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Dear Sir / Madam

Homes, Spaces, Places Options and Preferences Plan Consultation

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015. We are responsible for operating, maintaining and improving the Strategic Road Network (SRN) in England, in accordance with the Licence issued by the Secretary of State for Transport (April 2015) and Government policies and objectives.

Our response to this consultation on the Homes, Spaces, Places Options and Preferences Plan ('the Plan') is written in the context of statutory responsibilities as set out in National Highways' Licence, and in the light of Government policy and regulation, including the:

- National Planning Policy Framework (NPPF);
- Town and Country Planning Development Management (Procedure) Order (England) 2015 (DMPO); and
- DfT Circular 01/2022 The Strategic Road Network and the delivery of sustainable development ('the Circular').

As a statutory consultee in the planning system, National Highways has a regulatory duty to co-operate. Consequently, we are obliged to give consideration to all proposals received and to provide appropriate, timely and substantive responses.

Our desire to be a proactive planning partner goes beyond this statutory role and follows the spirit of the Licence which stipulates that National Highways should: "Support local and national economic growth and regeneration".

We encourage all parties promoting and preparing Plans that may have an impact on the SRN to engage with us as early as possible, to enable collaborative working and to deliver positive outcomes in a timely manner.

National Highways' Approach to Plan Making

The Circular, published December 2022, is national policy which sets out the framework for working with National Highways on the SRN that emphasises the need for developments to come forward in a sustainable manner. Paragraph 11 states:

The company [National Highways] will act in a manner which conforms to the principles of sustainable development. In this context, the company's licence agreement defines sustainable development as encouraging economic growth while protecting the environment and improving safety and quality of life for current and future generations.

Paragraph 15 goes on to state a shift in policy from the traditional 'predict and provide' approach to transport planning, to planning for the outcomes that communities want to achieve in terms of sustainability and providing transport solutions for those outcomes.

With this in mind, National Highways seeks to encourage new developments that facilitate a reduction in the need to travel by private car and focussed on locations that are or can be made sustainable. In the first instance, new developments should give priority to walking, wheeling and cycle movements and facilitate access to high-quality public transport where possible. For residential-led developments, due consideration should be given to home and street layouts, broadband infrastructure, safe and secure cycle parking, and access to local amenities and open space in support of these aims, while mobility or micromobility hubs should be provided in larger schemes.

The Local Plan should be fully cognisant with further policies outlined in the Circular; particularly paragraphs 26 to 38 that details National Highways' strategy on 'Engagement with plan-making'.

The Circular also establishes National Highways' commitment to limiting its environmental impact. This includes the selection and allocation of development sites, to ensure that they are not reliant on the SRN for transport access. Rather, National Highways' approach is set out in Paragraph 28:

When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport, and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan.

Preparation of a Local Plan Transport Evidence Base

When producing the Local Plan, it is key to National Highways that any future development will not negatively impact the functionality and safety of the SRN, and that the transport evidence base ensures this. This is set out in Paragraph 26 of the DfT Circular:

In relation to the preparation of local plans and spatial development strategies, the government expects that the relevant authorities will engage with the company from the outset of this process, to understand the interaction between land use designations and the impacts on road safety and future performance of the SRN. The involvement of the company will ensure that the strategic transport evidence base will provide a robust assessment of any positive and negative impacts on the SRN and inform a transport strategy and the Strategic Environmental Assessment (SEA) for the study area that aligns with the safe operation and long-term integrity of the SRN.

In line with Paragraph 42 of the Circular, all parties preparing plans that could impact the SRN are encouraged to engage with National Highways at the earliest opportunity. We therefore welcome the early engagement on Local Plan Duty to Co-Operate matters.

The Local Plan's supporting evidence base will need to be robust. National Highways will wish to review technical papers to satisfy itself that the model development is robust and accords with DfT requirements. National Highways would also welcome other transport evidence such as accessibility assessments, and/or analysis of likely average vehicle kilometres generated by new development, associated with sites being considered for allocation in the plan. The preparation of the transport evidence will require a collaborative approach between Tameside Metropolitan Borough Council, National Highways as the strategic highways company, the Greater Manchester Combined Authority (GMCA), Transport for Greater Manchester (TfGM) and neighbouring authorities as appropriate.

It is important that the Local Plan is based on transport evidence which demonstrates that suitable schemes and mitigation have been considered, and will be implemented, that will shift demand into less carbon-intensive forms of travel. This is set out in Paragraph 33:

A robust evidence base will be required, including demand forecasting models, which inform analysis of alternatives by accounting for the effects of possible mitigation scenarios that shift demand into less carbon-intensive forms of travel.

The Local Plan should be produced in line with the Circular, paying due cognisance to its position as National Highways' policy.

Furthermore, the plan should be developed using the 'Transport Evidence Bases in Plan Making and Decision Taking' guidance which has been published by the Department for Levelling Up, Housing & Communities and the Ministry of Housing, Communities & Local Government. Whilst the full guidance should be reviewed and considered whilst preparing the Local Plan, the following key issues should be considered whilst preparing and developing the transport evidence base:

- *Assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social, and environmental terms.*
- *Assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport.*
- *Highlight and promote opportunities to reduce the need for travel where appropriate.*
- *Identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate.*
- *Consider the cumulative impacts of existing and proposed development on transport networks.*
- *Assess the quality and capacity of transport infrastructure and its ability to meet forecast demands; and*
- *Identify the short, medium, and long-term transport proposals across all modes.*

The MHCLG guidance provides further advise and detail) on the preparation of a Local Plan evidence base in relation (but not limited to) the following:

- *When the transport assessment of the Local Plan be undertaken.*
- *What baseline information should inform a transport assessment of a Local Plan.*
- *What detailed information is required for the transport assessment of the Local Plan.*

- *How a transport assessment of the Local Plan be undertaken.*
- *How safety considerations be addressed, and accident analysis used effectively in the transport assessment of the Local Plan.*
- *How the impact of land allocations should be considered in assessing the transport implications of Local Plans.*

Both the Circular and the Transport Evidence Bases in Plan Making and Decision Taking guidance should be thoroughly considered whilst preparing a Local Plan.

Approach to Traffic Assessment and Modelling

It is anticipated that the assessment methodology and supporting traffic modelling tools may involve all tiers of traffic models:

- Strategic Modelling (such as SATURN).
- Micro-Simulation Modelling (such as PARAMICS or VISSIM).
- Local Junction Modelling (ARCADY, PICADY and LINSIG).

Early engagement with National Highways is therefore important and should be undertaken to agree the approach to traffic assessment so that key parameters and assumptions for elements can be agreed such as, but not limited to:

- The traffic Data being used.
- The type(s) of traffic modelling tools being used and their location.
- The Calibration / Validation of any Base Traffic Models/Modelling.
- The traffic forecasting Methodology and Local Plan scenarios that are to be tested.

National Highways highlight the need for Thameside Metropolitan Borough Council to ensure that sufficient time is allowed for the evaluation of the transport evidence given the need for iteration throughout its development.

National Highways is committed to working with local authorities and plan-making bodies prior to and between formal consultation periods to contribute to the thinking, and to support the analysis of options and development of strong plans and proposals that take full account of highways issues.

The preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and

encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and also reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.

In framing our contribution to the development of Local Plans, our aim will be to influence the scale and patterns of development so that it is planned in a manner which will not compromise the fulfilment of the primary purpose of the SRN. To that end, we look forward to gaining an understanding of the likely impact of any proposed allocations and policies on the SRN, and where work is being undertaken to develop a Transport Strategy for the borough.

In order to develop a robust transport evidence base, we will look to work with Tameside Metropolitan Borough Council to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety. Such assessments should be carried out in line with current Department for Transport guidance or on a basis otherwise agreed with the National Highways.

Through the production of Local Plans, development should be promoted at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives, and which support existing business sectors as well as enabling new growth.

We will look to work with Tameside Metropolitan Borough Council and developers to identify opportunities to introduce travel plan and demand management measures through the Plan. These will be based on existing and proposed patterns of development in a manner that will support sustainable transport choice and retain capacity within the transport network so as to provide for further development in future Plan periods.

Net-Zero Carbon Transition

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The National Planning Policy Framework supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of PAS2080 promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be taken into account within any relevant Local Plan policies to ensure that future planning decisions are in line with the necessary transition to net zero carbon.

Strategic Road Network

The M60 and M67 run through the borough and provide access to other parts of Greater Manchester as well as offering a connection towards Glossop and over the Pennines to Sheffield.

M60 Junctions 23 and 24 are situated within the borough, with M60 J24 being a key, busy junction providing access to Manchester city centre to the west via the A57. M60 J23 also provides access to Manchester city centre to the west via the A635 and Ashton-under-Lyne to the east. The M60 provides access to the neighbouring local authorities of Oldham to the north and Stockport to the south.

M67 J1A begins at M60 J24 (Denton Island) and ends at M67 J4 in Hattersley, where National Highways are currently working on the A57 link road project. This project aims to enhance connectivity between Manchester and Sheffield and reduce local road congestion along the route. The A57 and A628 which passes through Hollingworth and Tintwistle and subsequently to Sheffield via the 'Woodhead Pass' is an all-purpose link on the SRN.

Places for Everyone Joint Plan

National Highways would expect any Local Plans and supporting Infrastructure Development Plans within Greater Manchester to be in conformity with the Places for Everyone Joint Plan (PfE). It should be noted that as part of the PfE process, a Statement of Common Ground (SoCG) was jointly agreed and signed by National Highways and the GMCA representing the nine Greater Manchester Districts involved in the PfE.

Section 5 of the SoCG set out the requirement for future collaboration between National Highways and the nine PfE Local Authorities as follows:

On-going work will be required to confirm the details and phasing of any enhancements that may be required to the SRN and adjacent local highway network in the short, medium, and longer term.

Dependant on the locations in question, and potential for additional traffic generation impacting the operation of the SRN, this ongoing workstream will include:

- Masterplanning (including phasing) of the larger sites to better understand the timescales within the plan period when significant impacts are expected as a result of the PfE allocations;*
- Further, more detailed studies to develop the detail of schemes that may be required to mitigate the potential impacts of the PfE allocations on the SRN, broadly in accordance with when those sites come forward in the planning process (building on masterplanning work where appropriate);*
- Use of the most appropriate traffic modelling tools supported by observed traffic data that is reflective of prevailing traffic conditions of the strategic and local road network being considered; and*
- Inclusion of the schemes required to mitigate traffic impacts on the SRN within Local Implementation Plans (LIPs).*

Each of the nine Local Authorities will continue to engage with National Highways on the development of their:

- Local Implementation Plan for the GM Transport Strategy 2040.*
- Local Plan.*
- Local Transport Plan and local transport strategy.*

A summary of key considerations and areas which are currently the subject of studies and ongoing collaboration with National Highways for Tameside Metropolitan Borough was set out as follows

Tameside

- i. Tameside Council will continue to work with National Highways and neighbouring Local Authorities as development proposals come forward, most notably sites at Godley Green and Ashton Moss.*
- ii. Tameside Council continues to cooperate with National Highways and Derbyshire County Council in respect of the A57 Link Roads project at Mottram,*

as the scheme progresses.

- iii. Tameside Council notes the ongoing work by National Highways in respect of the M60 South-East Junction Improvements Study and looks forward to working closely both with National Highways, neighbouring Local Authorities including Stockport Council, and other stakeholders as this study progresses, with a particular interest in potential options at M60 J24 Denton.*

Comments Regarding Homes, Spaces, Places

Below are National Highways' comments on policies within the draft Plan and associated documents for your consideration.

Spatial Framework

HSP S1: Overall Spatial Strategy

It is acknowledged by National Highways that the draft Plan recognises the residential development identified through the PfE Policy JP-H1, which includes at least 8,245 (an annual average of 485 homes) of the total minimum 175,185 homes. This is likely to have a notable impact on the SRN through the proposed additional dwellings. Careful planning will be required to ensure that the SRN has sufficient capacity to accommodate these changes whilst promoting sustainability and resilience.

The significant volume of new industrial and warehousing floorspace has the propensity to be located near to the SRN given the nature of these operations as typically being road reliant and could be expected to impact the SRN.

National Highways will engage in scoping discussions with Tameside and developers, where required, to ensure that impacts of development sites on the SRN are managed and minimised to ensure the capacity and safety of the SRN.

HSP S2: Neighbourhood Spatial Policies

The Plan states that allocations for the above will be set out in the neighbourhoods' policies, including criteria for their development and so it is not clear the exact scale of impact these developments will have on the SRN. However, it is expected that large development sites such as the Economic and residential growth in the Eastern Growth Cluster, Ashton Mayoral Development Zone, and Hyde Triangle will lead to an increase in demand on the SRN.

Therefore, effective management of the SRN and access using sustainable means of transport to and from these development clusters should be a key consideration in the criteria for development. National Highways will work with Tameside to enable these development aspirations to be bought forward whilst managing and mitigating, where required, the impacts to the SRN.

Centres

HSP C1: Network, Hierarchy and Designation of Centres

It is seen that there is a particular focus on development being contained in main town centres, inclusive of having local and district town centres which will reduce the requirement for travel for smaller shopping / leisure trips which will not place further constraint on the SRN.

It is recommended that the policy should provide more detail on, or provide reference to, transport related matters and the proposed provisions required to access these centres. Additionally, further information is requested if developments are to take place to improve sustainable transport access to the town centres and between towns in Tameside.

HSP C2: Primary Shopping Areas

National Highway acknowledges that the policy is in line with the approach outlined in the Circular 01/2022, allowing individual centres to become self-sufficient and reducing the need for long-distance travel. In providing fewer reasons to travel greater distances by private vehicle, this policy should contribute significantly to a reduction in new development trips on the SRN.

HSP C3: Local Shopping Areas and Parades

If any new or redeveloped sites come forward where there may be an impact on the SRN due to the expectation of an increase in the number of vehicles travelling to and from the site, it is expected that National Highways should be consulted to allow input into any potential mitigation measures to alleviate this.

It is recommended that once these units have been identified, it will be beneficial to have these mapped on the Policies Map in the final version of the Plan.

HSP C4: Development involving Retail and Leisure Uses

National Highways is supportive of this policy as it may potentially help reduce additional traffic being diverted to the designated centres and hence help reduce impact on the SRN. It is appreciated that an impact assessment will be carried out based of the above

criteria and where development proposals add significant additional traffic onto the SRN, mitigation measures should be proposed.

HSP C5: Markets

National Highways has no comment on this aspect of the Plan.

HSP C6: Healthier Food Markets

National Highways has no comment on this aspect of the Plan.

Environment

HSP E1: Renewable Energy Opportunities

National Highways is supportive of this approach to support renewable energy opportunities.

HSP E2: Critical Drainage and Water Demand

National Highways has no comment on this aspect of the Plan.

HSP E3: Biodiversity

National Highways is supportive of this approach to support and protect the borough's protected sites.

Whilst improving air quality is mentioned in the Plan, there is no specific reference to particular issue areas. It is noted that there is an Air Quality Management Area (AQMA) along the M60 and M67 corridor in the borough, which also includes the A57 in Hyde. National Highways supports plans and strategies which seek to address air quality issues.

Homes

HSP H1: Housing Type, Mix, Tenure and Affordability

National Highways is supportive of this policy as it provides a strong evidence base for the requirement of additional housing needed in the borough.

In line with NPPF, early transport considerations should be made and where large housing development take place an impact assessment of the development on the SRN should be completed. If required, any appropriate mitigation measures should be suggested to reduce any adverse impact or additional traffic on the SRN.

HSP H2: Houses in Multiple Occupation (HMO)

In line with NPPF, early transport considerations should be made and where large housing development take places, an impact assessment of the development on the SRN should be completed and appropriate mitigation measures should be suggested to reduce any adverse impact or additional traffic on the SRN.

National Highways recommends that access using public transport and active travel is added to the criteria for consideration for HMO applications.

HSP H3: Gypsy, Traveller and Travelling Show-People

National Highways has no comment on this aspect of the Plan.

HSP H4: Land and Garden Development

National Highways has no comment on this aspect of the Plan.

Jobs

HSP J1 and J2: Existing Employment Areas and New Employment Development

National Highways is supportive of the above policy, in particular, the statements around encouraging enhanced use of existing employment sites and positively considering developments for new proposals. It is appreciated that reasoned justification for these policies is provided. If any new or redeveloped sites come forward where there may be an impact on the SRN due to the expectation of an increase in the number of vehicles travelling to and from the site, it is expected that National Highways should be consulted to allow input into any potential mitigation measures to alleviate this.

The need for adequate lorry parking is recognised in the NPPF and the Circular. Where B8 development is encouraged such as this, particular focus on adequate lorry parking facilities needs to be considered.

Existing and proposed employment sites are not shown on the Policies Map, it is advised that these should be added when the final draft of the Plan is released.

HSP J3: Assessing the Loss of Employment Land or Accommodation

National Highways has no comment on this aspect of the Plan.

HSP J4: The Visitor Economy

National Highways appreciates that consideration has been given to visitor economy. It would be beneficial to add to the policy the impact that the visitor economy is likely to have on the borough's economy. Consideration has been given to potential public

transport links to key visitor site, however, there is no reference to accessing visitor sites by active travel modes, which would reduce impact on the SRN.

People

HSP PE1: Development and Healthier Environments

National Highways is supportive of this policy as it promotes improved health in the borough.

It is recommended in measures to tackle health inequalities that active travel should be given consideration as it can help increase activity levels which can reduce risk cardiovascular disease and obesity.

HSP PE2: Publicly Accessible Green Spaces

National Highways is supportive of the policy to protect publicly accessible green spaces. It is recommended that active travel access to these spaces is considered.

HSP PE3: Green Space Standards

National Highways is supportive of the policy as green spaces encourage physical activity resulting in physical and mental well-being, and can encourage communities to engage in physical activity within their neighbourhoods and reduce the need to travel.

HSP PE4: Strategic Recreation and Countryside Access

National Highways is supportive of this policy as it promotes access to recreational and countryside areas through sustainable means of transport. It is appreciated that the PFE Policy JP-P7 in relation to protecting Greater Manchester's public rights of way network and increasing opportunities for walking and cycling has also been considered.

HSP PE5: Outdoor Sport and Recreational Facilities

National Highways acknowledges that this policy considers sports and recreational facilities within the borough. This approach is in line with the NPPF guidance on open spaces and recreation. Outdoor spaces and sports facilities can improve physical health and activity, as well as benefitting the community overall. Sustainable access to these sites can benefit the environment as well as provide wider active travel benefits.

HSP PE6: Peak District National Park

National Highways welcomes this policy and view that consideration should be given to protecting the Peak District when new development or redevelopments are taking place close to the area. Any negative impact should be mitigated through impact assessment

of the developments at the scoping and planning stage, in liaison with stakeholders and National Highways.

Travel

HSP T1: General Approach

National Highways is supportive of the above policy, in particular, the statements around encouraging a modal shift from private car to active travel and public transport. This specifically supports the DfT Circular 01/2022 as it states the following about sustainable transport:

“New development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable. In this regard, recent research on the location of development found that walking times between new homes and a range of key amenities regularly exceeded 30 minutes, reinforcing car dependency. Developments in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be a key consideration when planning for growth in all local authority areas.”

HSP T2: Trunk Road Developments

National Highways acknowledges that existing trunk roads can have multiple interactions with the communities and the environment through which strategic traffic flows. Subject to detailed assessment, the principle of a bypass of Hollingworth and neighbouring Tintwistle in Derbyshire could bring benefits to these communities. However, National Highways has no future plans, commitments or funding to provide a further bypass as referenced in this policy. Although such a bypass is also mentioned in Greater Manchester’s 2040 Transport Strategy, its inclusion in either that document or this draft Plan does not guarantee a commitment from National Highways that we will look to undertake any further work in this location once the A57 Link Roads scheme to bypass Mottram has been completed. We will always work with Local Authorities and transport bodies who may wish to bring forward their own road schemes, but at this time there can be no assumption that this will be funded by National Highways, as per the Circular paragraph 29:

“29. New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure. However, there cannot be any presumption that such infrastructure will be funded

through a future RIS. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy.”

HSP T3: Rail Infrastructure

National Highways is supportive of this policy as improvements to current and new rail infrastructure will encourage the use of public transport for longer journeys which cannot be undertaken via active travel modes. A modal shift away from private vehicles will reduce congestion on the SRN and the related adverse impacts, hence provide wider health and environmental benefits.

The policy also supports the objectives of the Greater Manchester Transport Strategy as set out in the Tameside Local Implementation Plan.

HSP T4: Rapid Transit

National Highways is supportive of this policy as it supports the objectives of the Greater Manchester Transport Strategy and the Draft GM Rapid Transit Strategy, inclusive of the potential for new developments to utilise public transport and reduce reliance and impact on the SRN.

HSP T5: Facilities for Buses

National Highways is supportive of this policy as improvements to bus waiting and journey quality facilities is likely to facilitate a modal shift to buses. A modal shift away from cars will reduce congestion on the SRN and the related adverse impacts, hence provide wider health and environmental benefits.

HSP T6: Walking, Wheeling and Cycling

In alignment with the comment made in relation to Policy HSP T1, National Highways supports this policy and its comments surrounding active travel.

Facilities to support active modes (e.g. secure parking) are welcomed and it is recommended that associated quantitative volumes of parking requirements are developed/updated.

HSP T7: Freight Movement and Deliveries

National Highways is supportive of this policy as whilst supporting freight movement and deliveries supports the economy, this policy also considers potential negative impacts of freight which can impact local centres or the SRN.

Adequate provision of lorry parking is a particular issue recognised in the NPPF and the Circular which should be considered as part of this policy approach.

As stated in the policy, where freight and logistics policies contribute to significant levels of traffic, mitigation measures should be added to minimise the impact on the SRN and unsuitable parking. National Highways is open to discussions on a local and strategic level to address these issues as and when they arise.

HSP T8: Parking

National Highways supports this policy as the car parking standards proposed will not discourage the use of more sustainable modes of transport, which is in line with National Highways policies.

HSP T9: EV Charging Infrastructure

National Highways is supportive of the expansion of electric vehicle charging infrastructure.

Places

HSP PL1: Archaeology and Scheduled Monuments

National Highways has no comment on this aspect of the Plan.

HSP PL2: Listed Buildings – Alternative Uses, Additions, Demolition and Development within their Setting

National Highways has no comment on this aspect of the Plan.

HSP PL3: Conservation Areas – Managing Development Within or Adjoining

National Highways has no comment on this aspect of the Plan.

HSP PL4: Historic Parks and Gardens – Managing Development

National Highways has no comment on this aspect of the Plan.

HSP PL5: Designated Heritage Assets – Energy Efficiency and Renewable Energy Generation

National Highways has no comment on this aspect of the Plan.

HSP PL6: Designated Heritage Assets and Enabling Development

National Highways has no comment on this aspect of the Plan.

HSP PL7: Non-Designated Heritage Assets

National Highways has no comment on this aspect of the Plan.

HSP PL8: Landscapes, Townscapes and Urban Form

National Highways has no comment on this aspect of the Plan.

HSP PL9: Design and Amenity

National Highways is supportive of this policy as having satisfactory level of amenities close to sites can reduce the need to travel, which can in turn reduce congestion on the SRN and negative impacts associated with it.

If any new design and amenity developments are to come forward where there may be an impact on the SRN due to the expectation of an increase in the number of vehicles travelling to and from the site, it is expected that National Highways should be consulted to allow input into any potential mitigation measures to alleviate this.

HSP PL10: Design of All Types of New Residential Development

National Highways is supportive of this policy as it is a key aspect to residential development to have suitable access to highways and car parking.

If any new residential developments are to come forward where there may be an impact on the SRN due to the expectation of an increase in the number of vehicles travelling to and from the site, it is expected that National Highways should be consulted to allow input into any potential mitigation measures to alleviate this.

In the criteria outlined to be considered for residential development, sustainable transport access to and from the site should also be considered.

HSP PL11: Design of Residential Additions, Alterations and Extensions

National Highways has no comment on this aspect of the Plan.

HSP PL12: Design of Employment Sites

National Highways is supportive of this policy as it considers key transport points in new employment development sites including access using sustainable transport means and cycle parking infrastructure.

If any new employment developments are to come forward where there may be an impact on the SRN, it is expected that National Highways should be consulted.

HSP PL13: Design within Centres, Retail and Leisure Developments

National Highways is supportive of this policy as it includes access using sustainable transport means, cycle parking infrastructure and minimising impact on the SRN. If any new developments are to come forward where there may be an impact on the SRN, it is expected that National Highways should be consulted.

HSP PL14: Design of Commercial Frontages

National Highways has no comment on this aspect of the Plan.

HSP PL15: Outdoor Sports, Recreation and Play Space

National Highways recommends that as well as highway access and parking, sustainable travel access using public transport and active travel is also added as a criterion.

HSP PL16: Design and Enhancement of the Waterside

National Highways appreciates that this policy promotes use of walking, wheeling and cycling to access the waterside environment, which is likely to provide environmental and health benefits, and reduce congestion.

HSP PL17: Design of Public Realm and Urban Spaces

National Highways is supportive of this policy as it promotes use of active travel and public transport, which can facilitate modal shift from private vehicles and reduce pressure on the SRN.

Additional Comments

National Highways is supportive of plans that aim to focus on sustainable travel ahead of private vehicle use. This is best achieved through promoting development sites that are already in sustainable locations, or sites that can be made sustainable through the use of travel planning and the delivery of public transports and active travel measures.

Importantly for National Highways, the vision-led approach to planning, as outlined in the Circular, requires that applicants consider this sustainability at the earliest stages. This vision would then form part of both the Transport Assessment and the Travel Plan.

Paragraph 33 of National Highways' Planning for the Future guide states:

33. In broad terms, a vision-led approach can be summarised as follows:

- 1. Establish a vision - understand the relevant national and local policy context; identify the drivers of change/key external factors acting on the plan or proposed development; set-out a place-based vision statement with*

associated outcomes that supports the principles of sustainable development.

2. *Develop scenarios - develop plausible future scenarios that help to understand the uncertainties that may impact on the ability to deliver the vision.*
3. *Generate options – generate, sift and prioritise options that can help achieve the vision.*
4. *Test options – test how the prioritised options perform in each of the plausible future scenarios (for example, is every option effective in all scenarios or are some less resilient and have some significant risks?).*
5. *Produce a vision strategy – produce a strategy for realising the vision that accounts for the identified uncertainty and includes a ‘monitor and manage’ approach to identify and address when the vision is unlikely to be achieved.*

Although primarily discussing assessments, the ‘vision strategy’ for the application should feed into the Travel Plan, be specific to the site, and include wherever possible clarity on the funding and deliverability of proposed measures. For example, National Highways would be more supportive of applications and Travel Plans that contained fully costed and approved transport measures, than one which simply highlighted a future need without clarity of funding. This should include an element of monitoring the site to ensure that the proposed measures had the desired effect of reducing single occupancy vehicle travel, and that impacts to the SRN had been minimised.

Additionally, it should be noted that a vision-led approach does not mean that public transport is suitable for all movements in all scenarios. For example, the vision for a new warehousing development or a site within another road-based sector is likely to include a large proportion of HGVs that should be factored into the vision, alongside measures to encourage staff and other visitors to travel sustainably. The vision for a housing development though should always look at sustainability first, and the SRN should not be relied upon for development aside from applications within those road-based sectors which require long-distance strategic access.

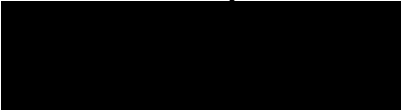
Future Engagement

We welcome further engagement with Tameside Borough Council as you progress your Local Plan, and to that end will be keen to arrange future meetings to discuss the Plan’s progress and how we might assist in its development.

In the meantime, if you would like to discuss anything further, please let me know at the email address below.

We look forward to working with you as your Local Plan develops.

Yours faithfully



Adam Johnson
Spatial Planning Team
Email: [redacted]