

**DRAFT SOUTH-EAST PLAN EXAMINATION IN PUBLIC**

**STATEMENT BY CPRE BUCKINGHAMSHIRE: PARTICIPANT 7625**

**SUB-MATTER 8Fiii: AYLESBURY TOWN AND AYLESBURY VALE**

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**8Fiii.1 Does the draft RSS give sufficient priority to strengthening the economy of Aylesbury town, and how will this be achieved?**

1. CPRE welcomes the emphasis in para 5.3 of Section E8 on the importance of strengthening the economic and employment role of Aylesbury. We would, however, reiterate the comments in our response to 8Fi.1 that the future success of Aylesbury is heavily dependent on the town establishing a clear identity within both Buckinghamshire and the Region as a whole. In particular, it must not be viewed merely as a satellite of Milton Keynes.
2. We would also reiterate our comments in the response to 8Fi about the inconsistencies between the recommendations of the independent panel which conducted the EIP of the Milton Keynes and South Midlands (MKSM) Strategy in April 2004 and the guidance contained in the MKSM Strategy which was published by Government in March 2005. The independent panel reached its conclusions and made its recommendations after hearing extensive evidence supported by detailed technical information, but many of these recommendations appear to have been ignored by the authors of the March 2005 document. It is regrettable that the panel's recommendations appear to have been ignored, and hence we believe that it is important to highlight the inconsistencies in this submission.
2. We welcome the reference in Policy MKAV2 to the preparation of a separate LDD on implementing measures to achieve an urban renaissance of the town and strengthening its traditional role. Indeed, we believe that this is so important that we would suggest that the word "possibly" is deleted from the reference in Policy MKAV2, and that the separate LDD becomes a mandatory requirement of the RSS.
3. In our response to 8Fi.1 we also expressed our concern about the future balance of jobs and houses and the impact of this balance on out commuting. We once again emphasise that merely monitoring this balance is insufficient - it is vital to the future success of Aylesbury's economy that the balance is positively managed, and in particular that the house building targets are lowered accordingly if the jobs do not materialise.

**8Fiii.2 Does the level of housing provision proposed for Aylesbury town post 2021 take appropriate account of its growth area status, local constraints and opportunities, and current build rates?**

1. Housing provision for Aylesbury town was discussed in some detail at the EIP of the MKSM Strategy in April 2004, and the Panel commented that "*We believe that there is already considerable risk that house building in Aylesbury to 2016 could tend to act as a further incentive to commuting ... further fuelling of commuting trends would not be*

*regarded as sustainable*” [para 8.9. of Panel report]. The Panel then went on to say “*our recommendation is to scale down the growth to be aimed for in the period 2016-2021 significantly but not too dramatically*” [para 8.10].

2. The Panel then recommended a house building rate of 3,500 for the period 2016-2021 [para 8.11], but this recommendation has been ignored in the draft RSS, which proposes a rate of 4,400 over the same period. Out commuting from Aylesbury Vale is already excessively high, having increased by 30% over the past ten years [source: Community Plan for Aylesbury Vale, August 2006], and there is no doubt that it will increase even further by 2021 if the housing targets of the draft RSS are delivered.
3. It is also notable that the draft RSS has inflated the job forecasts for Aylesbury Vale to a higher level than the ones presented to the EIP in April 2004. The job forecasts presented in 2004 are detailed in document PART 103 of the EIP, which shows a “high growth” target of 16,800 new jobs created in Aylesbury Vale over the 20 year period 2001-2021. Conversely, Policy MKAV2 of the draft RSS shows a target of 21,200 new jobs over the 20 year period 2006-2026. There has therefore been a 25% inflation in the 20 year job growth target for Aylesbury Vale between the EIP in March 2004 and the publication of the draft RSS in March 2006. CPRE is not aware of any reason for, or justification of, this very significant inflation of job targets. An inflated (and probably unrealistic) job forecast will, of course, add to the pressures on out commuting.
4. CPRE therefore concludes that the housing provision proposed for Aylesbury town post 2021 is excessively high, for three reasons:
  - i) the housing targets for 2016-2021 in the draft RSS are some 25% higher than those recommended by the 2004 EIP Panel, and the inflated targets will generate an excess of new housing over new jobs, leading to still higher levels of out commuting.
  - ii) the 20 year jobs forecasts in the draft RSS are some 25% higher than those considered by the 2004 EIP, leading to an overestimation of housing needs in the draft RSS
  - iii) CPRE’s response to question 8Fi.1 emphasised that a 1:1 jobs:housing ratio will lead to an excess of job seekers over available jobs, as every 100 new houses will accommodate some 125 new job seekers. Consequently the 1:1 ratio assumed in the draft RSS will place even more pressure on out commuting.
5. We therefore propose that the RSS adopts the house building rates for Aylesbury town recommended by the 2004 EIP Panel, and that these rates are extended at the same level post 2021.

**8Fiii.4 Does the proposed housing provision for the rest of Aylesbury Vale post 2016 (excluding any growth associated with an expansion of Milton Keynes) provide sufficient allowance for these areas to meet cross border (Leighton Linlade) and local needs (Policy MKAV2)?**

1. We assume that the reference to Leighton Linlade arises from Bedfordshire and Luton Policy 2(b) of the Milton Keynes and South Midlands (MKSM) Strategy, which suggests that the Leighton Linlade growth area may extend over the County boundary into Aylesbury Vale. Once again this represents a change from the recommendations of the

panel conducting the 2004 EIP of the MKSM Strategy, which makes no reference to extending Linslade into Aylesbury Vale.

2. Bedfordshire and Luton Policy 2(a) of the MKSM, which also applies to Leighton Linslade, places emphasis on a number of considerations, including (i) developing the character of and public access to the surrounding countryside, (ii) maximising opportunities for recycling redundant and under-used urban land, (iii) upgrading the qualities of town centres and (iv) reducing the need to travel by private vehicles by integrating land use and transport planning. Any significant new housing in the predominantly rural areas of Aylesbury Vale adjacent to Leighton Linslade to support the growth of these towns would, of course, be in conflict with most, if not all, of these four considerations.
3. CPRE therefore suggests that reference to Aylesbury Vale in Bedfordshire and Luton Policy 2(b) of the MKSM is inappropriate as (i) it does not reflect the recommendations of the 2004 MKSM EIP Panel and (ii) new housing in Aylesbury vale to support the growth of Leighton Linslade would be in conflict with the environmental and infrastructure requirements of Policy 2(a). In short, there should be no house building in Aylesbury Vale associated with any growth of Leighton Linslade

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