

Thank you for giving Highways England (HE) the opportunity to comment upon the Regulation 19 Pre-Submission Local Plan setting out your development needs, policies and strategies over the period 2016 to 2033. 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). The SRN is a critical national asset and as such Highways England works 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 the Local Plan, Highways England is interested in the potential impact that the development might have upon the M25 Junctions 28 and 29 and the A12. We would be concerned as to whether there would be any adverse safety implications or material increase in queues and delays on the strategic road network as a result of your Local Plan development.

We have reviewed the Pre-Submission Plan and have the following comments:

As you are aware we have been in discussions with yourself about the transport assessment for the Local Plan concerning the impacts upon the SRN. We are continuing to liaise to look at how any required mitigation at M25 Junctions 28 and 29 may be assessed outside of this Regulation 19 consultation. This is implied if not specifically mentioned in Paragraph 5.101 of the main consultation document text. We look forward to the outcome of your Local Plan impact assessments on the two M25 junctions.

Policies BE11 and BE16 cover Strategic Transport Infrastructure and Mitigating the Transport Impacts of Development. Both policies The former states “any significant impacts from the development on the highway network on highway safety must be effectively mitigated to an acceptable degree in line with policy BE16. The latter policy states that new development will be required to “provide reasonable and proportionate financial contributions/mitigation measures where necessary to mitigate the transport impact of the development to an acceptable degree...Such measures should be provided to meet the first or early occupation of a site...”.

For clarity, we suggest that the wording is amended to reflect that there is a need to mitigate the impacts of the full Local Plan rather than the developments within it individually. Any single development may have no discernible impact whereas cumulatively the Local Plan impacts may require mitigation. Accordingly we are looking for evidence on the cumulative impacts of the Local Plan. Similarly, you may wish to amend the wording of policies relating to individual allocations, particularly the strategic allocations for Dunton Hills in Policy R01 (ii) under Transport Impact Mitigations and Brentwood Enterprise Park in Policy E11. These two policies suggest that impacts for these two developments will be assessed in isolation rather than as part of a bigger Local Plan picture.

We note that Paragraph 5.102 Point 2 of the main submission document identifies M25 Junction 28 improvements being undertaken by Highways England and that further engagement will be required on this scheme. Additionally, Point 3 states that mitigation is being considered at M25 Junction 29 in relation to the Brentwood Enterprise Park development. Lower Thames Crossing is also mentioned as impacting upon Junction 29. Paragraph 5.102 is specifically related to third party mitigation to the network. From the Transport Assessment of the Local Plan we are aware that additional Local Plan development is likely to impact upon these two junctions and potentially requiring mitigation. Again, we will continue to liaise in relation to this assessment.

We hope that you find these comments useful and we look forward to further correspondence in due course. We will be in touch again when we receive details from you of the Local Plan impact assessments upon M25 Junctions 28 and 29.

