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Subject: 19071 Consultation on the West Berkshire Local Plan Review 2022-2039 Proposed Submission
Date: 03 March 2023 15:42:45
Attachments: [B2418400 West Berks Reg 19 TA Review TN 01 03 03 23.pdf](#)

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For the attention of: Planning Policy Team, West Berkshire Council

Proposal: West Berkshire Local Plan Review 2022-2039 Proposed Submission

Our Reference: #19071

Dear Planning Policy Team,

Thank you for inviting National Highways (NH) to comment on the Regulation 19 West Berkshire Council (WBC) Local Plan Public Consultation Review 2022-2039 Proposed Submission.

NH 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 NH 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 will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M4 (J12-J13) and A34.

Overall, in accordance with national policy, we look to WBC to promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. We would be concerned if any material increase in traffic were to occur on the SRN or at its junctions because of planned growth within the borough, without careful consideration of mitigation measures. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure being in place.

When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. NH will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN.

As part of this latest Consultation, NH have reviewed:

- West Berkshire Local Plan Review 2022-2039, Proposed Submission, January 2023
- HELAA, January 2023
- Infrastructure Delivery Plan (IDP), January 2023

- Duty to Cooperate Statement, January 2023
- Consultation Statement, December 2022
- [Phase 1 Transport Assessment Report](#), December 2020
- [Phase 2 Transport Assessment Report](#), July 2021
- West Berkshire Strategic Transport Model - Local Plan Forecasting Report, March 2022
- West Berkshire Strategic Transport Model - Local Plan Forecasting Report Appendices, March 2022

Local Plan Review 2022-2039 Proposed Submission

NH support Policy SP23 'Transport' which requires development with a transport impact to mitigate any adverse impact on local transport networks and the SRN. NH also notes Section 7.48 which states that:

“All development proposals will be required to demonstrate that they do not adversely affect these networks or that they can mitigate the adverse impact. Where a Transport Assessment for a significant development illustrates that there will be an impact on the capacity of the SRN or local networks, the developer will need to undertake detailed traffic modelling in accordance with national guidance. Developers will need to work with the Council and National Highways to establish a suitable mitigation package.”

NH requests that WBC expand on what is meant by 'a suitable mitigation package' and provide clarity in regard to the SRN.

The above Policy is supported by Development Management Policy DM42 'Transport Infrastructure' which aims to minimise travel activity and will require development proposals to be supported through transport infrastructure delivered in a timely manner. NH also notes Section 12.97 which states that:

“The Council as both local planning and local highway authority will need to ensure that development proposals will not result in an unacceptable impact for any user of both the local and strategic road networks.”

Currently it is not clear from the documents submitted as part of the Regulation 19 (either through detail included in the plan itself or through signposting to other documents) what is necessary in terms of transport intervention to support the economic, social and environmental objectives of the Local Plan. Furthermore it is not clear from the documents that the delivery of growth can be controlled such that it is in pace with the availability of necessary transport interventions and that unacceptable impacts on highway safety do not occur, or the cumulative impacts on the road network would not be severe.

To ensure that the Local Plan is deliverable, the transport evidence base should demonstrate the Local Plan impact on the SRN and as necessary identify suitable mitigation. This work will form a key piece of evidence to demonstrate the Local Plan is sound, therefore it is important that any identified mitigation has a reasonable prospect of delivery within the timescales of when the identified growth is planned. Once the transport impacts of the Local Plan sites are understood, the Infrastructure Delivery Plan document should set out any SRN mitigation required

to deliver the Local Plan development.

The Transport Evidence base is not yet sufficiently developed to inform a view on whether the plan is sound. To demonstrate that NPPF requirements have been met, will require a combination of transport evidence and relevant Local Plan Policy (eg Development Management Policy).

NH supports WBC's commitment to work with NH to consult on potential developments coming forward within the borough and the Transport Assessment supporting the Local Plan. NH note that the Duty to Cooperate Statement (Section 5.26) details modelling advances, arranging a meeting to discuss and working towards a Statement of Common Ground. NH support these steps and we recommend a meeting at your earliest convenience to address issues raised in the attached technical note and to discuss next steps.

We look forward to working with all parties to identify and produce a robust transport strategy which would inform the size and scale of development deliverable within West Berkshire up to and beyond the Local Plan process.

I hope this is helpful.

Kind Regards

-

Patrick Blake, Area 3 Spatial Planner

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Tech Note

Spatial Planning Framework Commission

Prepared by Jacobs-SYSTRA Joint Venture (JSJV) for the National Highways National Spatial Planning Contract 2022 in relation to the South East Region

Job number:	B2428401		
Job title:	West Berkshire Local Plan		
To:	West Berks Planning Policy Team (PlanningPolicy@westberks.gov.uk)	cc:	Patrick Blake (National Highways), Beata Ginn (National Highways), Simon Doyle (JSJV), Joe Colclough (JSJS)
Topic:	TN01 - West Berkshire Local Plan Transport Evidence Base Review for Regulation 19		
	Prepared:	Checked	Approved
Name:	Joe Colclough / Simon Doyle	George Nock	Mike Howell
Date:	03/03/23	03/03/2023	03//03/2023

Introduction

This Technical Note (TN) has been produced in response to a Regulation 19 consultation from West Berkshire Council (WBC) and reviews the transport documents that form part of the evidence base.

Strategic transport modelling is required to provide an evidence base for assessing the impacts and identifying the mitigation needed to support the proposed Local Plan development.

JSJV has been commissioned by National Highways (NH) to audit the supporting transport evidence base and traffic modelling documents prepared by WBC.

Review Categorisations

Issues are categorised according to the categories in Table 1.

Table 1: Review Categorisations

Classification	Description
Observations	are points for consideration on an issue that would not significantly affect model operation or output.
Comments	which may identify particular assumptions, technical approaches or guidance references which may be deemed inadequate but may not influence the result of the analysis. The main function is to highlight such issues for attention in subsequent project stages or for future projects.
Substantive Issues	which require corrective action. The audit will suggest the detailed action required to address the issue, although there should be freedom for the model development team to use alternative approaches in order to achieve the required level of analysis.

Items Reviewed

The following Transport Modelling documents have been reviewed by JSJV. The following sections records the review.

Table 2: Transport Modelling Documents Reviewed

No.	Document name
1	Phase 1 Transport Assessment Report, December 2020
2	Phase 2 Transport Assessment Report, July 2021
3	West Berkshire Strategic Transport Model - Local Plan Forecasting Report, March 2022
4	West Berkshire Strategic Transport Model - Local Plan Forecasting Report Appendices, March 2022

Local Plan Modelling Methodology

The local plan modelling undertaken by WBC is described in the West Berkshire Strategic Transport Model (WBSTM) March 2022 Report. WBSTM is a highway assignment, public transport assignment and variable demand model developed in PTV-VISUM version 17.01. **Comment: Use of a highway assignment element alone for the Local Plan modelling will most likely generate a 'worst case' for the SRN, the modelling of highway demand alone, however, requires justification.**

The following scenarios are included:

- 2037 Reference Case
- 2037 Scenario 1R2 (S1R2)
- 2037 Scenario 1R2 Mitigation 1 (S1R2 Mit1)
- 2037 Scenario 1R2 Mitigation 2 (S1R2 Mit2)

NH notes the following. Local Plan impacts are assessed against a Reference Case which assumes no growth beyond the currently adopted Local Plan, this is acknowledged to be unrealistic because additional growth is inevitable. The large North East Thatcham Site (THA20) has been modelled with two separate mitigation scenarios, a demand management reduced car trips and then an assortment of highway junction changes. The Sandford Park development is proposed to be pushed into the New Local Plan and not included as part of the 2037 reference Case. The M4 smart motorway and J10 improvements have been included in the modelling.

NH identified in the response to the Regulation 18 Consultation Local Plan Review and Phase 1 Transport Assessment on 03/02/21 that M4 and A34 junctions within West Berkshire are predicted to be over capacity with predicted growth. These impacts are still evident in the latest reports reviewed. No highway mitigation has been proposed on the SRN. The Infrastructure Development Plan contains the M4 Smart Motorway Scheme between J3-J12 and the following statement:

“Whilst it is hoped that there will be some improvements made to the A34 (by National Highways) in order that it can continue to carry out its important strategic function in a safe and efficient way, it is not currently anticipated that proposed development in West Berkshire in this plan period up to 2039 will cause the need for further improvements to the Strategic Road Network.”

Comment: Once the transport impacts of the Local Plan sites are understood, the Infrastructure Delivery Plan document may need to be revisited and set out any SRN mitigation required to deliver the Local Plan development.

The WBSTM Local Plan Forecasting report, March 2022, states that TRICS based trip rates have been agreed with West Berkshire and added separately to the traffic demand matrices. **Comment:** These trip rates should be provided to National Highways for review. It should be considered that where flexible employment use (whether Class E, B2 / B8) is proposed that for the purpose of future year forecasting, and any subsequent individual planning applications that may arise from the Local Plan, there is an expectation that this would be modelled with a worst case scenario land use trip rate when determining potential impact on SRN.

A separate note produced by TPA Associates has been produced regarding THA20. The 2037 S1R2 MITIGATION 1 Scenario contains measures to reduce car trips to/from THA20, resulting in:

- Car demand to/from THA20 reduced by 5% for active travel measures (trips within 10km)
- Car demand to/from THA20 reduced by 20% for bus proposals (to/from Thatcham town centre and rail station).

Distribution of trips and flow by junction arm from/to the SRN for all of the future cumulative allocated sites in each scenario should be provided to NH.

Substantive Issue: Some errors have been identified in specific tables of the Local Plan Forecasting Report, March 2022 which need correcting for NH to understand the potential SRN impact:

- Table 2-19 (Final highway assignment matrices – 2037 S1R2) – the Total Vehicles at the base of table are incorrect

- Table 2-24 (Final highway assignment matrices – 2037 S1R2 Mit1) – the Total Vehicles at the base of table are incorrect
- Table 2-24 (Final highway assignment matrices – 2037 S1R2 Mit1) is the same as Table 2-19 (Final highway assignment matrices – 2037 S1R2)

Local Plan Modelling Results

Reference Case flows increase across the majority of the network compared with the base year:

- increases are greatest on strategic routes like the M4 and in the Newbury and Thatcham area where the majority of new committed developments are located
- some routes in the Newbury area experience flow reductions due to congestion at a number of junctions within Newbury and on the A339, there is notable reassignment of strategic traffic from local routes in Newbury town centre and the A339 to other alternative strategic routes like the A34

S1R2 traffic flows increase compared to the Reference Case:

- increases are on major roads such as the A34, the A339, the A4, Bury's Bank Road/Crookham Hill and the Broad Lane
- there is a consistent re-assignment of traffic in all Local Plan scenarios (compared to the Reference Case) due to town centre congestion particularly
- local roads are generally associated with small flow increase across all Local Plan scenarios
- increased flows through the corridor, as well as THA20 site traffic directly accessing the A4, are likely to cause traffic displacement onto wider routes away from the A4, through local villages like Upper Bucklebury
- demand mitigation (modelled in S1R2 Mit1) could relieve the A4 – however, highway mitigation (modelled in S1R2 Mit2) may be necessary to alleviate impacts of local rerouting around the congested A4

Substantive Issue: Flow differences only appear to be provided for S1R2 Mit2, the plots show reductions in flow on the A34 and M4, clarity is needed as to why, is Local Road network (LRN) congestion restricting flow to the SRN. NH request the flow difference data for S1R2 Mit1 and S1R2.

Summary and Next Steps

JSJV have undertaken a review of the available transport evidence base documents associated with the Regulation 19 Consultation for WBC on behalf National Highways.

JSJV have highlighted a number of areas where further information is requested, including model justification, trip rates, trip distribution, assignment matrix table errors and flow impact plot data.

JSJV request that WBC respond to the points raised in this TN before a meeting is arranged with NH and JSJV representatives to discuss the transport evidence base for the WBC Local Plan.

Given the interdependency of the SRN and the LRN, following the on-going review work of development impacts, once these are understood and agreed by JSJV, NH and WBC, any mitigation package must be in its final form and, where necessary, appropriately tested to quantify impacts on the SRN.