APPLICATION BY HIGHWAYS ENGLAND FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE PROPOSED M4 JUNCTIONS 3 TO 12 SMART MOTORWAY

PLANNING INSPECTORATE REFERENCE NO. TR010019

WRITTEN EVIDENCE ON HIGHWAY MATTERS

PRESENTED BY

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ON BEHALF OF BUCKINGHAMSHIRE COUNTY COUNCIL
AS HIGHWAY AUTHORITY

OCTOBER 2015

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1. INTRODUCTION:

1.1. My name is Christine Urry. I am the Head of Highways Development Management at Buckinghamshire County Council. I have a Bachelor of Arts Degree in Geography, a Master's of Science in Transport Planning and Management and I am a member of the Charted Institution for Highways and Transportation. I have 7 years' experience in the field of highway design, transportation planning and traffic engineering

1.2. The principal functions of the Highways Development Management Team are:-

i) To provide technical advice and recommendations to the Local Planning Authorities and Council on the transport aspects of new development proposals;

ii) To ensure that where new developments do affect the Highway the impact on highway safety, capacity and inconvenience to road users is not severe;

iii) To negotiate and secure, where appropriate, developer contributions for "off-site" highway works under Planning Obligation or Highway Agreements;

iv) To ensure that all new Residential Access Roads and Industrial/Commercial Access Roads comply with the appropriate standards and specification prior to their adoption;

v) To provide technical advice and recommendations to the Licensing Authority on those applications for Goods Vehicle Operators Licences which adversely affect the interests of the County Council as Highway Authority.

2. THE PROPOSED SCHEME:

2.1 This written statement has been prepared in respect of an application made by Highways England to the Secretary of State for Transport for a Development Consent Order (DCO) under Section 37 of the Planning Act 2008.

2.2 The draft DCO is referred to as The M4 Smart Motorway Junctions 3-12. The Order would grant powers to improve the M4 Motorway to a smart motorway between junctions 3 (Hayes) and junction 12 (Theale).

2.3 The M4 is the main strategic route between London and the west of England, and on to South Wales. The M4 between junctions 3 and 12 carries over 130,000 vehicles per day. The scheme will help relieve congestion by permanently converting the hard shoulder of the M4 to a running lane and using technology that varies speed limits and manages traffic. Signs and signals will be used to inform drivers of conditions on the highway network, when and where variable speed limits are in place, and when lanes are closed.

2.4 The Scheme is some 51 km (32 miles) in length and will have a number of principal elements:

i. conversion of the hard shoulder to a permanent running lane and, where no hard shoulder is in place at present, the construction of a new lane. This will mainly take place between junction 4b and junction 8/9;

ii. replacement of overbridge structures where portals are too narrow to accommodate the improved motorway;

iii. extension of underbridges and other structures such as culverts and subways to accommodate the improved motorway;

iv. changes to junctions and slip roads needed to accommodate traffic joining and leaving the improved motorway, and to allow use of the hard shoulder as a running lane, as well as allowing "through junction running" ("TJR");

v. provision of new gantries and signs to allow the motorway to function as a smart motorway with a variable speed limit, and to provide messages to road users; and

vi. other infrastructure needed for the improved motorway, such as Emergency Refuge Areas (“ERAs”), enhanced communication systems, closed circuit television (“CCTV”) and electrical supplies, as well as works to accommodate statutory undertakers' apparatus and other parties who may be affected by the Scheme.

2.5 A draft Statement of Common Ground (SoCG) has been prepared between Highways England (HE) and Buckinghamshire County Council for the purpose of the Examination to be held by the Secretary of State. The draft SoCG considers the items raised by Buckinghamshire County Council in its relevant representation on the application, including highways and transportation issues and sets out those matters on which agreement has been reached.

2.6 This written statement sets out Buckinghamshire County Council's concerns, where to date no agreement has been reached with HE. The written statement expands on the joint Local Impact Report submitted by Buckinghamshire County Council and South Bucks District Council.

3. THE M4 AND SURROUNDING HIGHWAY NETWORK:

3.1 The M4 motorway is one of the main strategic route in the south of England. It runs from London through to Wales and carries over 130,000 vehicles per day in places. The M4 forms Buckinghamshire's border to the east of Slough and bisects Burnham and Dorney, within the county's boundary.

3.2 The section of the smart motorway proposal which affects roads that are within Buckinghamshire County Council's jurisdiction is between junction 8/9-7 and junctions' 5-4b, as shown in figures 1 and 2 below.

Figure 1: Junction 5-4b of the M4

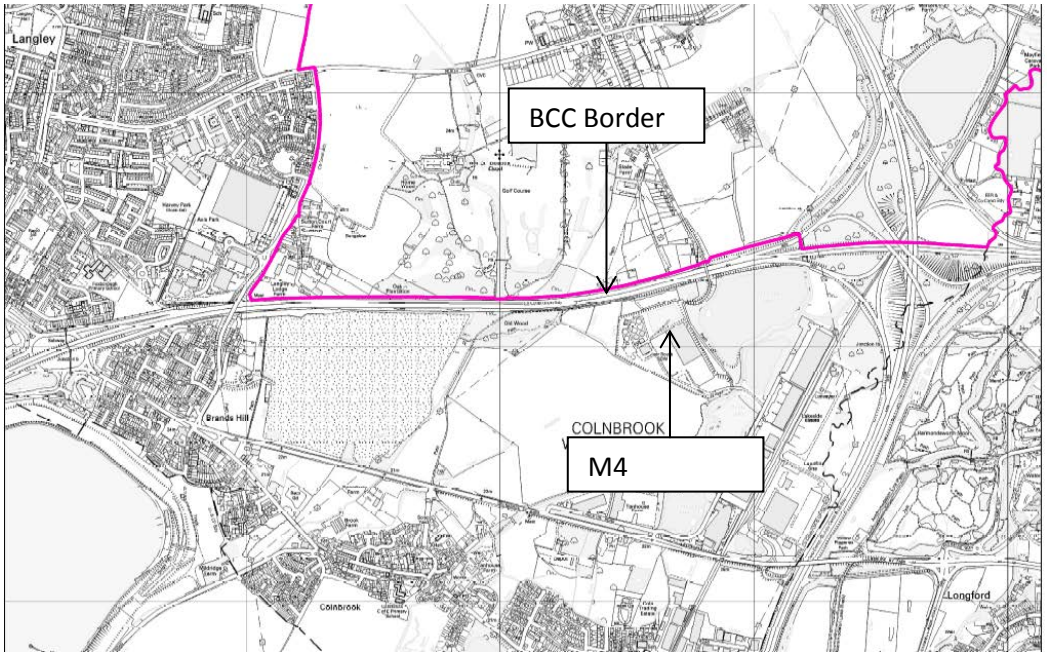
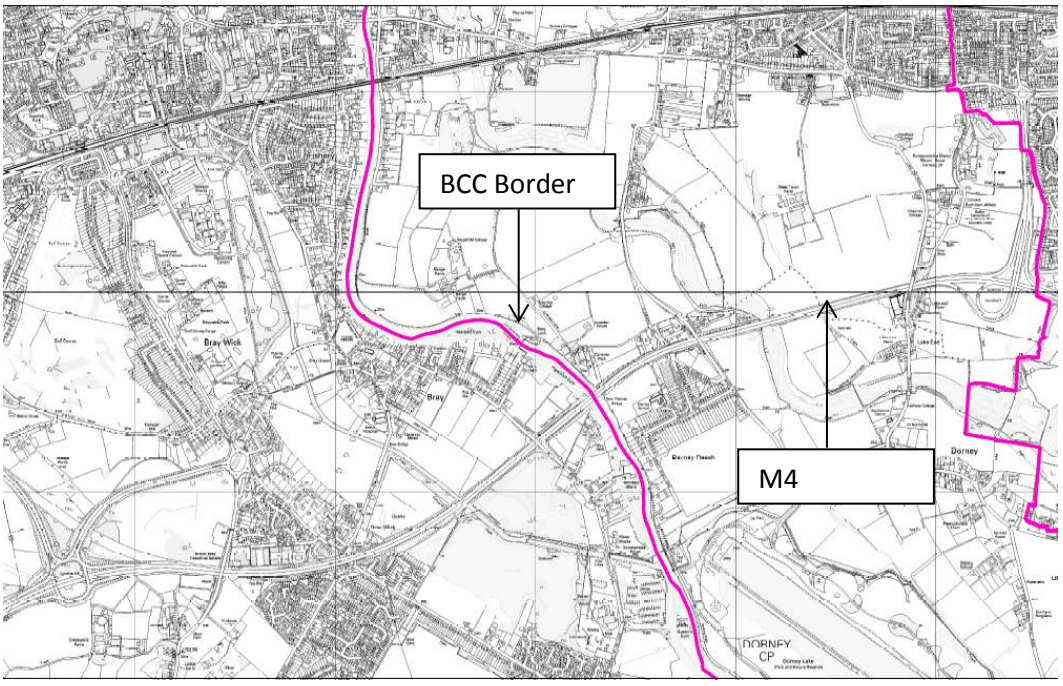


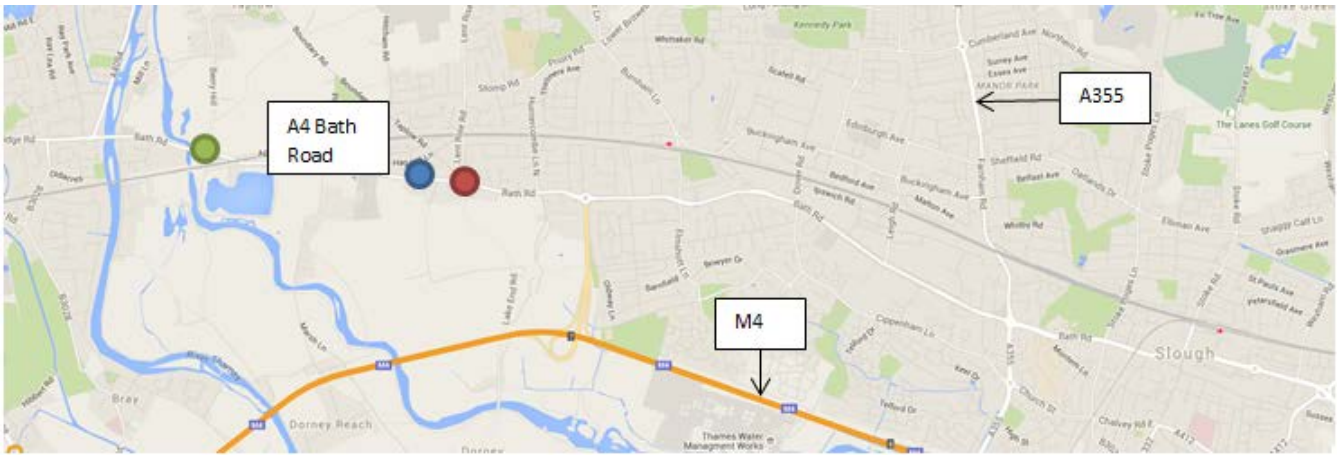
Figure 2: Junctions 7-8/9 of the M4



3.3 Bath Road (A4) runs parallel to the M4 and is a strategic road that has a status towards the top of the County Road hierarchy in recognition of its strategic inter-urban purpose. It is currently a highly used A road serving Slough and Maidenhead which carries some 22,000 vehicles per day.

3.4 It should be noted that there have been 37 recorded personal injury accidents along the section of the A4 within Buckinghamshire within the last 3 years.

Figure 3: Local Highway Network



3.5 The A355 runs north from Slough to Beaconsfield and the M40 motorway at Junction 2 and fulfils a major north-south connectivity role in the County road network. In recent years it has been used for motorway traffic where there is an incident on the M40 or M4. The A355 between Slough and Beaconsfield typically carries some 21,000 vehicles per day, reflecting the strategic nature of the route.

3.6 It should be noted that there have been 27 recorded personal injury accidents on the A355 between the county's border with Slough and its junction with the M40 within the last 3 years, of which 2 have resulted in fatalities.

3.7 Both of these routes currently experience problems with capacity and delay which has not been acknowledged by HE. The County Council is aware from eework undertaken as part of a number of recent planning applications along the A4 corridor that several junctions are experiencing problems with capacity and delay.

3.8 Table 1 shows extracts of the modelling outputs used to inform the assessment of the planning applications for the Bishop Centre (planning application reference 11/01625/FUL) and Mill Lane Taplow (15/01039/FUL and 15/01041).

3.9 The Bishops Centre is a new commercial development containing A1, A2 and A5 use classes. The site has been fully constructed and has been operational for over a year. The permissions on Mill Lane for 141 dwellings and 40 retirement units have only recently granted by South Bucks District Council and are subject to a Section 106 Agreement.

M4 Junctions 3-12 Smart Motorway
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Table 1: Junction Capacity Assessments A4 Corridor

A4 Bath Road/ Lake End Road/ Lent Rise Road roundabout junction– Bishop Centre (11/01625/FUL)

Arm	Friday PM		Saturday PM	
	RFC	Max Queue	RFC	Max Queue
A4 Bath Road (East)	0.688	2.2	0.719	2.5
Lake End Road	0.646	1.8	0.671	2.0
A4 Bath Road (West)	0.941	11.7	0.877	6.5
Lent Rise Road	0.564	1.3	0.466	0.9

2018 ARCADY Assessment with Development traffic

A4 Bath Road/ Station Road/ Marsh Lane signal junction – Bishop Centre (11/01625/FUL)

Arm	Friday PM (cycle 88sec)		Saturday PM (cycle 88sec)	
	DoS	MMQ	DoS	MMQ
A4 Bath Road (East) Right	4.4%	0.1	7.9%	0.3
A4 Bath Road (East) Ahead and Left	88.4%	16.1	97.5%	25.7
A4 Bath Road (West) Right	18.4%	0.9	31.2%	1.2
A4 Bath Road (West) Ahead & Left	82.4%	18.4	81.0%	17.7
Station Road (North)	71.4%	3.9	68.5%	3.6
Marsh Lane (South)	72.2%	3.9	95.4%	8.2

2018 LINSIG Assessment with Development traffic

A4 Bath Road/Berry Hill Signalised Junction – Mill Lane, Taplow (15/01039/FUL 15/01041/FUL)

Arm	Weekday AM		Weekday PM	
	DoS	MMQ	DOS	MMQ
Bath Road (East) – Right / Left / Ahead	48.4 %	10.3	74.3 %	21.0
Bath Road (West) – Ahead / Right / Left	106.2 %	89.5	95.8 %	46.3
Berry Hill – Left / Right / Ahead	106.9 %	36.8	96.3 %	16.5
Barge Farm – Right / Left / Ahead	2.6 %	0.3	2.2 %	0.2

2024 LINSIG Assessment with Development traffic

3.10 The above table highlights that in the network peaks, junctions along the A4 Bath Road are operating over capacity, leading to queues and delay (particularly in the westbound traffic direction). These results should be used as an indication of traffic conditions on the A4 Bath Road, taking into account committed development and forecasted traffic growth at the time of assessment.

3.11 The County Council has been lobbied hard about traffic conditions on the A4 and A355 from local Parish Council's and actions groups such as the Taplow Society. Residents of Buckinghamshire will expect the County Council to represent the interests of its residents in seeking to ensure that proposals do not temporarily or permanently lead to a further deterioration of conditions on these key routes. However, it will be seen from later parts of this Statement that no such information has been provided by the HE.

4. CHANGES IN TRAVEL PATTERNS

Construction Impacts

4.1 Chapter 13 of the Environmental Statement (ES) prepared by HE "Effects on all Travellers" includes an indicative assessment of the likely traffic impacts of construction on the operation of the M4. An assessment year of 2018 was considered as this is likely to be the time when traffic management has been introduced to substantial portions of the M4 to support the construction works.

4.2 The tables below (13.12 and 13.13 of the ES) consider predicted driver stress by eastbound M4 drivers for the construction assessment year. The tables consider a 'do minimum' scenario (without scheme) and a 'do something scenario' (with scheme)

Table 2: Eastbound M4 Drivers – 'Do minimum' 2018

M4 junction	Link	2018 Do Minimum			
		Average peak hourly flow per lane (flow units/hr)	Average journey speed (km/hr)	Average HGVs (%)	Driver stress level
8/9-7	Mainline	2032	87	5.6%	High
7-6	Mainline	1944	87	6.4%	High
6-5	Mainline	2044	87	6.1%	High
5-4b	Mainline	1620	93	6.2%	High

Table 3: Eastbound M4 Drivers – 'Do Something' 2018

M4 junctions	Link	2018 Do Something			
		Average peak hourly flow per lane (flow units/hr)	Change from 2018 Do Minimum	Average journey speed (km/hr)	Average HGVs (%)
8/9-7	Mainline	1804	-228	53	5.9%
7-6	Mainline	1607	-337	58	5.4%
6-5	Mainline	1680	-364	56	5.0%
5-4b	Mainline	1356	-264	63	4.9%

4.3 The results show a **reduction** in average peak hourly flow per lane and average journey speeds during the construction period as a result of traffic management on the M4, including the use of narrow lanes and reduced lane speeds. A similar situation is predicted in the westbound traffic direction, as denoted in tables 13.14 and 13.14 of the ES.

4.4 The reduction in peak hourly flows, suggests that vehicles are likely to be displaced from the M4 onto routes that adjoin or run parallel to the motorway. The ES acknowledges that other non-motorway links could be affected during the construction period however this has not been quantified and the impact on network performance untested.

4.5 Tables 4 and 5 (13.4 and 13.5 of the ES), identify **possible alternative routes** for vehicles during the construction period. Those in the jurisdiction of Buckinghamshire County Council are as follows:

Table 4: Possible Diversion Routes for Drivers during M4 Smart Motorway Construction

M4 Junction	Route	
j7	M4 Spur towards Slough	A4W towards Slough
j7	M4 Spur from Slough	A4E from Slough
j6	A355N towards Slough	A355S from Slough
j6	A355N from Windsor	A4W towards Slough
j6	A355S towards Windsor	A4E from Slough
j5	B470W towards Datchet	B470E from Datchet
j5	A4E towards Heathrow	A4W from Heathrow

Table 5: Possible Diversion Routes for Drivers during M4 Smart Motorway Construction –A4

M4 junction	A4 links	
j12	A4E towards Reading	A4W from Reading
j10	A4W towards Reading	A4E from Reading
j10 to j8/9	A4W towards Reading	A4E from Reading
j8/9	A4W towards Maidenhead	A4E from Maidenhead
j7	A4E from Maidenhead	A4W towards Maidenhead
j5	A4W towards Slough	A4E from Slough
j3	A312S towards Heathrow	A312N from Heathrow
j3	A4E towards Heathrow	A4W from Heathrow

4.6 The ES does not consider the displacement of vehicles during the construction period or the impact this will have on the operation or safety of the local road network within Buckinghamshire, in particular the A4 and A355. It is essential that this is properly assessed and understood and if appropriate mitigation is proposed to ensure that the works do not have a severe impact on the local highway network.

4.7 On the basis of the limited information provided to date it is not possible for the County Council to confirm that the impact of the works will not be severe for users of the A4, A355 or local residents. The construction period is likely to be the period that will have the biggest impacts on the County Council's highway network.

Operational Impacts

4.8 The HE has developed a Variable Demand Model (M3M4DM) and a Highway Assignment Model (M3M3HAM) to assess the impacts of smart motorway operations on both the M3 and M4. The models have been calibrated and validated in accordance with Webtag Guidance for the motorway network.

4.9 The M4 Junction 3-12 Smart Motorway Traffic Forecasting Report, published in October 2014, has assessed a scheme opening year of 2022 and a design year of 2037. The results from the SATURN

assignment model indicate that the implementation of the scheme would significantly improve driving conditions along the M4 in the peak periods both in 2022 and 2037.

4.10 Table 6 (Table C-21 and C22 of the Smart Motorway Traffic Forecasting Report), denotes the volume capacity ratios of the M4 in both 2022 and 2037 with and without the implementation of the scheme:

Table 6: Volume Capacity Ratios of the M4 (2022 and 2037)

M4 - MM ALR No Scheme	Morning peak hour (07:00 - 08:00)				Evening peak hour (17:00 - 18:00)			
	Eastbound		Westbound		Eastbound		Westbound	
Description	2022	2037	2022	2037	2022	2037	2022	2037
M4 J12 to J11	96.5	**100.0**	79.9	86.2	90.9	99.5	86.4	90.0
M4 J11 to J10	**100.0**	**100.0**	83.6	88.6	93.1	99.3	91.5	95.7
M4 J10 to J8	95.7	99.4	81.0	85.0	82.7	89.0	94.4	98.7
M4 J8 to J7	95.4	99.2	78.6	82.5	82.0	86.2	99.6	**100.0**
M4 J7 to J6	91.0	93.3	81.1	86.4	81.5	84.1	92.9	97.7
M4 J6 to J5	95.3	98.0	87.0	91.2	90.0	93.7	95.9	99.6
M4 J5 to J4B	72.6	74.9	72.9	74.5	74.0	77.5	78.3	82.2
M4 J4B to J4	76.1	76.8	73.9	74.8	76.8	79.0	76.4	77.0
M4 J4 to J3	82.9	85.4	87.2	87.8	91.7	91.9	83.6	83.5
M4 - MM ALR With Scheme	**Morning peak hour (07:00 - 08:00)**				**Evening peak hour (17:00 - 18:00)**			
	Eastbound		**Westbound**		**Eastbound**		**Westbound**	
Description	**2022**	**2037**	**2022**	**2037**	**2022**	**2037**	**2022**	**2037**
M4 J12 to J11	80.6	87.1	63.3	70.0	74.2	82.5	71.1	75.5
M4 J11 to J10	90.3	96.8	69.8	76.1	77.9	84.4	76.9	81.5
M4 J10 to J8	84.4	91.1	68.0	73.0	71.7	78.4	82.2	88.1
M4 J8 to J7	84.8	90.6	66.6	72.4	72.0	78.4	86.7	92.8
M4 J7 to J6	81.7	86.1	69.5	76.2	71.4	75.6	81.3	87.0
M4 J6 to J5	82.8	87.8	73.4	78.5	76.4	81.3	82.1	86.3
M4 J5 to J4B	81.5	85.5	79.2	82.4	80.7	85.4	85.9	89.7
M4 J4B to J4	64.8	65.3	61.5	62.7	64.8	66.8	64.0	64.9
M4 J4 to J3	66.6	68.0	68.5	69.3	72.4	72.9	65.8	66.3

4.11 It is anticipated that capacity will be at 95.7% between junctions 8-7 in 2022 ‘do nothing’ scenario for eastbound traffic in the am peak and 99.6% for westbound traffic in the pm peak hour. The motorway network is therefore running close to capacity in these directions during these periods.

4.12 It is predicted that the implementation of the smart motorway will increase available capacity along the stretch of the M4 between junctions 12 and 3 in both directions during the morning and evening peak hours. It is anticipated that capacity will be at 84.8% between junctions 8-7 in 2022 ‘do something scenario’ for eastbound traffic in the am peak and 86.7% for westbound traffic in the pm peak hour.

4.13 Travel time reductions along the M4 between junctions 1-13 are forecasted to range from 5% (eastbound in the inter peak period) to 11% (westbound in the pm peak) by 2037 as a result of

implementing the scheme. The model however forecasts an **increase** in journey times on sections of the A4 in both 2022 and 2037 modelling periods of up to 3% as a result of implementing the scheme. It should be noted that base year observed, modelled and forecast year journey times are only available for the section of the A4 between Langley and Chiswick (tables C-26 and C-20 of the forecasting report).

4.14 The ES considers driver stress for the A4 link in table 13.2 and concludes that the effect for users is neutral. This has not been quantified with changes to vehicle flows, queues and journey times and does not consider the above findings of the forecast report.

4.15 The ES considers driver stress for the approaches to the M4 in table 13.27 and 13.28. The A355S approach from Slough, which links into junction 6 of the M4 is likely to experience an increase in driver stress as a direct result of the scheme implementation from low to moderate. No assessment has been undertaken to understand the local highway impacts resulting from this change.

4.16 Further information is required from the HE to understand the implications of the scheme once constructed on the future operation of the A4 and A355. Insufficient information has been provided for Buckinghamshire County Council to assess the impact of the proposal on the local highway network.

5. CONSTRUCTION TRAFFIC MANGEMENT PLAN

5.1 The outline construction traffic management plan (appendix E to the Outline Construction Environmental Management Plan) predominantly focuses on the traffic management requirements associated with the construction of the M4. Little consideration has been paid to the following:

- Impact of bridge closures and associated diversion routes
- Impact of construction sites and compounds (access/egress arrangements)
- Impact of construction traffic (volume and routing)

5.2 The Outline Construction Traffic Management Plan does not provide any indications of the impact of additional traffic on the performance, congestion or road safety of the County's network.

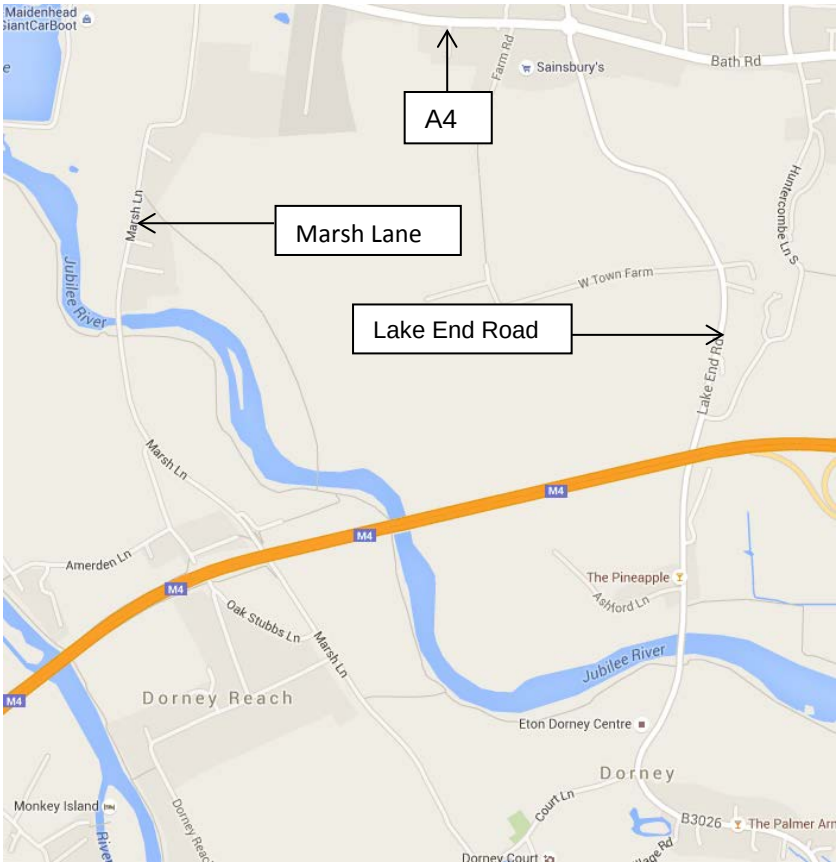
<u>Impact of Bridge Closures and Associated Diversion Routes</u>

5.3 Four bridges are affected within Buckinghamshire County Council's administrative area:

- Thames Bray Bridge- to be widened to the north
- Lake End Road – to be built off-line
- Marsh Lane Bridge – to be built on-line
- Old Slade Bridge – to be built on-line

5.4 Both Marsh Lane and Lake End Road bridges are to be replaced in order to facilitate Smart Motorway operations. Marsh Lane and Lake End Road are the main access roads for Dorney Village together with the local businesses and Eton Dorney Lake, as shown in figure 4.below:

Figure 4: Location of Lake End Road and Marsh Lane

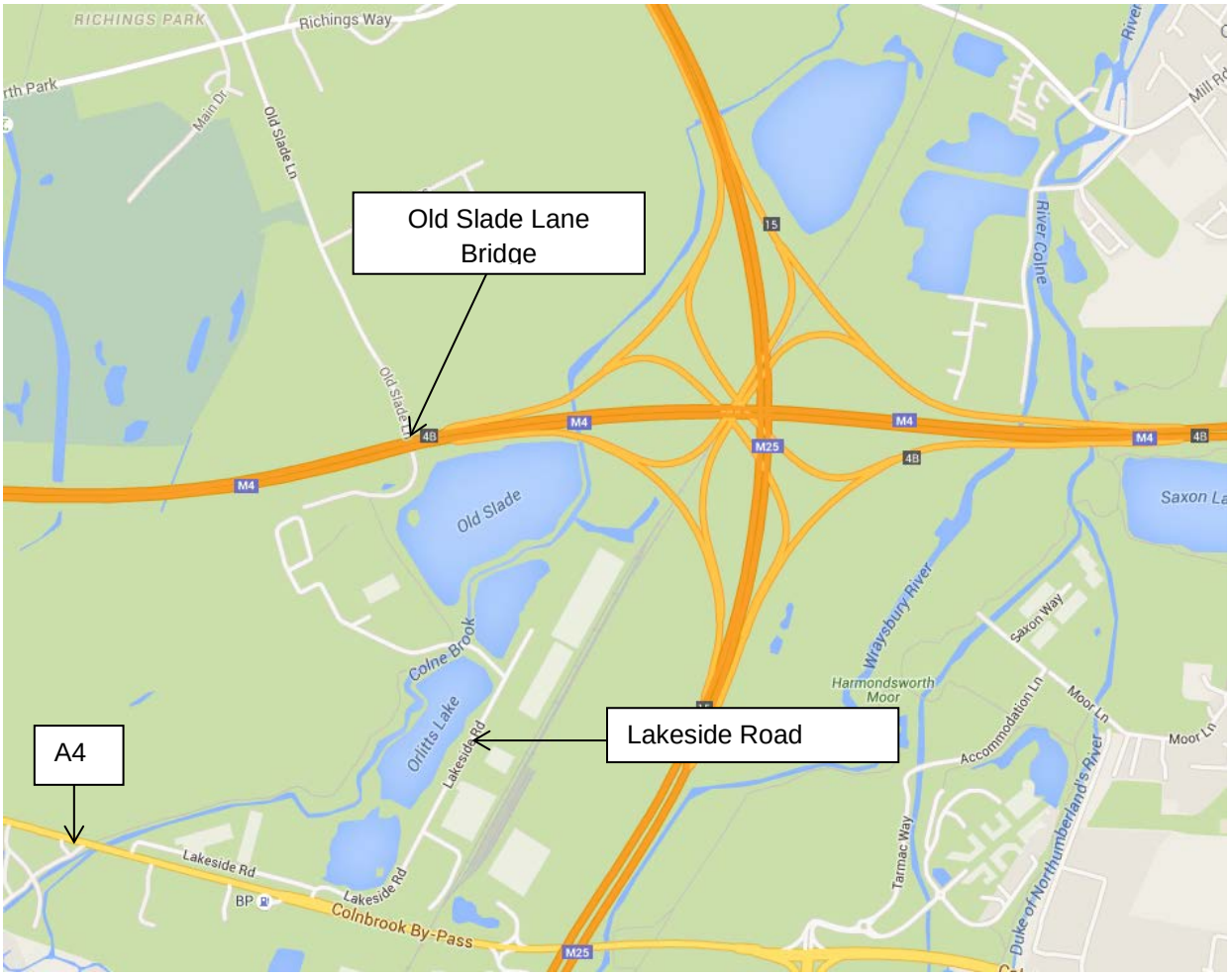


5.5 Lake End Road is to be built off-line, following representations made during the formal consultation. The HE have agreed in the draft SoCG that works to Lake End Road and Marsh lane will not be undertaken during the same period. Lake End Road bridge is to be constructed first, followed by Marsh Lane bridge as illustrated in the construction programme in Appendix 4.1 of the ES.

5.6 Marsh Lane will be shut whilst a new bridge is constructed on-line between November 2018 and December 2019. The potential diversion route is via Lake End Road/A4 Bath Road and involves a 10km detour. Lake End Road and its junction with the A4 Bath Road will experience increased traffic as part of the planned online development of Marsh Lane over a 13 month period. The impact of this diversion route, particularly on the junction of Lake End Road and the A4 Bath Road has not been assessed and Buckinghamshire County Council cannot confirm that it will not be severe.

5.7 Old Slade Lane forms part of the Colne Valley Trail, a prominent series of walkways through the Colne Valley Park. The bridge is therefore primarily used for walkers, cyclists and horse riders with a gate present to stop vehicles crossing.

Figure 5: Location of Old Slade Lane



5.8 The County Council is currently seeking formal designation of this route to a bridleway to connect Buckinghamshire and South Bucks District Council on the north side of the M4 with Slough Borough Council on the south side.

5.9 In the draft SoCG HE has agreed to review the current designation status of the public right of way over the bridge and ensure that the bridge is made suitable for vehicles, pedestrians, cyclists and horse-riders within the scheme design and order limits. No assurance has been made that Highways England will dedicate the path as a bridleway, as part of the works to the bridge.

5.10 Old Slade Bridge is to be closed between November 2017 and December 2018. Due to the nature of the bridge the proposed diversion route is considered to be impractical, requiring a 6km detour. The ES considers the impact of severance in closing Old Slade Bridge to be severe, however no mitigation has been proposed.

5.11 Two 12 hour counts of users of the bridge were undertaken on 3 and 6 June 2015, the results of which are appended to Appendix 1 of the draft SoCG. On Wednesday 3 June 2015, a total of 58 people used the bridge (45 adults, 6 children and 7 cyclists) and on Saturday 6 June 2015 44 people were observed using the bridge (35 adults and 9 cyclists).

5.12 Buckinghamshire County Council is of the view that access during bridge construction should be maintained. The HE has suggested that off-line construction of Old Slade Bridge is not viable due to the proximity to the M25 slip roads and presence of a lake, as set out in Table 6 of the Engineering and Design Report (Application Document Reference 7.3). The County Council has suggested the provision of a temporary off-line bridge for use whilst the existing bridge is demolished and re-built in order to mitigate the impact during construction.

Impact of Construction Traffic

5.13 The majority of the works will be carried out within the existing M4 corridor however as part of the construction process the contractors are anticipated to use a number of sites for operational processes. Two sites have been identified within Buckinghamshire:

- Compound 6 (within junction 7)
- Compound 9 (Colnbrook Landfill Site, Sutton Lane)

5.14 No information has been provided by HE in relation to the likely volume or the proposed routing of construction traffic. This needs to be properly assessed, taking into account the constraints of the local highway network, to ensure that routes are suitable for the proposed levels of traffic. The County Council would expect either temporary or permanent mitigation to be proposed to ensure that the works do not have a severe impact on the operation of the highway network.

5.15 Buckinghamshire County Council has raised the following local areas of concern to HE:

- **Construction traffic to Old Slade Lane** – construction traffic associated with the construction of Old Slade Bridge should be routed via Lakeside Road due to concerns regarding HGV's using Richings Way and Iver areas to the north.

- **Access to Compound 9 (Colnbrook Landfill Site, Sutton Lane)** – vehicle movements to and from this compound should be restricted to ensure that HGVs vehicles do no use North Park or Richings Way. Vehicles should be routed via London Road (A4) and Sutton Lane.

- **Richings Park and Iver** - ongoing consultation with the local Parish Council and further research being undertaken as part of South Bucks District Local Plan identify that there is a popular alternative route for HGV's through the district from Richings Park to the M40. This route involves the Village Town Centre of Iver, which is already experiencing high volumes of HGVs. The County Council would not wish the scheme to add to this problem either directly or indirectly.

5.16 Buckinghamshire County Council wishes to enter into routing agreements with HE, to minimise the impact of construction on the local road network and surrounding communities and prevent large vehicles from using unsuitable roads. The agreement would need to detail how routing will be monitored and enforced by HE to ensure compliance by contractors and suppliers.

5.17 It should be noted that HE has referred the County Council to Schedule 2, Requirement 18 (1) of the Draft DCO which states:

"*No authorised development is to commence until a construction traffic management plan, detailing traffic management measures during construction of the authorised development and* ***substantially in accordance with the outline construction traffic management plan annexed to the CEMP****, has been submitted to and approved by the relevant planning authority*."

5.18 Schedule 2, Requirement 18 (1) of the Draft DCO does not offer any certainty due to the inadequacies of the Outline Construction Traffic Management Plan that has been submitted.

6. SUMMARY

6.1 This written statement has been produced to outline the concerns of the County Council in relation to highway matters and should be read in conjunction with the Local Impact Report, jointly submitted by South Bucks District Council and Buckinghamshire County Council., and the draft SoCG.

6.2 The County Council needs to ensure that proposals do not temporarily or permanently lead to a further deterioration of conditions, particularly on the A4 or the A355. The County Council is of the view that the Environmental Statement submitted in support of the Development Consent Order does not adequately assess the impact of the proposed smart motorway scheme on the local road network for the following reasons:

- The ES does not consider the displacement of vehicles from the M4 onto the local highway network during the construction period or the impact this will have on the operation or safety of Buckinghamshire County Council's network.
- The Outline Construction Traffic Management Plan does not provide any indications of the impact of additional/diverted traffic on the performance, congestion or road safety of the County's network.
- No mitigation measures are proposed to address the County Council's concerns relating to severance or routing.

6.3 It is essential that the impacts of the scheme are properly assessed and understood and if appropriate mitigation is proposed to ensure that works do not have a severe impact on the local highway network.