

Our ref: 3/2/467

Your ref:

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Dear Mr Prout

**THE ROYAL BOROUGH OF KENSINGTON & CHELSEA'S PROPOSED
SUBMISSION CORE STRATEGY, WITH A PARTICULAR FOCUS ON NORTH
KENSINGTON**

Thank you for inviting the Highways Agency (HA) to comment on the 'Proposed Submission Core Strategy (CS) for the Royal Borough of Kensington and Chelsea (RBKC) with a particular focus on North Kensington'.

As you may have noted from our previous correspondence, the HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN, Motorways and Trunk roads) on behalf of the Secretary of State for Transport. In the case of RBKC, although there is no SRN in the Royal Borough, it should be noted that the access to the M1 via junction 1 is located approximately 5km to the north of the borough, and the M4 access via junction 1 is located approximately 4km to the west of the borough. The sections of the M1 and M4 close to the borough are currently heavily congested during peak hours and therefore any increase in traffic on either of these sections of the SRN would be of concern to the HA.

In spatial planning and development control terms, we have a duty to safeguard the operation of the motorway and trunk road network as set out in the DfT circular 02/2007 (Planning and the Strategic Road Network)¹. The circular encourages the HA to work co-operatively with Local Planning Authorities (LPAs) within the framework of the Government's policies for planning, growth areas, regeneration, integrated transport and sustainability. We look to your Council's LDF to promote strategies, policies, and land allocations which would support alternatives to the private car.

Please see below some general comments regarding the CS consultation document, which have been assessed from a transport perspective against the soundness requirements set out in PPS12.

Section 2B: Policies and Actions

As mentioned in our previous responses to Kensington and Chelsea's Core Strategy consultations, the HA does not have any major concerns with strategic sites identified

¹ <http://www.dft.gov.uk/pgr/regional/strategy/policy/circular207planningandstrategic>

in the borough due to there being no SRN in the Borough. However, it is important that the potential transport impact generated by any proposed development is assessed. We therefore expect Section 2b (Policies and Actions) of the Core Strategy to set out the requirement for Transportation Assessments to be undertaken for development proposals above the threshold size stated in the adopted Transportation Supplementary Planning Document (SPD). We understand that the Core Strategy should not repeat other planning policies and therefore reiterate our recommendation that a reference to the Transportation SPD is sufficient.

Travel Plans

The Agency supports the council's statement that 'Travel Plans will be standard for all types of development' (32.2.3), however this is contradicted by the later statement that the council will 'require Travel Plans for larger scale development' (Policy CT 1). Travel Plans should be produced by all developments that exceed the thresholds defined in TfL guidance on *Workplace Travel Planning* and *Residential Travel Planning*, in line with London Plan Policy 3C.2. The HA suggests that there should be greater clarity over the requirements for Travel Plans and a clearer distinction between Travel Plans and Transport Assessments. This will help ensure that the CS is in line with national policy and hence PPS12 (2008).

We hope that the above information is helpful to you. Please feel free to get in touch if you wish to discuss anything further.

Yours sincerely



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