

[REDACTED]

From: Nigel Walkden <[REDACTED]>
Sent: 17 March 2025 11:37
To: Richmond Local Plan
Cc: [REDACTED]
Subject: NH/25/09814 London Borough of Richmond upon Thames – Consultation on Proposed Main Modifications to the Local Plan from 31 January to 17 March 2025

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For the Attention of: Planning Policy Team (London Borough of Richmond upon Thames)

Consultation: Proposed Main Modifications to the Local Plan

National Highways Ref: NH/25/9814

Thank you for your email of 31 January inviting National Highways to comment on the above consultation and indicating that a response is required by 17 March 2025.

National Highways was 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. In relation to this consultation, our principal interest is safeguarding the operation of the M4 and M3 to the north and south west of the borough respectively.

We 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. National Highways 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 response to your Consultation, I would like to draw your attention to National Highways document '*The Strategic Road Network, Planning for the Future: A guide to working with National Highways on planning matters*' (October 2023). This document sets out how National Highways 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 National Highways will review and provide comments on local plans proposed by local planning authorities that have the potential to affect any part of the SRN.

In this instance, we would specifically be concerned with any proposals which have the potential to impact the M3 Junction 1 and M4 Junctions 1 to 3, which are within or in close proximity to the Richmond upon Thames Local Plan Area and are subject to congestion at peak times.

We note this consultation does not allow for comments on the remainder of the Plan, but concerns the modifications only.

We do not have any comments to make on the Sustainability Appraisal Addendum of the Main Modifications or the Habitats Regulation Assessment Addendum of the Main Modifications.

In terms of Schedule of Proposed Main Modifications, our comments are as follows:

We note that the London Plan housing target for the borough is 4,110 homes, which was noted in our response to the Regulation 19 Consultation, whilst the main modifications also now refers to a total Local Plan housing requirement of 5,928 over the plan period, with the following stepped trajectory:

- 2021/22 to 2024/25 – 210 dwellings per annum
- 2025/26 to 2027/28 – 420 dwellings per annum
- 2028/29 to 2030/31 – 670 dwellings per annum

We accept that the housing requirement for the plan period is unlikely to significantly alter the impact of the plan on the SRN. The cumulative impact on the SRN will not be significantly different from what is already agreed in the LP.

Policy 47 Sustainable Travel Choices (Strategic Policy), Part B, includes additional wording to clarify the requirement for the impact on the public transport network to be assessed and to reflect updates to the National Policy Planning Framework in 2023. The new statement reads '*The impact of all major developments will be assessed relative to current and forecast capacity and passenger trips on the passenger transport network*'.

Policy 47 also includes a new paragraph regarding implementation of the Healthy Streets Approach, emphasising that all major developments must include an Active Travel Assessment as part of their transport assessment. Applicants will need to provide details of how the proposed development will provide a high-quality walking and cycling environment that promotes active travel.

Additional details to Policy 47 relevant to National Highways include a requirement for new development proposals to include any necessary mitigation measures required as a result of the development to be funded and/or delivered by the developer, to ensure the continued safe and efficient operation of the strategic and local road and transport networks.

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.

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@nationalhighways.co.uk.

Kind Regards,

Nigel Walkden, Assistant Spatial Planner

Spatial Planning South East

National Highways | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Web: nationalhighways.co.uk

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National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |

<https://nationalhighways.co.uk> | info@nationalhighways.co.uk

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