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Classification: OFFICIAL

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**Sent:** 13 September 2021 12:25

**Re:** Draft Enfield Local Plan 2019-2039

**Highways England Ref:** #13623

Thank you for your formal notification email of 21 June 2021 inviting Highways England to comment on the draft Enfield Local Plan', as part of the consultation process.

On behalf of the Secretary of State for Transport, Highways England 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 Enfield Local Plan area, the SRN comprises M25 Junction 25 although other junctions and sections of the SRN may also experience impacts.

Highways England is 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 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 order to constructively engage in the local plan-making process, we require a robust evidence-base so that sound advice can be given to local planning authorities, in relation to the appropriateness of proposed

development in relation to the SRN. This also extends to include transport solutions that may be required to support potential site allocations.

We would like 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 local plans proposed by local planning authorities that have the potential to affect any part of the SRN. Responses to Local Plan consultations are also guided by other pertinent policy and guidance, namely the NPPF and the 'Highways Agency (Highways England) and the Local Plan Process' protocol.

### **Local Plan Context**

The draft Local Plan proposes at least 25,000 new homes over the Plan Period to 2039. The Plan will also aim to deliver new jobs through intensification but also through new sites including a logistics hub close to M25 Junction 24.

### **Strategic Policies**

Highways England has not provided comments on specific draft site allocations in the Local Plan but has provided general comments that relate to Highway England's primary interests for the continuing operation and safety of the SRN. Comments are provided below under each of the Local Plan policy headings:

#### Policy DM DE9 Shopfronts and Advertisements

No reference is currently made to the SRN or Highways England within this Local Plan policy.

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.

Most advertisements on land directly facing motorways and trunk roads require the express consent from the relevant local planning authority, as well as prior permission from the landowner before they may be displayed lawfully. It is a requirement of the local planning authority to consult Highways England on the road safety aspects of advertisements proposed alongside the SRN. Highways England should be consulted on any advertisement proposals close to the SRN and Highways England will need to consider its location, if visible from the SRN, its size, brightness/lighting (if any) and its effect on public safety. Highways England is likely to recommend refusal of proposals that would be detrimental to the safety of the SRN.

#### Policy SP SS1 Spatial Strategy

For sites positioned site close to the SRN carriageway and junctions, it will be necessary to ensure that the proposals mitigate appropriately the potential for

ground conditions, lighting, noise and vibration impacts. In terms of noise, we would expect the site masterplan to be designed to minimise the exposure of noise-sensitive receptors to strategic traffic, using either or a combination of a landscape buffer and acoustic bund designed to shield the settlement from motorway noise. In addition to noise impacts, we would also draw attention to the importance of ensuring that drainage, landscaping, lighting and boundary treatment proposals for the proposals in accordance with the DfT Circular 02/2013 Annex A A1, which states that all noise fences, screening and other structures must be erected on the developers land, and far enough within the developers land to enable maintenance to take place without encroachment onto highway land. We would expect that these issues are considered when finalising the site layout and masterplan proposals

Impacts arising from any disruptions during construction, noise, vibration, traffic volume, composition or routing and transport infrastructure modification should be fully assessed and reported.

#### Policy DM SE8 Managing Flood Risk and SE10 Sustainable Drainage Systems

- We would request that reference is made to the SRN or Highways England within these Local Plan policies.

In relation to drainage and the SRN, it is important to note that no new connections are permitted to Highways England drainage network. In the case of an existing 'permitted' connection, this can only be retained if there is no land use change. Development must not lead to any surface water flooding on the SRN carriageway. These points apply to the site operation and construction phases. Highways England should be contacted to discuss these points in detail as part of, or in advance of a planning application submission.

#### Policy DM D3 – Infrastructure and Phasing

Highways England 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, as set out in Government policy. Paragraph 18 of the DfT Circular 02/2013 states that 'capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage'.

Additionally, Highway England would expect necessary SRN improvements to have already been identified and tested as part of the cumulative assessment of the Plan. It should identify the provision of infrastructure at the right time to support the development strategy, combined with developer contributions to secure infrastructure provision as part of an Infrastructure Delivery Plan (IDP). As such, as site allocations later come forward as part of the planning application process, they will be expected to proceed in line with the necessary highway improvements identified as part of IDP strategy. This being the case, the only issues for

consideration as part of a planning application submission, would be the phasing of the development in relation to the IDP strategy. Highways England would make use of Grampian conditions to ensure that necessary infrastructure is in place prior to or phased in relation to the development becoming operational. This will be necessary to ensure operation and safety of the SRN.

## **SRN Traffic Impact**

Appendix A of the Local Plan Main Issues and Preferred Approaches document lists a strategic transport assessment within the evidence base for the Plan. As you are aware we have been involved in recent dialogue with Enfield about the requirements for the assessment in relation to the SRN (M25) including trip generation, distribution, background growth and modelling tools.

To date the transport assessment and modelling parameters and assumptions have yet to be finalised and agreed. We have agreed to provide advice about assessment requirements prior to undertaking the assessment and we hope to continue to liaise with you in the coming weeks and months.

Highways England supports the preparation of strategic transport modelling to inform the 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 Highways England and deemed fit for purpose.

## **Summary**

Highways England has undertaken review of the draft Enfield Local Plan and has provided comments in relation to policies relevant to Highways England and the SRN. Highways England will continue to liaise over the forthcoming Strategic Transport Assessment covering any mitigation requirements. Until the modelling is agreed, Highways England will not be able to review the IDP, which identifies mitigation measures based on this assessment. This is a key consideration for Highways England in determining the soundness of the Plan.

You may be aware of recent announcements that Highways England has been renamed National Highways. For the purposes of this consultation we remain legally Highways England, but by the time your Local Plan is published we expect the necessary legal changes will have been made and that all reference within the Plan to “Highways England” will need to be replaced by “National Highways”.

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

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