

Carmell Thomas

From: Nigel Walkden [REDACTED]
Sent: 13 August 2025 11:47
To: Planning Policy (SADC)
Cc: Planning SE; Janice Burgess; Diana Ngobi; Matthew Lewis
Subject: NH/24/08091 St Albans City and District Council: Draft Local Plan Examination - Additional Documents Technical Consultation

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For the attention of: Spatial Planning Team

Consultation: St Albans City and District Council: Draft Local Plan Examination - Additional Documents Technical Consultation

Dear Spatial Planning Team,

Thank you for your email dated 4 July 2025 inviting us to take part in the Additional Documents Technical Consultation. The Strategic Road Network (SRN) is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. For the purposes of the emerging St Albans Local Plan, we would be concerned with development patterns that have the potential to impact on the operation of the A1(M), M1, M25 specifically M25 J21, 21A, 22 and 23, although subject to the scale of impact, this may include other SRN positioned further afield.

As a statutory consultee to the Local Plan consultation, we are interested in the potential traffic impacts of any development site proposals and/or policies coming forward which may impact on the operation of our network and the need to ensure that any impacts are fully understood at the plan-making stage.

For National Highways, the safety and operation of the SRN is our primary consideration. In terms of traffic impacts on the SRN, we take the view that development proposals would be unacceptable, by virtue of an unacceptable road safety impact or severe congestion impacts, in accordance with DfT Circular 01/2022 and NPPF.

DfT Circular 01/2022 confirms in paragraph 28 that ‘the policies and allocations that result from plan-making must not compromise the SRN’s prime function to enable the long-distance movement of people and goods. 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’.

St Albans Local Plan

As you are aware we have been advising the council on the requirements for the assessment of the Local Plan impacts upon the Strategic Road Network (SRN). This has been examined in isolation to the end of the Local Plan period 2041. We have received and commented on several of the transport modelling reports included in this consultation that concern this scenario. Therefore we do not have anything to add on the transport modelling for the St Albans Local Plan.

Combined St Albans and Dacorum Local Plans

Additionally, this consultation has provided supplementary transport modelling evidence that has examined the combined impacts of the St Albans and Dacorum Local Plans to 2041.

In most cases we would assess each Local Plan individually (as has been the case with the assessment of the St Albans Local Plan to date) although NPPF recognises that joint plans can be considered. We have not to date seen any written confirmation from the Planning Inspector for both Local Plan EiPs that from a transport perspective we need to consider joint impacts.

Notwithstanding this, we are mindful that the Hemel Garden Communities (HGC) is a substantial development that is split between the two Local Plans. We have examined the documentation for the consideration of the combined St Albans and Dacorum Local Plans. The assessment methodology appears similar to the approach taken to the recent assessment for the St Albans Local Plan with which we were content.

Looking at the impacts upon the SRN, these have been expressed in terms of additional/reduced delays and flow changes at junctions on the M1 (Junctions 8 and 9), M25 (Junctions 20 to 23) and A1(M) Junction 3 for Option 0 (committed development only in St Albans/Dacorum), full growth to 2041 elsewhere, Option 4a (as Option 0 plus Local Plan non-consented development) and Option 4b (Option 4 plus M1 Junction 8 upgrade scheme).

The overall picture comparing Option 4a to Option 0 is that there are some significant flow changes, often detrimental, particularly at M1 Junction 8, (hence the inclusion of Option 4b), but also several locations elsewhere across the SRN. Option 4b provides some mitigation at Junction 8 although re-routed traffic (some significant) leads to changes in flows on motorway slip roads.

The strategic model, in our opinion, is not an ideal tool for the assessment of junction delays. Ordinarily for a Local Plan assessment, where strategic modelling indicates that junctions/links are likely operating close to, at, or over capacity, more detailed modelling is often undertaken to more accurately assess any mitigation requirements. Accurately determining mitigation at junctions from a strategic model can be challenging and more appropriate tools are available. Furthermore, the strategic modelling report does not include any details of queues and slip road queueing back onto the main motorways.

At this stage our overall view, should a joint Local Plan assessment be required, is that some mitigation is likely although the full requirements cannot be determined by strategic modelling alone. For merges and diverges we require additional assessments as laid out in DMRB CD122 using flows derived from strategic modelling. This is to determine whether development related changes in flow can be accommodated. Any physical mitigation to infrastructure would also need to follow national design standards (DMRB) and give further assurances in relation to design and safety standards, being sufficiently robust to demonstrate that there would be no "showstoppers" that could prevent construction at a later date.

The documentation also includes further modelling evidence for scenarios up to 2050. While this is well beyond the end of both Local Plans it is recognised that HGC will continue after 2041. Given the further information required to assess the impacts at 2041 described above, we have not considered the requirements for 2050 in more detail at the present time although we do recognise that the flow increases at M1 Junction 8 will be approximately 50% higher with full build out with the "Vision and Validate" scenario compared to Option 0A. This would necessitate further detailed assessment in its own right.

We would caution that, should any mitigation be required for the combined Local Plans, there is no reliance on further development beyond the end date of the combined Plans to enable its delivery.

Given the reservations above about the modelling and the requirements for further assessment to enable a robust consideration of the outcomes, we reserve overall judgement on the combined impacts at the present time, including trigger points for mitigation requirements. The additional traffic flows identified in some locations indicate that further infrastructure improvements may be required. We are happy to meet and provide further details of assessment requirements for the combined Local Plans as necessary.

Statement of Common Ground

We are currently in the process of agreement on the wording of our Statement of Common Ground (SoCG) with St Albans City and District Council. For clarity, this SoCG relates to the consideration of the Local Plan in isolation. A separate SoCG may be required for joint Local Plan sessions moving forward.

Summary

We are content to continue working closely for the consideration of combined St Albans and Dacorum Local Plans.

We hope that you find these comments useful. We look forward to continuing to engage with St Albans City and District Council and Dacorum Borough Council as the proposals develop.

Kind Regards,

Nigel Walkden, Assistant Spatial Planner

Spatial Planning South East

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From: consult@objective.co.uk <consult@objective.co.uk>

Sent: 04 July 2025 11:03

To: Planning SE <planningse@highwaysengland.co.uk>

Subject: St Albans City and District Council: Draft Local Plan Examination - Additional Documents Technical Consultation



Dear Sir/Madam,

RE: Additional Documents Technical Consultation

The St Albans City & District Local Plan was submitted to the Secretary of State for Independent Examination on 29 November 2024. Inspector Matthew Birkinshaw BA(Hons) Msc MRTPI and Inspector Thomas Bristow BA Msc MRTPI from the Planning Inspectorate were appointed by the Secretary of State to conduct the Examination of the Local Plan.

Following the Local Plan Stage 1 Hearings which were held between 29 April – 1 May 2025, the Inspectors addressed some topics where the Council was producing further supporting information to assist the subsequent Stage 2 Hearings indicated for Autumn 2025. The Inspectors have requested these are published for consultation.

The Council is providing the opportunity for comments to be made on new documents with regards to the following topics:

- Transport Modelling
- National Landscape
- Flood Risk

- Green Belt Previously Developed Land
- Site Sifting
- Gypsies, Travellers and Travelling Show People

These documents are available at <https://www.stalbans.gov.uk/additional-documents-consultation-4-july-22-august-2025> and replicated at <https://www.stalbans.gov.uk/examination-documents-0>

The Council is providing the opportunity for comments to be made on these technical documents, although there is no expectation for individuals or bodies to make a response.

New representations on the Local Plan itself, or other documents, will not be considered by the Council or the Inspectors.

Comments received by the Council will be provided to the Inspectors and considered in their Examination of the Draft Local Plan. All previously made consultation responses will continue to be considered by the Inspectors.

The consultation will run from Friday 4 July at 10.00 am until Friday 22 August at 10.00 am. Any comments should clearly identify the document(s) to which they are referring and be sent to planning.policy@stalbans.gov.uk

Comments will be published in line with the Local Plan privacy notice available at <https://stalbans-consult.objective.co.uk/kse/terms/tnc>. Should you no longer wish to be contacted in future please email planning.policy@stalbans.gov.uk. This means we will not use your personal data to contact you again about future consultations.

Yours Faithfully,

Spatial Planning Team

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