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Dear Mr Motuel,

#### **SOUTH BUCKS PROPOSED SUBMISSION CORE STRATEGY**

1. Thank you for inviting the Highways Agency (HA) to comment on the South Bucks Proposed Submission Core Strategy, received 1<sup>st</sup> April 2010.

2. As stated in previous correspondence, the HA has a duty to safeguard the operation of Strategic (Trunk) Road Network (trunk SRN, to avoid any confusion with Bucks' SRN) as set out in the DfT circular 02/2007<sup>1</sup>. The HA looks to your Council's Local Development Framework (LDF) to promote strategies, policies and land allocations which will support alternatives to the private car, for the reasons set out in PPG13 and PPS1 which stresses the need for integrated planning and transport and 'reducing the need to travel, especially by car' thereby minimising congestion and infrastructure requirements<sup>2</sup>. The Proposed Submission Core Strategy has also been reviewed with regard to PPS12. Specifically we have assessed the soundness of the document in relation to paragraphs 4.36 to 4.38 and 4.44 and 4.47 of PPS12.

3. In the case of South Bucks, the trunk SRN potentially affected is the M25 (Junctions 15 to 18) M40 (Junctions 1 to 3), and M4 (Junctions 4B to 8/9) both the mainline and associated junctions. Much of the nearby M25, has long been congested during peak times. M25 J16-21 is currently being widened but parts of the M25 relevant to S Bucks, including most junctions, will probably experience congestion by 2026. The M40 mainline between Junctions 1 - 3 is currently operating without congestion, however is likely to suffer from some congestion by 2026. Junction 1 of the M40 is at capacity at present and could suffer from substantial congestion by 2026 (see below). Circular 02/2007<sup>3</sup> looks for appropriate

<sup>1</sup> DfT, Circular 02/2007: Planning and the Strategic Road Network

<sup>2</sup> DfT Circular 02/2007: Planning and the Strategic Road Network, 'the presumption should be to give preference, where possible, to solutions other than the provision of new road capacity'.

<sup>3</sup> DfT, Circular 02/2007: Planning and Strategic Road Network, Paragraph 33 "local authorities must submit plans for the implementation and maintenance of measures that will minimise the traffic generated by their development"

mitigation measures to be put in place to alleviate any material impact at the junctions.

4. This response also takes into account the "Evaluation of Transport Impacts" document (Atkins, dated January 2010 but received by us in March) and the more recent response to the Highways Agency (Atkins, April 2010). Correspondence is ongoing at the time of writing.

### **Evidence Base**

5. The HA have been working with South Bucks District Council to develop a robust and credible evidence base to assess the situation by 2026 on the trunk SRN and also local roads, particularly given 4.8 of PPS12. It is intended that this evidence would also be used to assess whether the proposals set out in Core Policy 6 are sufficient to minimise the impacts on the SRN, as required by DfT Circular 02/07 and to meet PPS12 4.8. The evidence provided to date (ETI dated January 2010) indicates that in 2026 there will be an unquantified but significant increase in congestion in the district and M40 J1 could be particularly affected. We regard the lack of quantification of congestion at M40 J1 a significant deficiency of the Evidence base, as the junction is important key point on A40, A412 and A412 connecting parts of S Bucks, as well as possibly causing safety problems on M40 due to queuing back. As some outstanding issues remain with regard to the modelling work by S Bucks it is not possible at present to determine whether J1 will be able to accommodate developments proposed within the Core Strategy. Nor is it possible to determine whether the transport mitigation measures proposed in Core Policy 7 will help to reduce any impact to an acceptable level.

6. para 3.2.49 does not accord with the information in the ETI. The ETI's discussion and conclusions seem not to consider the overall increase in congestion to 2026 and thus the problems development will face, but the only the increase due to some specific uncommitted developments. The correct comparison should be the 2009 figures in table 4.1 with the 2026 scenarios in table 5.5. This seems to show considerable increases in congestion in some places, bearing in mind that congestion increases rapidly once a road link goes over the 95+% level. Para 3.2.49 must be revised, which could lead to other changes in the Core Strategy.

On the basis that a completed Evidence Base has not been provided to date, the HA must submit a representation that the proposed Core Strategy is not sound as it is 'not founded on a robust and credible evidence base' and therefore is not 'justifiable'. It is therefore considered that, at present the DPD is unsound as required by paragraph 4.36 of PP12.

### **Mitigation- Local Infrastructure Needs, Policy 6**

7. A number of mitigation measures in regard to the local road network have been discussed to date. However, it should be noted (above) that the HA are currently in the process of working with South Bucks District Council and Atkins in order to establish the impact traffic in 2026 may have on the trunk SRN. It is intended that the

evidence base will also be used to assess whether the mitigation proposals are sufficient to minimise the impacts on the trunk SRN. At present it seems that a scheme at M40 J1 will be needed and this should be added to appendix 6. Notwithstanding a future more detailed DPD, appendix 6 should also include most or all the schemes identified in ETI table 5.4. As a result it is not possible to determine whether the transport mitigation measures proposed in Core Policies 6, 7 and 14 to 17 respectively will sufficiently reduce any traffic impacts on the trunk SRN, as outlined within DfT Circular 02/07.

8. Appendix 6 lists a project titled "M40/A404/M4 motorway box". I understand that some relevant signing has taken place on A404 but we are not aware of any specific commitment by HA to further work. Please therefore either delete this item or confirm the relevant agreement.

It is currently unclear whether the proposed Core Strategy development with mitigation is 'deliverable', without causing adverse impact on the safe and efficient running of the trunk SRN. It is therefore considered that the Core Strategy is not deliverable as required by paragraph 4.52 of PPS12 and is unsound.

#### **Infrastructure Delivery Schedule**

9. The HA notes that the Infrastructure Delivery Schedule (IDS) outlines a number of schemes that aim to relieve congestion in the area and gives indication of who will be responsible for its delivery and the phasing. However the IDS does not give an indication of the potential cost of such schemes and therefore the HA are unable to determine whether the funding for the proposed infrastructure is fully understood and therefore it is questionable whether it is 'deliverable'.

10. I hope this assists you in your development of the Core Strategy for South Bucks, helps its economy, and its compliance with PPS12. If you have any queries please do not hesitate to contact me or my consultant Leigh Shuttleton ([shuttletonl@pbworld.com](mailto:shuttletonl@pbworld.com)). The HA will look forward to working with South Bucks District further and Atkins to ensure a sound Core Strategy.

