

Core Strategy Submissions, AVDC
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You will be only too aware of the large number of different representations advising the Aylesbury Vale District Council which should be the preferred direction of housing growth around Aylesbury. My purpose in writing to you is not to rehearse all of the arguments in exhaustive detail. Rather, I wish simply to underline a series of points which have been powerfully made by constituents over recent months and which are profoundly relevant to your decision.

1. No evidence has been produced to show that, in terms of land ownership, the Eastern Arc has advantages over the Southern Arc.
2. As you will know, Planning Authorities are required under PPS12 to demonstrate through a Sustainability Appraisal that their plan is the most appropriate when compared with reasonable alternative sites. In the words of the Planning Inspectorate in June 2007, "a Sustainability Appraisal will be a key piece of evidence. Choosing a strategy contrary to the SA must be fully justified. Failure to do so risks a finding of unsoundness." AVDC's Appraisal examined 17 objectives for each site and appeared to show by a clear margin that the Southern Arc was the preferable location. There is therefore a real risk that the Inspector could find the Core Strategy to be unsound.
3. Planning Policy Statement 7 says that the best and most versatile land should be protected. The 2007 Sustainability Appraisal undertaken for the Council noted that 75% of site C is assessed as best and most versatile land. Do you agree we should be losing this amount of beautiful Buckinghamshire's best and most pleasing agricultural land?
4. Planning policies state that "sites of lower ecological value should always be developed before sites of higher ecological value". Given the acknowledged ecological merit of the Eastern Arc, it is hard to see why it should be proposed for development when that development can reasonably be located on an alternative site. Buckinghamshire County Council has suggested that the ecological evidence points strongly towards directing any new development away from Watermead, Berton and Broughton Crossing. The Strategy fails to undertake a sequential test for site selection.

5. The Environment Agency concludes that the Eastern Arc is the worst option in terms of flood risk (not surprisingly given its relative closeness to the River Thames and the Grand Union Canal) and it is by no means clear that this risk can be managed. Furthermore, the initial and continuing costs of managing the higher risk have not been identified. Rather than relying on flood mitigation measures on unsuitable sites, it is surely right to choose alternative locations where the risk is lower.
6. A key test is the extent to which a chosen site meets the objectives of PPS13. On this point, it is clear that the southern arc performs better in reducing car use.
7. Council officers have previously indicated that in technical terms the Southern Arc was preferable to the Eastern Arc and it is by no means apparent what has caused that view to be changed. Thames Water in its submission stated that “growth concentrated to the south will result in less significant network upgrades being required.” DLP Planning for Hallam acknowledges that “in service supply terms, EDF would prefer development to take place to the south of Aylesbury” and the cabinet paper notes the conclusion of the Strategic Flood Risk Assessment level 2 that “In terms of overall flood risk the Eastern Arc performs worst due to its location closer to the River Thames and the Grand Union Canal”.
8. Boyer Planning on behalf of Fairfield Partnership and Taylor Wimpey promote site D which is included in all of the growth options. Over a range of issues, they consider the Southern Arc as the most comprehensive option. As they put it “we raise concerns that the somewhat separated form of the eastern arc fails to provide the opportunities which the southern growth arc provides through its relationship with the existing settlement and interconnectivity within the urban extension. The separation of the MDAs in the eastern arc also provides a further issue relating to key infrastructure.”
9. All the evidence base has been developed on the assumption that Site G (Broughton Crossing) would be developed with 1600 dwellings. Instead, the Core Strategy now assumes there will be 2450 dwellings. None of the conclusions that have led the Officers to recommend the Eastern Arc has been revalidated using this 50% higher figure. All the papers repeatedly emphasise that the decision is “finely balanced”. In these circumstances, can it be right not to revalidate the evidence before going forward to the next stage?
10. Once a strategy is adopted it will probably be difficult for a planning authority to reject a formal planning application for development of any of the sites confirmed in an adopted core strategy.

I recognise that the issues have been hotly contested by people who, with equal sincerity and passion, hold divergent views. On the basis of the evidence I have seen and the representations I have received, however, I put it to you that the Eastern Arc is a flawed option and should be rejected.

John Bercow