

ENVIRONMENT AND LEISURE
DEPARTMENT
RECEIVED

27 DEC 2006

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Your ref:

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Development Plan Team,
Environment and Leisure Department
Bracknell Forest Council,
Time Square,
Market Street
Bracknell,
RG12 1JD

Direct Line: 01306 878363
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22 December 2006

Dear Mr Hindle

**BRACKNELL FOREST CORE STRATEGY DEVELOPMENT PLAN DOCUMENT
(SUBMISSION) AND SUSTAINABILITY APPRAISAL (SUBMISSION)**

1. Thank you for inviting the Highways Agency (HA) to comment on the Bracknell Forest Core Strategy and Sustainability Appraisal submission stage.
2. The HA's interest relates to the motorway and all-purpose Trunk Road Network (TRN) that it manages on the Secretary of State's behalf. In the case of Bracknell Forest, this relates to the M4 junction 10 and the M3 junctions 3 and 4. The M4 junction 10 and M3 junctions 3 and 4 are both currently operating at capacity during peak periods.
3. In spatial planning and development control terms we have a duty to safeguard the operation of the motorway and TRN as laid down in the DTLR circular 04/2001 (*Control of Development Affecting Trunk Road and Agreements with Developers under Section 278 of the Highways Act 1980*). We, therefore, have the following representations on the soundness of this document.

CORE STRATEGY DEVELOPMENT PLAN DOCUMENT (SUBMISSION)

Policy CS2 Locational Principles
Policy CS3 Bracknell Town Centre
Policy CS19 Location of Employment Development
Policy CS24 Transport and New Development

4. It is noted that developments will be accompanied by a Transport Assessment (TA). Additionally, Travel Plans should be developed for all potential development sites, these require the consideration of targets, monitoring, incentives for compliance and a funding stream to maximise their potential for success. **Until this is indicated the HA are concerned that this might risk failing PPS12 (paragraph 4.24) Tests of Soundness 4 ("It is consistent with national planning policy"), 7("the strategies/policies/allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are**

founded on a robust and credible evidence base”) and 8 (“there are clear mechanisms for implementation and monitoring”).

Policy CS4 Land at Amen Corner

Policy CS5 Land North of Whitegrove and Quelm Park

Overall Housing Provision

5. The HA notes the housing allocations for Bracknell Forest. Additionally, it is noted that there is potentially easy access from these allocated sites to the M4 junction 10. The HA would suggest that the cumulative impact of these sites may have an impact on the TRN, meaning that the need for a combined or integrated assessment of cumulative transport impact is that much greater.

6. With the new planning system, in accordance with PPS12 requirements, the increased emphasis on evidence based plans means it is more likely that an Evaluation of the Transport Impacts (ETI) of specific LDF proposals will be required. Where an LDF proposes development that will impact on the TRN, such an approach will help you to devise measures to maximise modal shift, and minimise car-based traffic. We are aware that Bracknell Forest is developing a Transport Model but that this is not available to inform the submission stage of the Core Strategy. Therefore we have suggested as an alternative, that a simple assignment model could be used to identify the transport mitigation issues resulting from development proposals, which may need to be addressed. The latest draft version of government guidance on TAs can be seen on the link below, section 5 refers to how the TA process can be applied to the development of an ETI for an LDF.

http://www.dft.gov.uk/stellent/groups/dft_roads/documents/page/dft_roads_612251.hcsp

7. Until this has been carried out the HA would be concerned that policies CS4 and 5 might fail PPS12 (paragraph 4.24) tests of Soundness 7 (“the strategies/policies/allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base;”) and 8 (“there are clear mechanisms for implementation and monitoring”).

8. Following your meeting on Monday 18th December with Paul Robinson and Fiona Wylie we said we would comment on, your Local Development Framework Site Assessment Study (August 2006), and Draft Cracknel Multi Modal Transport Model Specification (15th August 2006) to see what might be done to resolve our concerns in paragraphs 6 and 7 above. Please see Annexes A and B for details

Policy CS19 Location of Employment Development
Policy CS20 New Development in Employment Areas
Policy CS21 Retail development in Town Centres
Policy CS22 Out of Town Centre Development

9. The HA notes the potential for the development of out of town retail and employment land uses. The HA would expect that local planning authorities will the likely transport effects of each allocated site should be considered as a proactive input to the planning process in order to avoid bringing forward sites that are likely to have a serious detrimental effect on the operation or safety of the TRN in the District. We would, therefore, like to see emerging policies that minimise demand at source and require the mitigation of trunk road impacts throughout all stages of development planning, implementation and operation. This is particularly relevant to rural or out of town areas, as alternative transport choices tend to be limited, meaning that levels of reliance on the private car can be much higher than in urban centres. Although the HA recognises that new transport hubs could be developed over time; that would facilitate the use of non-car modes and provide opportunities to reduce the need to travel as well as the length of journeys, this process is likely to require very substantial investment. **The HA are concerned that if substantial development occurs in rural areas that this might fail to align with PPS12 (paragraph 4.24) Tests of Soundness 4 (“It is consistent with national planning policy”) and 7 (“the strategies/policies/allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base”).**

10. The HA note that paragraph 240 indicates that ‘Bracknell Forest will be required to provide contributions towards providing and maintaining the network’. The HA would request that this is amended to ‘Bracknell Forest will be required to provide contributions towards mitigating the impact of the development’.

FINAL SUSTAINABILITY APPRAISAL REPORT CORE STRATEGY DEVELOPMENT PLAN DOCUMENT (SUBMISSION)

11. The HA would request that you consider the TRN in your Sustainability Appraisal, until this is included this might risk failing PPS12 test of Soundness 3 (“the plan and its policies have been subjected to sustainability appraisal”) and 8 (“there are clear mechanisms for implementation and monitoring”).

12. I hope that the above information is helpful to you, please do not hesitate to contact me to discuss anything further.

Yours sincerely



Patrick Blake
Network Strategy South East
Email: Patrick.Blake@highways.gsi.gov.uk

**Local Development Framework Site Assessment Study Draft Final Report
(August 2006)**

The Site Assessment Study uses Accession software to map the site allocations in the Core Strategy document. The site allocations are divided into 20 clusters, and assess the accessibility levels to local facilities.

At the Meeting with Bracknell Forest District Council pre Submission of the Core Strategy (18th December 2006) it was indicated that Bracknell Forest is aiming to direct all the additional trips arising from the potential housing allocations towards Bracknell town centre. The HA have the following preliminary additional comments relating to this study;

1. The study area as indicated by figure 3 shows that only the local road network is included in the study area. The HA would request that the potential impact on the M4 junction 10 and the M3 junctions 3 and 4 is included in the study area.
2. Any mitigation measures to reduce the impact on the TRN should be examined and any resulting mitigation measures required for the TRN should be highlighted.
3. Potential softer measures to reduce the impact on the TRN should be highlighted such as Travel Plans, Parking Strategies and Public Transport improvements.
4. The Travel to Work census data from 2001 should be used to establish trip distribution patterns. This should then be assigned appropriately to the local network and TRN.

Draft Bracknell Multi Modal Transport Model Specification (15th August 2006)

This document outlines the requirements of the transport model that will be developed for Bracknell Forest Site Allocations. The HA has the following comments to make on the document;

1. Paragraph 2.1.2 outlines that only developments of 75 dwellings or 5000 sqm or above will be included in the transport model. The HA would request that the transport model should not be limited to this size of development, noting that all the developments in the Core strategy or Site Allocations regardless of size, should be included in the transport model as there the likelihood that there will be a cumulative impact of development at certain junctions on the TRN.
2. The forecasting years for the model should ideally align with the Transport Assessment Guidelines.
3. The HA would request that in reporting the following should be included;
 - Select Link Analysis data for site specific allocations – this should be used to derive information such that the quantum and proportion of trips that impact on the TRN can be assessed.
 - It would be useful to have a status report on assumed transport scenarios, i.e. Where these schemes stand; and how these may relate to relevant TPI commitments.
 - It would be valuable to have turning movement counts v. observed counts at the TRN junctions. Observed / modelled queuing / delay information at the TRN junctions and slip roads will likely be required as an output.



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Bracknell Forest Borough Core Strategy Development Plan Document Submission Representation Form

This form is available on-line at www.bracknell-forest.gov.uk/ldf

You are advised to read the guidance notes at the end of this form before completing it.

1. Personal Details *

*if an agent is appointed, please complete only the Title and Name boxes below but complete the full contact details of the agent in 2

2. Agent's Details

(if applicable)

Title & First Name	MR PAUL	
Last Name	ROBINSON	
Job Title	NETWORK MANAGER	
Organisation	HIGHWAYS AGENCY	
Address	1B FEDERATED HOUSE	
Address	LONDON ROAD	
Address	DORKING SURREY	
Post Code	RH4 1SZ	
Telephone No.	01306 878328	
Email Address	Paul.robinson@highwaysgsi.gov.uk	

3. Did you raise the matter that is the subject of your representation with the Bracknell Forest Borough Council earlier in the process of the preparation of the Core Strategy, i.e. before it was submitted for examination?

No

Yes (at Issues and Options stage, July / August 2005)

Yes (at Preferred Options stage, January / February 2006)

4. If 'No', can you briefly explain why you did not do so:

5. To which part of the Core Strategy does your representation relate? (please insert specific reference)

Paragraph Map Policy Proposals Map Whole Document

All representations on the submission Core Strategy will be considered by an independent planning inspector who will consider the document against the 9 Tests of Soundness, as set out in the Annex. In this context, "sound" is considered to mean "showing good judgement" and "able to be trusted". These definitions are considered to fulfil the expectations of the relevant legislation.

6. Do you consider the Core Strategy is:

Sound (ie. you support the Core Strategy) Unsound (ie. you object to part of the Core Strategy or wish to see a change, go to Questions 7 & 8)

7. If you consider the DPD is **unsound**, please identify which test of soundness your representation relates to (i.e. which test the document fails, see Annex). Soundness Test No.

PLEASE NOTE that you should complete a separate form for each test of soundness that you consider the development plan document fails.

8. If you consider the Core Strategy to be **unsound**, please give details of the change(s) you would like to see made, or the reasons why you object to the document. You will need to say why the document is unsound (having regard to the Test you identified at Question 7) and how the change(s) you propose will make it sound.

See attached Highways Agency letter ~~at~~ (paragraph 11) dated 22 December 2006.

(Continue on a separate sheet if necessary)

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(please sign and
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Signature:



Date:

22/12/06

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Paragraph
Map

Policy

Proposals Map

Whole Document

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Soundness
Test No.

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See attached Highways Agency letter (paragraph 9)
dated 22 December 2006.

(Continue on a separate sheet if necessary)

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Paragraph Policy 4 and 5 Proposals Map Whole Document

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Soundness Test No.

 7 and 8

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PR WA

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