

Statement of Common Ground

between

London Borough Ealing

and

National Highways

Issued – 09/10/2025

This Statement of Common Ground (SoCG) is to set out areas of common agreement between the London Borough of Ealing (LB Ealing) and National Highways in relation to the new Ealing Local Plan.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority, and street authority for the Strategic Road Network (SRN). The 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.

There are no SRN assets within LB Ealing; the closest SRN network assets are:

- the M4 located just south of the Borough boundary in an east-west direction
- the M25 located c4miles west of the Borough
- the M40 located c6miles west of the Borough

This SoCG also aims to address the matters raised by National Highways in its representation to LB Ealing's Regulation 19 Local Plan, which for ease of reference are reproduced in Appendix 1.

LB Ealing and National Highways have engaged following the representation, and Ealing have appointed a consultant to carry out an SRN impact assessment.

Appendix 2 contains a log of comments capturing ongoing matters.

Agreed Matters

Both parties agree that they have a positive working relationship regarding the Ealing Local Plan. Both agree to continue to work together collaboratively to resolve strategic matters relating to the SRN.

Both parties welcome and encourage the use of active travel and will be supportive of any policies which may off-set car journeys that could otherwise travel on the SRN.

Both parties agree that a quantified assessment of the SRN is required.

Both parties are content that a 'monitor and manage' approach will be agreed to mitigate impacts arising from the LB Ealing Local Plan. Whilst impacts have not been confirmed at this stage, both parties agree that these may be tackled through sustainable 'demand management' and 'new or improved infrastructure'.

Ongoing Matters

Ealing and National Highways are collaborating on the SRN assessment. Whilst the technical study is ongoing, both parties have agreed on a proportionate approach for this and have agreed a methodology. The study will include a quantification of Local Plan led traffic demand forecasts calculated using trip rate benchmarks and modal split targets for the housing growth target and commercial site allocations. DfT/TfL and the Council's road database and readily available surveys will be used to inform the current level of AADT on the A-road network and the vehicle class split. Macro-area (e.g. Ward/ local centre level) typical trip distribution will be explored in Google Maps through distance and journey time parameters.

The impact on the SRN assets (junctions) will be identified as the number of additional trips in the peak period, and DMRB merge/diverge assessment will be carried out to ascertain the magnitude of impact. Where physical mitigations are necessary local models will be used to identify the effectiveness of the mitigation measures. Or sustainable alternatives will be agreed between both parties.

The initial outcome of the study indicates that approximately a third of the planned growth trajectory is located within 3 miles of the M4 Brentford and Cranford interchanges but work on this is ongoing. More detailed assessment of these junctions is ongoing to quantify the potential impact and ascertain requirements for mitigations.

Signed confirmation:

The contents of this Statement of Common Ground are agreed for the purposes of the examination of the Ealing Local Plan submitted in November 2024.

Signed on behalf of the National Highways:

Name and position	Signature	Date
Janice Burgess Spatial Planner National Highways	Janice Burgess	9 October 2025

Signed on behalf of Ealing Council:

Name and position	Signature	Date
Steve Barton, Strategic Planning Manager, Ealing Council	<i>Steve Barton</i>	9 October 2025

Appendix 1

“Thank you for your e-mail of 28th February 2024 inviting National Highways to comment on the above consultation and indicating that a response is required by 10th April 2024.

On behalf of the Secretary of State for Transport, National Highways is responsible for managing and operating a safe and efficient Strategic Road Network (SRN) as laid down in DfT Circular 01/2022: The Strategic Road Network and The Delivery of Sustainable Development (“the Circular”).

We are a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. National Highways is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour.

In response to your Reg 19 Consultation, I would like to draw your attention to National Highways document ‘The Strategic Road Network, Planning for the Future: A guide to working with National Highways on planning matters’ (October 2023). This document sets out how National Highways intends to work with local planning authorities and developers to support the preparation of sound documents which enable the delivery of sustainable development. The document indicates that National Highways will review and provide comments on local plans proposed by local planning authorities that have the potential to affect any part of the SRN.

In this instance, we would specifically be concerned with any proposals which have the potential to impact the M4 (which runs to the south of the borough and provides strategic connections to west of London, Heathrow Airport, and Berkshire), the M40 (which runs to the north-west and provides links to Buckinghamshire and West Midlands), and the M25. The M40 also connects to the A40 to the west, which is a key highway corridor running through the borough.

Ealing Local Plan (Regulation 19)

The Regulation (Reg) 19 submission documents prepared by Ealing Council covers future development in the area over the next 15 years from 2024 to 2039. The plan includes a strategic vision and spatial strategy, a collection of seven Town Plans which provide place-based strategies and spatial policies along with accompanying Development Sites (or site allocations), as well as the criteria-based development management policies that will help guide future development in the borough. However, it is noted that no transport information has been presented at this stage for any of the 82 Development Sites that are included.

Paragraph 5.3.1 of the Integrated Impact Assessment states that “the aim of the LB Ealing Local Plan is to improve the town for local people. Therefore, it is anticipated that traffic from outside of the LB Ealing will not increase. However, this cannot be fully ascertained without traffic modelling being undertaken for the operational stage.

National Highways welcome and encourage the use of active travel and will be supportive of any policies which may off-set strategic car journeys that could otherwise travel on the SRN. However, the Reg 19 documents are lacking in sufficient detail and only provide details of the Local Plan’s vision, strategic priorities and options for development growth at this stage. Given the proximity of several key SRN routes to the Borough (the M4, M40, and M25), we are keen to understand if any impact the Ealing Local Plan will impose on our network. National Highways cannot be expected to cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour, in line with DfT Circular 01/2022. National Highways expect the promoters of development to put forward initiatives that manage down the traffic impact of proposals to support the promotion of sustainable transport and the development of accessible sites.

We recommend a full transport evidence base be produced and transport modelling be undertaken to determine what the impact of the proposed quantum of development could be on the strategic highway network and what measures may be required to mitigate these impacts. The transport related evidence base needs to be sufficiently appropriate, up-to-date, transparent and robust, such that it can be deemed sound and should cover an appropriate area; for transport this may be beyond the borough boundary. The evidence base should also ensure that it assesses the individual and cumulative impacts of developments within the study area over the whole plan period and, as necessary, at various intermediate dates to identify any tipping points when action will be required. The findings should be presented in a Strategic Transport Assessment.

Conclusion

It is unclear at this stage whether it will be possible to sufficiently mitigate the impact of the allocated development locations or whether the impact will be too great to feasibly ensure that the network operates within capacity at the end of the plan period. We therefore advise that the transport evidence base and Strategic Transport Assessment, in accordance with DfT Circular 01/2022, are prepared and sent to National Highways for consultation as soon as possible.

We look forward to continuing to participate in future consultations and discussions. In the meantime, if you have any questions with regards to the comments made in this response, please do not hesitate to contact us at planningse@nationalhighways.co.uk<<mailto:planningse@nationalhighways.co.uk>.”

Appendix 2

Reference	Summary of issues	Ealing response	National Highways response	Ealing response
Strategic Objectives and Priorities	National Highways welcome and encourage the use of active travel and will be supportive of any policies which may off-set strategic car journeys that could otherwise travel on the SRN. However, the Reg 19 documents are viewed as lacking in sufficient detail and only provide details of the Local Plan's vision, strategic priorities and options for development growth at this stage.	<p>Ealing welcomes the support for active and sustainable modes of transport.</p> <p>Encouraging active travel and reducing car journeys is central to the Local Plan. Firstly, Ealing implements London Plan policies on car parking, cycle parking, and other measures which support development growth without generating car trips.</p> <p>Other London boroughs also apply these policies and it is important that we achieve a consistent approach across the London Plan and individual Local Plans.</p> <p>Secondly the Local Plan policies specify improvements to cycling and walking infrastructure for each of the seven towns and across the borough. For example, the Acton Spatial Strategy policy A1.I, i-iv provide details of specific improvements to cycling and</p>	<p>We welcome the policies you have outlined with regards to supporting modal shift and accept that the direction of travel with regards to mitigation measures for transport impacts, particularly within London, is first and foremost for improvements to sustainable modes such as walking, cycling and public transport.</p> <p>DfT Circular 01/22 paragraph 12 notes that "<i>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.</i>"</p> <p>We expect that many of the residential proposals which will come forward in the borough may be car free in line with the London Plan</p>	<p>Ealing have undertaken a cumulative assessment of the Local Plan impact on the SRN including forecast travel from large mixed use and small site allocations. The initial technical note was shared with NH for review in September 2025. Ealing acknowledges that this remains an ongoing matter, as the initial technical note had insufficient detail for NH to sign it off as a demonstration of impacts on the SRN.</p>

Reference	Summary of issues	Ealing response	National Highways response	Ealing response
		<p>walking routes for Acton, including town centre cycle lanes, the A40 and Uxbridge Road.</p> <p>Ealing's plans for cycles route delivery over the plan period are set out in the Cycle Network Plan approved by Cabinet in January 2025. These will determine funding submissions to TfL and other bodies for infrastructure improvements. The Plan was submitted as part of the modification schedule in November 2024, so it is understood that National Highways had not had sight of it. Proposed routes are shown for the whole borough, classified as 'core', 'neighbourhood', 'green', and 'other key routes' where adherence to LTN 1/20 guidance is not possible but improvements are still acknowledged as important.</p> <p>Taken together, these measures, along with the London Plan transport policy (and the Mayor's Transport Strategy), provide an appropriate and proportionate level of detail on our approach to reducing car trips and enabling modal shift.</p>	<p>requirements. However, there may be large residential or employment allocations which will have a substantial vehicle trip impact, and without any evidence of the cumulative level of this impact we will struggle to reach agreement.</p> <p>As stated previously, your comments outline the Council's vision and strategic priorities, but we have not been supplied with any specific transport evidence which demonstrates how the impact of additional trips from local plan growth will be mitigated for the SRN.</p> <p>DfT Circular 01/22 states in paragraph 33 that "<i>It is the responsibility of the local authority undertaking its strategic policy-making function to present a robust transport evidence base in support of its plan or strategy.</i>" If this or any supporting evidence is available it should be</p>	

Reference	Summary of issues	Ealing response	National Highways response	Ealing response
			supplied for review, and we will provide comment.	
Transport information for site allocations	National Highways noted in their representation that 'no transport information has been presented at this stage for any of the 82 Development Sites that are included'.	Transport information has been presented for every site, at a proportionate level for the Local Plan. Each site's PTAL is noted, along with any transport or highway related key infrastructure requirements, on its introductory page. The Design Principles for each site include transport information, e.g. the tolerated provision of car parking, desired and required improvements to surrounding public realm, and/or provision of new walking or cycling routes. More detailed transport information, e.g. expected trip generation, would not be feasible to include at this stage and is more appropriate to the application stage.	<p>Please could relevant links be provided to the evidence base for each site for review. It is not clear whether this was available at the time of our previous consultation response, or whether we deemed it insufficient.</p> <p>We remind you that C01/22 states that the plan making process "<i>provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms</i>" for delivery of mitigation.</p> <p>Note also our comments above about C01/22 Paragraph 33 and the requirement to produce a robust evidence base related to the whole plan i.e cumulative impacts, not subsequent individual impacts of each subsequent planning application</p>	<p>In support of the transport evidence the following documents have been submitted within the Local Plan evidence base:</p> <ul style="list-style-type: none"> - EB87 Transport Strategy, Ealing Council, 2019 - EB88 Ealing Cycle Network Plan, Ealing Council, 2024-2035 - EB89 Local Implementation Plan, Transport Delivery, 2019-2022 - EB83 Ealing Infrastructure Delivery Plan <p>Furthermore, technical notes have been exchanged with NH following the Regulation 19 representation.</p>

Reference	Summary of issues	Ealing response	National Highways response	Ealing response
			This cannot adequately be considered when transport information is only presented on a per site basis.	
Strategic Objectives and Priorities	National Highways expect the promoters of development to put forward initiatives that manage down the traffic impact of proposals to support the promotion of sustainable transport and the development of accessible sites.	This approach is essentially the backbone of the Local Plan, ensuring housing delivery with minimal car trips generated. Car-free and car-lite development, alongside improving local walking and cycling routes. The Transport Strategy (expected summer 2025) and ongoing discussions with TfL will address public transport needs, e.g. developing a bus strategy for Southall.	<p>DfT Circular 01/22 outlines our approach to this with regards to promoters of individual development. Paragraph 48 states that the transport assessment for each proposal “<i>should start with a vision of what the development is seeking to achieve and then test a set of scenarios to determine the optimum design and transport infrastructure to realise this vision</i>”.</p> <p>The overarching strategies you have mentioned will be important in determining the type and location of mitigations which will be necessary to cater for the cumulative impact of local plan growth.</p> <p>However, we will need to be provided with the aforementioned documents to review to determine their acceptability in terms of the SRN.</p>	Please refer to documents listed above.

Reference	Summary of issues	Ealing response	National Highways response	Ealing response
<p>Strategic objectives – evidencing transport interventions and potential impacts on SRN</p>	<p>Given the proximity of several key SRN routes to the Borough (the M4, M40, and M25), National Highways want to understand what, if any, impact the Ealing Local Plan will impose on their network.</p> <p>National Highways recommend a full transport evidence base be produced and transport modelling be undertaken to determine what the impact of the proposed quantum of development could be on the strategic highway network and what measures may be required to mitigate these impacts. The transport related evidence base needs to be sufficiently appropriate, up-to-date, transparent and robust, such that it can be deemed sound and should cover an appropriate area; for transport this may be beyond the borough boundary.</p> <p>The evidence base should also ensure that it assesses the individual and cumulative impacts of developments within the</p>	<p>While many of Ealing’s key roads are congested, data indicate that this is mainly due to short car trips on the local network, not to longer car trips accessing the SRN or other parts of London or the south-east. The Infrastructure Delivery Schedule (February 2024) makes this clear. In the most recent three-year period for which we have reliable data, excluding Covid (2017/18 – 2019/20), on average 35% of car trips were less than 2km long, and 66% were less than 5km long. By 2023/24, this had risen to 46% being less than 2km long, and 72% being less than 5km long. This indicates that even more of the congestion on our highway network is now caused by residents making short car trips in their local area. The proportion of trips over 5km (e.g. between town centres or potentially accessing the SRN) fell year on year, from 21% in 2017-2020, to 15% in 23/24. Trips over 10km, the most likely to be accessing the SRN, stayed broadly constant at a low 13-14%.</p> <p>In assessing overall capacity, particularly outside the borough and</p>	<p>Please could the evidence you have to support these statements be provided for review? At the moment we have not been supplied anything to evidence these comments. If for example the Transport Strategy you mention is a key document to enable us to understand the detail behind your approach, it would be useful to have sight of a draft copy of this.</p> <p>We support the move towards vision led approaches for local plan development, however we would at least expect to be able to understand the cumulative level of trip generation expected from the site allocations included within the plan as part of a transport evidence base, even if we were to then agree that strategic transport modelling does not have to be provided.</p> <p>As a reminder the default position outlined in C01/22 states in paragraph 33 that although <i>“the company can review measures that would help to avoid or significantly reduce the need for additional infrastructure on</i></p>	<p>Please refer to documents listed above.</p>

Reference	Summary of issues	Ealing response	National Highways response	Ealing response
	<p>study area over the whole plan period and, as necessary, at various intermediate dates to identify any tipping points when action will be required. The findings should be presented in a Strategic Transport Assessment.</p>	<p>on the SRN, conventional traffic modelling would not be relevant or proportionate, particularly in terms of value for money, for understanding Ealing's congestion challenges. As the IDS notes, "in response to the issues identified above, future highway schemes are primarily focused on traffic calming, congestion reduction, active travel improvements, bus priority measures and road safety improvements across the borough." Our forthcoming Transport Strategy will tackle these short car journeys by making walking, cycling and public transport more attractive and viable options for everyday journeys. Given the data, this is the only viable option for reducing Ealing's congestion.</p> <p>Reducing trip generation is inherent to the Local Plan's policies and spatial strategy with allocations and densities largely determined by public transport accessibility. Sites must adhere to London Plan maximum standards for car parking, minimum standards for cycle parking, and provide for improvements to cycling and</p>	<p><i>the SRN where development can be delivered through identified improvements to the local transport network, to include infrastructure that promotes walking, wheeling, cycling, public transport and shared travel. [However] 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."</i> This requirement is contrary to the view that "modelling is not proportionate or informative in the context of the plan"</p> <p>There is also insufficient information supplied regarding the Council's plans to reduce the types of longer distance strategic journeys which are more likely to use the SRN. Note also that a large generator of longer distance trips may be employment growth including in-commuting from other London boroughs and from outside London.</p>	

Reference	Summary of issues	Ealing response	National Highways response	Ealing response
		<p>walking infrastructure and the public realm wherever required. Site access, construction, logistics and servicing will be carefully controlled, and travel plans are expected, to ensure modal shift.</p> <p>The plan follows the best practice approach of 'predict and provide' rather than 'decide and provide'. It is not within our policy to provide more road capacity for traffic, and the Council is committed to improving walking and cycling infrastructure and public transport services to provide for the trips generated in the Local Plan period.</p> <p>Transport modelling of the whole borough would not be proportionate or particularly informative in the context of the Local Plan, as it is not well designed to test the specific policies that it proposes. Modelling would also be effectively out of date as soon as complete, given the current pace of development in Ealing and the continual improvements to the transport network.</p>		

