

Our ref:
Your ref: Budbrooke Neighbourhood Plan
November 2017

Dave Butler
Business Manager
Policy & Development
Warwick District Council
Via Email: newlocalplan@warwickdc.gov.uk

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20 December 2017

Dear Dave,

BUDBROOKE NEIGHBOURHOOD PLAN TO 2029

Thank you for forwarding me the submission version of the Budbrooke Neighbourhood Plan dated November 2017.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). This network is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

The Budbrooke Designated Neighbourhood Area is bounded by the M40 Motorway to the south at Junction 15 and the A46 Trunk Road to the north. We welcome the opportunity to comment on the Budbrooke Neighbourhood Plan and have reviewed the application material in the context of the SRN.

We have considered the consultation documents and make the following comments:

General Comments

The Budbrooke Neighbourhood Plan recognises the need to conform to the policies and allocations as set out within the recently adopted Warwick District Council Local Plan (WDLP policies DS10 and DS11). This is welcomed. However, we would like to reiterate our comments made during the WDLP process, given that the housing and employment allocations identified within the Local Plan and in the Budbrooke Neighbourhood Area could result in a material traffic impact on the SRN. It is noted

that this has been satisfactorily assessed within the Strategic Transport Assessment (STA) produced by Warwickshire County Council in support of the WDLP and has been reviewed and commented upon by us in previous correspondence. As you will recall we were content with the policy choices made by WDC in terms of the WDLP.

Notwithstanding these comments, it will be necessary for any planning applications for identified sites to be supported by a Transport Assessment. Highways England will provide comments on the application to the Planning Authority at the appropriate time. Furthermore, we welcome the opportunity to be involved in scoping the Transport Assessment methodology for these applications, and later review of the assessments, to ensure the traffic impact on the SRN is robustly assessed and mitigated as appropriate.

We welcome that the Neighbourhood Plan recognises the importance of the A46 and the M40 as key roads and which now recognises current congestion at adjacent A46 junctions. Furthermore, in the context of cumulative traffic impacts on the A46 and M40, the latest Neighbourhood Plan now takes account of proposed improvement schemes specified within the Infrastructure Delivery Plan that supports the adopted Local Plan.

Policy Specific Comments

Policy BNDP9 Traffic Management and Transport Improvements sets out the requirement that all new development will be expected to satisfy the following criteria, where possible:

(b) There will be no demonstrable adverse impact on the capacity and operation of the highway network that are not outweighed by other benefits of the development

It is recommended that this is reworded to meet with National Planning Policy Framework (NPPF) current guidance as per paragraph 32:

32. All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;

*- safe and suitable access to the site can be achieved for all people;
and*

*- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.
Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*

Policy BNDP10 sets out the intentions to promote sustainable transport measures which also broadly fall into line with the proposals of the WDLP. The sustainable transport ambitions set out are welcomed as they have the potential to reduce the need to travel by private car and associated vehicular movements on the SRN.

Policy BNDP4 'Community facilities and Community Infrastructure Levy' prioritises a pedestrian bridge across the A46. We are particularly interested in the implications of any active travel schemes which directly affect the SRN and further scheme details and locations along the A46 would be welcome if available. Schemes that will improve existing pedestrian crossings and improve the SRN for Non-Motorised Users at junctions are a priority for Highways England and we will be required to be involved in the consultation of such schemes. The promoter of each scheme will be required to wholly consider the implications on safety and operation of the SRN and directly liaise with the relevant Asset Manager through the current Asset Support Contract.

In summary, we broadly support the policies contained within the Budbrooke Neighbourhood Plan, but would reiterate the importance of Highways England being consulted where there are likely to be implications on the operation of the SRN.

Please do not hesitate to contact me if you require any more information or clarification.

Yours sincerely



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