## **Christopher Waller**

From:	Archer, Heather
Sent:	24 November 2017 18:14
То:	DPD (Planning Service Area)
Subject:	Redbridge Local Plan - Main Modifications Consultation

## For the Attention of: Ciara Whelehan

**Consultation:** Redbridge Local Plan – Main Modifications Consultation

Dear Ciara Whelehan,

Thank you for your letter dated 16<sup>th</sup> October 2017 inviting Highways England to comment on the Local Plan Main Modifications.

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.

We previously commented on the Local Plan (Reg 19) in October 2016 stating that our interest in such documents is specifically focussed on the council's approach to highway and transport matters in relation to regeneration and new development. We are keen to understand how local authorities initially identify and prioritise transport improvements in order to deliver sustainable development. Specifically how local authorities set and implement policy to manage trip demands and ultimately how these might affect the safe and efficient operation of the Strategic Road Network for which we are responsible.

One main modification to the Local Plan is;

'The Transport Assessment (2017) forecasts that 7 junctions and 3 links will experience a net increase in traffic of over 20% as a result of the borough's proposed growth. As such, where a significant impact has been identified and where the net increase in traffic arising from developments is expected to be significant, it may be appropriate for mitigation measures to be considered. These could include both 'soft' and 'hard' interventions and indeed, may include a mix of both measures.

Further evidence set out in Local Plan Transport Assessment Technical Note (2017), in particular based on the junctions and links that have a high or medium potential for requiring mitigation measure by 2030, includes a high level review of the types of 'hard' measures that may be considered, based on the junction type. These do not represent a definitive set of mitigation measures and the Council will expect, as part of any future planning application, that further work is undertaken to consider local impacts and cumulative effects of other development. '

Highways England will be concerned that the cumulative effect of future proposals has the potential to impact on the safe and efficient operation of the SRN, in this case the M25 junctions 27 to 30 and M11 junction with the A406 NCR. The council will need to provide sufficient evidence to demonstrate that the Local Plan proposals have no residual severe impacts on the operation of the SRN or provide proposals to mitigate such impacts to an acceptable level.

Highways England welcomes the requirement that further work is to be undertaken to consider local impacts and cumulative effects of other development as part of any future planning application. However, we are concerned that there is a potential for the SRN to be overlooked in such assessments as undoubtedly numerous developers will seek to develop individual strategic investment and growth areas and individual impacts on Highways England's network are likely to be small. However, cumulatively, delivery of the totality of the individual strategic areas could have noticeable impacts on the SRN. For example individual packages of 300 – 500 dwellings at the llford Strategic area are unlikely to have a noticeable effect on the SRN but the full 6000 allocation with employment and retail could have detrimental effects on the A13 and its junction with the M25.

I trust that the above comments are of assistance to you and look forward to our continued involvement with the development of your Local Plan. You may wish to build on your current existing engagement with Highways England and I would be happy to attend any meeting.

Thank you again for involving us in your consultation process.

Heather

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