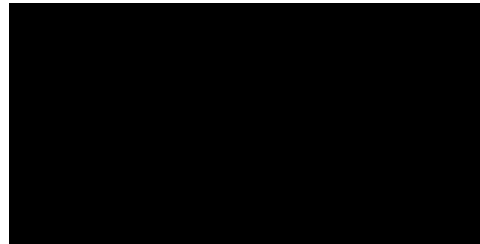


Our ref:  
Your ref:

Mark Norman

Brentwood Town Council  
Town Hall  
Ingrave Road,  
Brentwood,  
CM15 8AY



22 March 2016

Dear Sir

### **Brentwood Borough Council: Draft Local Plan Consultation**

1. Thank you for your email dated 10 February 2016 inviting comments on the Brentwood Draft Local Plan (LP) Consultation.
2. Highways England are responsible for the operation, maintenance and improvement of the Strategic Road Network in England on behalf of the Secretary of State. In the local area Highways England has responsibility for the M25 and A12.
3. We are a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents.
4. Highways England is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the Strategic Road Network (SRN) and associated junctions. We cannot be expected to cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour.
5. We wish to draw your attention to Highways England's document '*The Strategic Road Network, Planning for the Future: A guide to working with Highways England on planning matters*' (September 2015). This document sets out how Highways England intends to work with local planning authorities and developers to support the preparation of sound documents which enable the delivery of sustainable development. The document indicates that Highways England will review and provide comments on any amendments to local plans proposed by local planning authorities that have the potential to affect any part of the SRN.

6. We do not consider it appropriate to state our support or objection to particular proposals, therefore instead my letter clarifies our views on a number of aspects of the Local Plan primarily focused on the potential impacts of all sites on the Strategic Road Network and highlights junctions which may experience significant increases in traffic. This letter will also consider the evidence base used to understand the impact of development and the potential funding of any infrastructure schemes that are required.
7. We acknowledge that Brentwood Borough Council has established a target of delivering 7,240 homes in the period from 2013 to 2033. Of these we understand that 1,127 dwellings have been completed or permitted to date, while the remaining 6,113 have been allocated to sites across the Borough.
8. Policy 5.3 of the Draft Local Plan indicates that the LP will provide an additional 5,000 jobs across the Borough, at the average rate of 250 jobs per year. It is noted that there is some inconsistency between the proposed number of additional dwellings and the proposed number of additional jobs during the LP period. This could result in an increase in the amount of out-commuting by those people who live in the Borough but work elsewhere.
9. It is considered that the provision of a number of strategic residential and employment locations in or close to the town centre could help to encourage sustainable travel and reduce the pressure on the highway network, which is welcomed. In particular, development located in close proximity to Brentwood Rail Station is welcomed as it could encourage long distance trips to shift away from private car use. The A12 highway corridor also runs alongside the railway corridor and therefore the railway provision could help reduce the reliance of new residents and employees on private vehicle use.
10. However, it is also noted that some development sites are located in close proximity to the M25 and A12 corridors and therefore consider that these could potentially have a notable impact on the number of trips at the junctions.
11. I consider that the proposed development locations could have a notable impact on the SRN, particularly on M25 Junction 28 and Junction 29, as well as A12 Junction 12. The flow diagrams provided within the LP appendices demonstrate that approximately 500 and 1,200 additional vehicles per hour could route via Junction 28 and 29 respectively as a result of LP development. Furthermore, there is predicted to be a material impact at A12 Junction 12, although the flow diagrams were not clear enough to calculate an accurate total.
12. As some notable development is located in close proximity to the A12, we would like Brentwood Borough Council to be mindful of the Road Investment Strategy (RIS) proposals announced and the potential for the widening of the A12, as well as strategic re-routing that could potentially occur as a result of large schemes in the RIS such as the Lower Thames Crossing, which was recently out to consultation. Additionally cross-border impacts will need to be considered from adjacent local authorities' local plans, including how these impacts will be mitigated. I would also draw your attention to the potential for noise and air quality problems and recommend suitable consideration is given to ensure new occupants are not adversely affected.

13. A key employment development site is Brentwood Enterprise Park, which is located to the east of M25 Junction 29. We consider that this could have a significant effect on the operation of the junction, due to the size of the development and its proximity to the junction. The LP indicates that public transport will be encouraged at the site to encourage employees to make use of alternatives to private car use. However, the extent of the public transport provision, access by cyclists and pedestrians is unclear at this stage. It is important that this provision is extensive and covers long distance as well as short distance trips, to try and minimise the impact of the development on the SRN. The access and egress arrangements to this site are also potentially challenging and it is recommended that the proposals for these are discussed with Highways England to provide reassurance that safe and acceptable operation can be achieved at an early stage.
14. It is important that all out of town sites are well connected to the public transport network, both in terms of bus provision and access to nearby rail stations to ensure longer distance strategic trips have an alternative to private vehicle use. Whilst this approach is supported through Policy 8.3, the LP does not provide specific public transport details and therefore the extent of the intended public transport provision is unknown.
15. Whilst specific details of the potential public transport provision at individual sites or locations are limited, there is discussion of a proposed Green Travel Route. This route is intended to provide better Borough links for strategic development allocations outside the Brentwood urban area, which is welcomed as the existing public transport provision to these locations is likely to currently be limited. Without a step change in provision these strategic development locations could result in a significant increase in vehicles on the highway network.
16. Whilst we support a public transport strategy for the strategic development sites, it is unclear what the exact provision may be. It is recommended that further details regarding the specific public transport provision is outlined within the LP and how BBC consider this could affect mode share for residents and employees at the development sites.
17. We acknowledge that Crossrail could have an impact on the mode share of residents and employees within Brentwood and that the scheme may encourage a greater rail mode share, which could reduce the reliance on private vehicle use. It should be noted that the Council will consider the scope for 'park and walk' schemes. Depending where the 'park and walk' sites are located, this could result in an increase in vehicle trips in certain sections of the highway network. It is important that any implications for the SRN are fully considered by Brentwood Borough Council.
18. Whilst we broadly agree with the approach to funding transport infrastructure outlined within the LP, through the pooling of contributions secured through Planning Obligations and, once adopted, the Council's Community Infrastructure Levy Charging Schedule (CIL), further details of the specific infrastructure schemes that may be required to support development across the Borough are not provided within the LP at this stage. Furthermore, an Infrastructure Delivery Plan (IDP) has not been prepared to accompany the LP and without this I can see the plan being challenged.

19. We understand that modelling is currently being undertaken to determine what the impact of development could be on the highway network and therefore what measures may be required to mitigate these impacts. It is therefore unclear at this stage whether it will be possible to sufficiently mitigate the impact of the allocated development locations or whether the impact will be too great to feasibly ensure that the network operates within capacity at the end of the plan period. Further discussion of this will take place in the Evidence Base section below.
20. The LP does not provide any details of infrastructure funding, which may be unknown at this stage if the specific infrastructure schemes that are required have not yet been identified. It is important that once the schemes are identified that the funding method for each is outlined, including any Central Government or Local Government funding that is available, the amount that could be collected from developers and any shortfall that could occur. It is recommended that an IDP is prepared to provide further details regarding the infrastructure provision and funding.

### **Evidence Base**

21. PBA, on behalf of Brentwood Borough Council, have prepared an evidence base to support the development proposals within the LP. The intention of this modelling is to determine how many additional vehicles will be generated on the network as a result of the LP and where improvements may be required to ensure the network continues to operate effectively throughout the plan period.
22. Aecom on behalf of Highways England have prepared a separate technical note detailing a review of this section of the evidence base, however a short summary of the review is outlined below.
23. We consider that the trip generation and distribution assumed by PBA is broadly reasonable. Some concerns have been raised regarding the assignment of trips across the network, primarily the decision to assign all trips between two zones to the same route, whereas in reality we consider that a number of different routes may be used, particularly if routes become congested and users change to an alternative route to avoid the congestion.
24. However, we consider that the current methodology could result in a robust impact on the SRN and therefore may be reasonable to take forward. If, however, the local highway authority plans to deter drivers from making use of certain routes or congestion hotspots cause a significant change in route choice, the total development trips on the strategic road network could alter from that presented within the Highway Modelling Report. The assessment undertaken suggests very high impacts to the SRN.
25. Junction capacity assessments of the SRN have not been presented within the Modelling Report, despite experiencing significant increases in trips at the junction as a result of development. It is recommended these are undertaken to determine the predicted operation of the junctions following LP development and to determine what measures may be required to mitigate the impact. Consideration may also need to be given to undertaking

merge/diverge assessments at various locations to determine whether changes are required to support the LP development.

26. We welcome the opportunity to respond to the Brentwood Draft Local Plan Consultation and look forward to continuing to participate in future consultations and discussions.
27. In the meantime, if you have any questions with regards to the comments made in this letter, please do not hesitate to contact me.

Yours sincerely

