
From: Blake, Patrick [REDACTED]
Sent: 26 March 2019 16:46
To: NewLocalPlan
Cc: Ginn, Beata; Townend, Zoe; Strongitharm, Glen; Planning SE
Subject: CONSULTATION ON PROPOSED MAIN MODIFICATIONS TO THE WYCOMBE DISTRICT LOCAL PLAN

Dear Planning Policy Team

Thank you for consulting Highways England in relation to the proposed main modifications to the Wycombe District Local Plan (Regulation 19) publication version.

Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. In this case Highways England's interests relate to the potential impact of development on the M40 and A404.

We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth within Wycombe without careful consideration of mitigation measures. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the M40 and A404.

This correspondence follows on from our letter dated 20 November 2017, produced in response to the earlier 2016 Wycombe Local Plan: (Regulation 19) Publication consultation for which our comments remain. Only new/amended policy items are considered below.

We have undertaken a review of the latest information and have the following comments:

POLICY CP2 – SPATIAL STRATEGY

The proposed main modifications for **CP2** discuss the 2018 central government announcements regarding a new runway for Heathrow Airport, and the Oxford to Cambridge Expressway preferred Corridor B being selected. Both of these announcements are noted to cause an impact on the district's transport system. The modification advises that Wycombe District Council (WDC) propose to engage actively in overarching governance structures to steer the preparation of formal strategic plans and a wider spatial strategy which responds to these. Highways England welcome further dialogue with WDC as these plans and a formal spatial strategy develops in order to ensure that any SRN impacts are minimised.

POLICY CP4 DELIVERING HOMES

The proposed modifications identify that due to a change in methodology, WBC is projected to actually deliver a greater number of dwellings than expected at the time of Local Plan Submission. This is expected to be up to 11,899 dwellings, an increase from the submitted figure of 10,927 dwellings over the Local Plan period. 972 additional dwellings have the potential to provide an impact on the SRN

dependent on their location - this has not been set out clearly or assessed within an updated transport evidence base.

We note that the number of dwellings anticipated to be delivered on sites with a net size of over 500 dwellings has risen from 2,891 dwellings in the Submission Local Plan to up to 3,668 dwellings within the main modifications. The intensification of existing proposed large sites may be of concern to us dependent on location due to the increased possibility of SRN junctions becoming congested at peak hours. We note that sites HW5, HW6 and HW7 account for some of the increase but request that further information is provided by Wycombe District Council and we would welcome a meeting to discuss these allocations in more detail.

POLICY HW5 – ABBEY BARN SOUTH AND WYCOMBE SUMMIT

Highways England notes that Policy HW5 has been updated and the indicative number of dwellings at the Abbey Barn South site has been increased from 505 to 580.

All other Highways England comments on these policies remain unchanged.

POLICY HW6 – GOMM VALLEY AND ASHWELLS

It is noted that Policy HW6 has been updated with residential allocations from 530 dwellings to 520 - 720 dwellings.

All other Highways England comments on these policies remain unchanged.

POLICY HW7 - TERRIERS FARM AND TERRIERS HOUSE

It is noted that Policy HW7 has been updated with residential allocations from 500 dwellings to 500 - 540 dwellings.

POLICY HW16 – WYCOMBE AIRPARK, HIGH WYCOMBE

We note that there are no proposed modifications to HW16 following our previous representation in 2017. For ease of reference, we requested the following modification to the policy wording and our position has not changed:

“Policy HW16 proposes that B1, B2 and B8 uses will be permitted at the site along with sui generis employment generating uses at the southern part of the site. The policy notes that “Development will be required to demonstrate through a travel plan how sustainable travel to the site will be improved”. Highways England is supportive of this addition to the policy. However, the scale of the site and proximity of the site may still impact the operation of the SRN at the Handy Cross junction. Proposals must demonstrate that the site will not impact the SRN and if necessary provide suitable mitigation if in fact it will have an impact.

The proposal for the site, by not including mitigation on the SRN, may not be considered Justified, Effective, or “sound” in line with the NPPF. We therefore recommend the following policy wording additions be applied to Policy HW16:

Planning permission will not be granted for this site(s) until it has been demonstrated how the adverse impacts to the safe and efficient operation of the local and strategic road networks will be mitigated.

POLICY HW18 – CRESSEX BUSINESS PARK, HIGH WYCOMBE

All previous Highways England comments on this policy remain unchanged.

POLICY BE1 – SLATE MEADOW, BOURNE END AND WOORBURN

POLICY BE2 – HOLLANDS FARM, BOURNE END AND WOORBURN

All previous Highways England comments on this policy remain unchanged.

POLICY RUR10 – STOKENCHURCH BUSINESS PARK

Policy RUR10 has not materially altered and therefore all previous Highways England comments on this policy remain unchanged.

SUSTAINABILITY APPRAISAL (SA) – DECEMBER 2018

In terms of transport effects overall the 2017 SA expected “that there will be a **residual minor negative effect** at this stage, based on the evidence available.” Highways England expressed a desire to work with WDC to help develop solutions to reduce the impact of planned development in the area.

The core text of the 2018 SA in Section 8.9 Transport and Traffic remains unaltered from 2017. There are no proposed major modifications to the SA that relate to the mitigation of transport impacts on the SRN. We welcome an opportunity to work with WDC to discuss potential mitigation options.

BUCKINGHAMSHIRE COUNTYWIDE LOCAL PLAN, WYCOMBE LOCAL PLAN SITES AND PRINCES RISBOROUGH EXPANSION TRAFFIC MODELLING REPORTS

We note that there has been no update to the transport evidence base, including the Buckinghamshire Countywide Local Plan Modelling Report: Phase 3 Technical Note (August 2017), Wycombe Local Plan Sites Traffic Modelling Report (June 2017) and Princes Risborough Expansion Traffic Modelling Report (July 2017) documents.

The insufficiencies with the countywide transport modelling identified in the previous two Local Plan reviews are still present. Highways England’s concerns regarding the transport evidence base not sufficiently considering the impacts of the WDC Local Plan on the SRN are therefore still relevant. It is not possible to quantify the potential impacts from the Wycombe Local Plan growth using this model. However due to the size, scale and location (distance from M40) of proposed Local Plan growth, the impacts to the M40 would unlikely be significant. Although we welcome further dialogue on individual sites through the formal planning application process to detail and if necessary identify measures to minimise/mitigate any identified impacts to the SRN and its junctions.

I hope this is helpful.

Kind Regards

Patrick Blake, Area 3 Spatial Planning Manager

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