



## National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: Regional Director South East  
Operations Directorate  
South East Region  
National Highways  
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To: Buckinghamshire Council (FAO Ms E Crotty)  
[planning.csb@buckinghamshire.gov.uk](mailto:planning.csb@buckinghamshire.gov.uk)

CC: [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk)  
[spatialplanning@nationalhighways.co.uk](mailto:spatialplanning@nationalhighways.co.uk)

**Council's Reference:** 22/06443/FULEA

**Location:** Land Adjacent South Side Marlow Road And A404 Junction, Westthorpe Park, Little Marlow, Buckinghamshire

**Proposal:** Full planning permission for production space and supporting buildings for screen-based media and associated services/industries. The development of approximately 168,718 sqm GEA total floorspace comprising: sound stages, workshops, office accommodation, studio hub associated outdoor space such as backlots and unit bases; entrance structures and reception; security infrastructure, mobility hub; cafes; parking; bridge; incidental supporting buildings; associated infrastructure; public art; upgraded vehicular access onto Marlow Road; new cycle and pedestrian accesses; a new cultural/educational/recreational building; a new community building and associated landscaping, publicly accessible recreational land and ecological and environmental enhancements/habitat creation.

**National Highways Ref: NH/23/0023 (Previous Ref: 95357)**

Referring to the consultation on a planning application dated 23<sup>rd</sup> June 2022 referenced above, in the vicinity of the A404 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

~~a) offer no objection (see reasons at Annex A);~~

~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~

**c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**

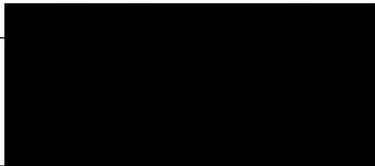
~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.<sup>1</sup>

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk) and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to [PlanningSE@nationalhighways.co.uk](mailto:PlanningSE@nationalhighways.co.uk).

<b>Signature:</b> 	<b>Date:</b> 06/04/2023
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<sup>1</sup> Where relevant, further information will be provided within Annex A.

## **Annex A National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a 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). The SRN 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.

In the case of this development proposal, our interest is in the A404, specifically the Westhorpe Interchange (A4155/ A404) and the M40.

We were first consulted on an EIA Scoping Opinion on 5th August 2021 regarding Land To The East Of A404 And West of Westhorpe Farm Lane Marlow Buckinghamshire to which we responded on 12th August 2021, stating that:

“We do not offer a view of if an EIA is required or not as this is for the Local Planning Authority to determine. However, we look forward to working with the applicant and Buckinghamshire Council to develop the scope for the subsequent Transport assessment (TA) and we would expect the TA to assess any potential impacts to the A404 and M40, particularly M40 Jct 4 and A404 Little Marlow Rd Interchange. Due to the above we would strongly recommend early engagement with the applicant prior to the submission of any future formal application.”

Since this response we were not consulted again until the full application consultation was received, nor were we involved in developing the scope of the Transport Assessment.

Having reviewed the application materials available on the Buckinghamshire Council planning portal, we have concerns regarding the Transport Assessment methodology and expected impact of the proposed development on the SRN, which we set out in our previous NHPR Holding responses dated 13th July 2022, 7th September 2022, 1st November 2022 and 21 December 2022.

In the first instance, we requested for the model files used to model the Westhorpe Interchange (A4155/ A404) to be provided. This will be followed by further information requests once a detailed review has taken place.

We have been in contact with the transport consultant who undertook the Transport Assessment and have attended meetings on the 29th July 2022, 18th August 2022, 22nd September 2022, 12th October 2022 and 20th December 2022, where the applicant presented the VISSIM model forecast runs which have been prepared to consider development impacts on the proposed site access, local highway network and the SRN. However, the applicant flagged that they have raised a number of clarifications regarding the outputs and consequently we await a further update in due course with refined modelling outputs. It was then understood that further

iterations of the site access junction are being designed informed by results of LinSig capacity assessments. Following receipt of this information the impacts will be assessed and any further information requests will be identified.

The meetings also covered potential use of the Volvo pedestrian footbridge, during which we provided operational feedback regarding restricted use.

The meeting scheduled with the applicant for February 2023 to discuss assessments/modelling of the site access was postponed until later date. We further received an e-mail dated 29 March from the Waterman Group consultants advising that a remodelling exercise was being undertaken with respect to the Westhorpe Junction, incorporating our proposed Site Access Roundabout on the A4155 and that a new set of traffic data was collected and a recalibrated / validated baseline VISSIM model and option testing was being developed. The scope of surveys and modelling timescales were being discussed and reviewed by Buckinghamshire Council (BC) and the meeting with NH and BC is to be arranged (by the applicant) once the outcomes are known. The amendments, as per formal consultation dated 10 March 2023, seek to change the previously proposed signalised junction to a four-arm roundabout. Located on Marlow Road, this proposed access lies approximately 300 metres to the east of the Westhorpe Interchange. Two options are proposed for pedestrian crossing facilities across the A4155 Marlow Road. In order to fully assess the impacts we require modelling of the access junction, crossing proposals and the applicant must provide a Stage 1/2 Road Safety Audit. It is noted that National Highways have been informed by the Applicant's transport consultant (Waterman Group), that modelling outputs for these elements will be shared once available.

### **Recommendation:**

National Highways recommends that the Local Planning authority does not grant planning permission for the application (Ref: 22/06443/FULEA) for a period of 56 days (until 31 May 2023).

Reason: To allow National Highways to understand the impact of the development on the safe and efficient operation of the Strategic Road Network and provide the Local Planning Authority with fully informed advice.

### **Standing advice to the local planning authority**

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.