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Little Chalfont Community Association  
c/o R A Funk

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By email only

Ref: P2125/L01/SG  
5<sup>th</sup> July 2019

Dear Mr. Funk,

### **POLICY SP BP6 – LITTLE CHALFONT EMERGING CHILTERN AND SOUTH BUCKS LOCAL PLAN**

Paul Mew Associates are development transport planning and traffic engineering consultants. We have experience in a wide range of applications for all major land uses in the UK. We have advised developers and local residents with regard to the transport and traffic implications of new developments at all stages of the planning process, from site allocation, planning application, appeals and implementation.

In line with your instruction, we are writing concerning the Emerging Chiltern and South Bucks Local Plan having specific regard to the allocation of land to the south east of Little Chalfont for residential led use (Policy SP BP6 of the Emerging Plan). We have reviewed the draft Local Plan and the supporting evidence available and would make the following observations/recommendations with regard to the transport implications of bringing this site forward for development.

#### **ACCESS**

The subject site is located between Burtons Lane and Lodge Lane. In considering the site for housing allocation, the possibility of providing two vehicular accesses to the site – one from Burtons Lane and one from Lodge Lane – was suggested. During previous consultations it has been made clear that a substantive access onto Lodge Lane would not be supported by the highway authority - *“Unlikely to be supported by the Highway Authority unless a suitable access can be achieved from Burton’s Lane, as there are likely to be issues with visibility onto Lodge Lane and the width of Lodge Lane itself. Will require Transport Assessment.”* (page 31 of the Post Preferred Green Belt Options Consultation November 2017).

This has led to the current scenario where only access to the employment land uses would be considered via Lodge Lane. The main access to the site would therefore need to be from Burtons Lane.

Burtons Lane is a narrow two-way single carriageway road operating with a speed limit of 30mph in the vicinity of the site. There is a broad verge and footway on the eastern side of Burtons Lane adjacent to the site. The site has a frontage onto Burtons Lane of approximately 200 metres in length. However, this frontage includes land known as “Pucks Paigles”, which includes mature woodland, owned by a party who does not support the allocation of this site. The actual frontage which would be available for an access is considered to be closer to 100 metres in length. It should be noted that Burton’s Lane dips along this stretch which has implications on visibility along the highway for traffic exiting and entering the site.

A simple priority access would require a minimum sightline provision of 2.4 m X 43m in both directions. No evidence has been presented in the current version of the Plan to indicate that this is achievable within land that can be delivered.

In order to serve 700 units via a single point of access, a right turn lane would normally be required to ensure that turning traffic does not block ahead traffic on the highway. This would require significant widening of Burton’s Lane and loss of the verge, impacting severely on the rural nature of the road.

The Infrastructure Delivery Plan June 2019 suggests a new mini-roundabout at access for site BP SP6 (page 48 of Appendix 1). This would support the conclusion that there were concerns regarding the feasibility of providing a priority junction in line with standards.

DfT guidance on mini-roundabouts, contained in DMRB Volume 6, Section 2 TD 54/07, states that mini-roundabouts must not be used at new junctions (paragraph 2.5 of Chapter 2) and as such it is not considered that a mini-roundabout can be implemented to provide access to the site.

No evidence has been presented that access to the site can be provided in accordance with highway standards. Given the clear issues regarding whether or not appropriate access can be provided to serve the site, it is considered reasonable to expect evidence to be presented to the Inspector to demonstrate that the site is actually deliverable.

It is generally considered good practice to allow a secondary access to development of this scale. The Policy does not include a requirement for this to be provided. Given the rural nature of Lodge Lane and the height restriction due to the railway bridge to the north, this cannot be considered an appropriate alternative emergency access to the site.

## **HIGHWAY IMPACT**

The site is currently being considered for development of approximately 700 dwellings. The transport modelling undertaken by Jacobs provides residential trip rates derived from TRICS. Applying the trip rates used by Jacobs to the development of 700 units on the site results in the following peak hour vehicular trips.

	Predicted Trips (Trip Rate)	
	In	Out
AM Peak (0800 – 0900)	113 (0.161)	316 (0.389)
PM Peak (1700 – 1800)	367 (0.361)	218 (0.204)

It can be seen from the above that development on the site would be expected to result in a significant rise in traffic flows on Burtons Lane with the majority of this traffic utilising the A404 / Burtons Lane junction to the north.

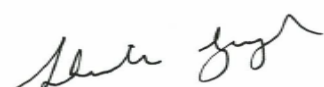
In the current situation, the junction of Burtons Lane with Chalfont Station Road operates as a priority T-junction. There are existing “Keep Clear” markings on the junction to facilitate vehicles turning into and out of Burtons Lane. The presence of these markings indicates that there is an existing issue with vehicles queuing back from the Cokes Lane mini-roundabout to the west blocking Burtons Lane. This is supported by local observations which confirm that these junctions become congested during peak periods.

It is noted that the draft Policy SP BP6 includes reference to “improvements to the A404 / Burtons Lane junction” however no layout showing improvements has been provided and it is therefore not possible to conclude that sufficient improvements could be achieved to allow the already congested junction to operate within capacity. In the Transport Topic Paper June 2019, the introduction of a mini-roundabout at this location, is described as a necessary congestion improvement scheme (page 34, Appendix I). The modelling results included in the study show that the junction of Burtons Lane/A404 would continue to experience congestion even with these mitigation measures in place.

The introduction of a mini-roundabout at the A404/Burtons Lane junction will not alleviate the existing problem of queuing back from the adjacent junction. Rather, the addition of such significant levels of traffic arising from development of the site is likely to exacerbate congestion on a network which is already over capacity.

We trust the above is informative and would suggest that the site identified in Policy SP BP6 should not be considered for intensive development at this scale without further supporting evidence being produced to demonstrate that it is deliverable.

Yours sincerely,



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