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Dear Andrea,

Publication of the proposed submission London Borough of Richmond upon Thames – Local Plan Publication under Regulation 19 of the Town and Country Planning Regulations (Local Planning) (England) 2012.

National Highways welcomes the opportunity to provide our comments on the Local Plan Publication (Regulation 19) version.

National Highways 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). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. For the purposes of the Richmond Local Plan, we would be concerned with development patterns that have the potential to impact on the operation of M3 Junction 1 and M4 Junctions 1 to 3.

As a statutory consultee to the Local Plan consultation, we are interested in the potential traffic impacts of any development site proposals and/or policies coming forward which may impact on the operation of our network and the need to ensure that any impacts are fully understood at the plan-making stage.

We have undertaken a review of the 'Richmond Draft Local Plan (Regulation 19) Consultation Version' and we agree with the themes and objectives set out in the Plan. These include the themes of 'reducing the need to travel' and 'improving the choices for more sustainable travel'. We also see the advantages of creating development that has a 'mixed pattern of land uses' and which limits car parking provision. These measures will help to reduce the need for travel and help to encourage sustainable transport journeys for those that do travel.

For National Highways, the safety and operation of the SRN is our primary consideration. In terms of traffic impacts on the SRN, we take the view that development proposals would be unacceptable, by virtue of an unacceptable road safety impact or severe congestion impacts, in accordance with DfT Circular 01/2022 and NPPF.

DfT Circular 01/2022 confirms in paragraph 28 that *'the policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan'*.

The Circular also states in paragraph 29 that *'capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure. However, there cannot be any presumption that such infrastructure will be funded through a future RIS'*.

Whilst sustainable transport measures are welcomed and encourage, there may still be a requirement for physical highway network improvements, if the assessment of

the transport implications of the Plan show that unacceptable road safety or severe congestion impacts are likely on the SRN.

Policy Comments

We have also provided additional comments on those key policies relevant to National Highways below:

Policy 47 Sustainable Travel Choices (Strategic Policy)

This policy sets out the need to assess the impact of developments and that all major planning applications will need to include a full transport assessment and travel plan, which must be completed in accordance with Transport for London (TfL) guidance. If the proposals share a boundary with the SRN or are likely to generate a significant/severe traffic demand on the SRN, National Highways will also need to be consulted. However, for Local Plan allocations, it is expected that traffic impacts, and any sustainable transport mitigation or capacity enhancements to the SRN, which are necessary to deliver (the proposals) strategic growth, should be identified as part of the plan-making process. This would be set out in an Infrastructure Delivery Plan (IDP), which sets out the infrastructure that is required to deliver the objectives, policies and development proposals set out within the Local Plan.

National Highways has yet had sight of any traffic modelling affecting the SRN, should it affect the SRN, or had any input to the IDP. We are not aware of any SRN impacts that have been identified. We would appreciate clarification and confirmation.

Other general points

On Page 343 of the Draft Local Plan, Paragraph 23.24 states that '*delivery of transport infrastructure, including the relevant proposed transport schemes as set out in the London Plan, is critical to the delivery of the strategic objectives of the Local Plan. Planning, through the use of developers' contributions such as through the use of planning obligations (including Section 106 and Community Infrastructure Levy) is a key way that the Council can gain the necessary resources to assist in the delivery of this vital infrastructure*'.

It should be noted that National Highways cannot be a party to Section 106 contributions. Likewise, it should not be presumed that any necessary SRN infrastructure will be funded through a future Road Investment Strategy (RIS), nor can mitigation requirements affecting the SRN be included within the Community Infrastructure Levy at a planning application stage.

We would expect that any mitigation necessary to deliver strategic growth of the Local Plan for the SRN will be identified and included in the IDP. The DfT Circular states in

Paragraph 34 that *'our engagement with plan-making will help inform the preparation of the local authority infrastructure delivery evidence base. From a transport perspective, this evidence should provide a means of demonstrating to the examining inspector, development industry and local communities that planned growth is deliverable, and that the funding, partners and relevant processes are in place to enable the delivery of infrastructure; or that there is a realistic prospect that longer term investment can be secured within the timescales envisaged'*.

National Highways would like to better understand the current position of the Local Plan in terms of anticipated future traffic growth (associated with applications) impacting on the SRN, and any mitigation measures (with the IDP) identified to off-set these impacts.

Paragraph 26.16 onwards concerning Infrastructure Delivery, refers to the provision of an IDP, but refers to more 'essential community infrastructure'. There is no mention of the SRN. If necessary, mitigation measures will be required if unacceptable road safety or severe congestion impacts are identified. These could, and preference should be given to, include relevant sustainable transport measures, or physical highway improvements as a last resort.

It does not appear that National Highways have been listed as one of the key stakeholders on the development of the IDP. However, we would appreciate the opportunity to stay informed and review the progress of the IDP so as to ensure that any SRN impacts would be considered, and if necessary, mitigated.

We look forward to continuing to participate in future consultations and discussions. Please do continue to consult us as the Plan progresses so that we can remain aware of, and comment as required on, its contents. Should a virtual meeting be beneficial to take this forward, please let us know at your earliest opportunity.

Should you have any queries regarding our response please contact us at PlanningSE@nationalhighways.co.uk.

Yours sincerely,



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