice and HFAG. However, as we are now in 2021, over five years since the original documents were produced, it would be unreasonable for anyone to have to go back and read those documents from a historical perspective. For ease of reference we repeat those issues here where they have not been addressed either through the Transport Assessment Addendum or the Highways Authority assessment of 13th January 2021. It should be read in conjunction with the documents we will signpost through this Transport assessment.

The 2020 Aylesbury Transport Model with 2017 Base Year

17. In developing the revised Transport Addendum, RPS Consulting Services (RPS) have taken the place of WSP but we note the Project Director remains unchanged. Buckinghamshire Council (BC) have asked RPS to use the updated 2020 Aylesbury Transport Model (“ATM”) with a base year of 2017.

18. We are pleased that after nearly ten years of trying to convince Bucks Council (BC) to improve their modelling they have finally agreed with us. The documents BC published in the run up to the Committee hearing of 25th October 2017, namely the Jacobs Forecast Methodology Review and BC’s subsequent endorsement of it, repay reading in full. For ease of reference, it concluded:

“It is therefore our conclusion that the methodology used to create the development matrices is in line with WebTAG advice for this type of model. We have subsequently concluded that the model forecasts are considered suitable for assessment of the development impacts and for proposing mitigation measures at key junctions.”
19. Whilst no doubt BC and Jacobs will argue that the 2020 Model is a standard progression/update of the model we submit that any criticisms we make of the model are genuine, well researched and supported by expert, independent analysis. Therefore, we request they are given due consideration and a full response is provided.

20. Whilst the new ATM is an improvement on the previous model there are still some serious reservations which cast doubt on its effectiveness 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.

21. It should be noted that we have not received any correspondence at all regarding these reports and in particular no response 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 TPP SEALR report.

22. Whilst we ask the reports to be considered as a whole, particular concerns regarding the modelling are briefly highlighted below:

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.

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.
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 applications, it is very surprising that no comparison was carried out for the Walton Street Gyratory and the A413/Camborne Avenue roundabout, both of which will be affected by the changes proposed.

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.”

23. 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.

Use of Different Morning Peak Hours between Aylesbury Transport Model and Hampden Fields Transport Assessment

24. The AM Peak hour model period in the ATM model base year has been changed. The modelled morning peak is now 07.00 to 08.00, not 08.00 to 09.00 (as in previous
versions of the Aylesbury Traffic Model and the current Countywide Model being used for the Local Plan Examination). Despite seeking clarification, no explanation has been given for this potentially very significant change, accompanied by a full Report from independent Transport Consultants, no response has been received from the Highways Authority.

25. We note that posted onto the CC/0015/20 portal on 6th January 2021 “SEALR Schedule of Applicant’s responses to consultee comments provided to LPA” 35030 published 6th January 2021 is a response from the applicant. It is the responsibility of the Highways Authority to explain what it has allowed in the development of the model, not the applicant.

26. Regardless, in that response, it states “The morning peak turning movements have been used in the Transport Assessment, as produced by the Aylesbury Transport Model, these have been incorrectly labelled as 08:00-09:00 in the TA, but this is a labelling error and not a case of different data being used - it is the modelled morning peak hour.”

27. It simply lacks credibility to state that this is a labelling error. It means 1000’s of pages of data in the model runs are incorrect. It means the applicant, their Highways Consultants, and BC Highways over a period of months have failed to check the relevant data yet the public are expected to believe the veracity of the results. It simply is not credible.

28. The response does not in any way answer the substantive points of:

   a. Why has the AM Peak hour, (previously used for all residential Transport Assessments in this area, as well as modelling exercises) been changed?
   b. Where is the evidence or data as to why this change has been made? It is important that the evidence is appropriate for the whole of Aylesbury and takes into account traffic delays as well as traffic flows.
   c. How are the public expected to meaningfully take part in consultation when the information is so basically wrong and with no explanation given?
29. The Highways Authority will be aware that in a very large proportion of cases the AM peak is 08.00 – 09.00. This is particularly the case when major residential housing schemes are being developed as is the case for Aylesbury. In the rare exceptions that the AM peak begins at 07.00 it is usually in a major city setting and most often accompanied by an analysis of a two-hour peak between 07.00 and 09.00.

30. This change has very significant and far-reaching effects when assessing development impacts in the town, especially when considering that the Walton Street Gyratory area has the highest concentration of secondary students in the country heading for the three schools in close proximity to it, all of which start at on or very close to 08.45.

31. The model needs to be representative of the busiest weekday hours for it to have any credibility. A full explanation is again required if this is not to be judged a significant error.

32. The Highways Authority will have wanted to know, as do we, how the developers have taken this discrepancy into account when preparing the TAA. We can find no mention of it in either the TAA or the Highways Assessment.

**Significance for Hampden Fields**

33. It would be reasonable to assume that the traffic generation relating to Hampden Fields and Woodlands development will be greater in the hour 08:00 – 09:00. That is the time every single scenario of the data pages published across all the junction assessments states as the AM peak hour.

34. It would be wrong to apply lower Hampden Fields trip generation figures for 07:00 – 08:00 and inconsistent with the ATM to use trip generation for 08:00 to 09:00.

35. If the consultants operating the ATM have applied 08:00-09:00 trip generation to 07:00-08:00 background flows, they are creating an inconsistency and probably underestimating the non-development traffic. If they used 07:00-08:00 for trip
generation and background flows they are underestimating the development impacts because 08:00-09:00 has greater trip generation.

36. Please urgently inform the public regarding the above.

37. See the section below on Preparation of Transport Assessments. When considering the issues raised in this document, the Highway’s agency will be aware that National Planning Policy Guidance on the preparation of Transport documents states that

“In order to make these documents as useful and accessible as possible any information or assumptions should be set out in a clear and publicly accessible form:

the timeframes over which they are conducted or operate should be appropriate in relation to the nature of developments to which they relate” (Paragraph: 007 Reference ID: 42-007-20140306)

38. How does the above meet this test?

The Standalone Case for Hampden Fields

The choice of 2036 as the forecast year for the Standalone case is reasonable, unlike in the Woodlands 16/01040/AOP scenario. The inclusion of the Eastern Link Road North and the Stoke Mandeville Relief Road (SMRR) makes sense. However, the Council has not asked for a standalone assessment for 16/01040/AOP with the SMRR present which creates inconsistencies from the very start of assessment.

Cumulative Assessments

39. It would have been helpful to have had the same comparator year as the VALP (2033) to allow meaningful comparisons.
40. 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 few, if any, base year comparisons are given which would 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.

41. Given that the cumulative scenarios are based on 3 years after VALP it is strange that a 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.

**National Planning Policy Guidance on preparation of Transport Assessments**

42. It is made clear in latest NPPG that only schemes that have a reasonable chance of coming forward within a 3-year period should be considered in Cumulative Assessments. The Cumulative Assessment 2 scenario assumes all road schemes will be delivered.

43. It only requires one of these developments such as the ELR(S) 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 Hampden Fields developers (ELR(S), SEALR and SWALR). These schemes require various levels of public funding and are subject to their own planning processes. They are not committed schemes. See “Deliverability” section below.

44. There is no ‘Plan B’ here. The risk in one or more of these schemes not coming forward is considerable. This partial ring road strategy is so starkly vulnerable that a Plan B needs considering.
45. But, given the uncertainty and controversy of some of these proposals, especially with regards to Woodlands, a scenario without some of these major developments is not only highly desirable but necessary to comply with NPPG.

46. We have already raised the point above regarding the preparation of Transport Assessments that “In order to make these documents as useful and accessible as possible any information or assumptions should be set out in a clear and publicly accessible form”

47. There are numerous parts of the Transport Assessment that fail this basic test including:

   i. The AM modelled peak change which *prima facie* defies all logic
   ii. The AADT inconsistencies highlighted below (ironically these are not actually part of the TAA or appendices but appear in the Environmental Assessment Addendum, but the point still stands)
   iii. Completely unrealistic hour long queues left unexplained
   iv. Changes in technical “intercept” figures which are not explained
   v. Unpublished Link data
   vi. No, or incredibly few, base year figures compared along with poorly laid out
   vii. ‘Cut off’ and poorly labelled appendices, mislabelled table headings and comparison with previous TA not base year (e.g., table 9.22 Transport and Access)

48. Can any objective person really consider this to be an appropriate basis on which form a public consultation? Clearly the issues raised need to be addressed, more information published, and the public consultation begun again.
Annual Average Daily Traffic (AADT) forecasts

Comparisons to 16/01040/AOP

49. There are significant issues with the AADT’s between Hampden Fields and Woodlands as we have set out in our letter to you of 14th January 2021.

50. As you will be aware often the start point, for assessing the impact of development is to establish the forecast flows of traffic by producing Annual Average Daily Traffic (AADT) figures. This forms the basis for numerous assessments including not only of traffic impacts but also of, critically, Air Quality, Emissions, Greenhouse Gases (GHG), Noise and Severance, among others.

51. As you will see, when the like for like figures in the two applications are compared they are markedly different. Yet as the Transport Cumulative Impact Assessment is promoted as a joint assessment, one would expect these figures to be very similar, if not identical.

52. Whilst we will not repeat the detail of those issues here, it needs to be recorded that, until such time as clarity is received on this issue and the information is published in such a way as to reasonably allow members of the public to assess it, the Council should not even consider progressing this application any further. Our letter of 14th January requires reading in full but as an illustration one example for the A41 is shown below:

<table>
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<tr>
<th>HIF Link Number</th>
<th>Woodlands Link Number</th>
<th>Description</th>
<th>2017 Baseline</th>
<th>Hampton Fields 2036 Cumulative 2</th>
<th>Woodlands 2036 Full Development Scenario with scheme</th>
<th>Diff Hampton Fields x Woodlands</th>
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<tr>
<td>1</td>
<td>1.5</td>
<td>A41 Aston Clinton Road West of Aston Clinton bypass between Woodlands and holiday tee</td>
<td>24026</td>
<td>25466</td>
<td>43503</td>
<td>1807</td>
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53. There is no specific analysis of the AADT’s in the Transport Addendum other than a very few passing comments, without any specific data. This is despite very significant issues which can be identified by doing so.

54. It is also remarkable that the Highways Authority, in their letter to you of 13th January 2021 appraising the scheme, no mention of AADT’s has been made.
Further comments have been made regarding the published AADT’s in this report but when the issues are clarified we would require sufficient time to be allowed for the public to reasonably comment further.

New Southern Link Road

55. Of significant concern are the flows along the new Southern Link Road. These are not published within the Hampden Fields TAA or ESA or their appendices. The developer rationale at the bottom of Table 9.22 of the Environmental Assessment Addendum Chapter 9, namely that it is not necessary as it is “excluded from the Do Minimum 2036 scenario and analysis within this chapter”, is baffling as the figures published as part of the Woodlands (16/01040/AOP) application show extremely and unacceptably high levels of traffic 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.

<table>
<thead>
<tr>
<th>Ref</th>
<th>Description</th>
<th>2022 Without Dev</th>
<th>2022 With Dev</th>
<th>2036 Without Dev</th>
<th>2036 With Dev</th>
<th>%Diff</th>
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<tr>
<td>15.1</td>
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<td>0</td>
<td>43.5</td>
<td></td>
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<tr>
<td>15.4</td>
<td>SLR E of A413</td>
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<tr>
<td>15.5</td>
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<td>0</td>
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<td>0</td>
<td>37.5</td>
<td></td>
</tr>
</tbody>
</table>

56. There will be 48,802 vehicles per day (to quote precisely from the Woodlands developer document) using the Southern Link Road by the time the developments of Hampden Fields and Woodlands have been completed. It will be by far the busiest road in the Aylesbury area. It is counter to policy and unacceptable given the location and use of this road. It will lead to a very significant Severance issue within the development (see also comments under ‘Coalescence’ above).
57. The fact that the developer has not chosen to assess this road link in the Transport and Access chapter of the ESA means that it has not been assessed for its impact on other critical elements of a full Transport Assessment namely, Pedestrian Amenity, Driver Stress, Fear & Intimidation, Accident & Safety and Severance. (N.B Air Quality would be assessed as part of the Air Quality chapters – see below)

The Role of the Southern Link Road

58. This road has been described by the developer as “serving as both the primary site access and as a cross-radial strategic road around the south of Aylesbury.” (paragraph 1.10 of the TAA). Whilst no doubt the developer will claim this can be done, it will become apparent that this road has a split personality.

59. The July 2020 Aylesbury Garden Town Masterplan (p. 140) refers to the “considerable emphasis” placed on its “boulevard character”. But in many other places including the crucial report considered in 2017 by the SDMC it is headlined as a ‘strategic link road’, for cars, light and heavy goods traffic. The speed limit will be 40 mph and barriers will be necessary to prevent pedestrians trying to cross this 4 Lane highway.

60. These two incompatible aims show an inconsistency in planning (and communication to the public). If this is a strategic road then the high traffic flows can be justified (assuming appropriate Air Quality assessments have been carried out, which currently they appear not to have been). However, high traffic flows will lead to Severance and parts of the development cut off.

61. The claimed solution is of course to reduce Severance by the placement of 4 crossing points. This is also at the request of the Highways Authority. However, it is obvious that this will create hold ups, especially in the morning peak (when appropriately modelled) and will reduce traffic flows. Where does that traffic then go? It is likely to reassign onto other parts of the network.

62. As this Action Group has been stating since 2011, the benefits of the Southern Link Road are overinflated by the developers and by officers. At paragraph 1.7 of the report to committee of October 2017 the officer concludes "The provision of the Southern Link Road and the financial contributions towards the delivery of the SEALR will bring about
major strategic benefits to the town’s highway network and are afforded significant weight”.

63. The issue of Severance is not given any weight in the planning balance. When this is objectively assessed and corresponding traffic is dispersed around the network the “benefits to the town’s network” are overstated.

**Junction Assessments**

64. 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.

**Junction 9 A41 Woodlands Roundabout**

65. The Woodlands roundabout is assessed with the peak hours of 08.00-09.00 for the AM peak and 17.00 to 18.00 for the PM peak. The AM peak modelled does not match the 2020 Aylesbury Transport Model’s peak AM of 07.00 to 08.00.

This is a fundamental inconsistency.

66. Table 4.5 on page 32 of the TAA shows the 2036 Do Minimum. As with the Woodlands results this shows delays at the junction that are impossible. The delay in the PM peak shows queues of 1444 vehicles and queues lasting 5073 seconds. This equates to queues of one hour and 25 minutes, which is impossible within a one hour peak period. We appreciate a full Arcady run was done for 90 minutes (without explanation) but it is presented clearly as only the peak hour assessment. This makes the Do Minimum meaningless.

67. We therefore object strongly to the developer statement on page 33 of the TAA, para 4.39:
“The proposed signalised roundabout is predicted to operate more satisfactorily than the existing configuration, the comparison between the level of queue that is reported on the main approach to the junction. This peak hour demonstrates that a level of betterment is achieved as a result of the Hampden Fields development when compared to the corresponding 2036 Do Minimum situation, with queueing levels predicted to reduce.”

68. The comparison to a significantly flawed 2036 Do Minimum simply would be unjustified at any junction in the network. For such a basic error to happen at one of the 3 most important junctions in the network is extremely concerning.

69. Accordingly, the Highways Authority’s assessment of this junction lacks even the most basic level of scrutiny and objectivity, as they reproduce the developer’s table in their own document, accepting the developer error and simply acknowledging the existing overcapacity. It is common ground that the roundabout is over capacity.

70. The Do Minimum 2036 data can be found at Appendix C of the Transport Assessment Addendum. What is shown is that the model period is actually over one and a half hours, from 08.00 to 09.30 in the AM and 17.00 to 18.30 in the PM. Not what it should be which is 08.00 – 09.00 in the AM peak and 17.00 – 18.00 in the PM peak.

71. We do not accept that any comparison with the current 2036 Do Minimum offers any insight into what might happen in the Cumulative scenarios of 2036. The Table 4.5 is incorrect as it shows 1.5 hours of traffic when all the cumulative scenarios show 1 hour.

72. What has also happened is that the worst data point has been used regardless of what time period it is in. So the delays at 9.30am (outside the peak hour) have been used to create the worst possible scenario.

73. This is a very basic error, but it makes the whole comparison meaningless.
Table 4.5 from Hampden Fields Transport Assessment Addendum

<table>
<thead>
<tr>
<th>Approach</th>
<th>AM</th>
<th>PM</th>
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<td>Do Minimum</td>
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<td>Delay (s)</td>
</tr>
<tr>
<td>A – Aston Clinton Road</td>
<td>76</td>
<td>127</td>
</tr>
<tr>
<td>B – A41</td>
<td>264</td>
<td>1008</td>
</tr>
<tr>
<td>C – Aylesbury Road</td>
<td>1</td>
<td>9</td>
</tr>
<tr>
<td>Junction Delay (s)</td>
<td>427.86</td>
<td>2974.62</td>
</tr>
</tbody>
</table>

74. As stated, these figures represent 1.5 hours not the morning and afternoon peak hours from which the Cumulative scenarios are derived. Although this will reduce some of the delays significantly, especially on the B-A41 arm, it would still be a totally unrealistic Do Minimum approach.

<table>
<thead>
<tr>
<th></th>
<th>AM Peak 08.00 – 09.00</th>
<th>PM Peak 17.00 – 18.00</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Queue (Veh)</td>
<td>Delays (Seconds)</td>
</tr>
<tr>
<td>A - Aston Clinton Road</td>
<td>76</td>
<td>127</td>
</tr>
<tr>
<td>B - A41</td>
<td>230</td>
<td>731</td>
</tr>
<tr>
<td>C - Aylesbury Road</td>
<td>1</td>
<td>9</td>
</tr>
</tbody>
</table>

75. As can be seen the queues are significantly reduced on the B-A41 Arm approaching from Tring but even this is not a realistic scenario.

2036 Do Minimum ARCADY Analysis
76. We have therefore analysed the raw data from the Arcady reports in order to see why the Do Minimum is so unrealistic.

77. The A41 Arm has been subjected to an “intercept adjustment” of “-1085”. This has led to effectively reducing the capacity at the approach by 1085. See “Arm intercept adjustments” below.

### Roundabout Geometry

<table>
<thead>
<tr>
<th>Arm</th>
<th>V - Approach road half-width (m)</th>
<th>E - Entry width (m)</th>
<th>F - Effective flare length (m)</th>
<th>R - Entry radius (m)</th>
<th>D - Inscribed circle diameter (m)</th>
<th>PHI - Conflict (entry) angle (deg)</th>
<th>Exit only</th>
</tr>
</thead>
<tbody>
<tr>
<td>A - Aston Clinton Road</td>
<td>3.80</td>
<td>7.30</td>
<td>29.5</td>
<td>59.0</td>
<td>63.5</td>
<td>3.0</td>
<td></td>
</tr>
<tr>
<td>B - A41</td>
<td>7.30</td>
<td>7.30</td>
<td>6.0</td>
<td>18.0</td>
<td>63.5</td>
<td>38.6</td>
<td></td>
</tr>
<tr>
<td>C - Aylesbury Road</td>
<td>2.60</td>
<td>6.60</td>
<td>11.5</td>
<td>36.0</td>
<td>63.5</td>
<td>20.0</td>
<td></td>
</tr>
</tbody>
</table>

### Slope / Intercept / Capacity

#### Arm Intercept Adjustments

<table>
<thead>
<tr>
<th>Arm</th>
<th>Type</th>
<th>Direct intercept adjustment (PCU/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>A - Aston Clinton Road</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>B - A41</td>
<td>Direct</td>
<td>-1085</td>
</tr>
<tr>
<td>C - Aylesbury Road</td>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>

### Roundabout Slope and Intercept used in model

<table>
<thead>
<tr>
<th>Arm</th>
<th>Final slope</th>
<th>Final intercept (PCU/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>A - Aston Clinton Road</td>
<td>0.630</td>
<td>2063</td>
</tr>
<tr>
<td>B - A41</td>
<td>0.603</td>
<td>1053</td>
</tr>
<tr>
<td>C - Aylesbury Road</td>
<td>0.480</td>
<td>1315</td>
</tr>
</tbody>
</table>

The slope and intercept shown above include any corrections and adjustments.

78. We have investigated the issues behind “intercept adjustments” from TRL (the company behind the ARCADY programme). Advice can be found on their website at

https://trlsoftware.com/support/knowledgebase/queues-are-longer-or-shorter-than-arcady-predicts/

79. Whilst they explain “If all else fails then you can apply factors to calibrate the model”. (N.B the example they give is “-200 PCU/hr to reduce the predicted capacity”). However, they make it clear that “Corrections at the junction are intended to account for factors at the junction which make the junction different to the ‘average’ junction with
the same geometries, such as poor visibility, gradient, driver hesitation, unusual layout, and so on". There appear no unusual factors at this junction limiting capacity especially as both lanes are fully utilised on the approach.

80. Further it seems highly unlikely that the A41 bypass (which has two lanes) on the approach has half the capacity of the Aylesbury Road approach.

81. An explanation as to why this adjustment has been made is required. There is nothing in the TAA which suggests that this adjustment has been approved by the Highways Authority, or for what reason. Has this been approved by the Highways Authority?

82. It is a very drastic calibration adjustment and explains the unrealistic delays in the 2036 Do Minimum. Such an adjustment has clearly not been made in the Aylesbury Transport Model SATURN model. Otherwise more traffic would be avoiding this location or peak spreading as the traffic builds up.

83. In any case the standalone 2036 Hampden Fields Do Something shown in Table 4.6 show significant overloading issues on several arms. It is quite likely that when the Do Minimum is reasonably adjusted the standalone position could actually be worse than the Do Minimum.

Overall Flows at the Junction

84. The vehicle flows at the junction are assessed as:
85. This shows drastically increasing traffic at this roundabout, way higher than would be expected, of over 50% for the junction as a whole and of an incredible 90% increase for the A41 arm itself. This growth needs to be put into context in that it does not include any development associated with Woodlands, Hampden Fields, SEALR, SWALR and other VALP schemes. These increases seem excessive and once again go some way to explain the unrealistic Do Minimum scenario.

### Cumulative Scenarios

86. The developer at paragraph 4.45 of the TAA gives a narrative that compares all Cumulative scenarios with the flawed 2036 Do Minimum. In fact this is difficult to do as the 2036 Do Minimum results are calculated using a different method than the cumulative scenarios. The Do Minimum is calculated using ARCADY, the standalone is calculated using LINSIG and the Cumulative scenarios are calculated using TRANSYT. Whilst these are broadly comparable, in some areas direct comparisons are not possible.

87. Analysis of the Cumulative scenarios are available in Appendix D to I of Appendix H to the TAA (Jacobs 2020 ELR-SLR Transyt updates). N.B This is published as...
88. Some of the data is incomplete as it appears to have been cut off screen grabs and as such cannot be seen. Again, can we have the full data? In some case numerous junction arms appear not to have been published. (See Final Prediction Table of DC1 AM Peak of Jacobs report in Appendix H).

89. No Cumulative summary results are produced by either the developer or the Highways Authority. This is extremely surprising given the significance of this junction.

90. We have analysed some of the data that can be utilised and have summarised the PM peak in the table below:

N.B 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 RFC (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).

<table>
<thead>
<tr>
<th></th>
<th>2036 Do Minimum</th>
<th>Hampden Fields Standalone</th>
<th>Cumulative One</th>
<th>Cumulative Two</th>
<th>Cumulative Three</th>
</tr>
</thead>
<tbody>
<tr>
<td>A41 East</td>
<td>2.44 RFC</td>
<td>196%</td>
<td>98%</td>
<td>104%</td>
<td>101%</td>
</tr>
<tr>
<td>ELR(N) Not in existence</td>
<td>Not in Existence</td>
<td>87%</td>
<td>99%</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>SLR (S) Not in existence</td>
<td>90%</td>
<td>90%</td>
<td>83%</td>
<td>88%</td>
<td></td>
</tr>
<tr>
<td>Overall PM PRC</td>
<td>118.5%</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table One: PM Peak Woodlands Roundabout Junction Capacity
Do Cumulative 1 Hampden Fields and Woodlands

91. The Jacobs reports states on page 17 that in the AM peak all queues will effectively clear with each cycle of traffic light change. However, “In the PM peak Queues on the A41 East (239 metres), the East Link Road North, South Link Road and pedestrian crossing on the South Link Road would fail to clear in some cycles.”

92. They conclude “These results are slightly worse than the 2017 results for the AM peak (57.5 PCU/hr) and considerably worse in the PM peak (64.7 PCU/hr)” [emphasis added].

93. No mention is made in TAA or on the Highways Authority assessment that there is a worsening at Woodlands Roundabout when assessed against the new transport model. Both are content to fall back on the comparison with an overinflated, unrealistic and flawed 2036 Do Minimum scenario. This is unacceptable.

Do Cumulative 2

94. It is very similar to the Cumulative 1 scenario where there is a worsening in the new transport model against the 2017 transport model. In the AM peak the model suggests a queue of 73 metres to clear with each cycle of lights on the approach from Tring (A41 East).

95. However, Jacobs conclude that in the PM peak the situation is much more serious “with a queue of 373m unlikely to clear and ensuring the network is over capacity.”

Do Cumulative 3 (full VALP)

96. Again, there are significant over-capacity issues especially on the A41 East approach from Tring in the PM peak. Jacobs state that the queue in the PM peak of 309 metres is “unlikely to clear in most cycles”
97. This scenario is particularly striking given that the whole Garden Town strategy seeks to reduce the need for vehicle journeys, yet one of the most important junctions in Aylesbury traffic will be overloaded causing congestion in 2036. It represents failure of the strategy.

98. The conclusion to the Jacobs report repays visiting in full:

“The sensitivity test of scenario DC2 for the Regulation 22 sites shows satisfactory results in the AM peak, however is overcapacity in the PM peak. The A41 East is observed to exceed a 100% DoS and would have queues that fail to clear in most cycles.

In Scenario DC3 [Do Cumulative 3 – full VALP], the junction is observed to be overcapacity in the PM peak with queues generated on A41 East and East Link Road that fail to clear. The AM is however observed to perform within capacity.

It is recommended that the results of the sensitivity tests are compared to a reference case (e.g., Do Minimum or Do-Nothing scenario) to determine whether the DC2 or DC3 performance are acceptable.”

99. As can be seen Jacobs recommend that these results are compared to the Do Minimum but this cannot be done as the Do Minimum scenario is flawed.

100. The modelling needs to be reworked and the completely impossible queue of 1444 vehicles reassigned throughout the model as would happen in real life. This would then lead to impacts on other parts of the network that must be assessed.
Junction 22 Bedgrove / Broughton Crossing

101. The junction operates well above capacity in the 2036 Do Minimum. The Standalone scenario with just Hampden Fields is effectively the same in the AM peak, 58% over capacity and a minor betterment in the PM peak (from -3% to 3%).

Cumulative Scenarios

102. All cumulative scenarios show a significant deterioration in the overall Practical Reserve Capacity of the junction in the PM peak when compared to the Do Minimum.

<table>
<thead>
<tr>
<th></th>
<th>AM Peak</th>
<th>PM Peak</th>
</tr>
</thead>
<tbody>
<tr>
<td>2036 Do Minimum</td>
<td>-57.9%</td>
<td>-3.3%</td>
</tr>
<tr>
<td>2036 Cumulative One</td>
<td>-44.2%</td>
<td>-26.5%</td>
</tr>
<tr>
<td>2036 Cumulative Two</td>
<td>-37.6%</td>
<td>-24.8%</td>
</tr>
</tbody>
</table>

103. 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).

104. 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 Hampden Fields (and indeed Woodlands) would be highly unlikely to be approved.

Overall capacity (PRC) at Junction 22 Bedgrove / Broughton Crossing

<table>
<thead>
<tr>
<th></th>
<th>AM Peak %</th>
<th>PM Peak %</th>
</tr>
</thead>
<tbody>
<tr>
<td>2036 Do Minimum</td>
<td>-57.9</td>
<td>-3.3</td>
</tr>
<tr>
<td>2036 Cumulative One</td>
<td>-44.2</td>
<td>-26.5</td>
</tr>
<tr>
<td>2036 Cumulative Two</td>
<td>-37.6</td>
<td>-24.8</td>
</tr>
<tr>
<td>2036 Cumulative One plus Richmond Road Closure</td>
<td>+24.7</td>
<td>+41.7</td>
</tr>
<tr>
<td>2036 Cumulative Two plus Richmond Road closure</td>
<td>+25.5</td>
<td>+42.3</td>
</tr>
</tbody>
</table>
105. 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.

**AADT’s and Tring Road Corridor (Hampden Fields Link 21, Woodlands Link 1.7)**

106. 2036 AADT’s published with Hampden Fields, at Table 9.22 of the ESA, state that 21,284 vehicles per day in the Cumulative 2 scenario will use the Tring Road Link. yet the corresponding figures for the Woodlands “Full development Scenario 2036” is 32,148. A difference of 10,864 vehicles (see below).

<table>
<thead>
<tr>
<th>HF Link Number</th>
<th>Woodlands Link Number</th>
<th>Description</th>
<th>2017 Baseline</th>
<th>Hampden Fields 2036 Cumulative 2</th>
<th>Woodlands Do Cumulative 2</th>
<th>Diff Hampden Fields v Woodlands</th>
</tr>
</thead>
<tbody>
<tr>
<td>21</td>
<td>1.7</td>
<td>A41 Adams Gage to Bedgrove</td>
<td>18313</td>
<td>21284</td>
<td>32148</td>
<td>10864</td>
</tr>
</tbody>
</table>

107. This is covered above and in our letter sent to you on 14th January 2021. Such wide differences will need to be thoroughly explained and any mistakes rectified.

108. 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.

109. Increased flows on this AQMA corridor are not acceptable to local residents and it cannot be reasonably acceptable to the Highways Authority either. Yet no comment is made by the Highways Authority regarding the increased flows on the Tring Road.

**Impact on junction modelling**

110. 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.
111. 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.

112. 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.

113. 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:

<table>
<thead>
<tr>
<th>Junction Number</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>Woodlands Roundabout</td>
</tr>
<tr>
<td>23</td>
<td>Bellingham Way / A4157 Stocklake</td>
</tr>
<tr>
<td>26</td>
<td>Park Street Roundabout</td>
</tr>
<tr>
<td>28</td>
<td>A418 Park Street</td>
</tr>
<tr>
<td>30</td>
<td>Broughton Avenue Priority Junction</td>
</tr>
<tr>
<td>31</td>
<td>A418 Cambridge Street</td>
</tr>
<tr>
<td>36</td>
<td>A41 King Edward Avenue</td>
</tr>
</tbody>
</table>

114. Without adequate junction assessments in all scenarios, with adequate mitigation being fully considered, the Highways Authority could not grant planning permission for application 16/00424/AOP (nor for 16/01040/APP).

Richmond Road Diversion - Proposed Mitigation – Implications for Decision Makers

115. 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 have any direct influence on the planning merits of the case.

116. 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 closing 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.

117. 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.

118. 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 TAAs and the draft 106 agreements for Woodlands and Hampden Fields as to who will deliver or contribute to it.

119. 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. Although they had 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.
120. 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]

121. 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”

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

122. 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 from the public.
Junction 99 – The Walton Street Gyratory

123. Referring to the 2020 Aylesbury Transport Model, the lack of validation using observed flows at the gyratory system is a major omission that 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.

124. 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.

125. 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.

126. 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. Yet, the trip generation used to base Hampden Fields Transport Analysis is from 08.00 – 09.00. The change to 07.00 – 08.00 is wholly unrepresentative of the busiest period at this junction given the concentration of school children during the time period 08.00 to 09.00.

127. This remains a fundamental inconsistency. Given the significance of this junction to the whole Aylesbury Road network, a credible explanation needs to be given.

128. The developer and the Highways Authority do 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.
129. At the time of Secretary of State’s decision, the Practical Reserve Capacity at the gyratory in 2031 was as follows

<table>
<thead>
<tr>
<th></th>
<th>AM Peak %</th>
<th>PM Peak %</th>
</tr>
</thead>
<tbody>
<tr>
<td>2031 Do Minimum</td>
<td>-29.7</td>
<td>-3.3%</td>
</tr>
<tr>
<td>2031 Do Something (with Hampden Fields)</td>
<td>-31.8</td>
<td>-2.7%</td>
</tr>
</tbody>
</table>

*from Inspector’s Report para 9.501 – 9.503

130. 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

131. Even given the wholly inadequate unacceptable change in the AM peak time period in the current application, there are still issues.

132. In the Standalone 2036 the minor betterment is very unlikely to be achieved when the modelling period is changed. Even if it tilts the balance back to a marginal deterioration of the situation at the gyratory, approving the application will go against the SoS decision of 2015 which 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”.

Cumulative Scenarios

The cumulative scenarios are as follows:

Practical Reserve Capacity 2036 at the gyratory system

<table>
<thead>
<tr>
<th></th>
<th>AM Peak</th>
<th>PM Peak</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inspector 2015 with Hampden Fields</td>
<td>-31.8%</td>
<td>-2.7%</td>
</tr>
<tr>
<td>2036 Cumulative One</td>
<td>-31.2%</td>
<td>-19.3%</td>
</tr>
<tr>
<td>2036 Cumulative Two</td>
<td>-26.9%</td>
<td>-17.0%</td>
</tr>
</tbody>
</table>

133. 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.

134. Developers of Hampden Fields, Woodlands and SEALR will claim that it is not their development that is causing the gyratory system to worsen and therefore they cannot be required to provide mitigation for it. The Highways Authority, however, has a legal duty to reduce congestion, 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, demonstrably fails.

135. 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.
Deliverability

136. We note in the original Transport Assessment from 2016 that the Southern Link Road is to be delivered upfront.

137. Whilst we have seen nothing in the TAA to alter this commitment we are concerned that the Hampden Fields s106 suggests that the Southern Link Road might not need to be delivered until “5 years after Commencement of Development”. 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 the development it is very unlikely that development would begin before 2023/24. The Council and the developer need to re-affirm their commitment to the upfront delivery of the Southern Link Road.

138. In the Hampden Fields covering letter (page 2), it is asserted that the SEALR and Woodlands will have planning permission secured. These are, of course, quite outside the Applicant’s control and cannot be taken for granted. Especially when the Vale of Aylesbury Local Plan is still under Examination in Public. To make such an assertion departs from best planning practice. It must therefore be understood that the current application has a significant dependency built into it. It is inconceivable the development could go ahead at all if either SEALR or Woodlands does not proceed.
BC Highways Objectivity

139. We are increasingly concerned about the approach taken by BC Highways since well before the public inquiry in 2013. An historical account of its failings will not help so will not be listed here but it is very important to note that BC Highways have supported this application, in its various forms since before that first public inquiry.

140. Whilst we understand that the Highways Assessment of 13th January 2021 has to be read with the initial assessment of 2017, a distinct and obvious lack of scrutiny of the published Transport Assessment Addendum is demonstrated in their published response of 13th January 2021.

141. We also note that Cumulative Assessments rely on consent being granted for what are effectively Council schemes (in relation to the SEALR and Woodlands). As a result a great deal rests on the approval of Hampden Fields. However, even in this context it should be noted that such fundamental changes to a Transport Assessment require thorough re-examination of the fundamental transport issues. We have pointed out in numerous places in this report where there are significant questions which the Highways Authority should want to address but appear to have not.
Transport Summary

142. 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.

143. The lack of consistency in the morning peak hour between the Aylesbury Transport Model and the associated inconsistencies with Trip Generation numbers puts the validity of the whole TAA in severe jeopardy.

144. 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.

145. Key Garden Town Principles are not achieved. These proposals encourage the use of cars and in key locations and 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.

146. Significant issues remain with the assessment of the critical Woodlands junction (Junction 9).

147. New roads, particularly the Southern Link Road, operate at volumes up to 250% higher than the average Urban A road, based on Department for Transport comparison data. In this context major Severance issues are created. Once again this is against key Garden Town principles. The benefits of the Southern Link Road are severely overstated in the planning balance.
148. The Transport Assessment Addendum contains significant omissions in data which prejudice the public; forecast AADT traffic flows have not been published on key links. The published AADT’s for the Cumulative Assessments of Hampden Fields and Woodlands are so wildly different that no reasonable assessment of the scenarios can be made.

149. 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, as the Highways Authority has been advised by their own Consultants.

150. Broughton Lane mitigation, required in all scenarios, is subject to a separate consenting regime over which the Council and developer cannot guarantee success.

151. 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 is a major concern and again contrary to Garden Town principles.

152. 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.

153. As with the Transport Assessment Addendum as a whole, the claimed improvements in the gyratory performance are achieved by adopting a wholly unrealistic earlier peak AM time of 07:00 to 08:00 from the Aylesbury Transport Model and seemingly applying inconsistent Trip Generation figures for 08:00 to 09:00.
154. These points taken together need much closer scrutiny with more analysis as required. We have highlighted NPPG here and the Highways Authority will be well aware they cannot allow a scheme to be approved with incomplete information, and unrealistic and unreasonable scenarios demonstrating beyond any doubt that there are significant highways deficiencies associated with the amended Transport Assessment.
Air Quality

155. The weaknesses highlighted in our Transport criticisms above naturally affect air quality in and around the site and subsidiary areas. The AADT figures that feature in the Air Quality Chapter of the ES Addendum (para 10.53 and Appendix 10.3) are highly questionable, as we have pointed out above.

156. The resultant Vehicle Emission factors are therefore similarly unreliable. Until and unless the AADT data can be clarified/rectified, the Air Quality element of the application must be considered unsafe.

157. Additionally, we find it an unacceptable omission that any future Air Quality effects appear not to have been assessed within the new development. There are potentially risks to air quality from the impact of the SLR on nearby residential areas, public spaces and footpaths. Emissions from the many thousands of vehicles forecast to use the SLR will be high as they stop and restart at the several planned crossing points. As shown on the parameters plan it appears that the urban residential core will be multi-storey in places and the employment areas will consist of similarly large buildings sited relatively close to the Southern Link Road. There is an obvious issue potentially being created which at the very least requires assessment.

Water services infrastructure

158. It has been alarming to read the statement from Thames Water that they cannot accommodate this development without network upgrades. How is it possible that such a major development that has been in preparation for more than four years could run into this basic problem? This issue is very current. It was highlighted on 13 January on a news item on BBC ‘South Today’ about sewage pollution of watercourses from a Thames Water plant. Professor Richard Harding of the Centre for Landscape and Climate Research at Leicester University and a member of the Thames Water Stakeholder Group explained that infrastructure often lags the creation of new developments, requiring remedial measures after the event. Thames Water recognise that they have sometimes been unable to match the development of sewage and surface water infrastructure to cope with new housing developments,
relying on asking the developers to “rectify any issues”. That risks water courses suffering frequent – not exceptional -- pollution.

159. We emphasise that all the aspects contained in Thames Water’s statement on 16/00424/AOP must be fully addressed and resolved prior to there being any question of planning permission being granted. Such a major issue of infrastructure provision is not appropriately addressed by means of condition. Significant improvements may need to be made and this needs to be provided for in the s106 agreement.

Flooding and drainage

160. A consultee has questioned the validity of the application in these important areas. In their 21 December 2020 letter, the Buckinghamshire Council Sustainable Drainage Team pointed out that:
   a. no fewer than seven Appendices were missing from the Foul and Surface Water Drainage Strategy;
   b. the Preliminary Surface Water Drainage Strategy needed to be revised;
   c. greenfield runoff rates needed to be recalculated, because they did not represent the true position at the site.

161. The importance of flood risk is acknowledged at the highest levels of Government (see, for example, Secretary of State’s ‘Flood and Coastal Erosion Policy Statement’ July 2020). The level of inaccuracy in the planning on this topic – from a well-resourced Consortium that has had many years to get it right first time – renders their proposition undependable.

162. There is also a mismatch between the flood plans contained in the application and local knowledge of the risks. The recently-built neighbouring estate of Westongrove has already suffered flooding in this, its second winter. National news coverage of the problems affecting Bedfordshire last month point to the problems that can be created when theoretical models are relied upon too heavily at the expense of a practical understanding of the area.

163. Not only do these problems have a terrible impact on the lives of the people affected, but they also create uncertainty over the availability of insurance for residential and
commercial properties. Which in turn has an impact on future employment prospects and flexibility.

164. If the developer continues to argue that the development will be flood-safe, they need to be prepared to go on record as guaranteeing this, and this should be required e.g., in the Section 106 agreement.

Healthcare

165. There is a serious risk that healthcare provision will be unable to cope with the extra demand created under this application. This makes the proposal in its current form unsustainable.

166. Using the figure of 2.4 persons per household (ONS 2018), the Hampden Fields project would add more than 7,000 residents to the locality. We accept that space for building a health centre is included in the plans. However, even if purchase were to be agreed, this only commits the developer to deliver a ‘shell and core’ building which would require fitting out by the practice to a standard acceptable to the Care Quality Commission to deliver the proposed extension of service, and only after the 1,000th house is occupied. This means that some 2,400 extra people would require healthcare without any alteration to the existing facilities, which are widely acknowledged to be overstretched even in normal times.

167. At present 15.3% of GP positions remain vacant in the UK (‘Pulse’ 2018). Various Government pledges to substantially increase the GP workforce have not been achieved; indeed, the number in post between 2015 and 2019 has fallen (‘GP’ journal, November 2019). It is difficult to recruit GP trainees, partly because the GP workload continues to increase and has been described as “unmanageable”. The application is therefore open to challenge on two counts: first, whether the present local GP workforce is able to accommodate the medium-term population increase and, second, where will the extra staff be found for the proposed expansion?

168. The categories of care to be provided in the new Healthcare centre being proposed at Hampden Fields cannot cover all aspects of secondary healthcare. How likely is it,
therefore, that the local secondary care facility -- Stoke Mandeville Hospital -- will be able to cater for the increase in attendances and admissions associated with these developments? Hampden Fields is only a part of the wider Aylesbury proposals currently under discussion, for some 16,000 houses equating to 38,400 residents. Stoke Mandeville caters for a yet wider population area including the growing area of Princes Risborough. Will further outpatient / ward space be required and if so, where will this be built?

169. The healthcare provision elements of this application have not been adequately thought through and therefore present a further reason for it to be rejected.

**Biodiversity**

170. The net gain claimed (13.8%) falls well short of the Council’s aspiration figure of 20%. This is disappointing for such a prominent part of the long-term plan for a Garden Town and we ask that ways be found to improve it.

171. Of greater concern are the comments from the Senior Biodiversity and Planning Officer at BBOWT, the Wildlife Trust for this area, dated 18 December in which she challenges the methodology used to calculate the biodiversity changes from this application. It is BBOWT’s opinion that if the biodiversity calculation were be completed “in line with the appropriate guidance, it demonstrates a significant net loss of biodiversity will result from this scheme.” HFAG has no expertise in biodiversity assessment, but it is concerning to see this cogent objection from an organisation that does.
The importance of local democracy

172. In 2015, the Secretary of State agreed with the Inspector that local opposition to the previous version of this scheme and the significant value of the appeal site to the local community were matters to be considered in the overall planning balance.

173. Since that time, the local community have been actively exercised in the current application. Through the Hampden Fields Action Group, they have raised tens of thousands of pounds to obtain independent professional advice on planning, transport, flood risk, and legal aspects so that they could contribute worthwhile, considered, evidence-based inputs to the Council’s deliberations. No fewer than 5,000 letters were delivered to AVDC in 2017, which we believe is was a record for a local planning application.

174. Any argument that a smaller number of comments have been made to the latest consultation can be rebutted by the fact that the consultation period was only the legal minimum and covered a Christmas and New Year season when the UK was undergoing all the stress and distraction of a worsening of the Covid-19 pandemic. There was no prospect to hold any public meetings or talk with people to get their views. We would also point out the use of the term “imminently” about the prospect of conclusion of the S106 negotiations (Planning Statement Addendum 3.9 and 1.24). This has further added to the pressure being applied to the public in this case.

175. Despite our efforts over the years to engage in a professional and well-reasoned planning discussion, the response from the Councils has been disappointing. We have made it clear at points throughout this report where and why the public consultation has become a meaningless exercise, bordering on farce.

176. Requests for information have often gone unanswered. A mass of cryptically titled and hugely complex reports have been allowed to be put to the public with little or no ‘signposting’. As we have demonstrated many of these reports have obviously not been proofread, presenting confusing inconsistencies. Public consultation has sometimes taken place at times with little regard to fairness and practicality, as in this case spanning Christmas and New Year during an especially tense period of the pandemic.
177. At the time of writing, we are ten days after the consultation formally ended. It has taken the full resources of this group, including engaging expert consultants, to try and work out the confusion. What hope would the public have to absorb all these documents, with their litany of errors, and to have met the deadline for consultation. They would simply give up.

178. This is no meaningful consultation as required in law. The issues raised in this report require a full response, errors need correcting and the public consultation started again.

179. Throughout the last 10 years the community has had to fight its council first and have been dismissed as “not representative of the silent majority who would want this”. It can be seen that the local community affected by this application are not a vociferous minority but actually represent a well-considered majority. Despite all the odds being heavily stacked against them and a council that has already made up its mind they have taken the opportunity to exercise their democratic right to express their views and have done so in a way that has required considerable investment of time, effort and money. We believe that their objections are valid and deserve full consideration, not only in the letter and the spirit of the comments and decision made by the Secretary of State in 2015.
Conclusion

180. The revised application demonstrably fails to answer the fundamental issues raised by the inspector and Secretary of State. In the attempt to shore up this 10 year old plan, and contribute to a 21 year old outdated and erroneous road plan, the evidence has been made to fit. Thus, it has created a road led strategy fundamentally at odds with Garden Town principles, an inappropriate 4 lane highway through a major residential area, urban sprawl, and Severance within the development, while imposing coalescence between the development and the villages.

181. Any objective assessment of the Planning Balance, with appropriate weight placed on the issues raised in this report, would lead to the rejection of this application as it now stands. Far from significant positive weight being placed on the provision of the Southern Link road, a negative weight should be placed on the Transport plan as a whole.

We have pointed out areas in this report where it is difficult to avoid the conclusion that the Council have been highly motivated by a desire to secure the related developments in which they have a definite stake – Woodlands and the SEALR – and that this will have affected the objectivity and diligence with which they have approached the scrutiny of this application.

182. Accordingly, we OBJECT to this application and invite the council to REJECT it.

---- END OF REPORT ---

Appendices:

Transport Planning Practice ("TPP") report into Local Model Validation Report LMVR (April 2020)

TPP report into SEALR Transport Assessment (June 2020)