

Statement of Common Ground between
London Borough of Barnet (LBB) and National Highways
August 2022

1.0 Introduction

- 1.1 This Statement of Common Ground (SCG) addresses the strategic planning matters specific to LB Barnet (LBB) and National Highways (NH) (formerly known as Highways England).
- 1.2 This SCG ensures that the requirements set out in the National Planning Policy Framework (NPPF) have been met. The NPPF states, “Local planning authorities are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.”
- 1.3 The purpose of the SCG is to document the strategic matters being addressed and the progress in cooperating to address them. It focusses on areas of agreement or disagreement between both parties on strategic matters. The SCG can be updated at any time at the request of either party. The SCG also forms part of the evidence to demonstrate compliance with the ‘duty to cooperate’.
- 1.4 In London, most strategic issues beyond borough boundaries (e.g. housing targets, major growth areas, etc.) are largely addressed by the London Plan.
- 1.5 Some strategic matters overseen by other organisations will be addressed in other Statements of Common Ground. This will serve to make the documents more concise for relevant parties.

2.0 Strategic Matters raised by National Highways (NH)

- 2.1 NH is responsible for operating, maintaining and improving the 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). Related to the Barnet Local Plan area, the SRN comprises junctions M1 J1, J2 and J4. Despite being in neighbouring districts, the M25 J23/A1 and J24 also have the potential to be affected by development located within LB Barnet.

NH 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 NH to support the preparation and implementation of development plan documents.

‘The Strategic Road Network, Planning for the Future: A guide to working with Highways England on planning matters’ (September 2015) sets out how NH intends to work with local planning authorities and developers to support the preparation of sound documents which enable the delivery of sustainable development.

- 2.2 Policy **CDH09 - Advertisements** – The display of advertisements is subject to a separate consent process within the planning system. This is principally set out in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. NH have highlighted that most advertisements on land directly facing motorways and trunk roads require the express consent from the relevant local planning authority (LPA), as well as prior permission from the landowner

before they may be displayed lawfully. It is a requirement for the LPA to consult NH on the road safety aspects of advertisements proposed alongside the SRN. NH will need to consider its location, if visible from the SRN, its size, brightness/lighting (if any) and its effect on public safety. NH therefore requests that a reference is made to this requirement within Policy CDH09.

- 2.3 **LBB response** – *LBB agree to revise Policy and supporting text to highlight requirement to consult NH on the road safety aspects of advertisements proposed alongside the SRN.*
- 2.4 Policy **ECC02 – Environmental Considerations** – Similar concerns to those about Advertisements are expressed by NH with regard to ECC02. NH have highlighted that it will be necessary to ensure that development proposals mitigate appropriately the potential for ground conditions, lighting, noise and vibration impacts. In particular, minimising the exposure of noise-sensitive receptors to strategic traffic, using landscape buffers and acoustic bunds as a shield from motorway noise. In addition, it is important to ensure that drainage, landscaping, lighting and boundary treatments are in accordance with DfT Circular 02/2013 Annex A A1. Impacts arising from any disruptions during construction, noise, vibration, traffic volume, composition or routing and transport infrastructure modification should be fully assessed at planning application stage.
- 2.5 **LBB response** – *LBB agree to revise the supporting text and make reference to Circular 02/2013 explaining that for sites close to the SRN carriageway and junctions, it will be necessary to ensure that proposals mitigate appropriately the potential for ground conditions, lighting, noise and vibration impacts. LBB notes that no specific distance is highlighted in Circular 02/2013.*
- 2.6 Policy **ECC02A – Water Management** – Similar concerns to those about Advertisements and Environmental Considerations are expressed by NH with regard to ECC02A. Development must not lead to any surface water flooding on the SRN carriageway. NH should be contacted to discuss these points in detail as part of, or in advance of a planning application submission.
- 2.7 **LBB response** – *LBB agree to revise the supporting text relating to drainage and the SRN, highlighting requirement to consult National Highways for development within a specified distance of the SRN. LBB will welcome guidance from NH on what the specific distance should be.*
- 2.8 Policy **TRC02 – Transport Infrastructure** - NH is interested in the potential traffic impacts of any development site proposals and/or policies coming forward, and the need to ensure that these are fully assessed during the plan-making stage. It is also imperative to identify any improvements needed to deliver aspirations at this early stage. NH supports use of strategic transport modelling to inform allocation of Local Plan sites. Before the IDP can be considered, the supporting traffic modelling and assessment work used to inform the IDP, needs to be acceptable to NH and deemed fit for purpose.
- 2.9 **LBB response** – *LBB's Long Term Transport Strategy and Local Plan identify areas where improvements in strategic road infrastructure are needed to support the delivery of the projected growth for the Borough. This has informed the Infrastructure Delivery Plan (IDP). The IDP is a 'living' document enabling thorough updates for*

impacts of new proposals to be better understood and infrastructure requirements adjusted appropriately.

- 2.10 **Strategic Transport Assessment (STA)** – NH have reviewed the Strategic Transport Assessment Final Report June 2021 and have raised a number of questions with regard to development impacts upon the SRN.

Person trip generation for new housing developments is based upon 12 sites from previous planning applications within the Borough. The person trip rates are significantly lower in the morning peak hour (0.556) than equivalent TRICS estimates for London as a whole (0.704) based upon a mixed private/affordable category assumed equivalent to the proportions and types of developments in the Local Plan. Given that Trip Rate Information Computer System- (TRICS) rates are based upon actual observations from a bigger sample size further justification is required from LBB on its approach.

LBB response

- *The rationale was to use local trip rates specific to Barnet and which had gone through the planning approval process; an approach also supported by TRICS. A sample of 12 sites, representing some of the largest development schemes in the Borough, can also be considered sufficiently robust.*
- *The STA does show a general level of consistency between the different sites.*

Soft Measures to reduce vehicle trips require further justification, particularly with regard to implementation across the Borough.

LBB response

- *STA Chapters 4 to 6 set out descriptions of the highway demand mitigation measures considered in the analysis of the 12 sites and highlight sources of information. The source data has been subject to further analysis in order to estimate the impacts at a network wide level from the original local study's perspective (individual scheme/study).*
- *For example, in the case of the bus routes' impacts, demand adjustments have applied only to the Simulation and Assignment of Traffic to Urban Road Networks (SATURN) zones along the relevant bus routes. The reported impacts of Local Town Consolidation centres have been applied to Large Goods Vehicle (LGV) trips to/from Barnet's SATURN zones relating to town centres only. In the case of school trips, for example, the model zoning system would not allow modelling of each individual school separately. The STA has therefore estimated the proportion of school trips in the Borough. This all contributes to a robust approach whereby external evidence from independent studies has been collated and applied to local specific circumstances.*
- *The STA assumes that, unless zone-specific such as low traffic neighbourhoods, most of the soft measures are applied throughout the Borough. Testing the impact of individual schemes on different parts of the Borough was out of the scope of the STA.*
- *None of these soft measures were applied to the trip rates from previous transport assessments used to derive trip rates for this study.*
- *Demand management measures (listed in STA Table 8-12) are assumed to apply outside the Local Plan. The impact of the measures has been tested on Scenario 1 (full Plan's demand growth) resulting in Scenario 3 (full growth with demand mitigation). Scenario 1 represents the most demanding scenario, highlighting where residual negative congestion effects may still be present in case of full growth.*

- *The level of demand disaggregation adopted in the STA is sufficiently robust at Borough wide level. An example of this is in terms of education trips. It would be impractical to try and further split the estimated education trips by length; this is because eventually trips to/from different schools and different lengths would be expected to balance out throughout the Borough. It should also be noted that the analysis must account for the nature of the relative coarseness of the zoning system of the SATURN model. Some of the measures such as gateways, car clubs and low traffic neighbourhoods were applied at zonal level.*

M1 – Impacts at Junctions 2 and 4 merges and diverges

Clarification required by NH on flows at M1 Junctions 2 and 4 as shown in Table 8-22 are in vehicles or Passenger Car Units (PCUs).

LBB response

- *The STA measured PCUs.*

M1 – Impact at Junction 1 southbound – NH note reference to the reconfiguration of the M1/A406 Junction from 2021 and that, for this reason, the Volume over Capacity (V/C) at this specific interchange cannot be considered representative of current conditions. For M1 Junction 1 southbound NH need to understand the impacts of the Local Plan in terms of additional queues and delays compared to the scenario with only consented development within Barnet at the end of the Plan period.

LBB response

- *The tested M1 scheme, related to the Brent Cross Redevelopment Area, was the consented one and therefore was tested in the proposed configuration. This relates to the reported performance indicators such as Volume over Capacity (V/C) referred to above. This particular M1 scheme is one of the committed highway schemes currently included in the LoHAM (London Highway Assignment Model) baseline model and is therefore reflective of the current and approved planning position. This is discussed in paragraphs 6.3 and 8.51 as well as Table 6.1 of the STA. Brent Cross Area studies are progressing and changes may be possible. However, any changes would require further assessments and formal approvals by the relevant authorities to the committed schemes / forecast scenarios. Testing of different highway arrangements would require revisions to the STA.*

3 Governance Arrangements

3.1 This statement has been informed by on-going engagement between the parties. This statement of common ground is a live document and will be reviewed on a regular basis, informed by continued communication between the parties through meetings, statutory consultation at key plan making stages and electronic communication.

3.2 Both parties agree to a collaboration meeting set to take place within 3 months of the signing of the SCG.

Signatories

All signatories agree that this statement is an accurate representation of matters discussed or still under discussion, areas where there is agreement between the parties and areas yet to be agreed

Signed: 
Name: Mrs Janice Burgess
Position: Spatial Planning Manager
National Highways
Date: 8 August 2022

Signed: 
Name: Neeru Kareer
Position: Assistant Service Director Planning & Building Control
London Borough of Barnet
Date: 16 August 2022

