

South Tyneside Submission Draft Local Plan 2023 - 2040

Statement of Common Ground

Between

South Tyneside Council and National Highways

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1. Introduction

Parties to this Statement of Common Ground ('SoCG')

- 1.1 This SoCG is submitted on behalf of:
 - South Tyneside Council
 - National Highways

Purpose

1.2 The purpose of this SoCG is to set out the confirmed agreements and any disagreements between South Tyneside Council and National Highways in relation to the emerging South Tyneside Local Plan.

Scope

- 1.3 This SoCG provides the following:
 - An overview of the development of evidence relating to the impact of the Local Plan on the strategic road network (SRN) and the conclusions arrived at, including the mitigation required.
 - Issues raised on behalf of National Highways in its representations on the Plan.
 - The matters on which there is agreement between the parties.

2. Development of evidence

- 2.1 National Highways and South Tyneside Council have worked closely and proactively together throughout the plan-making process, to ensure that appropriate evidence is provided as part of the local plan evidence base. For example, the South Tyneside Regulation 18 Draft Local Plan (2022) was supported by the following evidence base:
 - Large Greenbelt Release Sustainable Accessibility Review (July 2021).
 - Large Green Belt Release Aimsun Testing (July 2021).
 - White Mare Pool Emerging Pressures Junction Study (December 2021).
 - South Tyneside Infrastructure Study (March 2022).
- 2.2 In addition to the above studies, National Highways has previously provided written representations to the South Tyneside Regulation 18 Draft Local Plan (2022).

Strategic Road Network Forecast Report and Model Development Report (2023)

- 2.3 South Tyneside Council and National Highways jointly commissioned the above study to assess the impact of the Publication Draft Local Plan (Regulation 19) 2024 allocations on the Strategic Road Network. The study was undertaken using a methodology agreed between the parties. The previous assessment of the network with Regulation 18 developments had significantly higher forecast traffic for the end of plan, +18% and +21% relative to the 2022 base for morning and evening periods. The current assessment forecasts a 15% increase.
- 2.4 Previous studies on the network had identified the need of an infrastructure scheme at the A19/A185 (Jarrow / Tyne Tunnel) Junction for satisfactory operation of the SRN. However,

due to the end of plan demand being considerably lower than previous forecasts, this study found that satisfactory network operation does not require a SRN scheme at the A19/A185 (Jarrow / Tyne Tunnel) Junction by 2040. The key findings of the assessment were as follows:

2040 Do Minimum Results:

- There are significant northbound and southbound queues at White Mare Pool junction in 2040 Do Minimum scenario morning and evening periods.
- Delays from White Mare Pool junction cascade to Lindisfarne junction resulting in northbound queues extending beyond the off-slip and on to the A19 mainline in both morning and evening periods
- In the evening period, the A19 southbound diverge queues at Lindisfarne junction also extend beyond the off-slip and on to the A19 mainline.

2040 Do Something Results:

- The delays at White Mare Pool junction are considerably less in the 2040 Do Something scenario (with the White Mare Pool widening and Lindisfarne lane gain) for both morning and evening periods compared to both the 2040 Do Minimum and 2022 base scenario.
- At Lindisfarne junction, the A19 northbound and southbound diverge queues remain well within the off slips in the morning period and will not cause a safety concern for National Highways.
- For the evening period, there are minimal queues on the A19 northbound diverge at Lindisfarne junction. The A19 southbound diverge queues are still significant but are contained within the proposed lane gain, reducing their safety impact.
- The capacity of the Tyne Tunnel, north of the network, remains a constraint for the northbound throughput of the tested network.

Interim test results

- 2.5 Tests for interim years, 2030 and 2035, were done to ascertain timeline for delivery of infrastructure schemes identified for end of plan period.
- 2.6 The White Mare Pool widening scheme (1) is required before 2030 and the A19 southbound lane gain / lane drop scheme (2) is required before 2035 for satisfactory operation of the network.

3. Local Plan consultation responses

Response by National Highways to the Regulation 18 consultation

3.1 National Highways responded to the consultation on the Regulation 18 Draft Local Plan and made the following comments:

¹ The White Mare Pool widening scheme proposes an additional lane on the north approach arm and the following east circulatory at the roundabout, increasing from three to four lanes, with two lanes each dedicated for southward and westward movements. Additionally widening from two to three lanes is proposed for the east approach arm (off-slip road), and south approach arm from Follingsby Lane to White Mare Pool.

² The A19 Southbound Lane Gain / Lane Drop scheme proposes the widening of the A19 from two to three lanes from Jarrow Road to Lindisfarne sections, along with upgrades of the merge and diverge to a lane gain and lane drop respectively.

- National Highways requested that wording is added to several housing and employment sites, explaining that the site is located in close proximity to the SRN and appropriate consultation with National Highways will be required.
- National Highways requested that the detail of the transport requirements for several employment allocations is included in the Local Plan.
- National Highways requested that an employment allocation is amended to reflect the fact that residential development is likely to come forward on the site.
- National Highways was not satisfied that all infrastructure requirements are shown on the Policies Map.
- 3.2 How the council has responded to these comments is set out in the Statement of Consultation.

Response by National Highways to the Regulation 19 consultation

3.3 National Highways responded to the consultation on the Regulation 19 Draft Local Plan and made the following comments:

Policy	Policy title	National Highways	Council response
reference		comments	
SP2	Strategy for Sustainable Development to meet identified needs	The policy states that the STLP will deliver 5,253 dwellings. The SRN Forecast report only assessed the impact of 4,937 dwellings within the Plan period. Initially, National Highways	The data regarding forecast dwellings for the SRN Forecast Report was aligned with the data regarding forecast dwellings for the Local Road Network – Traffic Capacity Assessment. This equated to circa 5,000 dwellings. Policy SP16
SP16	Housing Supply and Delivery	would suggest that STC should explain the reasoning for this variance.	- Housing Supply and Delivery, includes a windfall allowance (444 dwellings) for sites of less than 20 dwellings. The SRN Forecast Report states 'Any site with less than 30 residential units is excluded due to its minimal impact on the overall network operation.'
SP2	Strategy for Sustainable Development to meet identified needs	The policy states that the STLP will deliver 49.41 ha of employment land. The SRN Forecast report assessed the impact of 208ha of employment land within the Plan period. Initially, National Highways would suggest that STC should explain the reasoning for this variance.	In the Local Road network assessment, Systra included the following employment land: • 48.78 hectares as 'Local Plan Allocation'. • 150 hectares at IAMP as a 'committed development'. • 9.56 hectares in North Tyneside as 'other development'. Which equals 208.34 hectares The 208 hectares referenced in the Strategic Road Network report is an amalgamation of employment land

			outlined in Section 3.1 of the SRN
			Forecast report.
SP17	Strategic Economic Development	The policy states "Maintaining a portfolio of 278.35 ha of land for economic development including 141.3 ha of land for specialist port-related development". The SRN Forecast report assessed the impact of 208ha of employment land within the Plan period. Initially, National Highways would suggest that STC should explain the reasoning for this variance.	As above
SP8	Fellgate Sustainable Growth Area	National Highways would suggest that STC should provide a quantifiable frequency for what it considers to be a high-quality bus service. National Highways would also suggest that policy	The policy cannot require a specific quantifiable frequency for a bus service as this is ultimately a matter for Nexus. Insert a new Point 5iiie as follows: Contributing to the provision of a high-quality bus service This is considered to be an asset management rather than a planning
		wording changes are required to ensure that the allocation boundary with the SRN is appropriately maintained.	matter.
51	Improving capacity on the road network	The policy includes "junction Improvements at A19/A185/Tyne Tunnel". This was not identified as being required in the SRN Forecasting Report. National Highways would, therefore, suggest that reference to this mitigation scheme should be removed.	Junction Improvements at A19/A185/Tyne Tunnel is currently listed in Policy 51 under Strategic Highway network projects. Retain reference to the scheme in Policy 51 but list under South Tyneside Local Highway Network projects.
SP26	Delivering sustainable transport	The policy states that new developments should "Provide or contribute towards the provision of new and/or improved sustainable travel infrastructure where the predicted number of additional trips will lead to a cumulative increase in carbased trips". In line with DfT Circular 01/2022, National Highways would suggest that all new	Amend the policy wording for SP26 (3) iii as follows: Provide or contribute towards the provision of new and/or improved sustainable travel infrastructure. where the predicated number of additional trips will lead to a cumulative increase in car-based trips

		1	
		developments should be	
		seeking improve their	
		sustainable travel	
		accessibility and the policy	
		wording is, therefore,	
		inappropriate because it	
		creates an unnecessary	
		criteria that is linked "a	
		cumulative increase in car-	
		based trips".	
59	Delivering	The policy states that "The	The council agrees to the requested
	Infrastructure	timing and prioritisation in	change but with the following
		the delivery of essential	amendment (insertion of transport
		infrastructure will accord	before 2 nd reference to
		with the priority needs	infrastructure):
		established through the IDP".	
		National Highways would	The timing and prioritisation in the
		suggest that this policy	delivery of essential infrastructure
		wording should be changed	will broadly accord with the priority
		to:	needs established through the IDP,
		The timing and prioritisation	however, the exact timing of any
		in the delivery of essential	required transport infrastructure
		infrastructure will broadly	will be identified through the
		accord with the priority	Transport Assessment and Travel
		needs established through	Plan process at the planning
		the IDP, however, the exact	application stage
		timing of any required	
		infrastructure will be	
		identified through the	
		Transport Assessment and	
		Travel Plan process at the	
1-		planning application stage.	Add the consequence of developing to
n/a	n/a	National Highways	Add the recommended wording to
		recommend adding the	the supporting text for Policy SP26:
		following wording to the	Delivering sustainable transport
		STLP with STC: "The	
		transport implications of	
		development must be	
		addressed as part of any	
		planning application, where	
		relevant this could include	
		through Transport	
		Assessments, Transport Statements and Travel Plans.	
		All development shall deliver	
		-	
		sustainable transport by:	
		ensuring that any vehicular traffic generated by new	
		development, following the	
		implementation of	
		sustainable transport	
		measures, can be safely	
		accommodated on the local	
		and strategic highway	
		network and does not cause	
		an unacceptable increase in	
		congestion or air pollution	
	<u> </u>	congestion of all pollution	

	and that severe congestion	
	can be overcome by	
	appropriate transport	
	improvements".	

Policies that National Highways support

- 3.4 National Highways expressed support for the following policies:
 - Policy SP15: Climate Change
 - Policy 24: Safeguarding land at CEMEX Jarrow Aggregates Wharf
 - Policy SP26: Delivering sustainable transport

Subject to the changes that STC have proposed, the following policies are now also agreed:

- Policy SP2: Strategy for Sustainable Development to meet identified needs
- Policy SP16: Housing Supply and Delivery
- Policy SP17: Strategic Economic Development
- Policy SP26: Delivering sustainable transport
- Policy 59: Delivering infrastructure

Policies Map

3.5 National Highways has suggested that the Policies Map is amended to show infrastructure requirements in the South Tyneside Local Plan area.

Further detailed comments on site allocations

It was agreed through the Regulation 19 consultation that National Highways would provide further detailed comments on the site allocations in due course.

Policy	Policy title	National Highways comments	Council response
reference			
SP7	GA3: Land to	We request that the following	These matters are already
(GA3),	the north of	wording is added to the site	broadly covered by Policy SP26
SP18	Town end	requirements for Policy SP7	points 5i and 5ii. The detail is
(ED.6),	Farm,	(GA3), Policy SP18 (ED.6), and	considered to be operational
SP18	ED.6: Land	Policy SP18 (ED.10):	matters that are not generally
(ED.10)	bound by	With a view to the proximity of	dealt with through planning
	Chaytor	the proposed development to the	conditions but more likely to be
	Street, Ellison	Strategic Road Network,	through negotiation as part of
	Place, the	development must consider the	the development management /
	Metro Line	following matters (in consultation	road safety process leading to the
	and Berkley	with National Highways)	signing of a Section 278
	Way		Agreement.
	ED.10:	a) Boundary treatment –	
	Boldon	including the physical boundary	
	Business Park	proposal; access to the boundary;	
		and confirmation in relation to	
		land ownership.	
		b) Drainage proposals –	
		further information relating to	

		the interaction of drainage measures between the proposed development and SRN should be afforded to confirm no relationship with the SRN drainage system. c) Structures and stability of embankments or cuttings. d) Construction safeguards, with regard the influences of the construction of the element of development that bounds the SRN. e) Environmental implications (including air quality and noise) with respect of the potential environmental impact of the SRN upon the development itself. How has it been determined that such matters would not influence the principle of the development with a view to the risk and the potential need for mitigation." f) The risk of the development being struck by errant vehicle and/or the potential for the development to create an additional safety hazard to road users in the event of a vehicle strike (with consideration of the Road Restraint Risk Assessment	
		Process).	
13	Windfall and Backland Sites	Part 1 of Policy 13 (Windfall and Backland sites) identifies requirements for residential development on sites that have not been allocated in the Plan (windfall sites). National Highways would note that DfT Circular 01/2022 contains specific requirements for windfall sites. To ensure that Policy 13 complies with national planning policy, National Highways would suggest that the following additional wording is required:	Accessibility is already covered by Policy SP26 e.g. "New development will be expected to support sustainable transport and improve accessibility" and "New development should promote sustainable transport and accessibility". Add the recommended wording "Development would not create a significant constraint to the delivery of any planned improvements to the transport network or allocated sites" as new point 1vi to Policy 13.

		"Development would be located in an area of high accessibility by sustainable transport modes" (To replace paragraph 1ii that only requires that "The site has access to sustainable modes of transport"). "Development would not create a significant constraint to the delivery of any planned improvements to the transport network or allocated sites." "Development has considered its highways impact on top of a committed development scenario that includes all relevant development that is consented or allocated over the entirety of the plan period".	Policy SP26 includes 'Where appropriate, new development will be supported by a Transport Statement or Transport Assessment and a Travel Plan'. Therefore, this is already covered in the Plan. However, to strengthen this, add 'The development scenario for Transport Assessments will include all relevant development that is consented and/or allocated over the entirety of the plan period' to the supporting text for Policy SP26.
SP8	Fellgate Sustainable Growth Area	We also request the following wording change to Policy SP8 (Fellgate Sustainable Growth Area), section 5v: "Ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic road network in terms of capacity and congestion, including mitigating the impact of the development at the White Mare Pool Roundabout A194(M)/A194/A184(T) White Mare Pool Junction in line with Policy 51 (1.iii) and the Infrastructure Delivery Plan (reference)".	Policy SP4 states 'Applications will be determined in line with other policies in the Plan'. The Local Plan does not therefore cross-reference in any policy to any other specific policies. The principle is that the Plan should be read as a whole. We do not therefore support 'in line with Policy 51. 'Nor do we support 'and the Infrastructure Delivery Plan' as this could be interpreted as elevating the IDP to the status of a Development Plan Document which would not be sound. Amend Policy SP8 Point 5v as follows: "Ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic road network in terms of capacity and congestion, including mitigating the impact of the development at White Mare Pool Roundabout the A194(M)/A194/A184(T) White Mare Pool Junction"
SP14	Wardley Colliery	We also request the following wording change to Policy SP14 (Wardley Colliery):	Policy SP4 states 'Applications will be determined in line with other policies in the Plan'. The Local

"In taking forward the economic development component, development proposals must: iv. Ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic road network in terms of capacity and congestion, including mitigating the impact of the development at the A194(M)/A194/A184(T) White Mare Pool Junction in line with Policy 51 (1.iii) and the Infrastructure Delivery Plan (reference)".

Plan does not therefore cross-reference in any policy to any other specific policies. The principle is that the Plan should be read as a whole. We do not therefore support 'in line with Policy 51'. Nor do we support 'and the Infrastructure Delivery Plan' as this could be interpreted as elevating the IDP to the status of a Development Plan Document which would not be sound.

Insert a new point 1iv as follows: "Ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic road network in terms of capacity and congestion, including mitigating the impact of the development at the A194(M)/A194/A184(T) White Mare Pool Junction".

4. Areas of agreement

Duty to Cooperate

4.1 Agreed - Effective and ongoing duty to cooperate engagement has taken place between the parties throughout the preparation of the draft South Tyneside Local Plan and will continue during its implementation.

Proposed modifications to the draft South Tyneside Local Plan in response to comments from National Highways

4.2 Agreed - The council proposes the following minor modifications to the draft Local Plan in response to comments from National Highways:

Policy SP8: Fellgate Sustainable Growth Area

- Insert a new Point 5iiie as follows: "Contributing to the provision of a high-quality bus service".
- Amend point 5v of the policy as follows (new text italicised, deleted text in strikethrough) "Ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic road network in terms of capacity and congestion, including mitigating the impact of the development at White Mare Pool Roundabout the A194(M)/A194/A184(T) White Mare Pool Junction".

Policy SP14: Wardley Colliery

• Insert a new point 1iv as follows: "Ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic road network in terms of capacity and congestion, including mitigating the impact of the development at the A194(M)/A194/A184(T) White Mare Pool Junction".

Policy 13: Windfall and Backland Sites

• Insert a new point 1vi as follows: "Development would not create a significant constraint to the delivery of any planned improvements to the transport network or allocated sites".

Policy SP26: Delivering sustainable transport

- Amend the wording for SP26(3) iii as follows (text with strikethrough is proposed to be deleted):
- Provide or contribute towards the provision of new and/or improved sustainable travel infrastructure. where the predicated number of additional trips will lead to a cumulative increase in car-based trips

Policy SP26: Delivering sustainable transport – supporting text

- Insert a new paragraph into the supporting text for the policy to read as follows:
- The transport implications of development must be addressed as part of any planning application, where relevant this could include through Transport Assessments, Transport Statements and Travel Plans. All development shall deliver sustainable transport by: ensuring that vehicular traffic generated by new development, following the implementation of sustainable transport measures, can be safely accommodated on the local and strategic highway network and does not cause an unacceptable increase in congestion or air pollution and that severe congestion can be overcome by appropriate transport improvements.
- Amend the wording for paragraph 14.14 as follows (new text italicised)
- The NPPF states that all development that generates significant amounts of movement should be required to produce a travel plan, and the application should be supported by transport statement or transport assessment so that the likely impacts of the proposal can be addressed. The development scenario for Transport Assessments will include all relevant development that is consented and/or allocated over the entirety of the plan period. When determining whether a Transport Statement, Transport Assessment or Travel Plan is adequate, applicants are advised to have regard to the criteria provided within the Transport Assessments/Statements, and Travel Plans section of the Validation of Planning Applications in Tyneside (2019).

Policy 59: Delivering infrastructure

- Amend the wording for the 2nd paragraph of the policy as follows (new proposed text italicised):
- The timing and prioritisation in the delivery of essential infrastructure will *broadly* accord with the priority needs established through the IDP, *however*, the exact timing of any required infrastructure will be identified through the Transport Assessment and Travel Plan process at the planning application stage.

Policies Map

The Policies Map will be amended to show infrastructure requirements in the South Tyneside area relating to the Strategic Road Network. The amendments are shown at Appendix 1.

Strategic Road Network – Forecast Report

4.3 Agreed - The study and associated modelling provides a robust evidence base.

Interventions necessary to mitigate the impact of the Local Plan on the SRN

A194M / A184 / A194 White Mare Pool Junction

4.4 Agreed – A194M / A184/ A194 White Mare Pool junction widening scheme is required before 2030 to enable satisfactory operation of the network.

A19 Southbound Lane Gain / Lane Drop between the (A185) Jarrow Road and (A194) Lindisfarne junctions.

4.5 Agreed - The A19 Southbound Lane Gain / Lane Drop between the Jarrow Road and Lindisfarne junctions is required before 2035 to enable satisfactory operation of the network.

Relevant Local Road Network mitigation

A194 (Leam Lane) and Mill Lane (B1306) roundabout improvements

4.6 Agreed - The A194 Leam Lane / Mill Lane roundabout will need to be upgraded as part of the development of the Fellgate Sustainable Growth Area. This intervention is complimentary to the White Mare Pool Junction intervention, in terms of managing traffic queues at the junction. The inclusion of this scheme does not imply acceptance of the scheme by either National Highways or South Tyneside Council, this is subject to normal planning requirements.

Relevant Committed Local Road Network Schemes

The IAMP bridge scheme

4.7 The SRN Forecast Report assesses this scheme as committed development. The scheme would involve the construction of a road bridge across the A19 which would tie into the A1290 and Washington Road.

Infrastructure Delivery Plan

Infrastructure Delivery Plan report

- 4.8 Agreed that the IDP is a living document that will be updated periodically and therefore given the timescales of the Plan and the changing environments that could occur over the life of the Plan, any emerging patterns or evidence that identifies a potential need for further consideration of the SRN can be undertaken as part of that process.
- 4.9 Agreed that the next iteration of the IDP states that all development should deliver sustainable transport by ensuring that any vehicular traffic generated by new development, following the implementation of sustainable transport measures, can be safely accommodated on the local network and SRN.

- 4.10 Agreed that the next iteration of the IDP states that there is potential that additional mitigation that is not identified at the Local Plan stage will be required.
- 4.11 Agreed that the link between sustainable transport measures and the resulting vehicular traffic generation is made more explicit.

Infrastructure Delivery Plan – delivery schedule

Infrastructure Scheme	National Highways comment	Council response
A19(T)/A185 Tyne Tunnels southern portal junction improvements	This is identified as desirable scheme with the lead organisation as National Highways/STC. This scheme was not identified as being required in the SRN Forecasting Report. National Highways would, therefore, suggest that reference to	It is acknowledged that the scheme is not identified as being required in the SRN Forecasting Report. However, STC still consider that the scheme is a desirable project. It will therefore be retained in the IDP but with National Highways
	this mitigation scheme should be removed.	removed as the lead organisation.
A194(M)/A194/A184(T) White Mare Pool Junction enhancement/realignment	Update to reflect the timescales identified in the SRN forecast report and title as 'essential' mitigation	Agreed - Change from 'desirable' to 'essential' and from 2028 to 2030
A19 Southbound Lane Gain / Lane Drop - A185 through to A194	Update to reflect the timescales identified in the SRN forecast report and title as 'essential' mitigation	Both the timescale and the essential status in the IDP delivery schedule are already consistent with the SRN Forecast Report.

Scheme Development / Future Funding

- 4.12 The statement of common ground has identified the infrastructure schemes that are required on the strategic road network to mitigate the impact of the South Tyneside Publication Draft Local Plan 2024 (Regulation 19).
- 4.13 The required (essential in the IDP) mitigation schemes will be developed through joint working between National Highways and South Tyneside Council, or through planning led involvement by developers, to develop the conceptual designs through the detailed design process and undertaking the appropriate consultation.
- 4.14 From a scheme funding perspective, both National Highways and South Tyneside will work collaboratively to identify the required sources of external funding to enable the implementation of the required (essential in the IDP) mitigation schemes. This will involve National Highways working with South Tyneside Council to identify realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies.

Demand Management

4.15 In December 2022, the Department for Transport [DfT] published its policy paper: "Strategic road network and the delivery of sustainable development" [DfT Circular 01/2022]. The document outlines the principles of sustainable development in relation to the SRN including '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' (Para 12). Sustainable in this

context refers to both active travel opportunities such as walking and cycling and also to public transport opportunities. It is agreed that these principles will be integral to the implementation of the Local Plan.

Fellgate Sustainable Growth Area Supplementary Planning Document

4.16 It is agreed that reference to DfT Circular 01/2022 will be considered as part of the preparation of the Fellgate Sustainable Growth Area Supplementary Planning Document.

5. Area of Disagreement

5.1 There are no known areas of disagreement between South Tyneside Council and National Highways.

6. Conclusion

- 6.1 It agreed by all parties that the impacts of the Local Plan on the SRN have been robustly assessed and that the necessary mitigation has been identified with solutions agreed for the most critical junctions. The evidence has been developed to the point you would expect it to be at this stage in the Local Plan process and sufficient to have a high degree of certainty regarding the delivery of the Plan.
- As summarised above, more work will be done in the period between now and the Local Plan Examination and as appropriate an updated version of the SoCG will be published.

7. Signatories

Signed on behalf of South Tyneside Council Stuart Wright, Director of Place Strategy

Signed on behalf of National Highways

Sunny Ali Regional Spatial Planning manager Appendix 1: Proposed modifications to the Policies Map in response to the representation from National Highways

