

Wycombe Delivery and Site Allocations Plan

Suggested amendments on behalf of Sainsbury's Supermarkets Limited as an alternative to finding the plan unsound

Following the appearance by Sainsbury's representatives on 19th December the Inspector asked whether the position highlighted by Sainsbury's in Issue 2 of the Statement of Common Ground paragraphs 4.30 onwards could be resolved by changes to the plan policies.

Sainsbury's representatives responded that no text had been put forward because the issues were sufficient to render the plan unsound. However if the inspector is minded to approval the DSA Plan we would request that additional text is incorporated in the Plan to assist in offering some comfort to stakeholders that the Council's vision for the town, to be a place where people choose to live, work and visit, could be delivered.

Whilst BCC representatives indicate that they do not believe any such compromise is required, WDC stated that if text were accepted this should be as part of policy HWTC3 rather than HWTC1 as originally suggested by Sainsbury's representatives. If we are to add to HWTC3 then the following text could be inserted as a new Item 1 (noting that the references to Part 1 and 2 in the existing part 3 will need to change).

Policy HWTC3

New item 1: A Town Centre Transport Strategy is to be developed in collaboration with BCC and in consultation with relevant stakeholders in advance of the detailed design and commencement of the town centre highway network revisions detailed in Policy HWTC3 and Appendix B. The Town Centre Transport Strategy will build upon existing initiatives for the Southern Quadrant Strategy and the Wycombe Local Area plan and demonstrate how the predicted traffic queues on the approaches to the town will be reduced to acceptable levels prioritising sustainable modes of travel and achieving a demonstrable shift in the mode of travel to the town centre. The Strategy is to include consideration of traffic flows associated with the town centre development identified in the DSA. The Proposed town centre highway works shall be undertaken in accordance with the Strategy.

Existing item 3 would change to 4: within part a) change reference in third line from 'Part (1)' to 'Parts (1) and (2)', and in b) amend 'Part (2)' to 'Part (3)'.

Justification on Behalf of Sainsbury's Supermarkets:

The Southern Quadrant Strategy sets out the proposals for access to and from the new coachway and for additional buses to run along Marlow Hill. However there are no proposals for bus lanes or bus only routes between the coachway and the town centre, so buses would add to the predicted 600 vehicles queuing on Marlow Hill. The new bus routes will only become attractive if bus passengers can bypass the traffic queues and get into the town centre quickly, which requires bus lanes or traffic free bus links. Cycle, walking and rail improvements may assist, but given the catchment for High

Wycombe for employment purposes, intercepting vehicle trips (targeting single occupant commuters and comparison shoppers) using a quality park and ride will be important.

The new proposed coachway and park and ride has a capacity of 388 vehicles (taken from WDC committee report into the coachway proposals on the Wycombe Sports Centre site). The existing queue on Marlow Hill is some 250-300m in length (some 100 vehicles) which will increase in the masterplan scenario to some 600 vehicles. If there were to be a mode shift sufficient to bring queues down to existing levels the park and ride would need to have a capacity of at least 500 vehicles in the design year to deal with the evening peak demand alone, and further spaces to deal with additional demands in other peak hours as well. A thorough study of the benefits of park and ride and any other initiatives required to deliver an acceptable access solution would be required.

Whilst BCC and their consultant refer to the minimal difference between Do Minimum and the Masterplan scenario, this is unsurprising given there is the same traffic in both scenarios. However if Sainsbury's are being asked to support specific Site Allocations then they need to be satisfied that there is a clear linkage between the allocation of those sites and their ability to be delivered and generate/attract trips and a credible transport strategy. Mr Callaghan referred to work on the Southern Transport Strategy, but stated that the modelling results presented do not rely on unrealistic or heroic assumptions about mode of travel, he stated that people will do almost anything to use the car before resorting to other modes, which is why Sainsbury's want to see a credible transport strategy for the town centre approaches. We agree with Mr Callaghan that there is no point having an attractive town centre if people cannot get there.

We trust that the above will assist in reaching a compromise solution.

Wycombe District Council Response

This response has been prepared in conjunction with Buckinghamshire County Council, in their role as Highway Authority.

It is the Councils' position that the proposed amendment suggested by Sainsbury's will not contribute to making the Delivery and Site Allocations Plan more effective or justified and ultimately sound. The Councils' believe that the proposed changes to the highway network and the policies within the DSA Plan which promote these changes (in particular policy HWTC3) are justified, being the most appropriate strategy, when considered against reasonable alternatives and based on proportionate evidence.¹

As has been demonstrated through the evidence base supporting the proposals, the road network changes being proposed in the DSA support the delivery of the town centre objectives and benefits, whilst maintaining an acceptable level of traffic performance that is similar to the performance of the existing highway network in a 2026 scenario without the network changes. Therefore the actual or perceived traffic issues within the town are not created by the proposals contained within the DSA Plan and it is not the objective or stated purpose of the DSA to address all of these. In particular, much was made by Sainsbury's consultants at the examination regarding the queues on Marlow Hill. Section 5.4.5 of CD3.10.19 sets out that in both AM and PM peak periods, the masterplan scenario meets the indicator set to measure the performance of Marlow Hill. It can be seen that in a Do Minimum scenario (no highway changes) the queues on Marlow Hill are longer. It should also be noted that at no point during the preparation of the Plan or during the examination did Sainsbury's challenge the appropriateness of this indicator as a way to measure the performance of Marlow Hill.

Policy HWTC3 recognises the importance of "effective traffic management so as to maintain accessibility to the town centre" (Clause 1. ii). Under its network management duties the Highway Authority will be monitoring the operation and performance of the town centre network as the

¹ Para 182 of the NPPF

changes to the highway network are implemented and will only implement the changes if the network is operating satisfactorily at that time. This is recognised in paragraphs 3.29 and 3.33 (supporting text to Policy HWTC3) which state that “It is also important that the implementation of these changes is managed in a sensitive and pragmatic manner to ensure they do not negatively impact on accessibility to, and operation of, the town centre network....Throughout the lifetime of the plan the Council will work with the Highways Authority to monitor the operation and performance of the town centre network as the changes are implemented.”

As set out in Chapter 5 of CD2.2 a series of network indicators have been developed to monitor the network over the lifetime of the plan and as parts of the masterplan proposals are implemented. This assessment will also allow for a review of phasing and implementation of the overall masterplan proposals, including looking at the timing of implementing certain stages of the proposals, with the potential to slow the pace of implementation if the network is not operating satisfactorily. The outcomes of the monitoring of the network will be shared with stakeholders as appropriate and changes to the highway network will be subject to the relevant legal processes, such as Traffic Regulation Orders and planning application for the construction of new links, within which there are statutory requirements for consultation with stakeholders. Therefore the introduction of a requirement for the development of a transport strategy is considered unnecessary and does not increase the effectiveness or justification of the Plan, as there is already the recognition within the plan that network changes will not be introduced if the network is operating unsatisfactorily at the time of implementation.

The Highway Authority is responsible under the Traffic Management Act 2004 to tackle congestion and disruption on the local road network. The Local Transport Plan (CD3.2.13) and supporting Local Area Strategies (CD3.2.13a) set out the highway authority's policies, strategies and the way they will prioritise improvements over the coming years to address transport related challenges and issues, including those applicable to High Wycombe town centre. Therefore a further requirement in the DSA Plan for the development of a town centre strategy is not required as this is addressed through existing strategy work. Future traffic levels in High Wycombe and the surrounding area will be influenced by the natural background growth of traffic and growth related to new development within the town and beyond. Work on the new Local Plan and related transport assessment work will work to address the impacts of traffic associated with new development.

In conclusion, it is the Councils' position that the evidence base presented in support of the town centre proposals is comprehensive and justifies the revised highway network and that the policies within the DSA Plan are sound and have been prepared in accordance with the NPPF. The Councils' do not feel that it is necessary to introduce additional requirements within Policy HWTC3 which are already adequately addressed within the DSA Plan and supporting evidence base and existing transport strategy work. It would unnecessarily delay implementation of the proposals which are needed to support the future health of the town centre, and thereby detract from delivery of the Plan.
