

James Scantlebury

From: Diana Ngobi <[REDACTED]>
Sent: 06 September 2024 10:15
To: Local Plan
Cc: [REDACTED]; [REDACTED]
Subject: NH/24/06825 Newham Local Plan Regulation 19 consultation

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FAO: Planning Policy Team, London Borough of Newham

Consultation: Newham Local Plan Regulation 19 consultation

Our ref: NH/24/06825

Dear Planning Policy Team

Thank you for your email of 20 July 2024 consulting us on the Newham Local Plan Regulation 19 consultation.

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 in providing effective stewardship of its long-term operation and integrity. For the purposes of the emerging Newham Local Plan, we would be concerned with development patterns that have the potential to impact on the operation of the M11 and A13, although subject to the scale of impact, this may include other SRN positioned further afield. 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.

In terms of distance, Newham is located remotely from the strategic road network (SRN) under the stewardship of National Highways, 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 directly by the A406 North Circular and A13 respectively.

The Local Plan proposals include provision for between 46,000 and 52,000 homes in the borough. In terms of employment this also includes a requirement for 335,000 sqm of industrial floorspace, a minimum requirement for 90,000 sqm of office floorspace including new employment space for 10,000 new jobs through the Plan.

Initial Review of Newham Related Vehicle Trips

Given that Newham is located some distance from the SRN we have initially considered the likelihood of traffic to and from the Borough using the SRN based upon 2011 Census Journey to Work Data.

The Newham Local Plan includes provision for approximately 50,000 homes and a similar number of new jobs. Given these statistics and the commuting information from the 2011 Census it is expected that overall, the Newham Local Plan is not expected to have any major impacts upon the SRN as a whole. Outbound commuting is not expected to lead to any issues. Inbound commuting may lead to issues at isolated locations, in particular at junctions around the M25 or on the M11 or A13, if sufficient additional traffic is geared towards specific locations.

The assessment will therefore be concerned with the impacts of inbound commuting upon the SRN, in addition to the adherence of the Local Plan to national policy in relation to the DfT Circular 01/2022. We see this as a proportionate approach to the Local Plan from a National Highways perspective given the distance from the SRN and the likelihood of any development impacts causing a severe impact or unacceptable safety concern as outlined in NPPF.

Transport Modelling and Implications for the SRN

We have examined the Newham Sustainable Transport Strategy (July 2024) to explain how the growth can be accommodated on the transport networks in and around Newham. As described above we have confined the potential area of concern outside London and relates purely to commuting traffic into and out of London during peak hours by non-London residents.

Our understanding is that the sustainable transport strategy itself is not based upon any specific model runs for the Local Plan but is, as stated in Section 2.7, based upon the review of modelling undertaken by TfL for the Royal Docks and Beckton Riverside Opportunity Area (OA). An uplift is then applied to represent the Local Plan as a whole.

We are interested with the highway modelling undertaken. From paragraph 2.7.10 we understand that an additional 14,673 peak hour trips by all modes will be generated by 2041, approximately 6% of which will be by motor vehicle. We note paragraph 2.7.14 that states “Other key destinations include outside of London for longer-distance trips, representing an opportunity for targeted interventions to reduce reliance on the private vehicle and promote the uptake of public transport.”

Given the location of most of the employment growth to the eastern and southern areas of the borough they are more easily accessible using the A13 and A406. The A13 to the east is part of the strategic road network under the stewardship of National highways outside London. The A406 connects directly to the M11 north of the borough, also part of the strategic road network. These allow direct access to the employment locations making the sites accessible by car from outside London.

We would therefore like more information on the additional volumes of peak hour traffic entering and leaving London via the A13 to the east and joining and leaving the A406 via the M11 to the north of the borough to understand any potential impacts on the strategic road network. We will then be able to determine whether we are supportive of the Local Plan or require further assessment to examine potential mitigation requirements for the network. This information should be available from LoHAM model assignments.

Compliance with Circular 01/2022 in Relation to Sustainable Development

Paragraphs 11 to 17 of DfT Circular 01/22, consistent with the NPPF, cover national policy in relation to requirements for sustainable development and impacts on the strategic road network. A summary of the requirements is outlined below.

- The Circular states that new development should facilitate a reduction in the need to travel by private car and be focused on locations that are or can be made sustainable (para 12).
- There is an expectation that strategic policy-making authorities and community groups responsible for preparing local and neighbourhood plans should only promote development at locations that are or can be made sustainable and where opportunities to maximise walking, wheeling, cycling, public transport and shared travel have been identified (para 13).
- National policy seeks to make the most efficient use of capacity within the overall transport network and supports other government policies, strategies and guidance that aim to reduce the negative environmental impacts of development (para 14).
- The policy marks a move away from transport planning based on predicting future demand to provide capacity (‘predict and provide’) to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (vision-led

approaches including 'vision and validate,' 'decide and provide' or 'monitor and manage'). National Highways will support local authorities in achieving this aim through its engagement with their plan-making and decision-taking stages, while recognising the varying challenges that will be presented by certain sites based on their land use, scale and/or location (para 15).

- Newham Local Plan Policies T1 to T5 are related to transport and how transport will be used to help deliver the Plan growth to 2041. Policy T1 deals with strategic transport and allows development that will minimise impacts on existing transport networks. This includes all modes of transport. Developments in the Local Plan will also need to contribute to strategic transport infrastructure where relevant. New transport schemes must unlock growth and minimise social, economic and environmental impacts.
- Policy T2 covers local transport including a local vision for sustainable and connected communities and new development. It includes commitments to the prioritisation of walking and cycling and discouraging vehicles from both design and management perspectives.
- Policy T3 states that with some exceptions all development will be car free except for limited provision. Residential car parking will not be supported except for blue badge holders and car parking for employment uses must be kept to the lowest justified provision. In place of car parking space, provision must be made for high sustainable travel storage, including safe and secure cycle provision.
- The Newham Sustainable Transport Strategy outlines a range of measures in detail that will be employed to deliver the above policy commitments. The strategy includes commitments to implement measures designed to increase the role of sustainable travel and reduce/discourage the role of private vehicle use and includes a set of targets for monitoring. The strategy identifies a list of projects and themes to be implemented based upon the above strategic actions and measures. Many of the larger schemes identified have been included within the Infrastructure Delivery Plan although not all schemes have been costed or have indicative costs at the present time.
- Additionally, although the strategy mentions vehicle trips travelling beyond the London boundary (Paragraph 2.7.10 and mentioned above), there is no indication of the scale of trips nor of what measures could be implemented to reduce these trips.

Conclusion

Newham's Local Plan largely accords with paragraphs 12 to 15 of Circular 01/2022, thereby complying with national policy on sustainable transport measures and consistent with National Highways commitment to Net Zero on the strategic road network by 2050 (Paragraph 11).

There is a question mark over longer distance commuting and further information is required concerning peak hour vehicle trips to and from a) the A13 east of the Borough that is entering and leaving London and b) the M11 to the north. This will allow a greater understanding of whether the strategic road network managed by National Highways (as opposed to the TfL strategic network) can accommodate the additional traffic in its present form.

If you have any questions about our response, please feel free to contact us via [REDACTED].

Kind regards
Diana

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