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Mr P Crysell  
C/O Lynette Duncan (Programme Officer)  
AJD Associates  
20 Anerley Close  
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Kent  
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Dear Mr Crysell

**WYCOMBE DELIVERY AND SITE ALLOCATIONS PLAN - EXAMINATION  
MATTER 6 - HIGH WYCOMBE TOWN CENTRE, ISSUE 5  
SAINSBURY'S SUPERMARKETS LTD (023)**

On behalf of Sainsbury's Supermarkets Ltd (SSL) and in accordance with the examination timetable we write to outline further representations in response to the identified Examination matters and issues. These comments should be read in conjunction with representations submitted in July 2012 (Reference DSA/2/023) and October 2011.

Following the submission of representations in July 2012 SSL has continued discussions with Wycombe District Council (WDC) in order to reach agreement where possible on issues raised in our representations of July 2012. A Statement of Common Ground between SSL and WDC is being prepared which refines and narrows the areas of dispute and will be submitted in due course once finalised.

Whilst a number of concerns have now been overcome as a result of additional discussions, we outline below the areas for which there remains concern for SSL all of which relate to Matter 6 Issue 5 of the Matters for Examination (12<sup>th</sup> November 2012). For consistency we have sought to retain the themes identified in our representations of July 2012 and the comments are reflective of our current position in the draft Statement of Common Ground.

**Reduction of passing trade to Sainsbury's town centre store**

The Evidence Base does not demonstrate that the form of junction proposed in the Plan can satisfactorily accommodate the traffic accessing the Sainsbury's and Dovecot car parks, providing a total of 1100 car parking spaces. Revisions to Appendix B of the plan are therefore proposed.

**Change in priority traffic accessing and egressing the Dovecot (Sainsbury's) car park**

The Evidence Base does not include a realistic estimation of traffic flows on Abbey Way or the Alternative Route and consequently does not demonstrate that the proposed junction forms on these routes can satisfactorily accommodate those flows. Revisions to Appendix B of the plan are therefore proposed.

**Satisfactory rerouting of A40 is unachievable**

The evidence base does not address the true performance of the Do Minimum scenario in a true planning sense; that is the conditions which would prevail if the Masterplan were not brought forwards; traffic flows are overestimated by some 1,100 trips on the network. Equally, the Evidence Base does not address the true performance of the Masterplan scenario; that is the conditions which would prevail if the Masterplan were brought forwards; traffic flows are overestimated by some 400 trips on the network.

On this basis, the Impact of the Town Centre Masterplan Development over prevailing conditions has not been assessed. The conclusions which have been drawn CD3.10.19 do not relate to the actual performance of the true Masterplan Scenario relative to the true Do Minimum Scenario. Rather those conclusions relate to an academic scenario to determine if the Masterplan Road Network has equivalent traffic capacity to the Do Minimum Road Network. It does not consider the impact of the Town Centre Masterplan Development.

The evidence base, therefore, does not assess the significant impacts of the development, and does not demonstrate that improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. The scale of the residual cumulative impacts of development cannot be determined from the evidence base, but is far greater than promoted by the Council. It is therefore our view that the Plan is unsound.

**Conclusions**

For the reasons outlined above, we maintain that the draft Wycombe Delivery and Site Allocations DPD is unjustified as a result of the preparation of the document and lack of robust evidence base. It is, therefore, considered the Wycombe Delivery and Site Allocations DPD is unsound. We wish to discuss this matter in further detail at the examination on 19<sup>th</sup> December 2012.

On behalf of SSL we will continue to finalise the Statement of Common Ground alongside WDC and provide a copy when available. Should you have any questions in the meantime please do not hesitate to contact me or my colleague Gemma Brickwood.

Yours sincerely

A handwritten signature in blue ink that reads "Turley Associates". The signature is written in a cursive, flowing style.

**Nick Jenkins**  
**Associate Director**

Cc Sarah Morgan – Wycombe District Council