1.0 INTRODUCTION

Context

1.1 This Highways Appraisal (HS) is prepared in relation to planning application reference UTT/25/2786/OP which proposes to develop land at Land North Of Taylors Farm, The Street, Takeley (the Application Site).

1.2 The planning application seeks permission in outline, with all matters reserved except for access, for a mixed use, commercial development including:

offices and/or industrial processes and/or general industrial and/or storage and distribution (Use Classes E(g)(i) and/or E(g)(iii) and/or B2 and/or B8 with any ancillary office floorspace) and/or a Mobility and Amenity Hub comprising retail food/beverage use (Use Class E(b)) and/or office (Use Class E(g)(i)) and/or a public transport interchange (Sui Generis), and access works, strategic landscaping, infrastructure and other associated works

1.3 This HS is prepared on behalf of Takeley Street Action Group (TSAG). It considers the potential impact that the Proposed Development will have on the lives of local residents.

1.4 The HS is prepared as at 15th December 2025 and is based on documents that are publicly available comprising:

- Land North of Taylors Farm Takeley, Essex, Transport Assessment dated October 2025 (hereafter referred to as 'the TAR'); and
- Land North of Taylors Farm, Takeley Street, Environmental Statement (hereafter referred to as 'the ES').

1.5 Specifically, this report considers chapters 8, 9 and 10 of the ES which correspond to Transport, Air Quality and Noise and Vibration, in so far as these chapter rely on traffic forecasts. For clarity, the TAR forms Appendix 8.1 of the ES.

Failure to Provide a Complete TAR

1.6 In preparing this HS, consideration has been given to the responses of the county highway authority (CHA) and National Highways (NH) issued on 28th November 2025 and 26th November 2025 respectively. Both responses raise a failure of the applicant to provide an appropriate highway capacity assessment of the potential peak hour impacts of the Proposed Development. The CHA note that the applicant has stated that micro-simulation modelling is going to be undertaken. Both the CHA and NH reserve their position to comment on the planning application once this assessment has been submitted.

1.7 Paragraph 118 of the National Planning Policy Framework (NPPF) states that:

All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored

1.8 It is incomprehensible therefore that a planning application should have been validated that is supported by a transport assessment that includes at paragraph 13.7 a statement that modelling will be undertaken at a future date.

1.9 As it currently stands, due to the absence of the results of this traffic modelling, which is yet to be undertaken, the application is contrary to the requirements of NPPF paragraph 118 which in turn means that it has failed to demonstrate either that there would not be an unacceptable impact in highway safety or that residual cumulative impacts would not be severe. IN accordance with NPPF paragraph 116, if the planning authority (LPA) is to make any determination of the application, it should be to refuse it.

1.10 In the alternative that the LPA provides the applicant with additional time to deliver the transport assessment work that should have been submitted with the planning application, TSAG reserves their position to provide additional representations on this assessment work. The LPA is also asked to consider the validity of the ES noting that three of the chapters directly rely on traffic forecasting data, which will not be fully available until some point in the future.

Scope of Highway Appraisal

1.11 Whilst peak hour congestion represents one concern that needs to be assessed and mitigated as part of the Proposed Development, for people who live adjacent to, or close to the Application Site, the adverse environmental impacts of increases in road traffic, and especially its HGV component, throughout the day and night is of equal concern.

1.12 Pending the provision of peak hour traffic modelling results, at this stage based on the information currently provided by the applicant, this HS appraises the following:

- The approach to predicting the HGV component of forecast development traffic and the environmental and physical implications arising from HGV volumes;
- The reasonableness of any assumptions on mode choice having regard to existing and planned active travel and public transport networks, and the implications for development traffic forecasts; and
- Highway Access – for which detailed planning permission is sought

1.13 A summary and conclusion is provided at the end of this HS which is that based on the information provided the planning application should be refused because:

- **Incomplete Transport Assessment:** The TAR is incomplete, with critical junction assessment work yet to be submitted.

- **Underestimated HGV Volumes:** The HGV forecasts used in the ES do not reflect the full range of land uses for which planning permission is sought. As a result, the conclusions of chapters 8, 9, and 10, which rely on these HGV forecasts, are unreliable.
- **Unsustainable Travel Assumptions:** Considering the Application Site's location, the existing level of sustainable travel infrastructure, and the minimal proposed measures to support travel by non-car modes, it is unlikely that the site would achieve the mode shares assumed in the TRICS-based traffic forecasts. Consequently, the TA and ES likely **underestimate car journeys**, rendering the conclusions of chapters 8, 9, and 10 unreliable.
- **Impacts on Road Safety and Capacity:** By failing to fully assess the HGV-generating potential of the proposed land uses, the application underestimates the severe impacts that high volumes of turning HGVs would have on road safety and highway capacity, particularly given the additional lane widths required to safely accommodate such traffic.
- **Indeterminate suitability of the access junctions:** There are several departures from standard apparent at both of the vehicular points of access. No road safety audit has been undertaken of either proposed point of vehicular access. The applicant has simply failed to demonstrate that the vehicular access points, for which planning permission is sought in detail, are safe and suitable.

1.14 TSAG reserves their position to provide additional comment should the applicant submit the required missing information.

2.0 HGV FORECASTS

TAR Approach

2.1 The planning application seeks permission for a range of land uses, with the final mix to be determined. It is understood that there are no restrictions currently proposed on the floor areas of specific land uses or any exclusions of sub-categories within broader land uses.

2.2 For the purposes of the TAR, paragraph 9.2 states the following:

To determine a robust forecast for the proposed development trip generation it has been assumed that the final development will comprise a mix between 70% 'Industrial Estate' use and 30% 'Business Park'.It should be noted that the proposed application is in outline only and for mixed employment uses, as such the details of use of each building and related occupier would be detailed at a later stage. As detailed earlier in this TA, the indicative unit mix has been agreed in consultation with National Highways and Essex County Council and is considered robust, reflecting a worst-case level of office/business floor space that generates a realistic highest number of potential trips

2.3 This approach applied to an assumed 83,000m^2 of total floor space (ca. 890,000sqft). The resulting weekday peak hour traffic volumes are set out in the TAR. However having review the TAR and chapters 8, 9 and 10 of the ES, there is no summary data of the daily HGV volumes expected to arise from the Proposed Development.

2.4 Table 8.12 of the ES presents the differences in traffic volumes and the HGV component between the future baseline and the future baseline plus the Proposed Development. The number of vehicles stated in the difference columns are assumed to be the Proposed Development traffic.

2.5 Considering the B1256 (link 5) from which the Application Site is accessed, this shows an AADT of 447 HGVs and a total traffic volume of 5,216 vehicles. The latter traffic volume does not align with the 4,534 daily vehicle movements referred to at paragraph 8.42 of the ES. Nonetheless, it is concluded that the Applicant's estimate of daily HGV movements is in the order of 447 HGV movements per day.

2.6 The forecast traffic volumes above assume a land use mix that is considered by the applicant to represent a realistic worst-case scenario in terms of peak hour traffic generation. However, it does not represent the worst-case potential daily HGV scenario, which is a critical input to the assessments set out in the ES.

2.7 The table below sets out daily total traffic and HGV volumes typically arising from 83,000m^2 of the unconstrained B2 and B8 land uses which are included in the planning application.

Time Period	B2 Industrial		B8 Warehousing (Commercial)		B8 Warehousing (self-storage)		B8 Parcel distribution	
	All traffic	HGV	All traffic	HGV	All traffic	HGV	All traffic	HGV
AM Peak	749	76	286	67	303	34	1178	118
PM Peak	421	34	320	59	362	42	1229	84
Daily	7213	614	2929	867	3526	295	9847	1355

Table 2.1 – B2 and B8 Traffic Generation (83,000m^2)

2.8 The table above shows that for unconstrained B2 and B8 land uses, daily HGV movements could be between 295 HGV movements per day and 1,355 HGV movements per day. At 447 HGV movements per day, the Applicant's estimate is at the lower range of potential daily HGV movements and less than a third of the potential daily HGV movements arising from the land uses for which permission is sought.

2.9 A potential 1,355 HGV movements would result in significantly different environmental impacts than the 447 HGV movements on which the ES is based. As the HGV forecasts used in the ES do not reflect the range of land uses for which planning permission is sought, resulting in underestimates of HGV volumes, the conclusions of chapters 8, 9 and 10, which rely on forecast HGV volumes, are unreliable.

Highway Impacts

2.10 The proposed highway access to the Application Site is designed as a left-in, right-out only junction for HGV traffic. This means that all HGV traffic approaches or exits via such that all HGV traffic must approach from M11 junction 8 ('Junction 8').

2.11 Junction 8 is a non-standard grade separated junction comprising a main gyratory with a concentric section of carriageway on its eastern side. As a consequence, the overall gyratory comprises 2 long sides which are broadly straight and 3 short sides (compared to a conventional gyratory which has only 2 short sides) which are circulatory.

2.12 A turning HGV requires more width than is provided in a standard lane width in order to turn safely and so short, circulatory sections of the carriageway require widened lanes in order to do safely accommodate HGV traffic. No such widening is provided on the circulatory carriageways of Junction 8.

2.13 Observation on site confirms that as a consequence, and as could be foreseen through design guidance, a moving HGV takes up the whole width of the circulatory lane and frequently more than the lane width in order to turn. This means that other vehicles on the road keep clear of moving HGVs on the short lengths of circulatory carriageway. In effect an articulated lorry takes up two lanes of the short lengths of circulatory carriageway, either physically or effectively as other drivers avoid driving adjacent to them.

2.14 The Proposed Development has the potential to result in a significant increase in HGV movements at Junction 8 (up to 1,355 HGV movements daily). It is therefore critical that the applicant adequately assesses the implications of this increase in the HGV component of vehicles arising from the Proposed Development, both in terms of road safety and capacity caused by HGV traffic unexpectedly straddling lanes on circulatory carriageways.

2.15 Failure to assess the HGV generating potential of the land uses for which planning permission is sought underestimates the severe impacts that high volumes of turning HGV movements will have on road safety and highway capacity by virtue of the additional lane widths required to accommodate HGV traffic.

3.0 MITIGATION

3.1 Section 7 of the TA details the mitigation that the applicant is proposing in order to encourage people to travel to and from the Application Site by non-car modes. This comprises:

- A section of shared footway / cycleway to the east of the Application Site access. This appears to just end without connecting to any other cycle infrastructure. Cyclists are expected to rejoin the carriageway.
- A financial contribution allocated to provide an enhanced bus service which may include extended operating hours of the 508/508A route, as well as an increased frequency during peak hours depending on further consultation through subsequent reserved matters stages.

3.2 All the other measures to support non-car modes of travel relate to movements within the Application Site and not to and from it i.e. they benefit people once they have arrived at the Proposed Development.

3.3 Section 12 of the TA talks about a "vision-led" assessment and how:

The measures set out within this TA and accompanying TP seek to reduce the car driver mode share of the proposed development by 20%.

3.4 It is difficult to see how a short section of cycleway that does not connect to anywhere and a commitment to consulting on bus improvements will lead a 20% reduction in the car driver mode share. This is particularly the case when considering that some or all of the Proposed Development will be operating:

- at times when there are no bus services operating; and
- during the darker winter months when inclement weather and darkness make active travel choices less attractive.

3.5 Indeed, having regard to:

- the location of the Application Site in relation to centres of activity;
- the existing level of sustainable travel infrastructure and services; and
- the token commitment to delivering infrastructure to support people travelling to and from the Application Site by sustainable modes

it is unlikely that the Application Site would be sufficiently sustainable to meet the mode choices implicit to the TRICS data used in forecasting.

3.6 As a consequence, the traffic forecasts used in the TA and ES underestimate the number of journeys that would be made by car. The conclusions of chapters 8, 9 and 10, which rely on forecast traffic volumes, are therefore unreliable.

4.0 VEHICULAR ACCESS

4.1 The planning application seeks outline permission with the detail of all matters reserved except for access. Access is the one element of the design for which planning permission for the detail is sought. It is reasonable therefore to expect that the access designs provided are the detailed geometry of what will be built. Details such as pavement specifications, lighting, street furniture locations etc will follow at the next stage. Were this not the case, then the applicant would be seeking outline permission only for the access, with the details of the layout deferred to a reserved matter.

4.2 It can therefore be expected that the design of the access would meet the requirements of the Essex highway design guide which points to the Design Manual for Roads and Bridges (DMRB) as appropriate guidance for industrial roads. Both the Essex design standards and the DMRB expect a Stage 1 road safety audit (RSA1) to be undertaken at this stage. The next stage in the road safety audit process would be following completion of the construction drawings (stage 2 RSA).

4.3 The Proposed Development provides two vehicular access points as follows:

- A left-in, right-out signal junction designed to accommodate HGV movements and designated as the "Primary Access". This will take the form of a signal junction; and
- An all moves junction designated as "Emergency, Servicing and Bus Vehicle Access" (hereafter referred to as "the All-Moves Access"). This will take the form of a simple priority junction. Paragraph 7.7 of the TAR states that the All-Moves Access will be restricted for use by buses, emergency vehicles, service vehicles and some general vehicle movements to and from the east.

4.4 A review of these two access points is provided below.

Primary Access

4.5 The Primary Access is designed to accommodate HGV movements and swept path analyses are provided demonstrating that this is the case.

4.6 A review of Appendix I of the TAR however reveals that there are insufficient details of the modelling parameters of this junction in order to determine if it will operate acceptably in the future.

4.7 There are no details of how the required right-turn out and prohibited right turn in will be enforced. It is assumed that this will be via a traffic regulation order however as the applicant is seeking permission in full for the access, these details should be provided prior to determining the application.

4.8 Moreover, there is no RSA1 provided. It is incredulous that a planning application should be submitted seeking permission for the details of highway access for a development expected to attract over 5,000 vehicle movements per day (according to the applicant) and yet no road safety audit has been provided.

Emergency, Servicing and Bus Vehicle Access

4.9 The All-Moves Access is intended to accommodate movements by large vehicles including buses. The following is noted:

- There is no operational assessment of the junction. The suitability of a priority-controlled egress at this location is unknown.
- There is no forecast of the number of vehicles that will use the access. Whilst it is a secondary access, nonetheless for this scale of development, even a secondary access will attract a significant volume of traffic.
- "Servicing" is not defined. Service traffic usually includes vehicles such as parcel delivery, maintenance contractors etc. Drivers of servicing vehicles approaching from the east will quite reasonably turn right at the junction and this could be a substantial volume of traffic
- There is no swept path analysis to demonstrate that a bus is able to enter and exit via this access.
- There are no details of the control measures to be put in place to prevent vehicles turning into this access.

- There are no details regarding how drivers will know not to turn in or how this will be enforced. If a vehicle turns right into this access to avoid u-turning at Junction 8 and entering left at the Primary Access, there is no where for the vehicle to turn and come out. This means that unless the vehicle is allowed into the Site, it will need to reverse onto the B1256 which would cause an unacceptable road safety impact.
- CD123 identifies that all roads with an AADT of 13,000 and above should be provided with a right turn ghost lane irrespective of the minor arm flow. The B1256 is forecast to have significantly higher AADT than 13,000 vehicles. No justification is provided for why a right turn ghost lane is not provided.

4.10 It is again noted that there is no RSA1 provided for this junction, for which permission in full is sought. Many of the points raised above may have been raised in such an audit.

5.0 SUMMARY AND CONCLUSION

5.1 This Highways Appraisal (HS) has been prepared in relation to planning application UTT/25/2786/OP for a mixed-use commercial development at Land North of Taylors Farm, Takeley. The appraisal considers the implications of the proposal for local residents, focusing on transport, air quality, noise and vibration impacts, all of which rely on accurate traffic forecasting.

5.2 A fundamental concern is that the Transport Assessment (TAR) submitted with the application is incomplete. Both Essex County Council, as the County Highway Authority, and National Highways have confirmed that essential peak-hour highway capacity modelling—required by the National Planning Policy Framework—has not been undertaken or provided. As a result, the application currently fails to demonstrate that highway safety impacts would be acceptable or that cumulative impacts would not be severe. In this context, the application should be refused unless and until the missing assessment work is provided.

5.3 Based on the information currently available, three further critical issues have been identified:

Underestimation of HGV Traffic

5.4 The application seeks, inter alia, unrestricted B2/B8 employment uses, but the TAR assumes a land-use mix that does not represent a worst-case scenario for daily HGV generation. Independent comparisons show that the Proposed Development could generate up to 1,355 HGV movements per day, whereas the ES is based on only 447. This underestimation renders the ES conclusions on transport, air quality and noise impacts unreliable.

5.5 The potential increase in HGV activity would also exacerbate safety and capacity problems at M11 Junction 8, where lane geometry already struggles to accommodate turning HGVs.

Unrealistic Sustainable Travel Assumptions

5.6 The limited off-site mitigation comprising a short, unconnected section of cycleway and a potential financial contribution toward bus service improvements to be determined at a future date, cannot credibly deliver the 20% reduction in car mode share assumed in the TA.

5.7 Given the site's location, limited public transport coverage and seasonal factors, car use is likely to be significantly higher than forecast. This further undermines the ES's traffic-dependent assessments.

Highway Access

5.8 The application seeks detailed approval for two site access junctions but fails to provide the information required to demonstrate that they are safe or fit for purpose. Because access is the only fully detailed element of the proposal, the designs should meet Essex and DMRB standards and be supported by a Stage 1 Road Safety Audit—yet no RSA1 has been submitted.

5.9 For the Primary Access, although HGV swept paths are shown, key information is missing, including traffic modelling details and how prohibited right-turn movements will be enforced.

5.10 For the All-Moves Access, no operational assessment, traffic forecasts, swept path analysis for buses, or enforcement measures are provided. The design also conflicts with DMRB guidance requiring a right-turn ghost lane on roads with the traffic levels expected on the B1256. Unsafe driver behaviour (e.g., mistaken right turns with no turning space) is not addressed.

5.11 Overall, the access proposals lack essential safety audits, operational evidence, and enforcement details, leaving major questions about their suitability and compliance with required design standards.

Conclusion

5.12 Based on the analysis set out above it is concluded that, based on the information provided the planning application should be refused because:

- **Incomplete Transport Assessment:** The TAR is incomplete, with critical junction assessment work yet to be submitted.
- **Underestimated HGV Volumes:** The HGV forecasts used in the ES do not reflect the full range of land uses for which planning permission is sought. As a result, the conclusions of chapters 8, 9, and 10, which rely on these HGV forecasts, are unreliable.
- **Unsustainable Travel Assumptions:** Considering the Application Site's location, the existing level of sustainable travel infrastructure, and the minimal proposed measures to support travel by non-car modes, it is unlikely that the site would achieve the mode shares assumed in the TRICS-based traffic forecasts. Consequently, the TA and ES likely **underestimate car journeys**, rendering the conclusions of chapters 8, 9, and 10 unreliable.

- **Impacts on Road Safety and Capacity:** By failing to fully assess the HGV-generating potential of the proposed land uses, the application underestimates the severe impacts that high volumes of turning HGVs would have on road safety and highway capacity, particularly given the additional lane widths required to safely accommodate such traffic.
- **Indeterminate suitability of the access junctions:** There are several departures from standard apparent at both of the vehicular points of access. No road safety audit has been undertaken of either proposed point of vehicular access. The applicant has simply failed to demonstrate that the vehicular access points, for which planning permission is sought in detail, are safe and suitable.

5.13 TSAG reserves their position to provide additional comment should the applicant submit the required missing information.