



LAND AT WEST HORNDON, BRENTWOOD

Draft Local Plan Representations

Report No. 13-158-15

March 2016

LAND AT WEST HORNDON, BRENTWOOD

Draft Local Plan Representations

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1.0 INTRODUCTION

Background

1.1 Odyssey Markides (OM) has been appointed by Countryside to provide transport advice relating to a site at West Horndon in Essex. The site is located within the Borough of Brentwood, adjacent to Basildon Borough.

1.2 Brentwood Borough Council (BrBC) are currently in the process of preparing their Local Plan, and have recently published an initial draft Local Plan (LP) document. The consultation period opened on 10 February 2016 and will close on 23 March 2016.

1.3 Simultaneously, Basildon Borough Council (BaBC) have also published an initial draft of their LP. The BaBC consultation period will close on 24 March 2016.

1.4 The purpose of this report is to represent the views of Countryside on the suitability of the site to be included in the BrBC LP with regards to transport.

Approach

1.5 **Section 2.0** of this report summarises the approach and contents as well as evidence for the BrBC LP document, setting out the relevant policies. It further sets out OM's/ Countryside's view of the proposed policies and strategic site allocations.

1.6 **Section 4.0** contains a summary and conclusions.

2.0 BRENTWOOD BOROUGH COUNCIL INITIAL DRAFT LOCAL PLAN

Introduction

2.1 Following BrBC's consultation on their Strategic Growth Options in January and February 2015, during which OM also represented Countryside's view, BrBC have now published the initial LP document along with its evidence base to date. The consultation period runs from 10 February 2016 to 23 March 2016.

2.2 For the purpose of the Strategic Growth Options Consultation in 2015, BrBC had divided the borough into three areas. These were:

- North of the Borough
- A12 Corridor
- A127 Corridor

2.3 At that time, in 2015, four strategic growth options were considered, along with a fifth option for a number of smaller sites. The strategic sites were:

- Option 1: Dunton (west of Laindon)
- Option 2: West Horndon
- Option 3: South-east of Brentwood / Shenfield
- Option 4: Pilgrims Hatch

2.4 For the purpose of the most recent consultations, BrBC have decided to split the borough into four areas, which are:

- Rural North
- A12 Corridor
- Rural South
- A127 Corridor

2.5 The draft LP consulted on at the moment contains, at Policy 5.2, the housing growth, based on the Council's Strategic Housing Market Assessment (SHMA). This suggests that provision is to be made for 7,240 new residential

dwellings (net) during the plan period of 2013-2033, averaging 362 dwellings per year.

2.6 Some of this has already been completed or granted planning permission, and the proposed or anticipated breakdown set out in Policy 5.2 is summarised in **Table 2.1** of this report.

Table 2.1 – Housing Growth during plan period 2013-2033 (source: BrBC initial draft LP February 2016)

	Net Homes	%
Completion 2013/14 & 2014/15	383	4%
Extant permissions (April 2015)	444	6%
Permitted development (April 2015)	300	4%
Urban areas (brownfield)	1,296	18%
Brownfield Land in Green Belt	97	1%
Strategic Site	2,500	35%
Greenfield urban extensions in Green Belt	1,292	18%
Windfall allowance	928	14%
Total	7,240	100%

Sustainability Appraisal

2.7 The initial draft LP is supported by a Sustainability Appraisal (SA), also dated February 2016. This sets out at paragraph 6.3.9 the potential options for the strategic site allocation. For the purpose of the latest draft LP the council identified six options for strategic growth:

- Option 1: 1,420 homes at land to the north of Brentwood
- Option 2: 2,500 homes at Dunton Hills Garden Village
- Option 3: 2,500 homes through an extension of West Horndon
- Option 4: 2,500 homes at land to the East of Running Waters, Hutton
- Option 5: 3,200 homes at Dunton Hill Garden Village and land north of Brentwood
- Option 6: 3,200 homes through an extension of West Horndon and land north of Brentwood.

2.8 In Table 7.2 of the SA, a summary of the appraisal of each option against each of the topics that comprise the SA framework is set out. At the bottom of Table 7.2, the SA states :

The primary conclusion to draw from the table is that, in terms of the majority of objectives, a strategic allocation at one or either of the A127 locations (West Horndon or Dunton Hills Garden Village) is to be supported. 'Biodiversity' objectives are a notable exception, although the appraisal is fairly marginal, i.e. it is not clear that there are major constraints to growth south of the A127.

2.9 It is clear that, based on the SA, the preferred options for strategic housing sites are those along the A127 corridor, i.e. Dunton Hills Garden Village or West Horndon.

2.10 However, the topics against which the SA has been undertaken do not include transport by all modes. This is a major factor contributing to the sustainability of any development, and hence the SA is fundamentally flawed due to the lack of consideration for transport as a topic. The Transport topic should include the assessment of links to public transport and in particular local railway stations; it should further consider travel by all modes, including walking, cycling, public transport as well as vehicles.

Highway Modelling

2.11 In addition to and informing the SA, the draft LP is supported by other assessments; most relevant for the purpose of these representations is the Peter Brett Associates (PBA) report entitled Development Options – Highway Modelling, dated February 2016.

2.12 The PBA report was prepared only shortly before its publication and it acknowledges that it has not yet been fully reviewed by the highways authority, Essex County Council (ECC), and Highways England (HE).

2.13 The PBA report contains the highway assessments of a number of junctions within Brentwood Borough. Four development options have been modelled; these correspond to Options 1 to 4 of the SA, albeit in a different order.

2.14 In the PBA report, the Dunton Hills Garden Village strategic site is referred to as Option 1 whilst the West Horndon strategic site is referred to as Option 2.

2.15 The highway modelling has been undertaken on the basis of the estimated trip generation for each development option, in addition to the background traffic which is based on surveys carried out in 2012.

2.16 The trip generation of the potential residential and employment developments has been estimated from first principles; that is using population data in combination with the National Travel Survey (NTS) to calculate the number of person trips. These were distributed using a combination of Census data and a gravity model, and a likely mode share was applied.

2.17 The model covers Brentwood District and within this a number of junctions which have been assessed using industry standard software.

2.18 It is not clear from the PBA report on what basis the mode share was obtained, in particular for those journeys that are made by two modes, e.g. car and train. Furthermore it is not obvious if an allowance has been made for potential developments in neighbouring authorities, beyond a general growth factor.

2.19 In October 2014, Essex CC provided comments on the proposed methodology for the trip generation, and these comments, together with PBA's response are included in Appendix A of the latest modelling document.

2.20 It is not clear, however, if those comments have all been taken on board for the latest assessments. For example, ECC comments make reference to Section 2.3.3 "Identifying Residential Population Figures", and PBA have agreed to change the methodology. We cannot be certain from the documents submitted that these changes are reflected in the latest document.

2.21 *There are a number of other shortcomings within the PBA report which puts doubt on the validity of the contents. This includes a lack of transparency about the assumed access points to the strategic sites and the apparent use of a static assignment in the Omnitrans traffic model. Furthermore, the model omits local junctions which are located in Basildon, which will be significantly affected by the strategic sites.*

2.22 *Importantly, the junction assessment results presented in Tables 11-1 and 11-2 of the PBA report suggest that the difference in performance between the Dunton Hills Garden village and the West Horndon site is minimal, and yet in paragraph 11.2.3 the author concludes that “it appears that Option 1 and 4 have resulted in lower RFC / Degree of Saturation in general when compared to the other two options.”*

2.23 *We consider this conclusion to be both misleading and unfounded. The work as presented in the draft PBA report lacks depth and serious technical analysis. No real conclusions on the four options can be drawn from it. A more detailed critique of that work is attached as Appendix A but we suggest that more needs to be done in terms of highway modelling to determine the real impact of the four options on the local highway network.*

Initial Draft Local Plan document

Policy 5.1 Spatial strategy

2.24 *Policy 5.1 of the draft LP sets out the spatial strategy for the borough: “The Borough’s distinct local character will be protected and enhanced while we foster sustainable communities by focussing new development on land within the Borough’s Transport Corridors. ... All development sites will be identified having regard to whether they a. are accessible to public transport, services and facilities, b. will have no significant impact on the Green Belt, visual amenity, heritage, transport and environmental quality including landscape, wildlife, flood-risk, air and water pollution; and c. are likely to come forward over the Plan period.”*

2.25 *This is then followed by paragraph 5.20, which states “Within the A127 Corridor, a new strategic allocation at Dunton Hills Garden Village will provide a*

new mixed use self-sustaining community in the south-east of the Borough. ... Brownfield opportunities will be taken to effectively meet local needs, such as residential-led mixed-use redevelopment of existing industrial land in West Horndon, creating a new village centre with supporting services and facilities closer to the village rail station. ...Significant improvements to infrastructure will be required to support growth within the A127 Corridor.”

2.26 An attempt has been made in paragraphs 5.31 and 5.32 to justify BrBC’s decision to choose the Dunton Garden Hill Village over the West Horndon sites as the strategic housing site: *“Larger villages in the Borough are served by a local shopping parade and a primary school. They generally have limited community and health facilities, local jobs and a variable bus service. As well as these facilities, West Horndon has a rail station and a large brownfield redevelopment opportunity using the existing employment areas. Among the Borough’s villages it offers the most scope for development, although it will be important to retain the settlement as a village and not over-develop in order to be consistent with the proposed spatial strategy.”*

2.27 *Indeed, West Horndon is the only settlement within the A127 Corridor in Brentwood Borough which benefits from a rail station, making it the most sustainable location along the A127 Corridor within Brentwood. Borough.*

2.28 *On that basis and in light of Policy 5.1 we consider West Horndon as a location for strategic residential development particularly suited, due to the railway station. Given the location of the railway station in relation to the potential development sites, the vast majority of the West Horndon settlement, including the strategic site, will be within walking distance of the railway station and all of West Horndon will be within easy cycling distance.*

2.29 *The nearest railway station to Dunton Hills Garden Village location is also West Horndon, however it is not what is typically considered within easy walking distance. It is therefore likely that the majority of train users from the potential Dunton Hills Garden Village will choose to drive to a railway station, either West Horndon, Laindon or Basildon, putting additional pressure on the highway network and station car parks.*

2.30 Furthermore, it should be borne in mind that part of the potential strategic site allocation includes land to the south of the railway which would enable significant improvements to the station access, including access by bus, making a strategic allocation at West Horndon the most cost-effective and sustainable location.

2.31 The notion of locating new development near railway stations is also reflected in the proposed changes to NPPF. At paragraph 14 this states “There are significant benefits to encouraging development around new and existing commuter hubs - reducing travel distances by private transport, making effective use of private and public sector land in sustainable locations, and helping to secure the wider regeneration and growth of the local area. In this context, we are keen to support higher density housing development around commuter hubs to help meet a range of housing needs including those of young first-time buyers.”

2.32 The proposed changes to the NPPF document goes on to say at paragraph 15 “We are proposing a change to national planning policy that would expect local planning authorities, in both plan-making and in taking planning decisions, to require higher density development around commuter hubs wherever feasible.

2.33 The OM assessment further suggests that a strategic site allocation at West Horndon would increase the rail user demand at the station to a level which is commercially viable for the train operator. We therefore consider it appropriate to class West Horndon station as a potential commuter hub in line with the proposed changes to the NPPF.

Policy 6.1 Sustainable Development

2.34 The draft LP recognises the importance of sustainable development, and this is set out in Policy 6.1: “When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework...”

2.35 We agree with this policy, which confirms compliance with the principles set out in national policy.

Policy 6.3 General Development criteria and Policy 6.4 Effective Site Planning

2.36 Policy 6.3 then sets out general development criteria:

“Proposals for development will be expected to meet all of the following criteria:.

a. ...;

b. provide satisfactory means of access to the site for vehicles, cyclists and pedestrians and parking and servicing arrangements;

c. ensure the transport network can satisfactorily accommodate the travel demand generated and traffic generation would not give rise to adverse highway conditions or highway safety concerns or unacceptable loss of amenity by reason of number or size of vehicles; ...

2.37 This is then expanded on in Policy 6.4 : *“Development will be favourably considered where the planning and design of buildings and spaces: a. arrange access points, routes within the site ... in an efficient, safe, workable, spatially coherent and attractive manner; ...”*

2.38 The Dunton Hills Garden Village site is bordered by the A127 to the north, by the A128 to the west, by the railway line to the south and by fields to the east, which are located within Basildon Borough.

2.39 The fields to the east of the site are in part proposed for residential development in the Basildon Local Plan, however following the Dunton Garden Suburb consultation in early 2015 it is now unlikely that the whole of the Dunton site (Brentwood and Basildon Boroughs) can be delivered jointly by the two Borough Councils.

2.40 It is therefore important that the Dunton Hills Garden Village site is accessible on its own, without relying on the Basildon site to come forward at the same time.

2.41 Given the proposed quantum of development, 2,500 dwellings plus employment schools, retail and ancillary facilities, at least 3-4 access points will be required to serve the development safely. Although without detailed development proposals it is difficult to estimate the likely trip generation, we anticipate that the residential element alone would generate in the order of 1,500 vehicle movement in the peak hour. Trips generated by the employment element as well as schools and ancillary facilities would be additional to this.

2.42 Given the location of the site and the surrounding area, the only potential access options for the Dunton Hills Garden Village site within Brentwood are therefore off the A127 or off the A128.

2.43 The potential for a new access junction onto the A127 has been explored and it has been concluded that it is not possible to provide safe access to the Dunton Garden Suburb via a new grade separated junction onto the A127 due to junction spacing constraints.

2.44 Therefore the only access option within Brentwood is off the A128. The A128 is a single carriageway and is subject to a 50mph speed limit in the West Horndon and Dunton area. It mainly carries through traffic and provides access to the A127 to the north and the A13 to the south..

2.45 Whilst there appears to be potential for one or two accesses to be provided off the A128, it is unlikely that the required number of accesses (three or more) can be provided off this road.

2.46 Furthermore, the western part of the Dunton Hills Garden Village site is affected by flooding and parts of it are in Flood Zone 3. For this reason, the original Dunton Garden Suburb proposals contained the recreational areas (open spaces etc) within the western part whilst the residential areas and other facilities were located in the eastern part of the site. We anticipate

that this would again be the case for any Dunton Hills Garden Village proposals.

2.47 Providing an access road through flood zones 2 or 3 is costly both in terms of construction and maintenance, and hence it does not usually provide a viable access strategy.

2.48 Additionally, even if one or several access roads, were to be provided through the flood zone, these would most likely be long straight roads through recreational space, thereby impacting on users of the recreational space as well as wildlife. The roads would be conducive to speeding thereby not creating a safe means of access.

2.49 We therefore do not consider that a suitable and safe vehicular access strategy can be achieved with accesses from the A128 alone. If such an access could be engineered, we expect that it would be both costly and environmentally undesirable.

2.50 We now consider the possibility of an access to the east, in Basildon District. West Mayne for the majority of its length is a single carriageway road, providing access to the residential areas of Laindon, Langdon Hills and beyond. It therefore already serves a number of existing areas with several access junctions along it. These local access junctions and the areas they serves would all be impacted on by a new access to serve the Dunton Hills Garden Village.

2.51 To the north, West Mayne provides access to the Dunton roundabout. This junction is already at capacity and with the addition of 2,500 homes, and potential in excess of this if the Basildon site comes forward, both the Dunton roundabout and West Mayne itself will operate above capacity.

2.52 We therefore consider that the Dunton Hills Garden Village site cannot be accessed in a suitable and safe way and so the Dunton Hills Garden Village proposal is contrary to policies 6.3 and 6.4 of the draft LP.

Policy 6.5 Key Gateways

2.53 In Policy 6.5, the importance of Key Gateways into the Borough is highlighted; with regard to rail station the policy states: “*Locations around rail stations should contribute to these aims through the delivery of higher density development to meet local needs in central sustainable locations.*”

2.54 *West Horndon is clearly one of the Key gateways into the Borough, with the only railway station in Brentwood Borough along the London Fenchurch Street to Shoeburyness line.*

Policy 6.6 Strategic Sites

2.55 The proposed strategic site allocations are set out in Policy 6.6, including the strategic residential site at Dunton Hills Garden Village.

2.56 In paragraph 6.32, the reason for removing the West Horndon sites from the strategic area for growth is explained: “*West Horndon village has been removed as a strategic area for growth in order to protect its village character. Instead, redevelopment of the existing industrial estate (brownfield) alone will bring forward sustainable development near to the rail station with new homes and supporting facilities, creating a new village centre at the heart of the community while maintaining the village boundary. Redevelopment of the industrial estate sites is now covered in Policy 7.4, and is consistent with the spatial strategy.*”

2.57 *Given all of the above we consider the proposals for the strategic site at Dunton Hills Garden Village set out in policy 6.6 to be contrary to policies 5.1, 6.1, 6.3 and 6.4 of the draft LP, whilst the West Horndon strategic allocation sites are all compliant in these policies, as has been shown above.*

Policy 7.1 Dunton Hills Garden Village

2.58 In Policy 7.1, details of the Dunton Hills Garden Village are then set out, although this is followed by paragraph 7.10, which states that “*land around West Horndon village remains a reasonable alternative because it can provide for similar development numbers towards local needs. However, it has not been selected as a preferred site in this Draft Plan owing to the impacts on the existing village, which*

would not be consistent with the emerging spatial strategy. It has also been considered that proposed redevelopment within West Horndon village will bring forward significant residential development, altering the character of the village but utilising brownfield land. Further development of Green Belt surrounding West Horndon is deemed disproportionate when considering the size of the existing village and how this fits with the spatial strategy for our Borough of villages.”

2.59 Whilst it is acknowledged that West Horndon is a village and that a strategic allocation would result in a large increase in population, it is the only settlement in Brentwood Borough with a railway station along the Fenchurch Street to Shoeburyness railway line. Given the national policy (NPPF) which requires new development to be located in sustainable locations near transport hubs where possible, this is considered to override any potential spatial strategy referred to within the LP.

Policy 10.1 Sustainable Transport

2.60 In Chapter 10 of the draft LP policies regarding Quality of life and Community Infrastructure are set out. Specifically, Policy 10.1 sets out the proposed approach to sustainable transport. It states that “*where travel is necessary public transport (rail, bus, taxi), walking and cycling will be promoted as an alternative means of transport to the private car.*”

2.61 Whilst public transport, walking and cycling are all considered sustainable modes of travel, it is generally accepted that walking and cycling are those that generate no greenhouse gases and do not add to existing or future congestion and hence are the most sustainable modes.

2.62 A potential site allocation at the Dunton Hills Garden Village would result in a significant number of car driver trips to local railway stations and in the requirement for an additional bus service to provide a connection to nearby railway stations due to the distance from existing railway stations.

2.63 A strategic allocation at West Horndon however would enable the majority of those who travel by train to walk or cycle to the station and so use the most sustainable form of transport.

Lower Thames Crossing

2.64 HE are currently consulting on four options for a new river crossing. Route 4 of these options runs from Tilbury / East Tilbury to the south (north of the river) towards the A13 and the runs to the east of and almost parallel to the A128.

2.65 If this option were to be delivered by HE, this would severely impact on the Dunton Hills Garden Village site, both in terms of community severance and traffic noise.

3.0 SUMMARY AND CONCLUSION

3.1 We have assessed the proposed strategic allocation of the Dunton Hills Garden Village site against the transport related policies of the draft LP.

3.2 We have shown that the Dunton Hills Garden Village allocation would be contrary to a number of policies in the draft LP as well as national policy (NPPF).

3.3 Furthermore, it would be difficult to deliver a safe and suitable access strategy due to the constraints at the Dunton Hills Garden Village site. Any access constructed through the flood plain would be both costly and environmentally undesirable whilst an access to the east, via West Mayne would lead to significant capacity issues on local roads.

3.4 We have reviewed the PBA report, which seeks to provide a highway modelling analysis. However, we have found it to be a superficial analysis which provides no clear conclusion and cannot be relied upon.

3.5 We have further shown that a potential strategic allocation at West Horndon would provide a solution that is both in accordance with the LP policies as well as national policy. This could include improvements to West Horndon station which would also benefit existing residents and rail users.

3.6 We have therefore demonstrated that a strategic allocation at West Horndon would provide a more sustainable development with a suitable access strategy than the Dunton Hills Garden Village could provide.

APPENDIX A

Review of PBA Strategic Development Modelling Report for BBC



ODYSSEY MARKIDES LLP

TECHNICAL NOTE

PROJECT : **Development at West Horndon**

JOB NO : **13-158**

NOTE TITLE : **Review of PBA Strategic Development Modelling Report for Brentwood Borough Council**

AUTHOR : **TDM**

APPROVED : **AM**

DATE : **March 2016**

1.0 INTRODUCTION

1.1 Odyssey Markides (OM) LLP have prepared this note in order to provide Countryside Properties with feedback regarding a Modelling Note prepared by Peter Brett Associates (PBA) for Brentwood Borough Council. The note by PBA set out the results of a high level traffic impact assessment of four strategic development sites (**Figure 1** refers) in the Brentwood area.

1.2 The four sites considered are as follows:

- Option 1 - Dunton Hills Garden Village - 2500 Dwellings;
- Option 2 - West Horndon Extension - 2500 Dwellings;
- Option 3 - North of Brentwood – 1169 Dwellings;
- Option 4 - Land East of Running Waters Brentwood – 1000 Dwellings

1.3 The report focused on the impact of the four options on the Brentwood Borough and therefore the assessment scope is limited in terms of the wider impacts upon the highway network.

2.0 SHORTCOMINGS OF PBA ASSESSMENT

2.1 Having reviewed the PBA assessment report, there are concerns regarding the assessment methodology and conclusions drawn from the assessment. The main shortcomings identified include:

- The assessment takes no account of existing and proposed major development proposals (as well as infrastructure), which are located to the east and south; for example there is a major employment site at DP World Gateway Logistics Park near Corringham, a proposed theme park at Gravesend, the Thames Link improvement scheme and other attractors located in the adjacent Basildon district. None of these have been factored in the PBA assessment.
- The assessment software used OMNITRANS, is '*not a true strategic modelling tool*' in the sense that, while it is able to assign traffic to the shortest journey (in terms of distance), this can result in convoluted routes which in reality are unlikely to be taken by development traffic.
- The modelling software does not take into account congestion at junctions which would then result in drivers choosing alternative routes;
- The junctions selected for testing were chosen by the local authority, however the study area only considered junctions within the Borough of Brentwood. It therefore under represents other nearby highway networks outside of Brentwood's jurisdiction (i.e. A127 / B148) as well as trunk roads (Highways England) to the east.
- The analysis carried out is superficial as it fails to investigate the significance of the impact (and/or remedial works) of one junction against another.
- The assessment results provide a strategic overview of total development impact within Brentwood, however Countryside's site at West Horndon is for 650 dwellings, not 2500 as has been modelled. The impacts assessed are therefore non-comparable.

3.0 PBA REPORT REVIEW

Assessment Results

3.1 The results presented in the PBA report are of a generic and superficial nature. This makes them unsuitable for drawing any conclusions from, relating to the four residential allocation options. It is impossible to determine from the work carried out if:

- The impact of each option at each junction is significant,
- The impact can be ameliorated: and
- Each junction is more important than another.

3.2 In addition, some of the assessment results appear to be incorrect. For example the link flow development traffic distribution diagrams indicate that approximately a third of traffic from Option 2 (West Horndon extension) will distribute onto the network via the country lanes to the west, whereas 95% of development traffic for Option 1 is distributed north to the A127 / A128 junction. Yet the capacity results suggest Option 2 has a bigger impact on the A127 / A128 junction, despite having significantly less traffic assigned to the junction.

3.3 These inconsistencies make the analysis unreliable, and therefore they cast doubt on the conclusions presented.

Mitigation Recommendations

3.4 The report arbitrarily selects the top 10 '*worst performing*' junctions (excluding junctions with the M25) and recommends these for improvement in order to mitigate development impact.

3.5 This conclusion is misleading as it implies that the 'worst' performing junctions do so as a direct result of development impact when in fact a number of the junctions assessed are already operating very close to or above maximum capacity. The addition of development traffic in some locations would be relatively minor in terms of additional traffic throughput; however the impact is presented as severe in the PBA report.

3.6 One such example of this is Junction 16, the A128 Brentwood Road / Running Waters double mini-roundabout. This junction is listed as the worst performing junction under all four options. However it already operates at an RFC of 1.79 in the baseline

scenario. While this junction would benefit from improvement the report is incorrect to suggest that the impact of the development traffic in itself, would necessitate any improvement measures.

Overall Comment

3.7 Notwithstanding the shortcomings of the PBA assessment it is clear from the language used in the report that the author is not confident about the depth of the work carried out and/or the conclusions reached.

3.8 For example, the report states that it only 'appears' Options 1 and 4 have the least impact upon the junctions assessed. There is little confidence in this statement and in fact, reviewing the summary tables it is clear that there is very little variation in impact across all four development sites.

3.9 In fact looking at the summary tables in detail, the results show that Option 2 (West Horndon) has less of an impact than Option 1 (Dunton Village), with junctions 2, 10,13,15,17,19,20,21, and 23 actually resulting in better impact results than Option 1. Therefore PBA's statement that Option 1 and 4 result in less impact than Options 2 and 3 is also incorrect.

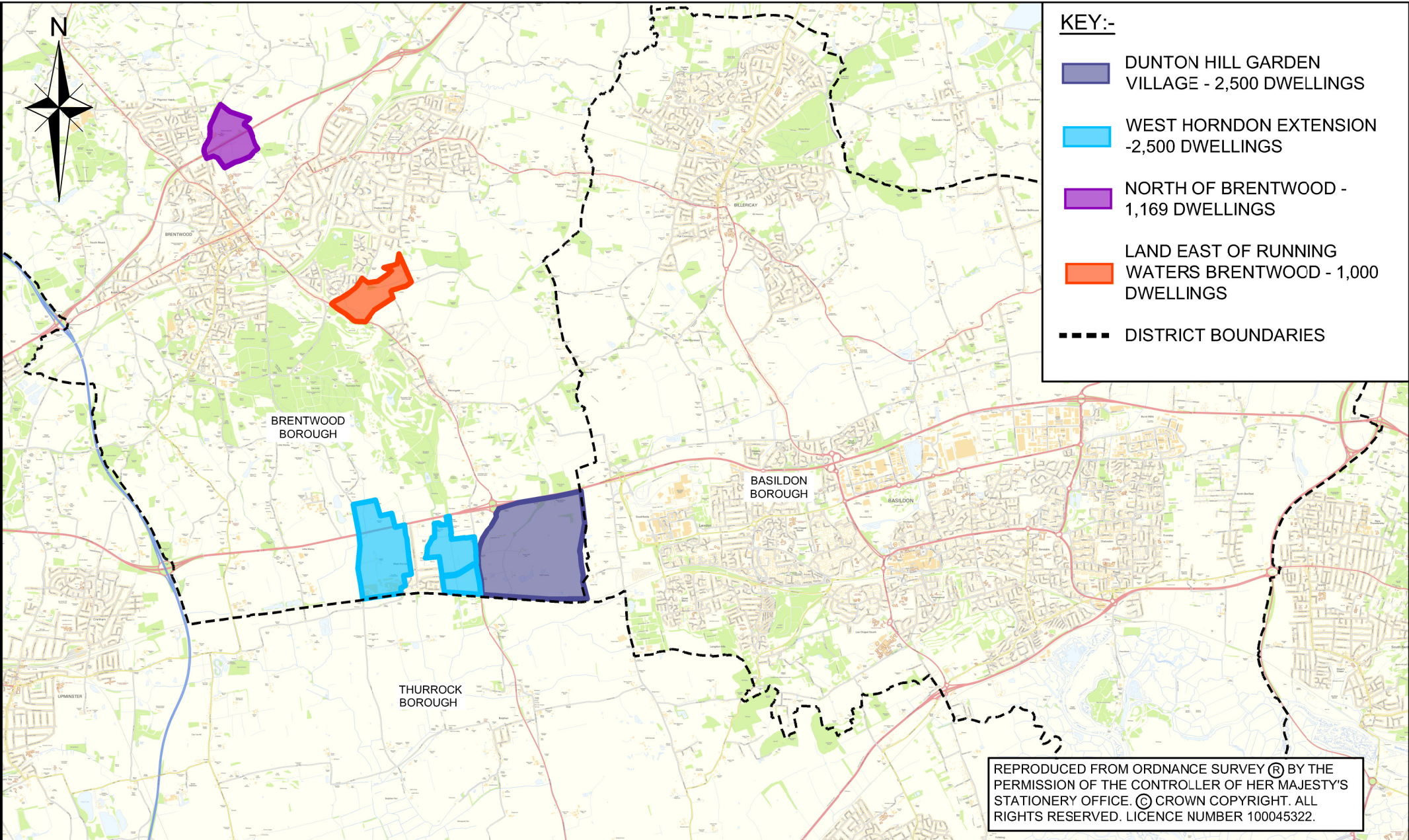
4.0 CONCLUSION

4.1 Having reviewed the PBA Strategic Development Impact Overview, it is clear that there are fundamental issues with the depth of the work carried out, the data presented; and conclusions drawn from that data.

4.2 It is also important to note that the scale of strategic development assumed in the assessment for West Horndon is significantly larger than the site being promoted by Countryside (650 dwellings vs 2500 dwellings). Therefore the conclusions presented in the PBA report are not applicable to this scheme as they are not comparing site for site.

4.3 In conclusion Odyssey Markides would suggest that the PBA report cannot be relied upon to draw any meaningful conclusions about the suitability or otherwise of the four options.

4.4 We would highly recommend that a more thorough assessment be undertaken in order to enable a decision to be made, based upon undisputed technical analysis and evidence.



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Job Title	WEST HORNDON
Drawing Title	STRATEGIC DEVELOPMENT SITES LOCATION PLAN

Client	COUNTRYSIDE
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Scale	N. T. S	Date	MARCH 15	Designed	AB
Drawn	AB	Checked	TM	Approved	TM
Job No	13-158	Drawing No	FIGURE 1	Rev	