



Statement of Common Ground

Between

London Borough of Newham

And

National Highways

Stage: Newham Submission Draft Local Plan (Reg. 19)

Date: 23 April 2025

1. Executive Summary

- 1.1. A statement of common ground is a written record of the progress made by plan-making authorities during the process of planning for strategic cross-boundary matters. It documents the strategic matters where effective cooperation has led to cross-boundary challenges and opportunities being identified, whether there is agreement between bodies in how these should be addressed, and how the strategic matters have evolved throughout the plan-making process. It is also a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries.
- 1.2. This Statement of Common ground addresses key strategic matters between the two signatories, the London Borough of Newham and National Highways, as relevant to the preparation of the Newham Submission Draft Local Plan and its progression to public Examination.
- 1.3. Strategic matters overseen by other organisations will be addressed in other SoCGs, in order to streamline the process of reaching agreements with each party. Where key strategic issues overlap between different organisations that Newham have signed statements of common ground with (e.g. the delivery of housing targets), these interrelations are summarised in the [Duty to Cooperate Statement](#) (2024) and the Duty to Cooperate Addendum (2025).
- 1.4. The document is intended to be 'live', updated as circumstances change. Please see the Governance Arrangements section of the statement for more details.

2. Parties Involved

- 2.1. Newham Council, the Local Planning Authority for the London Borough of Newham, which is an inner London Borough in East London situated between three rivers: the Lea to the west, Thames to the south and Roding to the east. London Borough of Newham is bordered by several other London Boroughs, including Tower Hamlets, Hackney, Waltham Forest, Redbridge, and Barking and Dagenham. Across the River Thames lies the Royal Borough of Greenwich.

AND

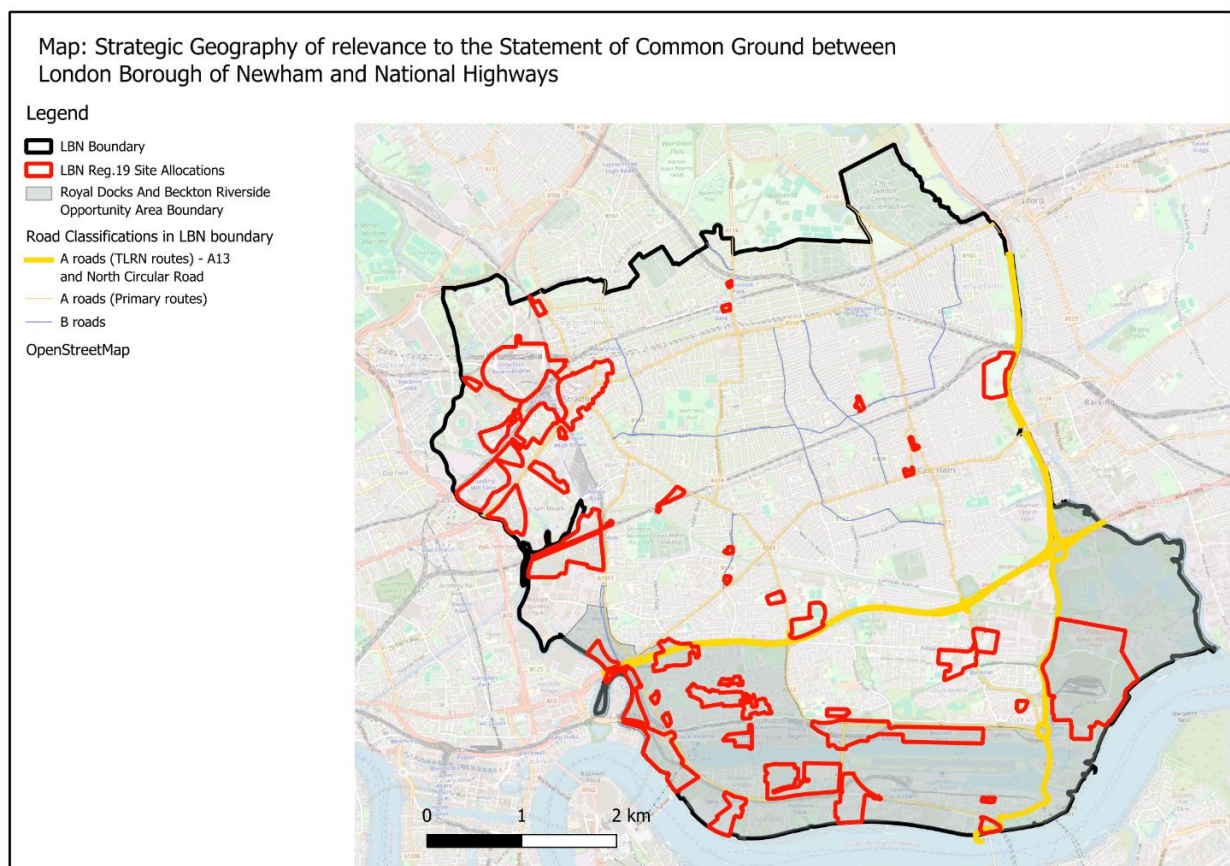
- 2.2. National Highways, appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). National Highways will be concerned with future growth proposals that have the potential to impact on the safe and efficient operation of the strategic road network, in this case the M11, A13 (Part) M25 motorway at junction 30.
- 2.3. The Strategic Road Network (SRN) is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as providing effective stewardship of its long-term operation and integrity.
- 2.4. Newham is strategically located at the intersection of the London-Stansted-Cambridge-Peterborough Corridor, which is centred on enterprise and innovation within emerging sectors

such as digital, media, life sciences, telecommunications and advanced manufacturing, and the Thames Estuary Creative and Cultural Industries Corridor, which adds to the borough's significance. It contains three Opportunity Areas: the Olympic Legacy (which also includes parts of the other Host Boroughs) Poplar Riverside (which crosses the boundary with Tower Hamlets) and Royal Docks and Beckton, which is also the home of London's only Enterprise Zone and Europe's largest regeneration area.

- 2.5. The London Legacy Development Corporation (LLDC) Mayoral Development Corporation returned planning powers back to the London Boroughs of Newham, Tower Hamlets and Waltham Forest and Hackney on the 1st of December 2024. As such, key strategic matters for the parts of the LLDC that fall within Newham's administrative boundaries are also addressed in the new Newham Draft Submission Local Plan, and are subject to the matters addressed in this statement of common ground.

3. Strategic geography

- 3.1. The map below identifies the spatial representation of the key strategic matters addressed, alongside the administrative area of the plan-making authority – London Borough of Newham.



- 3.2. In terms of distance, Newham is located remotely from the SRN being 3-4km at its boundary from the start of the M11 and approximately 12km from its boundary along the A13 to the

London boundary. The Borough is directly connected to both roads via the A406 North Circular and A13 respectively.

- 3.3. As noted above, the LLDC returned planning powers back to the London Borough of Newham on the 1st of December 2024. Where relevant, the Newham draft Local Plan has retained and evolved site allocations and designations from the LLDC Local Plan (2020).

4. Background

- 4.1. Newham Council prepared the Submission Draft Local Plan and published it for consultation between 19th July and 20th September. This is the version of the plan that the Council considers to be 'legally compliant' and 'sound' and will be submitted to the Planning Inspectorate for examination in 2025. The council undertook two rounds of consultation prior to this, to inform the Newham Submission Draft Local Plan. These were:
- Issues and Options Consultation, which took place between 18 October and 17 December 2021; and
 - Draft Local Plan Consultation (Regulation 18), which took place between the 9 January and 20 February 2023.
- 4.2. A [Duty to Cooperate Statement](#) (DtC Statement) was published as part of Newham's Reg. 19 consultation, which provides a summary of London Borough of Newham's engagement with National Highways, as a duty to cooperate partner, as part of the preparation of the new Newham Local Plan, including as part of the preparation of the Sustainable Transport Strategy evidence base.
- 4.3. The national and regional policy context forming the background to this statement of common ground is also detailed in the Duty to Cooperate Statement (2024), under 'Chapter 2: Legislative and national policy context', and in 'Chapter 3: Demonstrating compliance with the duty to cooperate' paragraph 3.22, as specific to cooperation with National Highways.
- 4.4. During the Reg. 19 consultation process, National Highways submitted comments to Newham that raised a concern that insufficient modelling has been undertaken to demonstrate that the growth proposed in the Local Plan will not impact the Strategic Road Network (SRN).
- 4.5. In response, Newham shared the baseline data for the Newham Sustainable Transport Strategy: Growth Assessment Technical Note and an explanation of the methodology and conclusions, alongside a further assessment of Census 2021 data on local travel patterns.
- 4.6. Following review of the above information, London Borough of Newham invited the National Highways to begin discussions towards the signing of this Statement of Common Ground.

5. Key Strategic Matters

- 5.1. **Potential for development to impact junctions on the M25, M11 or A13**
- 5.2. Newham has undertaken an impact assessment of the planned growth in the borough on the highways network, as part of the Sustainable Transport Strategy (2024). The growth assessment is detailed in a technical note, 'Newham Sustainable Transport Strategy Growth Assessment Technical Note'. This technical note was not published, however the outcomes of this growth assessment are summarised in the published Sustainable Transport Strategy, in section 2.7 Summary of Growth Assessment. The note makes use of data prepared by Transport for London as part of the preparation of the Royal Docks and Beckton Riverside Opportunity Area Planning Framework, extrapolating the assumptions in that modelling to the growth planned for the wider borough. The Growth Assessment technical note sets out that only 6% of new trips are forecast to be generated by car. Of this only 10% of those trips would be outbound car trips having destinations outside of Greater London, and 15% of inbound car trips having destinations outside of Greater London. The Growth Assessment technical note concludes that there is "a high level of internalised trips within the borough", and that "the borough is achieving a relatively sustainable mode share using alternatives to the private vehicle".
- 5.3. The assessment of impact is based on TfL's AM (8am to 9am) peak hour forecast model. PM peak modelling was not undertaken by TfL, as the AM peak is the busiest time of day, and therefore running additional modelling would not have been time or cost effective.
- 5.4. National Highways noted in their Regulation 19 representation that they have concerns regarding inbound commuting on their road network. The 2021 census data shows that of the 144,805 people who work in Newham, 101,844 live within the borough. Study of the origin-destination data shows that 42,961 workers travel into the borough. The vast majority of workers (around 40,000) travelled from other London boroughs, with 23,094 of these workers travelling from boroughs directly adjacent to the borough (i.e. the London Boroughs of Waltham Forest, Redbridge, Barking and Dagenham, Tower Hamlets, Hackney, and the Royal Borough of Greenwich).
- 5.5. Furthermore, Census travel to work data shows that public transport, walking and cycling are the modes of transport used by commuters in Greater London boroughs, with only 17% of existing residents in Newham travelling to work by car or van. It should be noted that the origin-destination data does not disaggregate trips by mode of transport. The census data therefore shows that a small proportion of workers (some of whom may travel by car) who travel into the borough live outside Greater London, resulting in a small impact on the Strategic Road Network.
- 5.6. In light of the growth assessment undertaken by SYSTRA and the 2021 census data, Newham considers that the very small number of additional inbound and outbound trips to areas outside London resulting from the growth proposed in the Local Plan will not impact the Strategic Road Network.
- 5.7. In follow-up written engagement, National Highways agreed with the methodology of using the results from the Opportunity Area modelling for determining trip generation for other Local Plan areas of growth. They also noted that, although they would still usually expect to see PM

peak hour modelling provided, National Highways can agree that it would not be likely to change the assessment outcome in this instance.

5.8. In their written further engagement, National Highways noted that only 6% of new trips from Local Plan development are expected to be by car and of that 6%, an average of only 12.5% of car trips are expected to originate from or travel to a destination outside of London, where the SRN may be used. Whilst the modelling has not accounted for the additional 6,125 dwellings now proposed in the Local Plan, the dwelling uplift represents an increase of 12.65% compared to what was modelled, so it can be assumed that the vehicular trip impact will increase by 12.65% as well. Applying this to the information provided by Newham, National Highways considered that the additional trips resulting from the uplift in development (which could be expected to use the SRN) would increase by a small amount of 11 outbound and 16 inbound trips in the AM peak hour. As mentioned above, the impact in the PM peak hour would be expected to be lower. This is a minor level of trip increase on the SRN and therefore National Highways accept that the additional growth will not cause any concerns.

5.9. Record of agreements and/or disagreements:

- National Highways are satisfied that the shared data and analysis of trip generation modelling provides sufficient evidence to demonstrate that car-based trip generation resulting from the development proposed by the Newham Local Plan would have a minimal effect on the Strategic Road Network. National Highways have no further concerns.


6. Governance agreements

6.1. This statement of common ground will be reviewed:

- 6.1.1. At each subsequent key stage of the plan making process, as it progresses towards adoption.

7. Signatories

7.1. We confirm that the information in this statement and referred to documents reflects the joint working to date undertaken between London Borough of Newham and National Highways towards addressing the identified strategic matters.

Signed on behalf of London Borough of Newham:  Name: Ellie Kuper Thomas Date: 24 th April 2025 Position: Policy Manager, Planning and Development Directorate	Signed on behalf of National Highways: Janice Burgess Name: Janice Burgess Date: 23 April 2025 Position: Spatial Planner
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