

Our ref: NH/23/02342

Your ref:

Planning Department
Sefton Council
Ground Floor
Magdalen House
Trinity Road
Bootle
L20 3NJ

Adam Johnson
National Highways
Piccadilly Gate
Store Street
Manchester
M1 2WD


15 September 2023

Dear Sir / Madam

Draft Bootle Area Action Plan – Our Future, Our Bootle

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 Bootle Area Action 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

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 planning documents 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.

Through the production of planning documents, 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 Sefton 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.

DfT Circular 01/2022 and Sustainable Development

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.

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 SRN in Sefton consists of sections of the M57 and M58 motorways, alongside the A5036 trunk road which all meet up at Switch Island. All other routes are maintained by

the local highway authority and it is for them to comment on the suitability of the Plan in terms of those roads. The Plan area itself is to the immediate south of the A5036 and therefore proposals within the Plan do have the potential to impact the traffic on the trunk road.

Comments Regarding the Plan

National Highways' primary focus is on ensuring the continued safe operation of the SRN. Although highway works are often the method in which mitigation for development is delivered, other more sustainable measures should be considered ahead of road improvements. Importantly, land uses should be appropriate for sites within the Plan and, where possible, suitability should be judged at least partly on the ability to use, enhance or develop forms of sustainable travel.

As such, we are supportive of plans that aim to deliver local employment opportunities that can be accessed via public transport or active travel routes. In particular, the proposed reuse of vacant office space in policy BAAP3 would help to keep trips local.

Much in the same vein, BAAP4 looks to masterplan the redevelopment of Bootle town centre, providing local facilities and an enhanced public space. This improved sense of place further encourages localised and more sustainable trips, which in turn will likely lead to a reduction in traffic on the surrounding road network.

BAAP8 discusses the need for new developments to adhere to the principles of active and sustainable travel, with the protection and enhancement of essential services and facilities to reduce the need to travel by car. This is a key policy to assist in minimising reliance on private vehicle use for short trips, reducing congestion and improving air quality. National Highways is supportive of this policy, which aligns with our own as outlined in the Circular.

In terms of impacts to the SRN, consideration must be given to how development near the A5036 would impact safety and congestion. It is expected that any proposals brought forward as a result of this plan would need to consider how the developments would impact the route, with developers providing a vision-led transport assessment in-line with the latest guidance. Early discussions regarding masterplanning or pre-application contact on individual sites would be the most appropriate time to accomplish this.

Next Steps

Thank you for consulting National Highways on the Bootle Area Action Plan. If you would like to discuss further anything mentioned in this letter, please contact me directly on the email address below, or at our Planning inbox, PlanningNW@nationalhighways.co.uk.

Yours faithfully



Adam Johnson
Spatial Planning Team

