

CPRE BUCKINGHAMSHIRE: VALE OF AYLESBURY DISTRICT

COMMENTS ON THE AVDC CORE STRATEGY DEVELOPMENT PLAN DOCUMENT – PREFERRED OPTIONS (JULY 2007)

CPRE welcomes the opportunity to comment on the Core Strategy Development Plan Document (referred to below as the Strategy).

Although we are generally supportive of the Spatial Objectives set out on pages 27 and 28 of the Document, we have two very serious concerns about the Strategy. Firstly, that many of the policies do not fully reflect, and in places contradict, the Spatial Objectives. Secondly, that strong conclusions are presented in some cases where, in fact, the underlying evidence is either inconclusive or requires further work. Our main concerns are summarised below:

1. **Housing and jobs.** The available evidence shows that employment in Aylesbury has fallen in recent years. The Strategy provides no evidence that this trend will be reversed. It is clear that the growth of housing (and hence residents) across the District will be far greater than the growth of jobs over the 20 year timeframe of the Strategy, and this will inevitably lead to even greater levels of out commuting from the District; equally inevitably much of the additional out commuting will be by car. The Strategy completely fails to address this major issue, and in particular fails to offer any definitive and imaginative policies and proposals to reduce the need to commute by car. This is a major failing which needs urgent attention.
2. **Brownfield/greenfield development.** We are concerned about the proposal to provide 89% of the required new housing growth (9,300 dwellings) on greenfield land and only 11% (1,200 dwellings) on brownfield land; this proposal is in conflict with both Government policy and Spatial Objective 2. We believe that the brownfield potential (particularly in Aylesbury) has been significantly underestimated, and consequently the Strategy needs major revision to reflect a much lower greenfield requirement.
3. **Employment land.** We are concerned about the proposal to allocate a further 130 hectares of employment land over the 20 year period. This allocation, combined with the existing employment allocations across the District, will be capable of supporting over 50,000 new “high tech” jobs, which is far in excess of even the most optimistic forecasts for job creation. The inevitable outcome will be large areas of derelict or unoccupied employment land, and hence the 130 hectare target needs to be significantly reduced.
4. **Transport infrastructure.** The proposals to enhance the transport infrastructure appear to be exclusively orientated around the construction of new roads (e.g. para 6.8.2.) As a consequence, the policies of the Strategy appear to be in conflict with Spatial Objective 4. The Strategy and policies need major revision to provide adequate emphasis on sustainable transport
5. **Choice of Northern or Southern Options.** We have studied all of the supporting evidence referred to in the Strategy in some detail, and we can find no evidence which suggests that there is an overwhelming case for expansion to the south of Aylesbury in preference to expansion to the north. Indeed, we believe that much of the evidence is fairly inconclusive, whilst other evidence appears to support growth to the north as much as to the south. We therefore believe that the Strategy is misleading in suggesting that there is a strong case for growth to the south. We recommend that AVDC should publish its “scoring” of the various options so that the decision making process can be seen to be transparent. We suggest that much more work is required on this point before a definitive conclusion can be reached regarding the best locations for growth.

6. **General infrastructure.** The concerns which have already been expressed by many people about the lack of adequate infrastructure to support the housing growth are not adequately addressed in the Strategy, which seems to focus exclusively on just a few requirements such as schools, a crematorium and shops. We note in particular that there seems to be little recognition of existing and future acute healthcare problems and their relation to adjacent districts. There are, of course, many other infrastructure needs ranging from leisure and recreational facilities to the strengthening of Aylesbury's role and heritage as a county town which will be required if the growth of Aylesbury and the rest of the District is to be successful, but these are not addressed. The Strategy needs to be much more imaginative and comprehensive on the provision and development of infrastructure.
7. **Miscellaneous.** We have a number of miscellaneous concerns, as follows:
- (i) Para. 6.8.2 concludes that for transport, the southern option is the best performing. The strategy model shows a more complicated picture with the southern option **not** being the best, at peak times. The southern option appears best on average, but we question whether the average is relevant compared to the peak. Even so, the margin is only 0.62% which would seem to be probably too small to be statistically relevant.
 - (ii) Para. 6.8.3 states that better ground conditions to the south of Aylesbury would alleviate flood risk. Our reading of the Flood Risk Assessment revealed that more studies were needed on this point, so it cannot be regarded as conclusive.
 - (iii) Para. 6.8.5 states that it is cheaper and easier to connect to the existing main sewer to the south. In fact the Aylesbury Water Cycle Strategy states that the northern housing option would be the lowest cost option and that the southern option would require more sewer building.
 - (iv) Para. 6.8.7 makes no reference to the Chilterns AONB. We believe that this is a serious omission which would impact particularly on the southern options.
 - (v) Para. 6.11.3 includes the phrase "reducing the rate of increase in net out commuting". This is inconsistent with Spatial Objectives 2 and 7 and should be changed to "reducing net out commuting".
 - (vi) The provision of an "environment cluster" at College Road North (6.11.7) is in total conflict with Spatial Objective 2 insofar as access could only be by car. We suggest that this section be removed.
 - (vii) We were surprised that the Strategy did not mention the Utilities Survey (2.5.1) in which the electricity supplier (EDF) referred to capacity problems, especially for commercial/industrial development.
 - (viii) We note that the "Evaluation of Transport Impacts on Trunk Roads and Motorways (2007) (2.5.1) had not been completed when it was requested for inspection. CPRE is concerned about the impact on local roads, most of which are neither trunk roads nor motorways. We would like to return to this issue when the information becomes available.

The volume of documentation in the Strategy, including the Evidence Base, is considerable and the issues are extremely important and far from simple. We do hope that you will consider any further comments that we might make after our further reflection on selected matters.

We hope you will find the above comments are both helpful and constructive. We would be very pleased to discuss them in more detail with the District Council.

CPRE VALE OF AYLESBURY. 16 AUGUST 2007