



Outlook

National Highways Representation on the Harrow Regulation 19 Local Plan

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Date Tue 17/12/2024 11:08
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Caution: External email

FAO Spatial Planning Team

Thank you for informing National Highways about the Regulation 19 Consultation for the proposed submission version of the New Harrow Local Plan 2021-2041, including proposed site allocations.

National Highways was appointed by the Secretary of State for Transport as the strategic highway company under the provisions of the Infrastructure Act 2015. National Highways is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). We are responsible for operating, maintaining, and improving the SRN i.e., the Trunk Road and Motorway Network in England, as laid out in Department for Transport (DfT) Circular 01/2022 (*Strategic Road Network and the Delivery of Sustainable Development*). The SRN is a critical national asset and as such we work 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 Harrow, our network which may be impacted includes the M1 bordering the borough to the north and potentially the M25 and M40, although these are some distance from the Borough boundary.

National Highways responses to Local/District Plan consultations are guided by relevant policy and guidance, including the **National Planning Policy Framework (December 2023) (NPPF)** and the DfT Circular above that is consistent with NPPF and forms national policy in relation to development impacts and the SRN. Circular 01/2022. Importantly for Local Plans, Circular 01/2022 outlines requirements for sustainable development (Paras 11 to 17), New connections and capacity enhancements (Paras 18 to 25), Engagement with plan-making (Paras 26 to 38) and Assessment of development proposals (Paras 47 to 54).

With regards to the NPPF and DfT Circular 01/2022 guidance, we have the following comments to make on the Regulation 19 Consultation for the Local Plan.

Transport Impact Assessment

The evidence base for the Local Plan consultation does not include any information on the transport impacts upon the road network either within or outside of the borough. Ordinarily we would expect to see an assessment of transport impact upon the SRN for a local plan, and this is outlined in Paragraph 33 of DfT Circular 01/2022, which states the requirement for a robust transport evidence base.

To be consistent with DfT Circular 01/2022, a Local Plan assessment should consider the effects of all non-consented development growth in the Borough. We understand that the 2041 Local Plan scenario includes all consented and non-consented growth associated with the Plan. The Local Plan scenario should be compared against the same scenario minus the non-consented development within the Plan.

The Local Plan envisages approximately 16,000 new homes across the 2021-2041 period. In employment terms it includes provision for 1,000 new jobs at the Harrow and Wealdstone opportunity area. On examination of the allocated sites and the housing numbers associated with each, many of the allocated sites and approximately half of the total number of homes on allocations are in or on the edge of the town centres with good to excellent public transport and active travel facilities. Consequently, from the details of the allocations, these developments will be predominantly tall buildings and the car parking spaces will be strictly limited or development will be car free in such locations (see comments on Policy M2 covering parking below). A further 4,000 homes (around 25%) either have extant permission or will be completed prior to adoption of the emerging Local Plan. The remaining allocations, except for the Royal National Orthopaedic Hospital site, are located centrally to the borough well within the urban area and remote from the SRN, or potentially scattered across the borough in the case of windfall sites.

Based upon the types, locations, parking policies and distance from the SRN, plus historic low levels of commuting from Harrow to locations outside of London by car, we are content that further assessment of the transport implications of the Local Plan is not required. The exception is the allocation of 500 homes at the Royal National Orthopaedic Hospital site, located approximately 1km to the southwest of M1 Junction 4. We are content that any impacts from this site can be covered under a future planning application.

New Harrow Local Plan 2021-2041 Proposed Submission Version (Regulation 19) November 2024

We have reviewed the proposed submission document for the Local Plan including the policies relevant to the SRN based upon national policy requirements.

Policies

Strategic Policy 10: Movement (p272)

We are generally supportive of the principles of this policy that concentrates on alternative modes to the highway network, facilitating movement by public transport and active travel rather than private vehicle use.

This policy aligns with national policy requirements for sustainable transport and development focusing on walking and wheeling priorities through public and active travel transport networks. This includes improvements to accessibility and sustainable travel for all Harrow residents alongside increased car parking control measures across the borough for new development in conformity with the London Plan parking standards. New development will be required to demonstrate sustainable goals and incorporate measures to increase walking and wheeling.

The Council will aim to increase accessibility to public transport through infrastructure improvements at stations for all abilities access.

The policy further adds promotion of electric vehicles and charging facilities where vehicle travel is required, aiding the goal of net zero across the SRN.

The measures and goals are likely to form a solid foundation on which to build a sustainable future for new development within the Local Plan. There is a framework for a future vision, further identified within the sustainable elements of the Infrastructure Delivery Plan.

Policy M1 Sustainable Transport (p276)

This policy includes the requirements for developments in contributing towards sustainable transport. This includes enhancement of cycle and pedestrian connections, and other forms of sustainable travel, to local destinations, schools and amenities, providing accessible, secure, and convenient cycle parking for all users, contributions towards publicly accessible cycle parking. Additionally major developments must demonstrate that they have supported mode shift away from private vehicles. Transport Assessments need to demonstrate that the development will not have a negative impact on safety, cause congestion or lead to illegal or additional parking near the site of the proposed development.

The policy aligns with Circular 01/2022 requirements to manage down vehicular demand, before consideration is given to residual demand on the highway. The Local Plan will ensure that planning decisions support investment in the transport infrastructure identified.

Policy M2: Parking (p281)

Policy M2 outlines developer requirements in relation to onsite and offsite parking including adherence to London Plan maximum parking spaces. It also encompasses car clubs in lieu of parking spaces. Proposals creating on street parking problems will be resisted.

It is recognised that households in Harrow continue to exhibit comparatively high levels of car ownership and that it is likely that car ownership will continue to be a preference for many residents. However, the policy informative explains that car free developments should be the starting point in areas that are well connected to public transport (PTAL 4-6). Developments in areas with lower public transport connectivity (PTAL0-1) should adhere to maximum parking standards as set by the London Plan. These standards are restrictive by historical benchmarks, limiting the amount of parking at levels below what would previously have been permitted.

This policy accords with DfT Circular 01/22 requirements for managing down vehicular demand and contribute to the sustainable vision.

Summary

We are content that given the levels and locations of proposed development within the Plan, further transport assessment evidence is not required at the present time. The Plan appears to follow national policy in identifying a vision and a sustainable way to reach the vision. However, National Highways reserve the right to make future representations regarding the Harrow Local Plan 2021-2041, should further information become available.

We hope these comments are useful. Please contact us at planningse@nationalhighways.co.uk should you require further information.

Kind Regards,



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