

**SOUTH EAST ENGLAND REGIONAL ASSEMBLY  
REGIONAL PLANNING COMMITTEE**

**RESPONSE TO CONSULTATION ON PLANNING AND THE  
STRATEGIC ROAD NETWORK**

**1. Introduction**

- 1.1 A key principle underpinning the South East Plan (the Regional Spatial Strategy for South East England) is the provision of timely investment in infrastructure in order to support delivery of planned levels of development. Achieving this in practice requires input from key delivery agencies, such as the Highways Agency, throughout the plan making process. Therefore the consultation is welcomed as an opportunity to provide clarity on the relationship between statutory planning authorities and the Agency.

**2. Comments on the draft Circular**

- 2.1 The South East Plan defines the spatial development framework at the regional level for the period to 2026. A spatial planning approach can only be achieved if the policies and proposals of key regulatory and delivery agencies are aligned towards the delivery of a common set of objectives.
- 2.2 The South East England Regional Assembly have adopted a progressive and proactive approach to engagement with key agencies that extends beyond the minimum requirements identified in the regulations associated with the enactment of the Planning and Compulsory Purchase Act 2004. As part of this approach the Assembly and Highways Agency have maintained a positive and on-going dialogue throughout the development of the South East Plan. This dialogue has enabled the Assembly to develop an understanding of the constraints and opportunities that exist for the Strategic Road Network (SRN) to accommodate development. It has also enabled the Assembly to develop an understanding the need for investment in additional capacity on the SRN where this is required to address existing bottlenecks.
- 2.3 However there have been instances where the demands for information that such an approach requires has exceeded the capacity of the HA to respond. Such pressures will increase as progress is made with the preparation of Local Development Frameworks.
- 2.4 Experience to date with the South East Plan suggests that the information required from the HA in order to support the preparation of the South East Plan is:
- Information on network stress, both historical and forecast, to cover at least the RSS period (normally 20 years) this will help inform spatial options. It would be helpful to highlight areas of particular stress to avoid and also indicative funding that may be available.

- Advice on the impact of spatial options on the Strategic Road Network, taking into account both spatial and temporal dimensions, including advice on opportunities to use measures to manage demand for travel.
  - More detailed advice on the impact of a preferred spatial option in terms of the need for investment.
  - Ongoing information and advice as part of the statutory monitoring requirements associated with the South East Plan and as part of the work associated with the Regional Transport Board to identify priorities for investment and monitor their progress.
- 2.5 **The Regional Assembly recommends that the HA is made a statutory consultee for the purposes of the preparation of Regional Spatial Strategies.** Failure to make the HA a consultee could result in inadequate resources being made available in order to enable the Agency to provide the information required to support the plan making process. The draft circular's expectation in terms of the level of engagement by the HA could therefore be frustrated, which in turn may adversely affect the quality of the plan making process.
- 2.6 **The proposal to limit the ability of the HA to object to the principle of a development which has been identified within an adopted Spatial Development Plan is supported.** This will address a frustration experienced in many parts of the region where proposals in adopted plans are being held up as a result of concerns raised by the HA.
- 2.7 **The Regional Assembly recommends that the final circular gives clarification on what constitutes a "material change" that would enable the HA to raise an objection in principle.**
- 2.8 **The Regional Assembly recommends that the definition of a "material change" is developed in discussion with Regional Planning Bodies.**
- 2.9 **The Regional Assembly supports the need for the HA to be able to comment on technical issues associated with the access arrangements associated with a specific development.** The Assembly suggests that the final circular should make explicit reference to the Highways Agency's "Design Manual for Roads and Bridges" as the basis for providing such comments. The final circular should also include explicit reference of any other relevant documents that the HA will use in forming their comments.
- 2.10 If the presumption is that the Highways Agency's role is to support delivery of proposals included within adopted plans then there is an implied assumption that the funds required to deliver the investment so identified will be available. Clearly the presumption in the circular is that where investment is associated with development then the funds will be available in the form of a contribution secured through the planning system. However in those instances where the investment is the responsibility of the HA it should be resourced accordingly.

**The Regional Assembly recommends that the Department for Transport give a commitment that where the Highways Agency is responsible for delivering investment requirements identified in adopted Spatial Development Plans the necessary funds are made available.**

- 2.11 The Regional Assembly supports the emphasis placed on the HA needing to promote measures to manage travel demand. However this may require both additional funding and a shift in funding from capital expenditure to revenue expenditure in order for the full potential of such measures to be realised. **The Regional Assembly recommends that the Department for Transport give a commitment that the Highways Agency will be adequately resourced in order to deliver measures that manage travel demand.**
- 2.12 The Regional Assembly supports the emphasis given to the role of the RSS (the South East Plan) in shaping the forward programme of investment in the Strategic Road Network. The emphasis on promoting measures to manage demand should reduce the need to invest in additional capacity. However, **the Regional Assembly recommends that the proposal to include a general presumption that there will be no capacity enhancements on routes of strategic national importance purely to accommodate new development is deleted.** Such a presumption ignores the reality of the situation in so far that the Strategic Road Network forms part of the wider transport system and that delivering of planned growth will require investment in the transport system as a whole. In this context it is important that the any consideration of the impact of potential development affecting the Strategic Road Network includes a requirement on the HA to discuss with the Local Transport Authority the impact on the local road network.
- 2.13 **The Regional Assembly recommends that the circular is amended to clarify that only regionally significant proposals need to be identified within the RSS. It is recommended that a regionally significant proposal should be defined as one which exceeds £5m in total cost.**

### **3. Comments on Draft Guidance on Section 278 agreements**

- 3.1 The support expressed for the “ringmaster” approach in dealing with investment funded by private sector development is welcomed. **The Regional Assembly recommends that the guidance is amended to permit the Highways Agency to undertake the role of “ringmaster”.**

### **4. Comments on Draft Guidance on Transport Assessment**

- 4.1 **The Regional Assembly supports the proposed reduction in the time horizon to be used in assessing the impact of proposed development on the Strategic Road Network.**