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To: [Planning Strategy](#)
Subject: 8913 Brent local plan Reg 19 Consultation 05
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Attachments: [image001.png](#)

Consultation: Brent Local Plan Reg 19 Consultation

Highways England Ref.: 8913

Dear Paul Lewin,

Thank you for consulting us on the Regulation 19 consultation for the Local Plan Preferred Options Document.

On behalf of the Secretary of State for Transport, Highways England is responsible for managing and operating a safe and efficient 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).

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. 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 be expected to 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.

We wish 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 any amendments to local plans proposed by local planning authorities that have the potential to affect any part of the SRN.

Further to our previous response on 02 January 2019, we note that you have taken account of all representations made and, where appropriate, made changes to the document. As previously, we are pleased to see that Highways England have been referenced within the Local Plan document and it has been made clear that Highways England will be consulted on any development that may have an impact on the M1. Although there is no SRN within the London Borough of Brent boundary, it should be noted that the M1 is located in close proximity to the north-east of the borough boundary.

There is a high level of development proposed within this Local Plan and it should be ensured that the transport evidence base for the Local Plan; following this review, provides indication as to what the residual impacts of the development would be on the SRN. We would anticipate that this is clarified prior to submission of the updated plan for examination, to enable us to make an informed decision as to the soundness of the plan at the appropriate time. We are happy to have a meeting with you to discuss this further and in more detail.

This letter clarifies our views on a number of aspects of the Local Plan primarily focused on the potential impacts of all sites on the SRN. This letter will also consider the evidence base used to understand the impact of development and the potential funding of any infrastructure schemes that are required. Our interest in local plans is specifically focussed on the council's approach to highway and transport matters in relation to regeneration and new development.

We would request transport evidence and modelling to be undertaken to determine what the cumulative impact of development could be on the SRN and therefore what measures may be required to mitigate these impacts. This is to be submitted as a Strategic Transport Assessment. Until this has been submitted, Highways England are not in a position to offer any detailed comments at this point in time. We advise that the Strategic Transport Assessment is sent to Highways England for consultation as soon as possible.

The Strategic Transport Assessment should be in accordance with Circular 02/2013. We require suitable measures to be considered and evidenced in the Local Plan to manage demand of future traffic levels and growth. Highways England expect the Local Authority to propose mitigation if required and suitable initiatives to manage down the cumulative traffic impact. The transport related evidence base needs to be sufficiently appropriate, up-to-date, transparent and robust, such that it can be deemed sound. The evidence base should cover an appropriate area; for transport this may be beyond the borough boundary. The evidence base should also ensure that it assesses the individual and cumulative impacts of developments within the study area over the whole plan period and, as necessary, at various intermediate dates to identify any tipping points when action will be required.

An Infrastructure Delivery Plan (IDP) has not yet been submitted to accompany the Local Plan and without this, the plan may be challenged. The Local Plan does not provide any details of infrastructure funding, which may be unknown at this stage if the specific infrastructure schemes that are required have not yet been identified. It is important that once the schemes are identified that the funding method for each is outlined, including any Central Government or Local Government funding that is available, the amount that could be collected from developers and any shortfall that could occur. It is recommended that an IDP is prepared to provide further details regarding the infrastructure provision and funding.

We welcome the opportunity to respond to the Brent Local Plan Preferred Options Document and 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 me



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