

# Penn & Tylers Green Residents Society

President: The Rt Hon. The Earl Howe

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Ms Nicola Gulley MA MRTPI  
Planning Inspector  
Wycombe District Local Plan

13 August 2018

Dear Inspector,

## **Penn & Tylers Green Residents Society – ID ref no. 620 – Matter no. 7**

Our major concern, as expressed in our letter of 24 November 2017, is the significant increase in out-of-area traffic through Penn and Tylers Green, particularly past the Middle School, forecast by traffic modeling, as a consequence of the proposed new, two-lane route to and from the A40 London Road, via Cock Lane, the Spine Road, and Gomm Road.

This traffic is likely to be at A40 London Road levels whereas WDC's declared aim in the Local Plan is *to minimise and distribute the impact of additional traffic on the existing local road network*, and more specifically in the Development Brief, *that it does not lead to a significant increase in traffic using Cock Lane, because of the detrimental impact that would have on the village of Tylers Green*. We maintain that, since it is not practicably possible, using the proposed traffic calming measures, to achieve WDC's intention, the Plan is unsound in that regard and ineffective because of the harm that will be done to Tylers Green.

There have been two significant changes since sending that letter:

a) The planning application for the Ashwells site development (18/05002/R9OUTE) has been submitted, together with its Transport Impact Assessment by Odyssey which found neither highway safety concerns nor any significant increase in traffic. As explained in Support Appendix 2A(b), we make the reasonable assumption that only 7 vehs/hr from the new development would pass through Cock Lane at the AM peak hour. These two findings reinforce our argument that there is no need to widen Cock Lane.

b) Human+Nature have taken over the development planning for the main Gomm Valley site and tell us that they intend to design an estate road layout which discourages its use as a through route (Spine Road) and will argue that this will not require the widening of Cock Lane. We strongly support this approach and call for the withdrawal of the plan on p.107 of the Local Plan which sets out the route of the Spine Road and its connection with Cock Lane.

Please find attached an Appx I which provides the detailed background to the traffic figures quoted in our earlier letter of 24 November 2017, as evidence that they are not just wishful thinking. Indeed the County Highways Department have not been able to refute them.

We also enclose an Appx II which similarly provides background information for our analysis of the TIA for the Ashwells planning application.

Yours sincerely

*Miles Green*

Miles Green  
Chairman

## **Support Appx I - Traffic Volume Refs in P&TG Residents Society Letter of 24.11.17**

- 1) **Major Concern, para 1: “significant increase in traffic .... past the Middle School”**  
Refer to Main Source Docs D (BCC/Mark Shaw) + Doc E (BCC/ Christine Urry) + Table 1.  
AM peak flow southbound increases from 210 vehs/hr by 470 v/hr to 680v/hr.  
AM peak 2-way flows increase by 670 v/hr from 644 v/hr to 1317 v/hr.
  
- 2) **Major concern, para 1: “This increase is likely to be at A40 London Road levels.”**  
Refer to Main Source Doc A (Baseline numbers) + Table 1 (and answer to 1) above).  
London Road peak AM traffic flow eastbound just before Cock Lane is 763 v/hr.  
The projected increase alone, at 670 v/hr is almost the same level.  
The flow past the Middle School, including the increase, at 1317 v/hr, is almost twice the A40 level.
  
- 3) **Major concern, para 2: “Only an additional 42 vehs/hr at AM peak hour from the GV&A sites”.**  
Refer to Main Source Doc B (Incremental Flows from the Reserve Sites)  
  
The diagram shows the AM peak traffic flows from all the Reserve Sites above Ashwells and passing the Middle School near the top of Cock Lane is 44v/hr heading north and 44v/hr heading south. For the section below, subject to the threat of widening and linking to then top of the Spine Road, the figures are 63v/hr heading north and 56 v/hr heading south  
  
Heading South, **just 12 v/hr**: The figures indicate the volume heading south from Ashwells on the ‘at risk’ section is just 12 v/hr [56 v/hr on the lane south of Ashwells less the 44v/hr from other sites coming down past Ashwells, giving 56-44=12v/hr]. Any vehicles heading south from the GV housing will not use the ‘at risk’ section as it is north of the GV development, so a count of 0 vehs/hr.  
  
Heading North, **net 30v/hr**: Any vehicles heading north from Ashwells site will already be north of the ‘at risk’ section, so they will make no use of it, a count of 0 vehs/hr. The 63 v/hr shown heading north along the ‘at risk’ section comprise two separate streams of traffic, one (of 24 to 27 v/hr) up lower Cock Lane to around Pimms Close where it then joins the flow (circa 36 v/hr) up the Spine Road. The 24 to 27 running up Cock Lane parallel to the Spine Road will all be from other sites (otherwise they would be using the Spine Road). Also, of the at most 36 v/hr (63v/hr-27v/hr) heading north on the Spine Road, some will be from other sites preferring the ease of the 2 lane Spine Road to the alternatives, so a net figure of 30v/hr has been assessed and assumed into the calculations.  
  
Therefore the volume of traffic from just the GV&A developments forecast to use the ‘at risk’ undeveloped 200m of Cock Lane between the top of the Spine Road and Ashwells new junction, based on Jacobs data is 30 v/hr north and 12 v/hr south = **42v/hr** in total over both directions.
  
- 4) **Argument point 1: “Sufficient data available from March 2017”.**  
Refer to Main Source Doc D (23 March 2017 letter from BCC / Mark Shaw).  
The contents and seriously worrying implications of this document were communicated to WDC Councillors and to WDC Planning on several occasions in May, June and July 2017.  
Refer also to Main source Doc E (20 September 2017 letter from BCC / Christine Urry) written to WDC following their request to BCC for a ‘rebuttal’ of the numbers P&TG were quoting, but which provided confirmation of the earlier (Shaw) numbers, not the rebuttal requested.
  
- 5) **Argument point 3: “labels the Spine Road / Cock Lane as a mitigation measure”.**  
Refer to Main Source Doc C (Jacobs Countywide Local Plan Modelling).  
Section 4 of this, starting page 11, is headed “Mitigation Options” and lists on page 14:
  - Scheme Name: Gomm Valley Spine Road
  - Scheme Description: This scheme includes **a new link road** to the east of High Wycombe, associated with the GV development. [my highlighting]
  - And that it is included in both mitigation runs
  
- 6) **Argument point 3: “shows that it significantly increases time eastwards on the A40”, etc**  
Refer to Main Source Doc C (Jacobs Countywide Local Plan Modelling), figure 5-L on page 32.  
Figure 5-L “Illustrates the travel time changes....in regards to the mitigated scenarios”

The text box in 5-L states “Increased travel time on the A40...despite the inclusion of mitigation.”

The markings in the diagram provide the basis for the above comments.

- 7) **Argument point 4: “an increase to almost two and a half times baseline AM peak traffic flows (to almost 700 v/hr in each direction) along Cock Lane past the Middle School”.**

Refer to Table 1:

Baseline total / 2 way flows past the Middle School = 556 vehs/hr

Forecast total / 2 way flows after widening & linking = 1317 vehs/ hr = 2.4 times Baseline number.

Total flows, after widening etc., forecast at 680 v/hr heading south and 637 v/hr heading north.

- 8) **Argument point 4: “of the increase, only 3% is the result of the new houses in the Gomm Valley while 97% comes from traffic diverted from elsewhere”.**

Refer to Table 2:

Approximately just 2.9% of the increase in traffic past the Middle School is from the GV&A housing. The rest is primarily due to traffic diverting to Cock Lane, attracted by the widening scheme.

More explanation is provided in Table 2.

- 9) **Argument point 5: “For the 200m of Cock Lane which it is proposed to widen to two lanes...the new houses in the Gomm Valley will generate only about 42 vehs/hr at the AM peak hour”.**

Refer: See answer to ‘Major concerns, para 2’, above.

- 10) **Argument point 6: “almost 700 vehs/hr each way at the AM peak”.**

Refer to Table 1.

Total flows, after widening etc., forecast at 680 v/hr heading south and 637 v/hr heading north.

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### **Main Source Documents (in the public domain on WDC website, etc.)**

#### **A) Baseline numbers.**

(AM peak hour traffic flows all around High Wycombe, before adding in effect of Reserve Sites.)  
Jacobs’ report for WDC “Southern Quadrant Transport Strategy”, July 2012, Appendix C, page 38.

#### **B) Incremental Traffic Flows from the Reserve Sites.**

(The increase in peak hour flows from all the Reserve Sites)

The data appears in at least 3 Jacobs / BCC / WDC documents, but best and clearest is in:  
Jacobs’ “High Wycombe Transport Package (Reserve Sites)” 26 Jan 2016, page 7.

This version is particularly useful in that it shows flows for Cock Lane and the Spine Road separately.

#### **C) Effect of Cock Lane Widening Mitigation Scheme.**

(Jacobs own results show that the Cock Lane scheme significantly worsens London Road traffic flows)

Jacobs’ “Countywide Local Plan Modelling, Phase 3, Technical Note” 16 August 2017.

- Page 14 for the HW ‘mitigation’ described as “a new link road to the east of High Wycombe.
- Page 32 for figure 5-L showing increased travel time on A40 / London Road after ‘mitigation’.

### **Main Source Documents (in the public domain but not on WDC website.)**

#### **D) First Forecast Increase in Local Traffic Flows due to Cock Lane roadworks scheme.**

Letter from BCC / Mark Shaw as Cabinet Member for Transportation, 3 March 2017.

This letter provided the first firm indication of the increase in local traffic flows that the widening etc. scheme would produce.

#### **E) Confirmation of Forecast Increase in Local Traffic Flows due to Cock Lane roadworks scheme**

Letter from BCC / Christine Urry of Highways Development Management, 20 September 2017.

This letter was the response to the request from WDC for BCC to provide ‘a rebuttal’ of P&TG claims based on D) above, but instead broadly confirmed the huge increase in traffic volumes.

**TABLE 1 – TRAFFIC FLOWS PAST THE MIDDLE SCHOOL BEFORE v AFTER THE WIDENING**

| Data Source / heading:                         | South                             | North      | Total/ 2 way |  |
|------------------------------------------------|-----------------------------------|------------|--------------|--|
|                                                | (AM peak hour flows in vehs / hr) |            |              |  |
| Baseline (pre Reserve Sites) / Doc A           | 166                               | 390        | 556          |  |
| Incremental flows from Res sites /Doc B        | 44                                | 44         | 88           |  |
| <b>Sub-total pre widening &amp; linking</b>    | <b>210</b>                        | <b>434</b> | <b>644 #</b> |  |
| +Alignment to BCC/Urry Doc E Baseline number   |                                   | 3          | 3            |  |
| + BCC / Mark Shaw info / Doc D:                |                                   |            |              |  |
| Diverts south from B494                        | 390*                              | n/a        | ?            |  |
| Diverts across from Ham'sley lane              | 80                                | n/a        | ?            |  |
| + BCC / Christine Urry info / Doc E            |                                   |            |              |  |
| Total increase                                 | -                                 | -          | 670          |  |
| Alignment by comparison                        | ----                              | 200        | ----         |  |
| <b>Sub-total from widening</b>                 | <b>470</b>                        | <b>200</b> | <b>670</b>   |  |
| <b>Total after effect of widening etc.</b>     | <b>680</b>                        | <b>637</b> | <b>1317</b>  |  |
| Split of this calc'd by BCC/Urry: -on Spine Rd |                                   |            | 707          |  |
| -On lower unwidened part of Cock Lane          |                                   |            | 610 #        |  |

\* "About 6 vehicles a minute" interpreted as more than 6 / minute (otherwise BCC would have said 'less than 6 vehs/ min), but less than 7 vehs / minute, meaning:  
at least 360 v/hr up to almost 420 v/hr (7/min), so mid-point of 390 vehs/hr used.

# It is interesting to note that BCC/Urry claims that:  
644 v/hr 2 way flow on single lane Cock Lane is unsafe and that widening is required, but that the 610 v/hr 2 way flow on lower (still single lane) part of Cock Lane, after widening top part, is safe!

**TABLE 2 –SOURCES of TRAFFIC FLOWS PAST THE MIDDLE SCHOOL**

| Data Source / heading:                  | South                             | North      | Total/ 2 way | % vs Baseline     |
|-----------------------------------------|-----------------------------------|------------|--------------|-------------------|
|                                         | (AM peak hour flows in vehs / hr) |            |              |                   |
| Baseline (pre Reserve Sites) / Doc A    | 166                               | 390        | 556          |                   |
| Total after widening (see Table 1)      | 680                               | 637        | 1317         | +237%             |
| <b>Total increase on Baseline</b>       | <b>514</b>                        | <b>247</b> | <b>761</b>   | +137%             |
|                                         |                                   |            |              | <b>% of total</b> |
| Increase from GV&A developments         | 0                                 | 22*        | 22           | 2.9%              |
| Increase from other Reserve Sites       | 44                                | 22         | 66           | } 97.1%           |
| Increase from widening & linking Cock L | 470                               | 203        | 673          |                   |
| <b>Total increase on Baseline</b>       | <b>514</b>                        | <b>247</b> | <b>761</b>   | 100%              |

Note: \* Incremental flows from all the Reserve Sites heading north past the Middle School = 44v/hr (see Table 1 above), but only about half (circa 30 v/hr out of the 63 v/hr) of the vehicles heading north on the 200m of 'at risk' section below Ashwells would have come from the GV development (see note on 'major concern, para 2', above), so only about half of the 44 v/hr heading north past the Middle School at the top of Cock lane will be from GV&A, some 22 v/hr. The actual figure could be even less as around 30 v/hr out of the 63 v/hr heading north would be from other sites and so unlikely to end their journey in Ashwells (just a residential area), therefore of the 44 v/hr heading north past the Middle School, possibly just 14v/hr (44v/hr less 30v/hr) = less than 2% might be from the GV&A development.

## **Support Appx II to P&TG Res. Soc. Letter of 13.8.18 – ID no. 620 – Matter no. 7**

### **Newly Published Information concerning Cock Lane Traffic Flows**

Since the publication of the Local Plan and after the Representation submission deadline had passed two major and significantly relevant documents have become available and been placed in the public domain.

#### **A) The Traffic Impact Assessment by Odyssey in the Planning Application (18/05002/R90UTE) for the Ashwells site at the top of the GV&A Development Area.** This indicates that:

**There is no need or reason to widen Cock Lane, other than the short section down to new Ashwells junction.**

WDC claim widening is included because BCC insist on it (we believe BCC does not have such power]. BCC says it is necessary for reasons of highway safety and significantly increased traffic volume, but the Application's Traffic Impact Assessment (in Transport Assessment 1) clearly shows:

a) **no highways safety concerns**, we quote:

***"3.7.8 Given the fairly minimal number of incidents, the low severity and absence of recurring trends it is reasonable to conclude that there is not a significant highway safety problem within the vicinity of the site."***

**It should also be noted that none of the 5 incidents recorded over the past five years occurred within the single track section of Cock Lane.**

b) **no significant traffic volume increase:**

The TIA (Section 7.2.3) lists the increased traffic volumes resulting from the planned development as

***"the proposals can be expected to result in the following vehicle trips, 60 (two-way) trips during the AM peak hour, ... It is considered that the anticipated increase in vehicular traffic will not result in a material impact on the local highway network."***

Furthermore, Appendix E of the same report forecasts that out of the 60 trips only 26 will be through the single lane section that BCC wants to widen. However it may be even less since this forecast is based on a Chepping Wycombe-wide travel to work survey. Perhaps more relevant, is the evidence from the existing Ashwells site, as reported in the TIA, where **only 12% of the AM peak traffic goes through that part of Cock Lane, so the volume from the new development could be more like 7 vehicles/hour (12% of 60, 2 way basis).**

**This TIA also supports (Sections 7.2.3 and 8.3.4) our view that there is no planning need for the Spine Road connection and widening of Cock Lane beyond the new Ashwells junction.**

Also there will be significantly increased accident / injury risk and air pollution if Cock Lane is widened:

BCC estimate that the peak AM traffic flow past the village's Middle School would more than double to 1317 vehs / hr (equivalent to adding a major main road – like the A40 east out of High Wycombe – to the current traffic flow on the village's narrow roads and lanes) massively increasing the danger to school children etc.

#### **B) The completely different new development proposals for the Gomm Valley part of the GV&A site.**

The development proposals made by Human + Nature for the new owners, AVIVA, does not employ the concept of a 'Spine Road'. It envisages the site's only connection with Cock Lane to be at the bottom (southern) end of the single track section of Cock Lane and could provide perhaps double the 400 or so of dwellings, but not if there were any development of Cock Lane that would bring a flood of out-of-area traffic through its carefully designed family and play friendly winding street network.

H+N are aware that there are several alternative (to Cock Lane) routes for the low level of traffic flow from their development that would wish to head north and that they have a choice of routes to do so:

- London Rd west / Hatters Lane (328 v/hr) / Totteridge / Hazlemere,
- London Rd east / Ham'sley Lane (just 119 v/hr going north at peak AM) / Hazlemere or Penn Street,
- London Rd east / A40 to Beaconsfield / north up A355 to Amersham, etc,

rather than:

- Cock Lane (557 v/hr heading north, at / near capacity) / P&TG M. School / Hazlemere or Penn St.,

and that any rational motorist will take whatever route works best for them, which for most of them will not be Cock Lane.

Gerry King, Member of P&TG Residents Society and of the Ashwells Forum.

19 July 2018