

**For the attention of:** The London Plan Team

**Proposal:** Public consultation on the draft London Plan

**Highways England Ref: #4150**

Thank you for your email dated 4<sup>th</sup> December 2017 consulting Highways England on the draft London Plan.

Highways England 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). Parts of the SRN lies within the London Plan area and is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We are concerned with proposals within the draft London Plan and associated documents that have the potential to impact on the safe and efficient operation of the SRN, in this case principally the M1, M11, M25, and M4 within Greater London and strategic trunk roads and motorways surrounding London.

We note the significant increase in development proposed in Outer London. We welcome the emphasis on sustainable travel. Also, the increase in housing provision within London has the potential to reduce the need for travel by reducing commuting from outside London. However, housing zoned in proximity to the SRN and its junctions will be attractive to households wishing or needing to commute by car particularly to locations outside London which do not benefit from the excellent public transport that exists within central London.

The draft London Plan therefore needs to assess the impact of the plan proposals on the SRN including those parts outside Greater London and in particular on the M25. Plan proposals that fail to do this may otherwise be undeliverable.

Having considered the information available online, please see our comments below on the draft London Plan:

#### Chapter 2 – Spatial Development Patterns

An assessment of Opportunity Area proposals in Policy SD1 of the draft London Plan has identified some growth areas that could have a significant impact on sensitive areas of the SRN. For example London Riverside and Bexley Riverside to the east and Heathrow and the Great West Corridor to the west.

Collaboration between The Mayor and Highways England and a commitment in the London Plan to realise the potential for investment in strategic infrastructure in Policy SD2 and SD3 is welcomed. However, the M25 should also be considered a strategic infrastructure priority as it will be required to support the Opportunity Areas in Outer London, in particular.

Highways England identifies SRN improvement schemes through our programme of Road Investment Strategies (RIS). The strategies, in combination with our existing works programme, helps us to prioritise investment to improve the network by

identifying and tackling important issues such as congestion and safety on specific routes. Investment priorities are identified over a 5-year period. Work has now started on RIS 2, which will cover roads investment beyond 2020.

From the information available to us, we cannot determine if the proposals materially affect the safety, reliability and/or operation of the SRN (the tests set out in paragraph 9 of DfT Circular 02/2013 – Planning and the Strategic Road Network and DCLG NPPF para 32). Overall Highways England is concerned that the implications on the SRN has not been appropriately assessed and recommends collaboration with the Mayor and the Boroughs to ensure the full implications of the employment and housing provisions are fully appreciated and subsequently mitigated. This is being partly achieved through individual Borough Local Plan consultations but the wider context would benefit from collaboration with the Mayors office. Development led mitigations are also identified through the Development Management process which can be delivered outside of the RIS programme.

## **Chapter 4 – Housing**

### **Policy H1 Increasing housing supply**

The 2017 draft London Plan is targeting additional housing of 65,000 dwellings per annum compared to 32,000 per annum in 2011 and so doubling the target set in the earlier London Plan.

The allocations for some Outer London boroughs in particular, have risen sharply and coincide with identified 'hotspots' on the SRN.

As with the Opportunity Areas, Highways England is concerned that the implications on the SRN has not been appropriately assessed and recommends collaboration with the Mayor and the Boroughs to ensure the full implications of the housing provisions are fully appreciated and subsequently mitigated.

## **Chapter 10 Transport**

### **Policy T1 Strategic approach to transport**

The evidence base made available on the draft London Plan website for the Strategic Transport Model is insufficient to allow Highways England to determine the predicted level of impacts on the SRN of the draft London Plan proposals and to compare these with other regional planning tools used by Highways England.

Highways England would welcome the opportunity to collaborate with the Mayor and TfL on the Strategic Transport Model to ensure the implications of the draft London Plan provisions are fully reflected in the modelling.

### **Policy T3 Transport capacity, connectivity and safeguarding**

Highways England supports the promotion of public and active transport to be potentially delivered through the indicative list of transport schemes as set out in Table 10.1 but has concerns about the policy on two fronts. Firstly, road safety has been omitted and should be a consideration of both Development Plans and development planning decisions. Secondly, Policy 6.12 Part A of the current London Plan includes provision for *'limited improvements to London's road network to address significant strategic or local needs'* and this should be retained in the draft London Plan as there is currently no policy provision for road network improvements outside of those required to support development.

### **Policy T4 Assessing and mitigating transport impacts**

Highways England strongly supports the content of **Policy T4**. It is important that emphasis is placed on the evaluation of transport impacts and the provision and improvement of sustainable transport infrastructure, particularly where high trip generating developments are proposed.

In line with paragraph 9 of DfT Circular 02/2013, this emphasis will assist in mitigating potential increases in private vehicle trips. In addition, effective travel planning and travel awareness schemes offer a mechanism to minimise the impact to the highway network through the active management of residential and commercial trips.

Highways England welcomes the opportunity for early engagement through the pre-application process.

### **Policy T6 Car parking**

**Policy T6** sets the maximum parking standards to be used in Development Plan Documents. It is noted that the thresholds are reduced from those Supplementary Planning Document on Housing for the 2011 London Plan, which linked parking provision to accessibility through PTAL.

It is also noted that Development Plan Documents may adopt minimum residential parking standards in Outer London locations with a PTAL of 0-1. The availability of parking has a major influence on the means of transport people choose for their journeys and greater parking would probably lead to increased traffic on the SRN. With Outer London Boroughs permitted to adopt minimum residential parking standards in areas with low accessibility to public transport, this could have an adverse impact on the SRN and we would welcome a consistent approach by applying maximum parking standards across all areas.

### **Policy T7 Freight and servicing**

Highways England strongly supports **Policy T7** and in particular **Part A**, which promotes the provision of freight and servicing strategies for OA Planning Frameworks, Area Action Plans and other area-based plans, **Parts D and G**, which support out-of-peak deliveries and **Part E** that seeks to deliver a mode shift from road to rail or water, reduce traffic and reduce emissions from freight and servicing trips and enable last-mile movements.

With regards to last-mile trips, HE would be keen to engage with the Mayor and TfL on this to explore expanding this beyond the GLA. This currently features in the areas for consideration within the M25 SW Quadrant Study.

### **Smoothing Traffic Flow and Tackling Congestion (Current London Plan Policy 6.11)**

The current London Plan includes the Mayor's desire to see Development Plans take a coordinated approach to smoothing traffic and tackling congestion but this has been omitted from the draft London Plan.

Given this is an objective in both the draft Mayor's London Plan (Policy 4) and for Highways England, we would welcome a reinstatement of this policy in the draft London Plan.

Highways England has previously engaged with TfL and GLA through the Operation Directorate and Strategy and Planning Directorate in respect of our Economic Growth Plans and would welcome the opportunity to continue and build on previous

dialogue on the draft London Plan to better understand the impacts on the SRN. We note the reference within the draft plan to; *links with the wider South East (WSE) Partners outside London will help to secure mutual benefits* and Highways England welcomes an opportunity to become part of the SWE Partnership.

Thank you for the opportunity to comment on the draft London Plan and, following a period of time to consider all of the responses, I would welcome the opportunity of a meeting to discuss the comments and concerns of Highways England.

Regards,

**Janice Burgess, Spatial Planning Manager Area 5**

Highways England Company Limited

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

Registered in England and Wales No. 9346363

Direct Tel: 0300 470 1055 | Mobile: 07834 333782

[www.highwaysengland.co.uk](http://www.highwaysengland.co.uk)

