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From: Burgess, Janice
Sent: 20 October 2021 09:50
To: forward.planning@barnet.gov.uk; [REDACTED]
Subject: Barnet Local Plan Comments from National Highways

For the attention of: Ngaire Thompson

Re: Barnet's Local Plan - Publication (Regulation 19)

Highways England Ref: #13364

Dear Ngaire,

Following on from the meeting we had last week please see below the missing comments that should have been sent to you back in August. I can only apologise again for not having sent them sooner. I think that in the process of trying to get the meeting arranged these got 'lost' along the way and I had thought that someone else in the Team had sent them. Thank you for your patience. It is probable that we have now covered, in discussion, some of the points raised and I'm sure you will want to come back to us on others. The following is an email as drafted back in August so I have left it as is. It refers to Highways England and, as you will know, we are now re-named as National Highways but I have left HE references rather than go through and change them.

Thank you for your formal notification email of 28 June 2021 inviting Highways England to comment on the emerging 'Barnet Local Plan', as part of the Regulation 19 consultation process. Highways England also provided comments on the Strategic Transport Assessment Final Report, dated June 2021

On behalf of the Secretary of State for Transport, Highways England is responsible for operating, maintaining and improving the Strategic Road Network (SRN) i.e. the Trunk Road and Motorway Network in England, as laid down in Department for Transport (DfT) Circular 02/2013 (Planning and The Strategic Road Network). Related to the Barnet Local Plan area, the SRN comprises junctions M1 J1, J2 and J4. Despite being in neighbouring districts, the M25 J23/A1 and J24 also have the potential to be affected by development positioned within the Barnet Borough. It is based on these responsibilities that Highways England has provided the comments that follow.

Highways England are a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. Highways England is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour. In order to constructively engage in the local plan-making process, we require a robust evidence-base so that sound advice can be given to local planning authorities, in relation to the appropriateness of proposed development in relation to the SRN. This also extends to include transport solutions that may be required to support potential site allocations.

We would like to draw your attention to Highways England's document 'The Strategic Road Network, Planning for the Future: A guide to working with Highways England on planning matters' (September 2015). This document sets out how Highways England intends to work with local planning authorities and developers to support the preparation of sound documents which enable the delivery of sustainable development. The document indicates that Highways England will review and provide comments on local plans proposed by local planning authorities that have the potential to affect any part of the SRN. Responses to Local Plan consultations are also guided by other pertinent policy and guidance, namely the NPPF and the 'Highways Agency (Highways England) and the Local Plan Process' protocol.

Local Plan Context

The emerging Barnet Local Plan proposes to meet the London Plan target of 35,460 new homes over the Plan Period between 2021 and 2036, while providing a supply of sites for up to 46,000 new homes. The Plan will also aim to deliver more than 27,000 new jobs, with the majority of these to be generated in the Brent Cross Growth Area.

The LPA recognise that sustainable growth is key to delivering the vision and objectives of the Plan to meet the needs of the Borough. Proposals such as the West London Orbital and the potential arrival of Crossrail 2 at New Southgate, are anticipated to provide a catalyst for growth, but that this potential must be planned for. In terms of transport, the Local Plan notes in Para 2.8.1 that Barnet is well served by public transport for radial travel, but orbital travel is significantly more challenging. In addition to the underground and national rail services to central London, Barnet has a good network of bus services that provide a varied frequency of journeys depending on the route; however, bus journeys tend to be slower than by car due to congestion. Traffic congestion is a significant challenge for Barnet, particularly along the major thoroughfares such as the A1, M1, A41 and A406, with a considerable number of trips originating from outside Barnet.

Strategic Policies

Highways England has not provided comments on specific draft site allocations in the Local Plan but has provided general comments that relate to Highway England's primarily interests for the continuing operation and safety of the SRN.

Comments are provided below under each of the Local Plan policy headings:

Policy CDH09 Advertisements

No reference is currently made to the SRN or Highways England within this Local Plan policy.

The display of advertisements is subject to a separate consent process within the planning system. This is principally set out in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Most advertisements on land directly facing motorways and trunk roads require the express consent from the relevant local planning authority, as well as prior permission from the landowner before they may be displayed lawfully. It is a requirement of the local planning authority to consult Highways England on the road safety aspects of advertisements proposed alongside the SRN. Advertisements that are likely to distract motorists are unlikely to be approved. Highways England should be consulted on any advertisement proposals close to the SRN and Highways England will need to consider its location, if visible from the SRN, its size, brightness/lighting (if any) and its effect on public safety.

Policy ECC02: Environmental Considerations

No reference is currently made to the SRN or Highways England within this Local Plan policy.

For sites positioned site close to the SRN carriageway and junctions, it will be necessary to ensure that the proposals mitigate appropriately the potential for ground conditions, lighting, noise and vibration impacts. In terms of noise, we would expect the site masterplan to be designed to minimise the exposure of noise-sensitive receptors to strategic traffic, using either or a combination of a landscape buffer and acoustic bund designed to shield the settlement from motorway noise. In addition to noise impacts, we would also draw attention to the importance of ensuring that drainage, landscaping, lighting and boundary treatment proposals for the proposals in accordance with the DfT Circular 02/2013 Annex A A1, which states that all noise fences, screening and other structures must be erected on the developers land, and far enough within the developers land to enable maintenance to take place without encroachment onto highway land. We would expect that these issues are considered when finalising the site layout and masterplan proposals

Impacts arising from any disruptions during construction, noise, vibration, traffic volume, composition or routing and transport infrastructure modification should be fully assessed and reported.

Policy ECC02A Water Management Policy

No reference is currently made to the SRN or Highways England within this Local Plan policy.

In relation to drainage and the SRN, it is important to note that no new connections are permitted to Highways England drainage network. In the case of an existing 'permitted'

connection, this can only be retained if there is no land use change. Development must not lead to any surface water flooding on the SRN carriageway. These points apply to the site operation and construction phases. Highways England should be contacted to discuss these points in detail as part of, or in advance of a planning application submission.

Policy TRC02 – Transport Infrastructure

This Local Plan policy does make reference to Highway England in that it states that *'the Council has an adopted Long Term Transport Strategy (2020-2041) It will work with Highways England, TFL, Network Rail and others to deliver schemes identified within the BLLTS document'*

England is interested in the potential traffic impacts of any development site proposals and/or policies coming forward, and the need to ensure that these are fully assessed during the plan-making stage. It is also imperative to identify any improvements needed to deliver aspirations at this early stage, as set out in Government policy. Paragraph 18 of the DfT Circular 02/2013 states that *'capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage'*.

For individual Local Plan allocation sites, Highway England would expect necessary SRN improvements to have already been identified and tested as part of the long-term Transport Strategy. It should identify the provision of infrastructure at the right time to support the development strategy, combined with developer contributions to secure infrastructure provision as part of an Infrastructure Delivery Plan (IDP). As such, as site allocation later come forward as part of the planning application process, they will be expected to proceed in line with the necessary highway improvements identified as part of IDP strategy. This being the case, the only issues for consideration as part of a planning application submission, would be the phasing of the development in relation to the IDP strategy. Highways England would make use of Grampian conditions to ensure that necessary infrastructure is in place prior too or phased in relation to the development becoming operational. This will be necessary to ensure operation and safety of the SRN.

SRN Traffic Impact

Para 2.8.6 and 2.8.7 of the Local Plan states that the Plan is *'supported by a Strategic Transport Assessment which has assessed the cumulative impact expected from projected growth up to 2036. This includes impacts relating to the highway network (strategic and non-strategic) and public transport (bus and rail). Barnet's Strategic Transport Assessment acknowledges that the long-term impacts of COVID19 on transport use remain uncertain and has therefore maintained levels of pre COVID19 growth as the basis for the Assessment'*.

The Local Plan later builds on this, suggesting that from the modelling undertaken, that Infrastructure improvements have been identified. Para 12.4.1 to 12.4.4 states that *'an important role of the planning system is to identify and coordinate the provision of infrastructure. The council has prepared an Infrastructure Delivery Plan (IDP) in order to help do this effectively, and to support a review of the CIL Charging Schedule which is ongoing and explained further below. The IDP forms a key part of the Local Plan evidence base and:*

- *Reviews the existing capacity of infrastructure provision across the Borough;*
- *Identifies infrastructure needs, gaps and deficits in provision and costs of updating and delivering new infrastructure (including where possible, the phasing of development, funding sources and responsibilities for delivery);*
- *Ensures that infrastructure providers have been involved in the IDP process so as to better align their priorities and resources with delivery of the Local Plan vision and objectives.*

The IDP is a “living” document that will be used as a tool for helping to deliver infrastructure. It will be monitored and revised where necessary. The IDP is used to inform the Council’s capital programme and its work in terms of supporting other agencies delivering infrastructure requirements, particularly through developer contributions, such as Community Infrastructure Levy and S106 planning obligations. The planning process has three main mechanisms for ensuring or contributing to the delivery of the infrastructure that will be required to support development given planning permission. These are the Community Infrastructure Levy (CIL) ,S106 planning obligations and s278 highways agreements’.

Highways England supports the preparation of strategic transport modelling to inform the allocation of Local Plan sites. Before the IDP can be considered, the supporting traffic modelling and assessment work used to inform the IDP, needs to be acceptable to Highways England and deemed fit for purpose. Our review of the supporting information is set out in the section below.

Transport Assessment Review

We have examined the “London Borough of Barnet DLP Reg18 Strategic Transport Assessment Final Report June 2021”. In order to allow us to make a valid assessment of development impacts upon the M1, we seek further information and raise a number of queries below:

Person trip generation for new housing developments is based upon 12 sites from previous planning applications within the Borough. The person trip rates are significantly lower in the morning peak hour (0.556) than equivalent TRICS estimates for London as a whole (0.704) based upon a mixed private/affordable category assumed equivalent to the proportions and types of developments in the Local Plan. Given that TRICS rates are based upon actual observations from a bigger sample size and most had travel plans for the developments surveyed, on what basis were the rates based in the transport assessments for planning applications based in Appendix C? Do the 12 sites comprising the previous planning applications (presumably without travel plans) better match the types of development in the Local Plan in relation to tenure and location for example?

Please provide documentation of the research or links to the research evidence on the proportional vehicle trip reductions related to soft measures. In terms of soft measures to reduce highway vehicle trips, with what certainty will these measures be implemented throughout the Borough? Can it be demonstrated that the measures be similarly comprehensive to those in the studies used to derive the evidence of trip reductions? Additionally, can it be confirmed that none of these measures were applied to the trip rates from previous transport assessments used to derive trip rates for this study?

It is unclear which soft measures are being implemented through the Local Plan and which measures are applied outside of the Plan? Have measures being applied outside of the Plan been included in both with and without development scenarios or just in the

full Local Plan mitigation scenario (Scenario 3)? If measures are not Plan related, they should presumably also apply to Scenarios 1 and 2.

How have soft measure reductions been applied to matrices? How has distance been factored into reductions to reflect those sustainable measures are more likely to affect shorter distance trips, where wider travel choices exist enabling substitution by other modes?

Table 8-22 shows flows through the merges and diverges at M1 Junctions 2 and 4. Please can you clarify whether the flows are in vehicles or PCUs?

With suitable responses to these queries, we should then be in a position to assess the impacts at M1 Junctions 2 and 4 merges and diverges.

We note also that the report does not include an assessment of impacts for the M1 southbound at Junction 1. Para 6.1 states that the LoHAM model “assumes the reconfiguration of the M1/A406 Junction from 2021 and that, for this reason, the V/C at this specific interchange cannot be considered representative of current conditions. For M1 Junction 1 southbound we need to understand the impacts of the Local Plan in terms of additional queues and delays compared to the scenario with only consented development within Barnet at the end of the Plan period.

Summary

Highways England has undertaken review of the Barnet Local Plan and has provided comments in relation to policies relevant to Highways England and the SRN. Highway England has provided comments on the Strategic Transport Assessment Report in considering the impact the Local Plan will have on the SRN, although at this time, further clarification / information is requested. Until the modelling is agreed, Highway England will not be able to review the IDP, which identifies mitigation measures based on this assessment. This is a key consideration for Highway England in determining the soundness of the Plan.

We look forward to continuing to participate in future consultations and discussions. In the meantime, if you have any questions with regards to the comments made in this response, please do not hesitate to contact us at planningse@highwaysengland.co.uk.

Many thanks

Janice Burgess, Spatial Planning Manager

National Highways Limited

Bridge House, 1 Walnut Tree Close, Guildford, Surrey, GU1 4LZ

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Highways England Company Limited | General enquiries: 0300 123 5000
|National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park,
Birmingham B32 1AF | [https://www.gov.uk/government/organisations/highways-](https://www.gov.uk/government/organisations/highways-england)
[england](https://www.gov.uk/government/organisations/highways-england) | info@highwaysengland.co.uk

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