

Subject: FW: TA Review, 25/00371/OUT

From: Matt Leek <Matt.Leek@nottsc.gov.uk>

Date: Thursday, 4 June 2026 at 13:32

To: David Frisby <davidfrisby@modetransport.co.uk>; Josh Norris
<joshnorris@modetransport.co.uk>

Cc: Darren Ottewell <darren.ottewell@broxtowe.gov.uk>; Jan Witko <jan.witko@nottsc.gov.uk>

Subject: TA Review, 25/00371/OUT

Dear David,

Following on from Jan's earlier email, a review of the submitted Transport Assessment (TA) has identified a number of fundamental concerns regarding its methodology, most notably the failure to assess the cumulative impact of development traffic on the wider highway network in accordance with paragraph 116 of the National Planning Policy Framework (NPPF). The NPPF makes clear that development should only be refused on highways grounds where there would be an unacceptable impact on highway safety, or where the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

The purpose of cumulative assessment is to ensure that the combined effects of the proposed development, alongside other committed and allocated sites, are properly understood, particularly where those developments influence the same routes and junctions. In the absence of such an assessment, it is not possible to robustly determine how development traffic will interact across the network or to reach a sound judgement on overall impact.

This is of particular relevance in the present case given the proximity of other significant proposals at Toton East (155 dwellings, ref. 25/00255/FUL) and Toton North (880 dwellings, ref.

25/00306/OUT), which form part of the wider allocation under Policy 3.2 of the Broxtowe Part 2 Local Plan. Additionally, the close proximity of the Chetwynd Barracks proposals allocated under Policy 3.1 of Plan, which currently assumes 500 dwellings in the plan period and 1500 dwellings overall is also connected to the above sites by way of a proposed strategic link road which physically links the allocations.

The above schemes are likely to materially influence traffic patterns on the same parts of the highway network; however, they have not been assessed as part of a combined cumulative scenario. Whilst it is acknowledged that wider cumulative modelling work is being progressed separately, the current submission assesses the application in isolation on the assumption that a broader mitigation strategy will be developed at a later stage. This approach does not accord with the expectations of the NPPF and does not provide a robust basis for decision-making.

The Highway Authority is therefore not satisfied that the submitted TA provides a sufficiently reliable evidence base for assessing future-year traffic impacts. While TEMPro/NTEM can be used to estimate general background traffic growth, it appears that such growth factors have been relied upon in place of explicitly modelling the effects of nearby committed and allocated developments. This is not considered appropriate in this instance, given the scale, proximity, and likely interaction of these schemes. The concern is not simply a preference for an alternative methodology, but that the submitted assessment does not provide a sound or defensible basis

upon which the residual cumulative impact on the highway network can be confidently established.

This issue is not limited to overall traffic growth, but relates critically to traffic distribution, route choice, and junction loading. Department for Transport guidance recognises that TEMPro-derived forecasts are subject to increasing uncertainty at a localised level. In this case, future network performance will be influenced not only by background growth, but also by the concentration of strategic development and planned infrastructure changes, including the proposed link road between the A52 and Chetwynd Road. Under these circumstances, the use of a spreadsheet-based approach reliant on existing patterns, with TEMPro uplift, is unlikely to provide a reliable representation of future network conditions.

The example of Stapleford Lane illustrates this limitation. Applying an approximate 11.5% uplift to an existing two-way AM peak flow of 1,730 vehicles generates an increase of around 200 vehicles. However, a single nearby development of approximately 1,200 dwellings could, in broad terms, generate significantly more peak hour traffic than this uplift suggests. Although actual distribution would depend on assignment assumptions, this demonstrates the risk that TEMPro-based growth can materially understate localised impacts where development is concentrated. This is further evidenced by sensitivity testing, where the removal of a large site results in only marginal changes to overall growth rates, reflecting the way in which TEMPro distributes growth across a wider area rather than capturing localised effects.

For these reasons, the Authority considers that the TA has not established a robust future baseline and does not provide a sufficient basis for assessing whether residual cumulative impacts would be severe. A revised cumulative assessment is therefore required, explicitly incorporating committed and allocated developments, future highway infrastructure, and associated traffic reassignment. In this context, the use of the relevant strategic model (managed by Systra), or a methodology of clearly equivalent robustness, is considered necessary to provide confidence in the assessment.

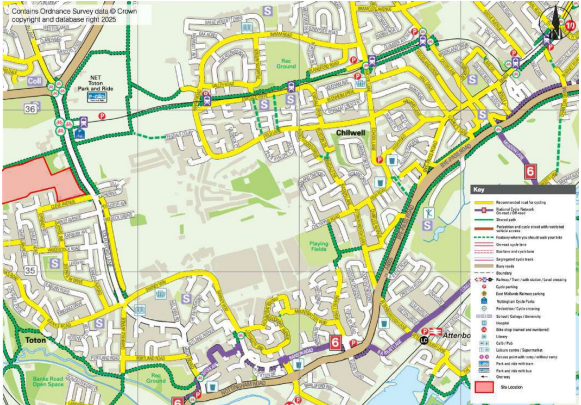
A model-based assessment is also required to robustly assess trip distribution and assignment. Whilst Journey to Work Census data has been used to inform likely trip destinations, and Google Route Planner has been used to assign routes based on estimated journey times, no detailed evidence has been provided to demonstrate how traffic is distributed or the proportion of trips travelling to each destination. As a result, it is unclear where development traffic is actually heading, and the assignment of traffic to the network cannot be verified. An Origin–Destination matrix should demonstrate how trips are distributed from the site to key locations. Furthermore, Google Route Planner identifies routes based on live data and changing algorithms, and does not account for wider network effects such as congestion and queuing, which can only be robustly assessed through a transport model.

In addition, the use of a 2028 opening year is not considered appropriate as it does not reflect the point at which the development would be fully built out and generating its maximum traffic demand. This results in both lower development trip generation and reduced background flows, thereby understating network impacts. The assessment therefore fails to test the most critical scenario, namely full occupation, and cannot be relied upon to demonstrate acceptability.

In terms of travel planning, whilst an initial Travel Plan has been submitted, it is considered that such a document must be informed by the findings of a robust and comprehensive Transport Assessment. A Travel Plan is intended to support sustainable travel behaviour and reduce reliance on the private car; however, its measures are inherently behaviour-based and cannot be relied upon in isolation to define or mitigate impact. Accordingly, an updated Travel Plan should be prepared following the completion of a revised TA to ensure that its measures are appropriately

targeted, proportionate, and directly responsive to the identified impacts. Furthermore, any Travel Plan or TA measures relied upon as mitigation should be clearly quantified and supported by a robust evidence base, in order to allow their effectiveness and deliverability to be properly assessed through the decision-making process. Notwithstanding this, the below Travel Plan review has been received and should form the basis of a future submission.

NCC Comments Feb 2026	Technical N
Overall note: The NCC Travel Plan Guidance makes clear that the Travel Plan is a distinct document from the Transport Assessment. The Travel Plan is intended to manage travel behaviour post-approval. The guidance explicitly states that, although some material may be consistent across both documents, the Travel Plan should not be used to justify travel behaviour and deliverability.	
<u>Developing the Travel Plan</u> The overarching aim of the Travel Plan should be to minimise all single-occupancy vehicle trips, not just those made in Internal Combustion Engine Vehicles (though accelerating adoption of such vehicles can also be a wider aim. (See first two bullets of Para 2.6.1 from the TP for the reasons for this. (We would recommend that this aim, expressed in the first bullet of 6.2.2, needs splitting out into the two sentiments to avoid conflating these two things – see below on targets).	Firstly, it should be noted that considering a shift from Internal Combustion Engine Vehicles to other components of the chief travel planning target in creating a multi-modal shift in transport. Any travel planning questionnaire surveys will allow residents to consider the inclusion of EV use in this target doesn't retract from the other way round. 2.3.2 Secondly, it is unclear as to why NCC don't wish to consider the shift from ICEVs to EVs. It remains the view of mode that a shift from ICEV to EVs should count towards the target. 2.3.3 Within Annex 2 of the NPPF, sustainable transport modes are defined as those that have a low impact on the environment, including walking and cycling, ultra-low and zero emission vehicles. 2.3.4 Ultra-low and zero emission vehicles are therefore clearly identified as sustainable transport. In planning decision making and policy compliance terms, it is considered that a shift from ICEVs to EVs constitutes travel by sustainable means. 2.3.5 It should also be noted that a draft NPPF document was published for consultation in 2025 for a period of consultation (running until March 2026). The document demonstrates that the government are maintaining their position on sustainable transport. 2.3.6 Further to the NPPF acknowledging EV travel as a sustainable transport mode, the Level Advisory Group defined sustainable transport as: "the provision of transport that delivers economic and social development benefit today's and future generations whilst minimising carbon and other emissions and environmental impacts". EVs are included under the definition of sustainable transport, as set out above. 2.3.7 The UK has also committed to net-zero carbon emissions by 2050. Transport is a major source of emissions in 2023, making it the largest emitting sector of the UK economy. The government has said: "the transition to electric vehicles (EVs) is a crucial step towards net-zero". 2.3.8 Based on the above, there is sound supporting evidence to suggest that a shift from ICEVs to EVs would therefore represent a shift to a sustainable means of transport. EVs constitutes travel by sustainable means. 2.3.9 As such, a modal shift from ICEVs to EVs accords with a sustainable transport target of a 10% target switch as stipulated within the applicant's submitted RPS. 2.3.10 Notwithstanding the points raised above, it is recognised that the current travel planning assessments presented to date, no consideration has been made to the inclusion of EVs in the target. 2.3.11 Crucially, a shift from Internal Combustion Engine Vehicles to EVs is a key component of the chief travel planning target in creating a multi modal shift from single occupancy vehicle trips to sustainable transport.

	planning measures implemented across the site can still have a major impact on the local highway network which use the local highway network.
<u>Site Assessment</u> 1. Details of how to access the nearest train station by public transport should be provided. 2. Vehicular constraints in the vicinity of the site, such as peak hour congestion, should be summarised from the Transport Assessment, alongside the presence of any nearby developments that are likely to have a cumulative impact on the local transport. 3. The amount of parking that will be provided at the site and the proportion of spaces that will be allocated to motorcycles, disabled users, car share users, pick up / drop off and visitors is not clear.	2.3.12 NCC have requested that details are provided in relation to a proposed bus stop to be provided within Paragraphs 4.5.8 and 4.4.8 of the submitted TA and the proposed bus stop described, for NCC's reference. 2.3.13 The nearest train station in relation to the site is Attenborough Train Station, the closest public transport accessibility to Attenborough Train Station, the fastest route to the station is via the staggered junction between the B6003 Stapleford Lane / Cleve Drive' and benefits from a flagpole with an associated timetable/information board. 2.3.14 The closest bus stop which facilitates access to this service is the staggered junction between the B6003 Stapleford Lane / Cleve Drive' and benefits from a flagpole with an associated timetable/information board. 2.3.15 The no.510 bus service provides hourly services at this stop, with the journey to Attenborough Train Station taking approximately 10 minutes. The bus stop is opposite Katherine Drive and between the stop at Ireton Grove (on the southbound route) and the stop at Attenborough (on the northbound route). 2.3.16 Should this primary route to Attenborough Train Station not be used, the alternative route is via High Road Central Tram Stop, prior to walking to the Bridge Avenue tram stop, which provides 6 services an hour (Monday-Friday) between Nottingham and Attenborough. 2.3.17 In terms of cycle accessibility, the station is located c3.2km from the site, as specified within Local Transport Note 1/20: 'Cycle Infrastructure Design Guide'. LTN 1/20 states that 'substitute short car trips, particularly those under 5km. LTN 1/20 further states that 'and generally journeys up to 8km are considered an achievable distance for most people' and 'trips are less than five miles in length – which is an achievable distance for most people.' 2.3.18 An excerpt of NCC's local Nottingham cycle map and recommendations are shown below in Figure 2.1, for reference.  2.3.19 As illustrated above, individuals can cycle southbound along Swiney Way (also a NCC recommended cycle route). From this point, individuals can cycle northbound along Nottingham Road. Individuals can dismount their bikes and utilise the Nottingham City Centre Network (NCN) route 6 which runs along Barratt Lane directly to Attenborough Train Station. 2.3.20 The topography of this route is flat and therefore conducive to cycling. The route includes 28 cycle parking spaces in the form of Sheffield Stands and as such is a suitable route for cycling. 2.3.21 Regarding NCC's comments pertaining to parking, the applicant should consider the subsequent reserved matters stages. It is not typical or a prerequisite for a reserved matters application to be submitted prior to a planning application.

	2.3.22 Notwithstanding this point, relevant parking provision on the provision for all users: cars, motorcycles, bicycles, visitors etc.																				
<u>Management of the Travel Plan</u> 1. Full contact details of the TPC should be supplied to NCC now. This can be an interim TPC (e.g. a representative of the developer or their agent) until such a time as a permanent TPC is appointed. The TP should commit to updating NCC should the TPC's name or contact details change for whatever reason. 2. One of the key roles of the TPC should be to implement the travel plan. 3. A description of the managerial hierarchy for the TPC should be provided, including internal reporting structures. 4. The TPC should commit to liaising with the planning authority (Broxtowe Borough Council) in addition to NCC. 5. The formal monitoring period and period in post of the TPC should run from prior to first occupation until a point 5 years following 50% occupation of the site.	2.3.23 To address the request made by NCC, mode will be appointed provided below, for completeness: • TPC Organisation: mode transport planning (mode); • Address: Griffin House, 18-19 Ludgate Hill, Birmingham, B3 • Telephone: 0121 7948390; and, • Email Contact: travelplan@modetransport.co.uk. 2.3.24 mode is fully trained and experienced in the aims and objectives of sales and occupation processes. 2.3.25 Given this is an interim post, should it transpire that a different details of the final TPC will be made available to NCC. 2.3.26 Finally, in line with NCC's request as set out above, the response continue until five years post the point of 50% occupation (and then																				
<u>Setting Targets</u> 1. Primary targets should be based upon trip generation. The TA associated with the proposal should have provided an estimate of trips associated with the site, and therefore this is the basis on which targets should be set (i.e. include one table showing the values used in the TA, and a further table showing the target trip generation with the Travel Plan in place). The mode share targets should then be used as a secondary target. 2. Any secondary targets for the uptake of low emission vehicles shouldn't detract from the trip generation targets that are aimed at ensuring the development performs in lines with the forecast of the Transport Assessment, and on which basis the development has been judged by the highway development control team in terms of wider impacts (e.g. congestion, severance, wider environmental impact, e.g. tyre particle shedding etc etc). 3. Targets should match the formal monitoring period (5 years following 50% occupation of the site). 4. Targets should not be changed or updated without discussion with, and agreement of, NCC. This should be stated.	2.3.27 On the contrary to the above, mode did provide an estimate of also provided a further breakdown of the forecast multi modal trip g 2.3.28 However, for completeness, the forecast trip generation ass Table 2.1 Forecast Trip Generation <table><tr><th rowspan="2"></th><th colspan="3">AM Peak Period (08:00-09:00)</th><th colspan="3">PM Peak Period (17:00-18:00)</th></tr><tr><th>Arrivals</th><th>Departures</th><th>Two-Way</th><th>Arrivals</th><th>Departures</th><th>Two-Way</th></tr><tr><td>Vehicular Trip Generation</td><td>39</td><td>191</td><td>230</td><td>145</td><td>58</td><td>203</td></tr></table> 2.3.29 As outlined in the submitted RTP, indicative and interim target Broxtowe 015 (E02005864). However, as explicitly set out within par round of surveying (both utilising count data and questionnaire surv 2.3.30 It should also be noted that ultimately a 10% reduction in sin necessary to provide a numerical table at this stage as ultimately th stage where full occupancy isn't reached. 2.3.31 In line with the request made above by NCC, targets will not targets established will be adhered to throughout the entire course following 50% occupancy levels). 2.3.32 NCC have requested that an explicit target should aim for full following fourth target is set: "Each household on site will be provid of the sustainable options to travel to/from the proposed developm available. This will encourage awareness of the travel planning proc 2.3.33 It is envisaged that this target will meet the following two cor • TPO-02: Address the access needs of residents and visitors by sup • TPO-03: Enable residents to have an informed choice about their t		AM Peak Period (08:00-09:00)			PM Peak Period (17:00-18:00)			Arrivals	Departures	Two-Way	Arrivals	Departures	Two-Way	Vehicular Trip Generation	39	191	230	145	58	203
	AM Peak Period (08:00-09:00)			PM Peak Period (17:00-18:00)																	
	Arrivals	Departures	Two-Way	Arrivals	Departures	Two-Way															
Vehicular Trip Generation	39	191	230	145	58	203															

5. The Travel Plan should aim for 100% TP awareness as a secondary target.	
<u>Travel Plan Measures</u> 1. In addition to the measures included within the Travel Plan, the following should also be included: 2. Contact details of local taxi firms. 3. Personal Travel Planning should be offered to any resident who requests it. 4. Taster public transport tickets should be provided to residents on opening. This is mentioned as a potential component of the mobility credit scheme (Chapter 7.10); however, the mobility credit scheme is outlined in vague terms and is not firm (“there is opportunity to introduce”. Rather, taster tickets should be offered as a standalone measure. A cycle voucher of equivalent value could also be offered to residents on a redemption basis as an alternative to provide them with the opportunity of purchasing a bicycle / cycle equipment.	2.3.34 Mode have undertaken a review of the local taxi firms which are relevant to promote to residents on site: ● Nottingham Taxis – specialising in offering coach hire, airport transfers etc. Website Link: https://www.nottinghamtaxi.co.uk/ Mobile: 0871 900 0000 ● Nottingham Cars – offering taxis, deliveries, airport transfers, executive cars etc. bookings@nottinghamcars.com Mobile: 01159 700 700; ● My Cars Nottingham – Nottingham based taxi service offering airport transfers, cars, minibuses and executive cars (advanced bookings only). Website: www.mycarsnottingham.co.uk/ ● Notts Cars – offering taxi services to residents in Nottingham and surrounding areas. 2.3.35 The Travel Welcome Pack will contain information and contact details of local taxi firms when requiring taxi services. 2.3.36 Furthermore, travel update leaflets will be distributed to residents on site to present the latest results but can also be used to promote the taxi services to avoid single occupancy vehicular trips. 2.3.37 NCC have also requested that personalised travel planning be offered to residents on site travel advice and personalised journey planning to any resident who requests this aspect of the travel planning process upon initial occupation of the property. 2.3.38 Finally, NCC are requesting that taster public transport tickets be offered to residents on site. 2.3.39 Our experience has demonstrated that providing residents with taster tickets. Furthermore, owing to the definition of sustainable forms of transport, taster tickets / discounted vouchers for other forms of sustainable transport could be offered. 2.3.40 As such, it is proposed that each household (who comes forward for a taster ticket, contribution towards a railcard or towards cycling equipment) should benefit from personalised approach which best suits their individual needs. 2.3.41 The mechanism to request this credit will be made apparent to residents via correspondence (through the use of announcements and update leaflets) and it via the TPC to ensure wastage doesn’t occur. 2.3.42 In line with NCC’s comments, discounts (in exchange for personalised travel planning) will be offered to residents on site who come forward to claim them.

Monitoring and Review

1. The results of monitoring should be disseminated via newsletter and / or email update to ensure residents are kept informed of TP success.
2. The first travel survey should take place within 3 months of the site reaching 50% occupancy.
3. Annual monitoring reports should be supplied to NCC within 1 month of collating data.
4. Secondary monitoring should also be conducted and reported upon, including the uptake of taster tickets / vouchers, resident feedback, etc.
5. The Travel Plan should commit to a 3-year review and evaluation with NCC and the planning authority.
6. In addition to annual travel surveys, we would expect traffic counts to be conducted (see below). Traffic count data should be uploaded to the TRICs database. The results of traffic counts should then be used to evaluate the progress of the TP against the trip generation targets.
 - o Year 1: Travel survey and count
 - o Year 2: Travel survey
 - o Year 3: Travel survey and count
 - o Year 4: Travel survey
 - o Year 5: Travel survey and count

2.3.43 To ensure all the requests made from NCC are satisfied, and NCC provide comment and acceptance of the suitability of this act

Task	Delivery Timescales
Appoint Interim TPC	Completed
Provide TPC details to NCC	Provided within this TN
Promotion of the RTP to new residents	During the property purchasing process
Preparation of Travel Welcome Pack and agreement of content with NCC/BBC	Prior to occupation
Distribution of Travel Welcome Packs to residents upon initial occupation	Upon occupation of dwelling
Agree content of resident's travel questionnaire surveys with NCC/BBC	Prior to first round of monitoring
Disseminate travel questionnaire surveys	Initial surveys to take place within three months of the site reaching 50% occupancy (following which annually for a period of 5 years)
Procure a count survey at the site access to establish the number of vehicles accessing / egressing the development during peak hours	Initial surveys to take place within three months of the site reaching 50% occupancy (following which, biennial count surveys will occur – thus providing data for years 1, 3 and 5 of the monitoring process). As requested, these surveys will be undertaken in accordance with the Standardised Assessment Methodology (SAM) for monitoring Travel Plans.
Analyse travel surveys to prepare & submit a Travel Plan Monitoring Report for issue to NCC	To be prepared within one month of receiving representative survey sample response (annually for the 5-year period of monitoring)
Preparation of an update leaflet for dissemination to residents on site	To be prepared and issued to residents within 3 months of the latest round of surveying to update residents on the progress of the travel plan and also to promote sustainable transport measures
Undertake a three-year review of the travel planning process with NCC	Following the third year of surveying on site
Provide residents with personalised travel planning advice and taster tickets (to any who come forward to request it)	Ongoing and on request at the initial occupation of each dwelling
Provide updates to NCC pertaining to the uptake of taster / discount vouchers	Ongoing throughout the life of the travel plan

Securing the Travel Plan

Remedial measures for if the TP fails to achieve its targets at the end of the monitoring period, should, at a minimum, include an extension to the monitoring period (as well as an extension to the TPCs period-in-post) and a full review of measures.

2.3.44 The objective of the RTP is to minimise the number of single annually, so that the targets can be re-evaluated, and appropriate part of the on-going evolution of the travel planning process.

2.3.45 If targets are not met, additional measures may be introduced (of):

- Further promotional events;
- Increased marketing to residents on site;
- Further / targeted Personalised Travel Planning;
- The TPC could investigate the potential for on-going discounted transport travel pass for residents with local operators (if applicable);
- Investigate options to provide cycle training for residents on site.

2.3.46 Notwithstanding the above, a full suite of potential further desirable or likely outcome. Furthermore, if the target is not met, the surveys and communications with residents during the 5th year of finalised following receipt of the 5th year round

of monitoring.

2.3.47 It is important to stress that it remains the aspiration of the a
on site.

Separately, it is noted that proposals at Toton East include measures to improve pedestrian connectivity and safety by including a toucan crossing at Woodstock Drive and a pedestrian refuge at Darley Avenue. These measures have not been reflected in the current TA but should be incorporated for completeness and consistency.

Kind regards,

Matt.

Matt Leek

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