

APPENDIX A

National Highways Planning Response, 18 June 2025

Sima Odedra

From: Catherine Townend <Catherine.Townend@nationalhighways.co.uk>
Sent: 10 June 2026 17:03
To: Catherine Townend
Subject: Appendix A - NH holding response - 18 June 2025
Attachments: National Highways Response-Land West Of Stapleford Lane Stapleford Nottinghamshire.pdf

From: Brittany Grosvenor <Brittany.Grosvenor@nationalhighways.co.uk>
Sent: 18 June 2025 07:58
To: pabc@broxtowe.gov.uk
Cc: transportplanning@dft.gov.uk; Spatial Planning <SpatialPlanning@nationalhighways.co.uk>
Subject: Holding- National Highways response: Planning application consultation - 25/00371/OUT

Please find attached National Highways response.

Kind Regards,

Brittany Grosvenor, BA (Hons), MSc, MCIOB
Assistant Spatial Planner
Operations Directorate (Midlands) – *Nottinghamshire, Derbyshire, North Leicestershire, Northamptonshire, Lincolnshire & Rutland*
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For information on working with National Highways on planning matters, please see the below recently updated guidance.

Planning for the future: A guide to working with National Highways on planning matters (October 2023)

https://nationalhighways.co.uk/media/2depj2hh/final-cre23_0370-nh-planning-guide-2023.pdf

From: pabc@broxtowe.gov.uk <pabc@broxtowe.gov.uk>
Sent: 03 June 2025 09:47
To: Planning M <PlanningM@nationalhighways.co.uk>
Subject: Planning application consultation - 25/00371/OUT

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please see the attached letter

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National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Kamaljit Khokhar (Head of Planning & Development)
Operations Directorate
Midlands Region
National Highways
PlanningM@nationalhighways.co.uk

To: Broxtowe Borough Council FAO: Mr D Ottewell
pabc@broxtowe.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 25/00371/OUT

Location: Land West Of Stapleford Lane Stapleford Nottinghamshire

Proposal: Outline Planning Application for the construction of a residential development of up to 420 residential dwellings and associated open space and infrastructure (With some matters reserved).

National Highways Ref: NH/25/11451

Referring to the consultation on a planning application dated 03 June 2025 referenced above, in the vicinity of the A52 Trunk Road that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningM@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature:

Date: 18 June 2025



Name: Brittany Grosvenor

Position: Assistant Spatial Planner

National Highways

The Cube, 199 Wharfside Street, Birmingham, B1 1RN

Brittany.grosvenor@nationalhighways.co.uk

¹ Where relevant, further information will be provided within Annex A.

Annex A **National Highways' assessment of the proposed development**

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 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 we work 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.

Development Proposal

The Outline Planning Application is for the construction of a residential development of up to 420 residential dwellings and associated open space and infrastructure.

The outline application is seeking approval for access only. All other matters are reserved until a later date.

The development site is located approximately 0.5km south of the A52/B6003 (Bardills Roundabout), which forms part of the SRN.

National Highways Considerations

Access and Boundary

The vehicular access point is proposed via a new signal-controlled junction on the B6003 Stapleford Lane 500m south of Bardills Roundabout. This road is owned and operated by Nottinghamshire County Council.

Upon review, the site does not share a common boundary with the A52 trunk road. Therefore, we do not have any boundary related comments to make.

Traffic and Transport

We have reviewed the Toton West Transport Assessment (TA) dated April 2025, produced by ADC Infrastructure on behalf of Bloor Homes for the proposed development of up to 420 dwellings on the land located to the north of Toton, (Application reference 25/00371/OUT).

General

As advised at the scoping stage and through consultation of Toton East and Toton North applications, one comprehensive traffic impact assessment to demonstrate the full impact of the combined site (Toton North, Toton East & Toton West parcels) should

be produced, such that we can understanding the cumulative impacts, and in turn ensure an efficient and effective infrastructure package is developed to accommodate the full site.

The three individual TAs prepared for the three applications focus on the impact of each application site individually. We require a TA to be agreed in a staged approach to avoid abortive work to include:

1. the key assumptions and approach of the traffic forecasts and assessment
2. cumulative impact assessment of the three developments as a combined development
3. proposed phasing of delivery of the three developments; and
4. trigger points for mitigation delivery, if any.

The impact assessment should include SRN junctions where there will be any potential impacts from the development traffic, including but not limited to:

- M1 Junction 25 Sandiacre Interchange
- A52 Bardills Roundabout
- A52 / Toton Link Road Signals (new site access junction)
- A52 Bramcote Island Roundabout

We also recommend that a list of assessment scenarios that includes the assessment year(s), opening years for the development parcels, with appropriate committed development traffic and infrastructure included, shall be clearly presented in the comprehensive TA.

LinSig

We will require the applicant to supply the following supporting information, for us to undertake a detailed reviewed of the junction assessment work:

- The actual LinSig models that have been used in the analysis.
- The Controller Specification documents for the existing signalised junctions so that we can confirm that the junctions have been coded into LinSig correctly.
- The Signal Layout Drawings (preferably in CAD format) for the existing signalised junctions so that we can confirm that distances have been measured correctly.
- A layout drawing (preferably in CAD format) of the new site access junctions so that we can confirm the LinSig input parameters have been measured correctly.
- Any observed signal data that has been collected to determine stage lengths and cycle times at the existing signalised junctions.
- The traffic flow analysis (preferably in Excel format) so that we can understand how the base and future year inputted traffic flows have been determined.
- A validation exercise to demonstrate that the model results for the Base Year scenarios accurately represents observed conditions on-site. This could be done by comparing Degree of Saturation and / or Queue values. We would

expect this analysis to be undertaken on a lane-by-lane basis. It is important this task is undertaken as an accurate base model will give us confidence in the results being predicted for the future year tests.

- An assessment of base and future year operation on a lane-by-lane basis, rather than on an overall junction performance basis. This assessment will highlight where, within the modelled junctions, the arms or lanes that are performing over capacity or not. It is important that this assessment includes the “internal” links on roundabouts as blocking back can have a significant effect on upstream links that wouldn’t be otherwise captured within the LinSig modelling results.
- Any other supporting information that you feel will help us in our review and provide us with confidence in the accuracy of the models.

EMGM

Following a review of the methodology and results provided for the EMGM modelling within the TA, we have following comments:

Base Model Review

The model is a conventional 4-stage model incorporating highway (SATURN), Public Transport (CUBE Voyager), Variable Demand (CUBE), and Trip End (TRICS) elements.

The base year is 2022. No further information has been provided on:

- Model coverage
- Network
- Zoning
- Demand
- Validation

It is not possible to ascertain the suitability of this model for assessing the proposed Link Road, and therefore appropriate details on the above should be provided.

Specific information on the quality of model validation within the scheme area and any coding within the vicinity of the scheme should also be provided. This should be presented in the form of a Base Year Model Suitability Note, focusing on the validation and calibration of the local area model. This is achieved through analysis of counts, screenlines, cordons, and journey time routes, to demonstrate that the model is appropriate for testing the development scheme.

Forecasting

The model forecasting approach appears acceptable in principle using TRICS trip rates to derive trip generation and forecasts constrained to TEMPro8. The trip rates used are the same as those used in previous assessments. However, further information on the forecasting process (e.g. forecasting report providing further detail

on how growth is calculated and applied, as well as how constraints are included) should be provided. Network coding has been described within a previous technical note, but this cannot be fully verified against drawings as model networks have not been supplied. Based on the description, the modelled junctions in the EMGM may be inconsistent with the drawing supplied as it appears that there is an inconsistency in number of lanes on approaches. Therefore, this will need to be clarified. Based on the extract from the SPD Movement Framework Plan, it appears that 'within-site' connectivity within the proposed Barracks development site may not be included in the model. This may affect forecasted traffic levels on new Link Road and will therefore need to be clarified.

Trip Generation

We are content with the use of the EMGM for calculating the trip rates and we are content with the trip generation provided.

Junction Modelling

No information on the signal timings used in SATURN has been provided. It can be desirable to iterate between LinSig / SATURN models to allow LinSig output signal plans to be reflected in the SATURN model and revised input flows to be used to further refine LinSig outputs. Therefore, information on the signal timings and flows in the SATURN and LinSig models should be provided.

Assessment Year

We have observed that Toton West has a projected completion year of 2035, whereas the modelling undertaken as a sensitivity test within the Toton North TA indicates a forecast year of 2041.

We also note that Toton East assessment has a 2030 assessment year, whilst the Toton North assessment has a 2041 assessment year.

It is advised that all the assessments must be carried out for the following scenarios in line with the DfT Circular 01/2022.

- Opening Year (the year in which the development is expected to be opened) Reference Case Scenario: This scenario should include trips generated by the proposed development, forecasted growth and committed development (as agreed with the LHA) to establish the residual transport impacts of the proposed development. For multi-phase developments, additional assessments shall be provided based on the opening of each phase.
- Opening Year with Development Scenario – Opening Year Reference Case Scenario + Proposed development. This scenario will determine whether any mitigation is required for the SRN.

Therefore, please could the expected opening year of the site, alongside any phasing that is planned be provided.

Toton West Results

EMGM results are provided at high level to demonstrate the impacts of proposed Link Road and developments, including link flow changes and junction performance. Flows are expected to substantially increase along the B6003 towards Bardills Roundabout, with the largest increase in traffic along the A52 away from the site in the AM peak and to the site in the PM peak. In the PM peak, there is a decrease in flows along the A52 away from the site and on local roads, which suggests the site may be causing capacity issues on the network. In 2030, there are expected to be congestion issues along the A52 between M1 Junction 25 and Nottingham. However, based on the modelling, substantial changes are not expected except at Bardills in the AM peak and Bramcote in the PM peak. However, this may be affected by the decrease in flows along the A52 in the PM peak as mentioned above.

Uncertainty Log

For both assessments, there are congestion issues along the A52 between the M1 Junction 25 and Nottingham, and we note that the committed development should be confirmed with Nottinghamshire and Derbyshire County Council, with the uncertainty level included within the uncertainty log as per TAG unit M4 Table A2.

Cumulative assessment

While our comments above relate to the TA provided, we will need a cumulative traffic modelling assessment for the combined three sites (Toton North, East and West) within EMGM to understand the overall impact of the development on the Strategic Road Network.

Summary

The following provides a list of the additional information required to fully assess the suitability of both sets of modelling:

- Base Year model review note to show suitability of the traffic model used.
- Further information on the forecasting process (e.g. forecasting report providing further detail on how growth is calculated and applied, as well as how constraints are included) should be provided.
- Based on the description, the modelled junctions in the EMGM may be inconsistent with the drawing supplied as it appears that there is an inconsistency in numbers of lanes on approach. Therefore, this will need to be clarified.
- Update the modelling for Toton North to include the full quantum of development.

- It appears that within-site connectivity within the proposed development Barracks site may not be included in the model which may affect forecasted traffic levels on new Link Road and will therefore need to be clarified.
- Information on the signal timings and flows in the SATURN models should be provided.
- We will require a cumulative impact assessment for all three sites.

As a general note, as per the advice provided through previous scoping consultations, we recommend that the TA is agreed in a staged approach, that is the overall methodology and elements such as trip generation, trip distribution, assessment years, modelling software etc be agreed prior to further assessment work being carried out. This approach should avoid any abortive work.

Summary and Recommendation

Deferral

It is recommended that the application should not be approved for a period of 3 months from the date of this notification.

Standing advice to the local planning authority

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 NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

APPENDIX B

National Highways Planning Response, 16 September 2025



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Kamaljit Khokhar (Head of Planning & Development)
Operations Directorate
Midlands Region
National Highways
PlanningM@nationalhighways.co.uk

To: Broxtowe Borough Council FAO: Mr D Ottewell
pabc@broxtowe.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 25/00371/OUT

Location: Land West Of Stapleford Lane Stapleford Nottinghamshire

Proposal: Outline Planning Application for the construction of a residential development of up to 420 residential dwellings and associated open space and infrastructure (With some matters reserved).

National Highways Ref: NH/25/11451

Referring to the consultation on a planning application dated 03 June 2025 referenced above, in the vicinity of the A52 Trunk Road that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningM@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature:

Date: 18 June 2025



Name: Brittany Grosvenor

Position: Assistant Spatial Planner

National Highways

The Cube, 199 Wharfside Street, Birmingham, B1 1RN

Brittany.grosvenor@nationalhighways.co.uk

¹ Where relevant, further information will be provided within Annex A.

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The Outline Planning Application is for the construction of a residential development of up to 420 residential dwellings and associated open space and infrastructure.

The outline application is seeking approval for access only. All other matters are reserved until a later date.

The development site is located approximately 0.5km south of the A52/B6003 (Bardills Roundabout), which forms part of the SRN.

National Highways Considerations

Access and Boundary

The vehicular access point is proposed via a new signal-controlled junction on the B6003 Stapleford Lane 500m south of Bardills Roundabout. This road is owned and operated by Nottinghamshire County Council.

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We also note that Toton East assessment has a 2030 assessment year, whilst the Toton North assessment has a 2041 assessment year.

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Uncertainty Log

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- Update the modelling for Toton North to include the full quantum of development.

- It appears that within-site connectivity within the proposed development Barracks site may not be included in the model which may affect forecasted traffic levels on new Link Road and will therefore need to be clarified.
- Information on the signal timings and flows in the SATURN models should be provided.
- We will require a cumulative impact assessment for all three sites.

As a general note, as per the advice provided through previous scoping consultations, we recommend that the TA is agreed in a staged approach, that is the overall methodology and elements such as trip generation, trip distribution, assessment years, modelling software etc be agreed prior to further assessment work being carried out. This approach should avoid any abortive work.

Summary and Recommendation

Deferral

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Standing advice to the local planning authority

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Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

Sima Odedra

From: Catherine Townend <Catherine.Townend@nationalhighways.co.uk>
Sent: 10 June 2026 17:04
To: Catherine Townend
Subject: Appendix B - NH Holding response - 16 September 2025
Attachments: National Highways Response-Land West Of Stapleford Lane Stapleford Nottinghamshire.pdf

From: Steve Freek
Sent: 16 September 2025 17:10
To: pabc@broxtowe.gov.uk
Cc: Daniel Law <daniel.law@aecom.com>
Subject: Holding- National Highways response: Planning application consultation - 25/00371/OUT

FAO Mr D Ottewell

Hi,

Further to previous correspondence regarding this application, National Highways responded in June 2025 recommending a holding notification be put in place pending receipt of additional information as detailed in our original response (copy attached for ease of reference).

The holding notice is due to expire and as such we are recommending that the notice be extended to 18 December 2025. Should the additional information be agreed within this timeframe then the notice could be lifted. In the meantime our original response still applies.

Let me know if you have any queries.

Regards

Steve Freek, MCIHT
Assistant Spatial Planner – Nottinghamshire, Derbyshire, N Leicestershire
National Highways (Area 7), Stirling House, Lakeside Court, Osier Drive, Sherwood Business Park Nottingham NG15 0DS
Tel: 0300 470 4457
Mob: 07712 543047
Email: steve.freek@nationalhighways.co.uk

My working days are Tuesday - Friday

For information about our engagement with the planning system please visit :
<https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>



From: pabc@broxtowe.gov.uk <pabc@broxtowe.gov.uk>
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Subject: Planning application consultation - 25/00371/OUT

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Please see the attached letter

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APPENDIX C

National Highways Planning Response, 16 December 2025



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Kamaljit Khokhar (Head of Planning & Development)
Operations Directorate
Midlands Region
National Highways
PlanningM@nationalhighways.co.uk

To: Broxtowe Borough Council FAO: Mr D Ottewell
pabc@broxtowe.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 25/00371/OUT

Location: Land West Of Stapleford Lane Stapleford Nottinghamshire

Proposal: Outline Planning Application for the construction of a residential development of up to 420 residential dwellings and associated open space and infrastructure (With some matters reserved).

National Highways Ref: NH/25/11451

Referring to the consultation on a planning application dated 03 June 2025 referenced above, in the vicinity of the A52 Trunk Road that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningM@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature:

Date: 18 June 2025



Name: Brittany Grosvenor

Position: Assistant Spatial Planner

National Highways

The Cube, 199 Wharfside Street, Birmingham, B1 1RN

Brittany.grosvenor@nationalhighways.co.uk

¹ Where relevant, further information will be provided within Annex A.

Annex A **National Highways' assessment of the proposed development**

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 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 we work 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.

Development Proposal

The Outline Planning Application is for the construction of a residential development of up to 420 residential dwellings and associated open space and infrastructure.

The outline application is seeking approval for access only. All other matters are reserved until a later date.

The development site is located approximately 0.5km south of the A52/B6003 (Bardills Roundabout), which forms part of the SRN.

National Highways Considerations

Access and Boundary

The vehicular access point is proposed via a new signal-controlled junction on the B6003 Stapleford Lane 500m south of Bardills Roundabout. This road is owned and operated by Nottinghamshire County Council.

Upon review, the site does not share a common boundary with the A52 trunk road. Therefore, we do not have any boundary related comments to make.

Traffic and Transport

We have reviewed the Toton West Transport Assessment (TA) dated April 2025, produced by ADC Infrastructure on behalf of Bloor Homes for the proposed development of up to 420 dwellings on the land located to the north of Toton, (Application reference 25/00371/OUT).

General

As advised at the scoping stage and through consultation of Toton East and Toton North applications, one comprehensive traffic impact assessment to demonstrate the full impact of the combined site (Toton North, Toton East & Toton West parcels) should

be produced, such that we can understanding the cumulative impacts, and in turn ensure an efficient and effective infrastructure package is developed to accommodate the full site.

The three individual TAs prepared for the three applications focus on the impact of each application site individually. We require a TA to be agreed in a staged approach to avoid abortive work to include:

1. the key assumptions and approach of the traffic forecasts and assessment
2. cumulative impact assessment of the three developments as a combined development
3. proposed phasing of delivery of the three developments; and
4. trigger points for mitigation delivery, if any.

The impact assessment should include SRN junctions where there will be any potential impacts from the development traffic, including but not limited to:

- M1 Junction 25 Sandiacre Interchange
- A52 Bardills Roundabout
- A52 / Toton Link Road Signals (new site access junction)
- A52 Bramcote Island Roundabout

We also recommend that a list of assessment scenarios that includes the assessment year(s), opening years for the development parcels, with appropriate committed development traffic and infrastructure included, shall be clearly presented in the comprehensive TA.

LinSig

We will require the applicant to supply the following supporting information, for us to undertake a detailed reviewed of the junction assessment work:

- The actual LinSig models that have been used in the analysis.
- The Controller Specification documents for the existing signalised junctions so that we can confirm that the junctions have been coded into LinSig correctly.
- The Signal Layout Drawings (preferably in CAD format) for the existing signalised junctions so that we can confirm that distances have been measured correctly.
- A layout drawing (preferably in CAD format) of the new site access junctions so that we can confirm the LinSig input parameters have been measured correctly.
- Any observed signal data that has been collected to determine stage lengths and cycle times at the existing signalised junctions.
- The traffic flow analysis (preferably in Excel format) so that we can understand how the base and future year inputted traffic flows have been determined.
- A validation exercise to demonstrate that the model results for the Base Year scenarios accurately represents observed conditions on-site. This could be done by comparing Degree of Saturation and / or Queue values. We would

expect this analysis to be undertaken on a lane-by-lane basis. It is important this task is undertaken as an accurate base model will give us confidence in the results being predicted for the future year tests.

- An assessment of base and future year operation on a lane-by-lane basis, rather than on an overall junction performance basis. This assessment will highlight where, within the modelled junctions, the arms or lanes that are performing over capacity or not. It is important that this assessment includes the “internal” links on roundabouts as blocking back can have a significant effect on upstream links that wouldn’t be otherwise captured within the LinSig modelling results.
- Any other supporting information that you feel will help us in our review and provide us with confidence in the accuracy of the models.

EMGM

Following a review of the methodology and results provided for the EMGM modelling within the TA, we have following comments:

Base Model Review

The model is a conventional 4-stage model incorporating highway (SATURN), Public Transport (CUBE Voyager), Variable Demand (CUBE), and Trip End (TRICS) elements.

The base year is 2022. No further information has been provided on:

- Model coverage
- Network
- Zoning
- Demand
- Validation

It is not possible to ascertain the suitability of this model for assessing the proposed Link Road, and therefore appropriate details on the above should be provided.

Specific information on the quality of model validation within the scheme area and any coding within the vicinity of the scheme should also be provided. This should be presented in the form of a Base Year Model Suitability Note, focusing on the validation and calibration of the local area model. This is achieved through analysis of counts, screenlines, cordons, and journey time routes, to demonstrate that the model is appropriate for testing the development scheme.

Forecasting

The model forecasting approach appears acceptable in principle using TRICS trip rates to derive trip generation and forecasts constrained to TEMPro8. The trip rates used are the same as those used in previous assessments. However, further information on the forecasting process (e.g. forecasting report providing further detail

on how growth is calculated and applied, as well as how constraints are included) should be provided. Network coding has been described within a previous technical note, but this cannot be fully verified against drawings as model networks have not been supplied. Based on the description, the modelled junctions in the EMGM may be inconsistent with the drawing supplied as it appears that there is an inconsistency in number of lanes on approaches. Therefore, this will need to be clarified. Based on the extract from the SPD Movement Framework Plan, it appears that 'within-site' connectivity within the proposed Barracks development site may not be included in the model. This may affect forecasted traffic levels on new Link Road and will therefore need to be clarified.

Trip Generation

We are content with the use of the EMGM for calculating the trip rates and we are content with the trip generation provided.

Junction Modelling

No information on the signal timings used in SATURN has been provided. It can be desirable to iterate between LinSig / SATURN models to allow LinSig output signal plans to be reflected in the SATURN model and revised input flows to be used to further refine LinSig outputs. Therefore, information on the signal timings and flows in the SATURN and LinSig models should be provided.

Assessment Year

We have observed that Toton West has a projected completion year of 2035, whereas the modelling undertaken as a sensitivity test within the Toton North TA indicates a forecast year of 2041.

We also note that Toton East assessment has a 2030 assessment year, whilst the Toton North assessment has a 2041 assessment year.

It is advised that all the assessments must be carried out for the following scenarios in line with the DfT Circular 01/2022.

- Opening Year (the year in which the development is expected to be opened) Reference Case Scenario: This scenario should include trips generated by the proposed development, forecasted growth and committed development (as agreed with the LHA) to establish the residual transport impacts of the proposed development. For multi-phase developments, additional assessments shall be provided based on the opening of each phase.
- Opening Year with Development Scenario – Opening Year Reference Case Scenario + Proposed development. This scenario will determine whether any mitigation is required for the SRN.

Therefore, please could the expected opening year of the site, alongside any phasing that is planned be provided.

Toton West Results

EMGM results are provided at high level to demonstrate the impacts of proposed Link Road and developments, including link flow changes and junction performance. Flows are expected to substantially increase along the B6003 towards Bardills Roundabout, with the largest increase in traffic along the A52 away from the site in the AM peak and to the site in the PM peak. In the PM peak, there is a decrease in flows along the A52 away from the site and on local roads, which suggests the site may be causing capacity issues on the network. In 2030, there are expected to be congestion issues along the A52 between M1 Junction 25 and Nottingham. However, based on the modelling, substantial changes are not expected except at Bardills in the AM peak and Bramcote in the PM peak. However, this may be affected by the decrease in flows along the A52 in the PM peak as mentioned above.

Uncertainty Log

For both assessments, there are congestion issues along the A52 between the M1 Junction 25 and Nottingham, and we note that the committed development should be confirmed with Nottinghamshire and Derbyshire County Council, with the uncertainty level included within the uncertainty log as per TAG unit M4 Table A2.

Cumulative assessment

While our comments above relate to the TA provided, we will need a cumulative traffic modelling assessment for the combined three sites (Toton North, East and West) within EMGM to understand the overall impact of the development on the Strategic Road Network.

Summary

The following provides a list of the additional information required to fully assess the suitability of both sets of modelling:

- Base Year model review note to show suitability of the traffic model used.
- Further information on the forecasting process (e.g. forecasting report providing further detail on how growth is calculated and applied, as well as how constraints are included) should be provided.
- Based on the description, the modelled junctions in the EMGM may be inconsistent with the drawing supplied as it appears that there is an inconsistency in numbers of lanes on approach. Therefore, this will need to be clarified.
- Update the modelling for Toton North to include the full quantum of development.

- It appears that within-site connectivity within the proposed development Barracks site may not be included in the model which may affect forecasted traffic levels on new Link Road and will therefore need to be clarified.
- Information on the signal timings and flows in the SATURN models should be provided.
- We will require a cumulative impact assessment for all three sites.

As a general note, as per the advice provided through previous scoping consultations, we recommend that the TA is agreed in a staged approach, that is the overall methodology and elements such as trip generation, trip distribution, assessment years, modelling software etc be agreed prior to further assessment work being carried out. This approach should avoid any abortive work.

Summary and Recommendation

Deferral

It is recommended that the application should not be approved for a period of 3 months from the date of this notification.

Standing advice to the local planning authority

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 NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

Sima Odedra

From: Catherine Townend <Catherine.Townend@nationalhighways.co.uk>
Sent: 10 June 2026 17:05
To: Catherine Townend
Subject: Appendix C - NH Holding response - 16 December 2025
Attachments: National Highways Response-Land West Of Stapleford Lane Stapleford Nottinghamshire.pdf

From: Steve Freek
Sent: 16 December 2025 14:16
To: PABC <pabc@broxtowe.gov.uk>
Cc: Spatial Planning <SpatialPlanning@nationalhighways.co.uk>; Daniel Law <daniel.law@aecom.com>
Subject: FW: Holding- National Highways response: Planning application consultation - 25/00371/OUT

FAO Mr D Ottewell

Hi,

National Highways responded to this application in June 2025 recommending a holding notification be put in place pending receipt of additional information as detailed in our original response (copy attached for ease of reference).

In November 2025 Mode Transport on behalf of Bloors, submitted 2 Technical Notes (TN1 and TN2) to address issues raised by National Highways. NH responded to the Notes on 5 December 2025 and although several of our queries were addressed there remains outstanding issues (traffic modelling) which need to be closed out.

The current holding notice is due to expire this week, and as such, we are recommending that the notice be extended to 18 March 2026. Should the additional information be agreed within this timeframe then the notice could be lifted.

Let me know if you have any queries.

Regards

Steve Freek, MCIHT

Assistant Spatial Planner – Nottinghamshire, Derbyshire, N Leicestershire

National Highways (Area 7), Stirling House, Lakeside Court, Osier Drive, Sherwood Business Park Nottingham NG15 0DS

Tel: 0300 470 4457

Mob: 07712 543047

Email: steve.freek@nationalhighways.co.uk

My working days are Tuesday - Friday

For information about our engagement with the planning system please visit :
<https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>



From: pabc@broxtowe.gov.uk <pabc@broxtowe.gov.uk>
Sent: 03 June 2025 09:47
To: Planning M <PlanningM@nationalhighways.co.uk>
Subject: Planning application consultation - 25/00371/OUT

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APPENDIX D

National Highways Planning Response, 28 January 2026

Ask for: Mr D Ottewell
Ext: 3046
Email: pabc@broxtowe.gov.uk
Our Ref: 25/00371/OUT
Your Ref:
Date: 13 January 2026



Broxtowe
Borough
COUNCIL

Planning Manager
Highways England
The Cube
199 Wharfside Street
Birmingham
B1 1RN

PlanningM@nationalhighways.co.uk

Dear Consultee,

Outline Planning Application for the construction of a residential development of up to 420 residential dwellings and associated open space and infrastructure (With some matters reserved). The proposed development is classified as EIA development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Land West Of Stapleford Lane Stapleford Nottinghamshire

Re-consultation

Additional information has been submitted for this application

If you would like to make any comments on the amendments please provide these in writing to the above officer within the next 21 days.

Please contact the case officer above if you wish to discuss the proposal in more detail.

Please note that where the proposal is for 'householder development' (extension or alteration to a dwelling) you will not be able to add further comment if the matter becomes the subject of an appeal against the council's decision.

The application is available to view on our Public Access web site by [clicking here](#). Once registered/logged in using the email address this was sent to, you will be able to see your Consultee In Tray under 'My Profile' and will be able to comment directly through this.

I look forward to your reply.

Yours faithfully,

R Dawson
Assistant Director, Planning and Economic Development

Sima Odedra

From: Catherine Townend <Catherine.Townend@nationalhighways.co.uk>
Sent: 10 June 2026 17:05
To: Catherine Townend
Subject: Appendix D - NH Re-consultation response - 28 January 2026
Attachments: ufm23_RECON_-_new_reconsultation.pdf

From: Steve Freek
Sent: 28 January 2026 09:49
To: PABC <pabc@broxtowe.gov.uk>
Cc: Daniel Law <daniel.law@aecom.com>; Jessica Leung <jessica.leung@aecom.com>
Subject: Planning application consultation - 25/00371/OUT

FAO Mr D Ottewell

Hi,

I refer to the attached planning application consultation.

We have reviewed the Toton West Transport Assessment (TA) dated April 2025, produced by Mode Transport Planning on behalf of Bloor Homes for the proposed development of up to 420 dwellings on the land located to the west of the B6003 Stapleford Lane in Broxtowe, Nottinghamshire (Broxtowe Borough Council's Application reference 25/00371/OUT).

At the scoping stage, we have requested that one comprehensive traffic impact assessment to demonstrate the full impact of the combined site (Toton North, Toton East & Toton West parcels) should be produced, such that we can understanding the cumulative impacts, and in turn ensure an efficient and effective infrastructure package is developed to accommodate the full site.

In November 2025, Mode / Systra prepared and submitted *TN01 –Toton EMGM Strategic Modelling Validation* and *TN02 - Toton - Reference Case Assumptions* regarding the EMGM development and National Highways responded to Mode on 5 December 2025.

While the strategic modelling is yet to be agreed, we have reviewed the submitted TA and summarised our comments, as follows:

Trip Distribution

We are generally content with utilising 2011 Census 'Location of usual residence and place of work by method of travel to work' data in MSOA level to distribute the development onto the road network. We however required the applicant to provided the details for the Census data used for deriving the distribution. Particularly, we note the distribution to zone G: Swiney Way (E) is significant as 15%. We require justification or supporting evidence regarding this assumed distribution to be applied.

Background Growth Rate

We are generally content with utilising TEMPro v8.1 data that traffic growth be NTM adjusted for identifying the background growth rate for the traffic. From our individual check, we found that the 2025-2028 AM growth rate was derived selecting "England" as the area served, while the PM growth

rate was derived selecting “Region”. We hence require the applicant to review all the growth rates to ensure the assumptions are consistent.

Assessment Scenarios

In line with the DfT Circular 01/2022, the traffic impact for the development shall be assessed in the opening year plus committed development, with and without proposed development – the opening year being that in which the full build-out of the development is realistically expected to first become operational. As such, we require the modelling and assessment scenarios to be updated to represent the opening year of the full development, instead of the construction commencing year as 2028. If the development is to be delivered in a phased manner, the junction modelling scenarios will need to be produced to reflect this phased delivery unless mitigation requirements are going to be delivered during the first phase.

Following the receipt of the comprehensive traffic impact assessment to demonstrate the full impact of the combined wider allocation (Toton North, Toton East & Toton West parcels), National Highways will be better placed to comment on the overall traffic impact of the proposed development on the SRN.

For Note: This application has a current holding notification which will remain in place (expires on 18 March 2026).

At the time of compiling this response a hybrid application (25/00928/FUL) has been received by National Highways for this site and is awaiting review (69 dwellings full, 351 dwellings outline).

Regards

Steve Freek, MCIHT

Assistant Spatial Planner – Nottinghamshire, Derbyshire, N Leicestershire

National Highways (Area 7), Stirling House, Lakeside Court, Osier Drive, Sherwood Business Park Nottingham NG15 0DS

Tel: 0300 470 4457

Mob: 07712 543047

Email: steve.freek@nationalhighways.co.uk

My working days are Tuesday - Friday

For information about our engagement with the planning system please visit :

<https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>



-----Original Message-----

From: pabc@broxtowe.gov.uk
Sent: 13 January 2026 09:58
To: Planning M
Subject: Planning application consultation - 25/00371/OUT

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APPENDIX E

National Highways Planning Response, 6 March 2026



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Kamaljit Khokhar (Head of Planning & Development)
Operations Directorate
Midlands Region
National Highways
PlanningM@nationalhighways.co.uk

To: Broxtowe Borough Council FAO: Mr D Ottewell
pabc@broxtowe.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 25/00371/OUT

Location: Land West Of Stapleford Lane Stapleford Nottinghamshire

Proposal: Outline Planning Application for the construction of a residential development of up to 420 residential dwellings and associated open space and infrastructure (With some matters reserved).

National Highways Ref: NH/25/11451

Referring to the consultation on a planning application dated 03 June 2025 referenced above, in the vicinity of the A52 Trunk Road that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningM@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature:

Date: 18 June 2025



Name: Brittany Grosvenor

Position: Assistant Spatial Planner

National Highways

The Cube, 199 Wharfside Street, Birmingham, B1 1RN

Brittany.grosvenor@nationalhighways.co.uk

¹ Where relevant, further information will be provided within Annex A.

Annex A **National Highways' assessment of the proposed development**

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 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 we work 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.

Development Proposal

The Outline Planning Application is for the construction of a residential development of up to 420 residential dwellings and associated open space and infrastructure.

The outline application is seeking approval for access only. All other matters are reserved until a later date.

The development site is located approximately 0.5km south of the A52/B6003 (Bardills Roundabout), which forms part of the SRN.

National Highways Considerations

Access and Boundary

The vehicular access point is proposed via a new signal-controlled junction on the B6003 Stapleford Lane 500m south of Bardills Roundabout. This road is owned and operated by Nottinghamshire County Council.

Upon review, the site does not share a common boundary with the A52 trunk road. Therefore, we do not have any boundary related comments to make.

Traffic and Transport

We have reviewed the Toton West Transport Assessment (TA) dated April 2025, produced by ADC Infrastructure on behalf of Bloor Homes for the proposed development of up to 420 dwellings on the land located to the north of Toton, (Application reference 25/00371/OUT).

General

As advised at the scoping stage and through consultation of Toton East and Toton North applications, one comprehensive traffic impact assessment to demonstrate the full impact of the combined site (Toton North, Toton East & Toton West parcels) should

be produced, such that we can understanding the cumulative impacts, and in turn ensure an efficient and effective infrastructure package is developed to accommodate the full site.

The three individual TAs prepared for the three applications focus on the impact of each application site individually. We require a TA to be agreed in a staged approach to avoid abortive work to include:

1. the key assumptions and approach of the traffic forecasts and assessment
2. cumulative impact assessment of the three developments as a combined development
3. proposed phasing of delivery of the three developments; and
4. trigger points for mitigation delivery, if any.

The impact assessment should include SRN junctions where there will be any potential impacts from the development traffic, including but not limited to:

- M1 Junction 25 Sandiacre Interchange
- A52 Bardills Roundabout
- A52 / Toton Link Road Signals (new site access junction)
- A52 Bramcote Island Roundabout

We also recommend that a list of assessment scenarios that includes the assessment year(s), opening years for the development parcels, with appropriate committed development traffic and infrastructure included, shall be clearly presented in the comprehensive TA.

LinSig

We will require the applicant to supply the following supporting information, for us to undertake a detailed reviewed of the junction assessment work:

- The actual LinSig models that have been used in the analysis.
- The Controller Specification documents for the existing signalised junctions so that we can confirm that the junctions have been coded into LinSig correctly.
- The Signal Layout Drawings (preferably in CAD format) for the existing signalised junctions so that we can confirm that distances have been measured correctly.
- A layout drawing (preferably in CAD format) of the new site access junctions so that we can confirm the LinSig input parameters have been measured correctly.
- Any observed signal data that has been collected to determine stage lengths and cycle times at the existing signalised junctions.
- The traffic flow analysis (preferably in Excel format) so that we can understand how the base and future year inputted traffic flows have been determined.
- A validation exercise to demonstrate that the model results for the Base Year scenarios accurately represents observed conditions on-site. This could be done by comparing Degree of Saturation and / or Queue values. We would

expect this analysis to be undertaken on a lane-by-lane basis. It is important this task is undertaken as an accurate base model will give us confidence in the results being predicted for the future year tests.

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- Any other supporting information that you feel will help us in our review and provide us with confidence in the accuracy of the models.

EMGM

Following a review of the methodology and results provided for the EMGM modelling within the TA, we have following comments:

Base Model Review

The model is a conventional 4-stage model incorporating highway (SATURN), Public Transport (CUBE Voyager), Variable Demand (CUBE), and Trip End (TRICS) elements.

The base year is 2022. No further information has been provided on:

- Model coverage
- Network
- Zoning
- Demand
- Validation

It is not possible to ascertain the suitability of this model for assessing the proposed Link Road, and therefore appropriate details on the above should be provided.

Specific information on the quality of model validation within the scheme area and any coding within the vicinity of the scheme should also be provided. This should be presented in the form of a Base Year Model Suitability Note, focusing on the validation and calibration of the local area model. This is achieved through analysis of counts, screenlines, cordons, and journey time routes, to demonstrate that the model is appropriate for testing the development scheme.

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We also note that Toton East assessment has a 2030 assessment year, whilst the Toton North assessment has a 2041 assessment year.

It is advised that all the assessments must be carried out for the following scenarios in line with the DfT Circular 01/2022.

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Therefore, please could the expected opening year of the site, alongside any phasing that is planned be provided.

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EMGM results are provided at high level to demonstrate the impacts of proposed Link Road and developments, including link flow changes and junction performance. Flows are expected to substantially increase along the B6003 towards Bardills Roundabout, with the largest increase in traffic along the A52 away from the site in the AM peak and to the site in the PM peak. In the PM peak, there is a decrease in flows along the A52 away from the site and on local roads, which suggests the site may be causing capacity issues on the network. In 2030, there are expected to be congestion issues along the A52 between M1 Junction 25 and Nottingham. However, based on the modelling, substantial changes are not expected except at Bardills in the AM peak and Bramcote in the PM peak. However, this may be affected by the decrease in flows along the A52 in the PM peak as mentioned above.

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For both assessments, there are congestion issues along the A52 between the M1 Junction 25 and Nottingham, and we note that the committed development should be confirmed with Nottinghamshire and Derbyshire County Council, with the uncertainty level included within the uncertainty log as per TAG unit M4 Table A2.

Cumulative assessment

While our comments above relate to the TA provided, we will need a cumulative traffic modelling assessment for the combined three sites (Toton North, East and West) within EMGM to understand the overall impact of the development on the Strategic Road Network.

Summary

The following provides a list of the additional information required to fully assess the suitability of both sets of modelling:

- Base Year model review note to show suitability of the traffic model used.
- Further information on the forecasting process (e.g. forecasting report providing further detail on how growth is calculated and applied, as well as how constraints are included) should be provided.
- Based on the description, the modelled junctions in the EMGM may be inconsistent with the drawing supplied as it appears that there is an inconsistency in numbers of lanes on approach. Therefore, this will need to be clarified.
- Update the modelling for Toton North to include the full quantum of development.

- It appears that within-site connectivity within the proposed development Barracks site may not be included in the model which may affect forecasted traffic levels on new Link Road and will therefore need to be clarified.
- Information on the signal timings and flows in the SATURN models should be provided.
- We will require a cumulative impact assessment for all three sites.

As a general note, as per the advice provided through previous scoping consultations, we recommend that the TA is agreed in a staged approach, that is the overall methodology and elements such as trip generation, trip distribution, assessment years, modelling software etc be agreed prior to further assessment work being carried out. This approach should avoid any abortive work.

Summary and Recommendation

Deferral

It is recommended that the application should not be approved for a period of 3 months from the date of this notification.

Standing advice to the local planning authority

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 NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

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These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

Sima Odedra

From: Catherine Townend <Catherine.Townend@nationalhighways.co.uk>
Sent: 10 June 2026 17:06
To: Catherine Townend
Subject: Appendix E - NH Holding response - 6 March 2026
Attachments: National Highways Response-Land West Of Stapleford Lane Stapleford Nottinghamshire.pdf

From: Steve Freek
Sent: 06 March 2026 12:27
To: PABC <pabc@broxtowe.gov.uk>
Cc: Spatial Planning <SpatialPlanning@nationalhighways.co.uk>
Subject: Holding- National Highways response: Planning application consultation - 25/00371/OUT

FAO Mr D Ottewell

Hi,

National Highways responded to this application in June 2025 recommending a holding notification be put in place pending receipt of additional information as detailed in our original response (copy attached for ease of reference).

In November 2025 Mode Transport on behalf of Bloors, submitted 2 Technical Notes (TN1 and TN2) to address issues raised by National Highways. NH responded to the Notes on 5 December 2025 and although several of our queries were addressed there remains outstanding issues (traffic modelling) which need to be closed out.

The current holding notice is due to expire on 18 March 2026, and as such, we are recommending that the notice be extended to 18 June 2026. Should the additional information be agreed within this timeframe then the notice could be lifted.

Let me know if you have any queries.

Regards

Steve Freek, MCIHT
Assistant Spatial Planner – Nottinghamshire, Derbyshire, N Leicestershire
National Highways (Area 7), Stirling House, Lakeside Court, Osier Drive, Sherwood Business Park Nottingham NG15 0DS
Tel: 0300 470 4457
Mob: 07712 543047
Email: steve.freek@nationalhighways.co.uk

My working days are Tuesday - Friday

For information about our engagement with the planning system please visit :
<https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>



From: pabc@broxtowe.gov.uk <pabc@broxtowe.gov.uk>
Sent: 03 June 2025 09:47
To: Planning M <PlanningM@nationalhighways.co.uk>
Subject: Planning application consultation - 25/00371/OUT

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please see the attached letter

Disclaimer

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APPENDIX F

National Highways Planning Response, 15 May 2026

Ask for: Mr D Ottewell
Ext: 3046
Email: pabc@broxtowe.gov.uk
Our Ref: 25/00371/OUT
Your Ref:
Date: 28 April 2026



Broxtowe
Borough
COUNCIL

Planning Manager
Highways England
The Cube
199 Wharfside Street
Birmingham
B1 1RN

PlanningM@nationalhighways.co.uk

Dear Consultee,

Outline Planning Application for the construction of a residential development of up to 420 residential dwellings and associated open space and infrastructure (With some matters reserved). The proposed development is classified as EIA development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Land West Of Stapleford Lane Stapleford Nottinghamshire

Re-consultation

Additional information has been submitted for this application

If you would like to make any comments on the amendments please provide these in writing to the above officer within the next 21 days.

Please contact the case officer above if you wish to discuss the proposal in more detail.

Please note that where the proposal is for 'householder development' (extension or alteration to a dwelling) you will not be able to add further comment if the matter becomes the subject of an appeal against the council's decision.

The application is available to view on our Public Access web site by [clicking here](#). Once registered/logged in using the email address this was sent to, you will be able to see your Consultee In Tray under 'My Profile' and will be able to comment directly through this.

I look forward to your reply.

Yours faithfully,

R Dawson
Assistant Director, Planning and Economic Development

From: Catherine Townend <Catherine.Townend@nationalhighways.co.uk>
Sent: 10 June 2026 17:06
To: Catherine Townend
Subject: Appendix F - NH holding response - 15 May 2026
Attachments: ufm3_RECON_-_new_reconsultation.pdf

From: Steve Freek
Sent: 15 May 2026 14:04
To: PABC <pabc@broxtowe.gov.uk>
Cc: Catherine Townend <Catherine.Townend@nationalhighways.co.uk>; Daniel Law <daniel.law@aeacom.com>; Jessica Leung <jessica.leung@aeacom.com>
Subject: Planning application re-consultation - 25/00371/OUT Land west of Stapleford Lane

FAO Mr D Ottewell

Hi,

I refer to the attached re-consultation in relation to the above referenced planning application. We have reviewed the traffic related submission dated April 2026, prepared by Pegasus group and the consultant, Mode transport planning on behalf of Bloor Homes for Outline Planning Application for up to 420 residential dwelling on the land located to the west of the B6003 Stapleford Lane in Broxtowe, Nottinghamshire (Broxtowe Borough Council's Application reference 25/00371/OUT) (Toton West).

We note there is another live Hybrid application of Full Planning permission for 69 dwellings and Outline Planning Permission: for the Construction of up to 351 at the same site (Broxtowe Borough Council's Application reference 25/00928/FUL). Both applications are proposing a total of up to 420 residential dwellings at the site.

The submitted documents include the Main Response Document titled "Highways Response to Consultee Comments" dated 17 April 2026, supporting appendices and signalised junction model reports.

Based on our review of the traffic related submission for this application, our comments are summarised as follows:

This is one of three sites where the live planning applications in the north of Toton area. The other two applications are 25/00306/OUT Outline planning application up to 880 dwellings (Toton North) and: 25/00255/FUL Full Planning Application for 155 dwellings (Toton East).

We acknowledge the statement from the applicant that a cumulative assessment for Toton West, East and North is now being prepared using the East Midlands Gateway Model (EMGM).

When the full results of the cumulative assessment modelling exercise are completed, we will be in a better position to comment on any assessment of the impacts of the proposed development on the SRN and any need for mitigation which may be required to facilitate the development.

Nevertheless, we also acknowledge the applicant has used the standard approach to demonstrate the potential development traffic onto the highway network from this development proposal as a standalone site. Although we have reviewed this, we do advise that the position remains unchanged and aligned with the requirements of the SPD for a cumulative assessment being required to understand the implications of the full allocation before any individual sites within the allocation come forward.

Trip Distribution

As stated in our previous comments, we are generally content with utilising 2011 Census 'Location of usual residence and place of work by method of travel to work' data in MSOA level to distribute the Toton West development onto the road network. We welcome the applicant in providing us the Census data used for deriving the distribution in "Appendix D - Distribution Assumptions / Workings" of the Main Response Document.

Following a request for further clarification, we now acknowledge that the traffic distributed to zone G: Swiney Way (E) includes traffic continuing past this zone and destined further to the east, via the A6005 Nottingham Road. From the information provided, it is not possible to distinguish what proportion of this zone G traffic is destined for zone G, and what is routing through zone G. Further, the explanation given (paragraph 3.2.11) does not align with the distribution data in the Appendix D Excel Spreadsheet. This should be clarified or can be discussed on a call.

Background Growth Rate

We welcome the applicant in correcting the TEMPro growth factors and we are now content with the amended growth factors as listed in Table 3.2 of the Main Response Document. We also welcome the applicant confirming 2028 as the opening year of the development.

Junction Model

The following junctions on the SRN have been assessed in LinSig within the report:

- Junction 1 – M1 Junction 25
- Junction 2 – A52 Bardills Roundabout
- Junction 3 – A52 Bramcote Island

The Park & Ride access junction should also be included in this list if the modelling for this junction or A52 Bardills Roundabout shows any queue interaction between the two in any of the scenarios modelled.

For us to undertake a thorough review of the LinSig modelling work, we require the following supporting documentation for each of the modelled LinSig junctions highlighted above:

- The actual LinSig models
- Existing Signal Controller Specification documents so that we can confirm the models have been built accurately
- Any observed signal timing data and analysis to support the modelled stage durations and cycle times
- Traffic flow analysis spreadsheets
- AutoCAD drawings of the junctions so that measured distances can be checked
- Calculations of the give way parameters
- Calculations of the saturation flow calculations

Regards

Steve Freek, MCIHT

Assistant Spatial Planner – Nottinghamshire, Derbyshire, N Leicestershire

National Highways (Area 7), Stirling House, Lakeside Court, Osier Drive, Sherwood Business Park Nottingham NG15 0DS

Tel: 0300 470 4457
Mob: 07712 543047
Email: steve.freek@nationalhighways.co.uk

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-----Original Message-----

From: Planning M <PlanningM@nationalhighways.co.uk>

Sent: 28 April 2026 14:06

To: Steve Freek <Steve.Freek@nationalhighways.co.uk>; Catherine Townend
<Catherine.Townend@nationalhighways.co.uk>

Cc: Planning M <PlanningM@nationalhighways.co.uk>

Subject: FW: Planning application consultation - 25/00371/OUT

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APPENDIX G

National Highways Planning Response, 19 May 2026



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Kamaljit Khokhar (Head of Planning & Development)
Operations Directorate
Midlands Region
National Highways
PlanningM@nationalhighways.co.uk

To: Broxtowe Borough Council FAO: Mr D Ottewell
pabc@broxtowe.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 25/00371/OUT

Location: Land West Of Stapleford Lane Stapleford Nottinghamshire

Proposal: Outline Planning Application for the construction of a residential development of up to 420 residential dwellings and associated open space and infrastructure (With some matters reserved).

National Highways Ref: NH/25/11451

Referring to the consultation on a planning application dated 03 June 2025 referenced above, in the vicinity of the A52 Trunk Road that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningM@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature:

Date: 18 June 2025



Name: Brittany Grosvenor

Position: Assistant Spatial Planner

National Highways

The Cube, 199 Wharfside Street, Birmingham, B1 1RN

Brittany.grosvenor@nationalhighways.co.uk

¹ Where relevant, further information will be provided within Annex A.

Annex A **National Highways' assessment of the proposed development**

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 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 we work 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.

Development Proposal

The Outline Planning Application is for the construction of a residential development of up to 420 residential dwellings and associated open space and infrastructure.

The outline application is seeking approval for access only. All other matters are reserved until a later date.

The development site is located approximately 0.5km south of the A52/B6003 (Bardills Roundabout), which forms part of the SRN.

National Highways Considerations

Access and Boundary

The vehicular access point is proposed via a new signal-controlled junction on the B6003 Stapleford Lane 500m south of Bardills Roundabout. This road is owned and operated by Nottinghamshire County Council.

Upon review, the site does not share a common boundary with the A52 trunk road. Therefore, we do not have any boundary related comments to make.

Traffic and Transport

We have reviewed the Toton West Transport Assessment (TA) dated April 2025, produced by ADC Infrastructure on behalf of Bloor Homes for the proposed development of up to 420 dwellings on the land located to the north of Toton, (Application reference 25/00371/OUT).

General

As advised at the scoping stage and through consultation of Toton East and Toton North applications, one comprehensive traffic impact assessment to demonstrate the full impact of the combined site (Toton North, Toton East & Toton West parcels) should

be produced, such that we can understanding the cumulative impacts, and in turn ensure an efficient and effective infrastructure package is developed to accommodate the full site.

The three individual TAs prepared for the three applications focus on the impact of each application site individually. We require a TA to be agreed in a staged approach to avoid abortive work to include:

1. the key assumptions and approach of the traffic forecasts and assessment
2. cumulative impact assessment of the three developments as a combined development
3. proposed phasing of delivery of the three developments; and
4. trigger points for mitigation delivery, if any.

The impact assessment should include SRN junctions where there will be any potential impacts from the development traffic, including but not limited to:

- M1 Junction 25 Sandiacre Interchange
- A52 Bardills Roundabout
- A52 / Toton Link Road Signals (new site access junction)
- A52 Bramcote Island Roundabout

We also recommend that a list of assessment scenarios that includes the assessment year(s), opening years for the development parcels, with appropriate committed development traffic and infrastructure included, shall be clearly presented in the comprehensive TA.

LinSig

We will require the applicant to supply the following supporting information, for us to undertake a detailed reviewed of the junction assessment work:

- The actual LinSig models that have been used in the analysis.
- The Controller Specification documents for the existing signalised junctions so that we can confirm that the junctions have been coded into LinSig correctly.
- The Signal Layout Drawings (preferably in CAD format) for the existing signalised junctions so that we can confirm that distances have been measured correctly.
- A layout drawing (preferably in CAD format) of the new site access junctions so that we can confirm the LinSig input parameters have been measured correctly.
- Any observed signal data that has been collected to determine stage lengths and cycle times at the existing signalised junctions.
- The traffic flow analysis (preferably in Excel format) so that we can understand how the base and future year inputted traffic flows have been determined.
- A validation exercise to demonstrate that the model results for the Base Year scenarios accurately represents observed conditions on-site. This could be done by comparing Degree of Saturation and / or Queue values. We would

expect this analysis to be undertaken on a lane-by-lane basis. It is important this task is undertaken as an accurate base model will give us confidence in the results being predicted for the future year tests.

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Summary and Recommendation

Deferral

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Standing advice to the local planning authority

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Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

Sima Odedra

From: Catherine Townend <Catherine.Townend@nationalhighways.co.uk>
Sent: 28 July 2026 13:29
To: Catherine Townend
Subject: Appendix G NH response to LPA - 19 May 2026
Attachments: National Highways Response-Land West Of Stapleford Lane Stapleford Nottinghamshire.pdf

From: Steve Freek
Sent: 19 May 2026 11:20
To: PABC <pabc@broxtowe.gov.uk>
Cc: Spatial Planning <SpatialPlanning@nationalhighways.co.uk>
Subject: FW: Holding- National Highways response: Planning application consultation - 25/00371/OUT

FAO Mr D Ottewell

Hi,

National Highways responded to this application in June 2025 recommending a holding notification be put in place pending receipt of additional information as detailed in our original response (copy attached for ease of reference).

In November 2025 Mode Transport on behalf of Bloors, submitted 2 Technical Notes (TN1 and TN2) to address issues raised by National Highways. NH responded to the Notes on 5 December 2025 and although several of our queries were addressed there remains outstanding issues (traffic modelling) which need to be closed out.

The current holding notice is due to expire on 18 May 2026, and as such, we are recommending that the notice be extended for a further 3 months (expiring 18 August 2026). Should the additional information be agreed within this timeframe then the notice could be lifted.

Note: At the time of writing, this application is now the subject of an appeal for non-determination. Discussions are under way with a view to resolving issues, ahead of the appeal date.

Let me know if you have any queries.

Regards

Steve Freek, MCIHT

Assistant Spatial Planner – Nottinghamshire, Derbyshire, N Leicestershire

National Highways (Area 7), Stirling House, Lakeside Court, Osier Drive, Sherwood Business Park Nottingham NG15 0DS

Tel: 0300 470 4457

Mob: 07712 543047

Email: steve.freek@nationalhighways.co.uk

My working days are Tuesday - Friday

For information about our engagement with the planning system please visit: :
<https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>



From: pabc@broxtowe.gov.uk <pabc@broxtowe.gov.uk>
Sent: 03 June 2025 09:47
To: Planning M <PlanningM@nationalhighways.co.uk>
Subject: Planning application consultation - 25/00371/OUT

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please see the attached letter

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APPENDIX H

National Highways Planning Response, 15 June 2026



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Andy Jinks (Divisional Director)
Operations Directorate
Midlands Region
National Highways
PlanningM@highwaysengland.co.uk

To: Broxtowe Borough Council – FAO: Mr D Ottewell

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 25/00371/OUT

Location: Land West Of Stapleford Lane Stapleford Nottinghamshire

Proposal: Outline Planning Application for the construction of a residential development of up to 420 residential dwellings and associated open space and infrastructure (With some matters reserved).

National Highways Ref: NH/25/11451

Referring to the above referenced planning application and consultation dated 26 May 2026, in the vicinity of the A52 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

¹ Where relevant, further information will be provided within Annex A.

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningM@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature:

Date: 15 June 2026



Name: Catherine Townend

Position: Spatial Planner

National Highways:

3 Snowhill | Queensway | Birmingham | B4 6GA

Catherine.Townend@nationalhighways.co.uk

Annex A **National Highways' assessment of the proposed development**

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 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 we work 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.

This consultation relates to the submission of evidence to support the traffic impact assessment of the proposed development on the SRN, namely distribution data and traffic models.

Development Proposal

This Outline Planning Application is for the construction of a residential development of up to 420 residential dwellings and associated open space and infrastructure located approximately 0.5km south of the A52/B6003 (Bardills Roundabout), which forms part of the SRN.

The vehicular access point is proposed via a new signal-controlled junction on the B6003 Stapleford Lane 500m south of Bardills Roundabout. This road is owned and operated by Nottinghamshire County Council.

The site, referred to as Toton West, forms part of a wider allocation within the Broxtowe Local Plan for which there are currently live applications for three separate land parcels (Toton North, Toton East, and Toton West) totalling approximately 1,455 new dwellings.

Background

As consistently advised both at the scoping stage and through consultation on all of the live applications which make up the wider Toton allocation, one cumulative comprehensive traffic impact assessment is required to demonstrate the full impact of the combined site (Toton North, Toton East & Toton West parcels), along with the Chetwynd Barracks allocation given the close proximity.

This is supported by DfT Circular 01/2022, the NPPF, and the above mentioned Broxtowe Local Plan (Specifically Paragraph 1.13 of Broxtowe Borough Council's *Toton and Chetwynd Barracks Strategic Masterplan: Supplementary Planning Document*, which aligns with the need for a joined-up approach across the wider allocation).

This is required such that we can understand the cumulative impacts, and in turn ensure an efficient and effective infrastructure package is developed to accommodate the full site before any elements within the allocation come forward.

This supports proper planning and best ensures the viability of delivery of the allocation in full. Allowing initial phases to come forward prior to any understanding of the infrastructure needs for the full allocation jeopardises the deliverability of later phases as infrastructure needs may become required prior to first occupation, and costs are shared over a smaller proportion of the allocation.

The impact assessment should include SRN junctions where there will be any potential impacts from the development traffic, including but not limited to:

- M1 Junction 25 Sandiacre Interchange
- A52 Bardills Roundabout
- A52 / Toton Link Road Signals (new site access junction)
- A52 Bramcote Island Roundabout

We also recommend that a list of assessment scenarios that includes the assessment year(s), opening years for the development parcels, with appropriate committed development traffic and infrastructure included, shall be clearly presented in the comprehensive TA.

Non-determination appeal

We are currently engaging regularly with the applicant regarding the submission of an appeal against non-determination of the planning application. Our Statement of Case submitted to PINS on 10 June 2026 referenced the extensive and timely engagement National Highways has provided throughout the consultation process, and justified the need for the cumulative assessment of traffic impacts on the SRN.

Although this cumulative assessment formed the main point of disagreement and reason for the appeal, the applicant accepted in recent meetings that the cumulative impact assessment should be provided.

We welcomed confirmation from the applicant that this technical work was being prepared using the East Midlands Gateway Model (EMGM), and we received a report on 12 June undertaken by Systra, which reports on this cumulative assessment. We are currently reviewing this.

Traffic impact assessment

Whilst we awaited the cumulative assessment work, we did however review the standalone traffic modelling work submitted to support the Toton West site in isolation. This modelling was produced using LinSig. This review was carried out to give all

parties the opportunity to identify and address any technical issues with the detailed junction models prior to these models being used to test the cumulative traffic impact scenarios, hence reducing potential delays between the submission of the cumulative assessment and approval of the application. The following comments relate to this standalone assessment.

We previously requested that for us to undertake a thorough review of the LinSig modelling work, we require the following supporting documentation for each of the modelled LinSig junctions highlighted above:

- The actual LinSig models
- Existing Signal Controller Specification documents so that we can confirm the models have been built accurately
- Any observed signal timing data and analysis to support the modelled stage durations and cycle times
- Traffic flow analysis spreadsheets
- AutoCAD drawings of the junctions so that measured distances can be checked
- Calculations of the give way parameters
- Calculations of the saturation flow calculations

LinSig models were provided on 26 May 2026, and a detailed response providing advice on matters to address was sent via email on 15 June 2026 to yourself and Pegasus on behalf of the applicant.

Traffic distribution

Through past consultations, requests were made to provide details of the proposed traffic distribution onto the highway network. This was provided on 26 May 2026, and a detailed response providing advice on matters to address was sent via email on 15 June 2026 to yourself and Pegasus on behalf of the applicant.

Summary of Strategic modelling from January and those missed in May

Following submission of the proposed scope of a cumulative impact assessment, we provided feedback in May 2026. As mentioned, on Friday 12 June, we received a modelling report undertaken by Systra which is stated to contain the cumulative impact assessment that we have been requesting. We are currently undertaking a review of this report.

In the meantime, we can provide comments on progress up to receiving the Systra report. Specifically, we reviewed and provided comments on the two following Technical Notes:

- TN01 – TOTON EMGM Strategic Modelling Validation v1.4
- TN02 – Toton: Reference Case Assumptions

Following review of the information in TN01, we raised queries seeking clarification on points related to link calibration and validation. We also confirmed that we can accept Journey time validation results with caveats to be noted in the Traffic assessment reports.

On review of TN02, we concluded that we have no further comments at this stage and are content to accept the reference-case assumptions although the points raised will need to be monitored during the subsequent detailed assessments.

Subject to satisfactory response to our queries raised above, we confirmed that we will be happy to approve the Toton EMGM Strategic Modelling Validation report.

The applicant acknowledged the above comments in May 2026 and stated that they were currently completing Do Something (DS) With Development testing and would submit this for our review, expected in June 2026.

Review of mitigation

The Council and applicant should note that until such time as the traffic modelling is complete, we cannot undertake a thorough review any proposed mitigation on the SRN. In the meantime, we recommend the Applicant refers to the Circular and our [planning guide](#) which sets out the level of detail that is required prior to planning consent.

Recommendation – Holding notification for a period of 3 months from the date of this consultation response to allow the outstanding technical work to progress.

Standing Advice to the Local Planning Authority

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 NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

Sima Odedra

From: Catherine Townend <Catherine.Townend@nationalhighways.co.uk>
Sent: 03 August 2026 15:30
To: Catherine Townend
Subject: Appendix H - NH response to LPA, 15 June 2026
Attachments: National Highways updated response - June 2026.pdf; RE: Planning application re-consultation - 25/00371/OUT Land west of Sta... (6.64 MB)

From: Catherine Townend <Catherine.Townend@nationalhighways.co.uk>
Sent: 15 June 2026 16:39
To: Darren.Ottewell@broxtowe.gov.uk
Cc: Alan Siviter <alan.siviter@pegasusgroup.co.uk>; Daniel Law <daniel.law@aecom.com>
Subject: National Highways response - Planning application re-consultation - 25/00371/OUT Land west of Stapleford Lane (aka Toton West)

Dear Darren,

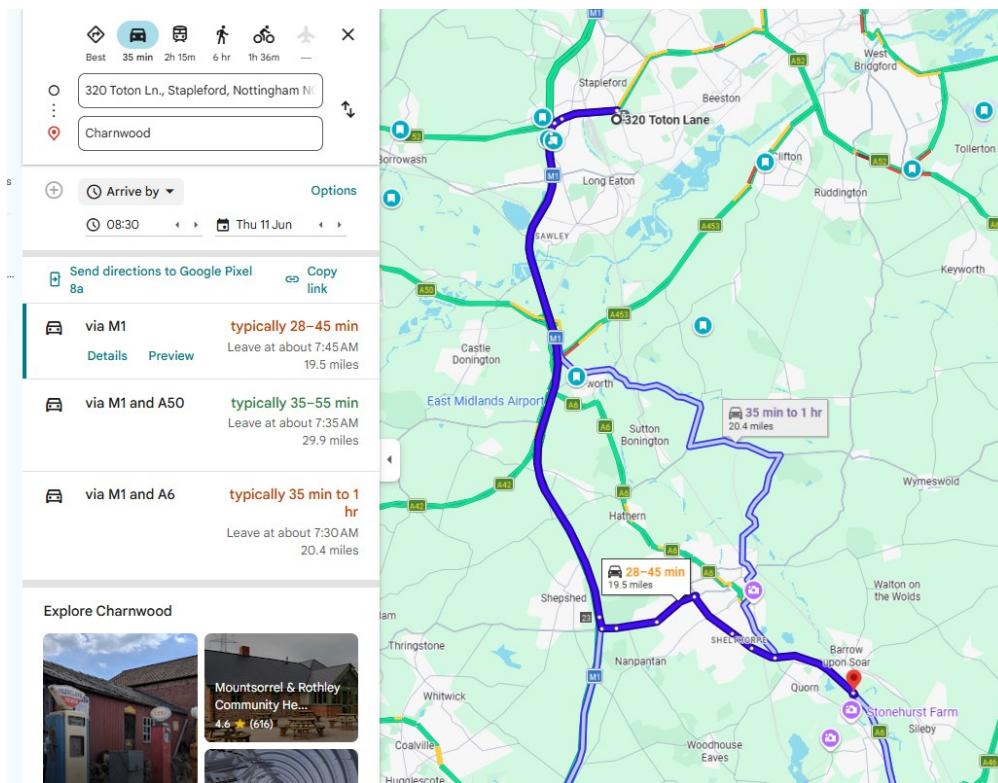
Further to your re-consultation on 26 May 2026 and attached email from Pegasus, please find attached our formal updated position.

You will be aware that new information was submitted to us on Friday (12 June), however, the attached response does not include our comments on the new information. This is still being reviewed.

In addition to our formal response, please find our more technical comments below:

Distribution Assumptions

We welcome the details regarding the distribution to and via Zone G. While we are content that the impact of the distribution to and via Zone G for MOSAs in Broxtowe and Nottingham are unlikely to generate significant demand on the SRN by the proposed development, we recommend the applicant re-visit the assigned route for Charnwood, for which we consider the routing shall not be via Zone G, but via the M1, as shown in the Google Map's Journey Planner below:



LinSig Modelling

As part of this LinSig model audit for the Toton West application, we have reviewed LinSig models and signal controller specification documents for the following junctions:

- M1 Junction 25
- A52 Bardills Roundabout
- A52 Bramcote Island
- B6003 Toton Park & Ride Access

General Comments for all Junctions modelled

Following our request, correspondence from the applicant confirmed that supporting information utilised to build the models would be provided. However the link provided to access the model files only includes the LinSig models and Controller Specification documents for each of the four junction sites.

To support the review of the modelling work for each junction location, the following additional information was requested through previous consultations, and this should be provided:

- Any observed signal timing data and analysis to support the modelled stage durations and cycle times
- Traffic flow analysis spreadsheets
- AutoCAD drawings of the junctions so that measured distances can be checked (PDF files have been received, but these should be provided in CAD file format if available)
- Calculations of the give way parameters used in the models
- Calculations of the saturation flow calculations (or assumptions made)

The applicant should explain how the modelled cruise times have been determined. If cruise times have been calculated outside of the model by applying an average speed to a distance, we recommend that these calculations are done within LinSig (on the connectors) so that we can understand what assumptions have been made.

The applicant should provide evidence to support the validation of LinSig models. This should compare modelled queue lengths or Degree of Saturation values on a lane-by-lane basis against site observations.

M1 Junction 25

The two lanes on Arm 14 should not be modelled with different lane lengths as the difference in distances may affect the vehicle routing across the roundabout with different journey times for the same O/D pairs. If one of the two lanes is fed from the other, this should be modelled as a flare even if the queues do not stretch back to the flare point.

Based on the above, the applicant should review the lane lengths of the long lanes on the other roundabout entries to ensure they are consistent and do not affect the choice of vehicle routes. We appreciate that lane lengths may have been reduced to reflect flares that have not been possible to model (LinSig can only model one flare off a long lane). However, as queues do not reach back past these secondary flare points, the adjacent long lane lengths should be consistent to ensure that routing choices are not affected by unrealistic differences in journey time values. Such an update would not have a significant effect on the model results.

On the M1 Southbound off-slip, lane 2 is signed for the A52 Derby, but this movement is not allowed with the current model structure. Arm 6 lane 2 should be fed by Arm 1 lane 2, rather than Arm 1 lane 3 as it is currently modelled.

A52 Bardills Roundabout – Existing

On Arm 7, the lane length has been set to the distance back to the A52 roundabout entry (Arm 4). It would be more appropriate if this lane length value was set to the distance back to the roundabout circulatory so any queues over this distance would be highlighted. The distances between the stoplines on Arm 4 and Arm 7 should be entered on the connectors between the two (as custom lane lengths) to determine the respective cruise times. A general rule of good practice LinSig modelling is to have the stopline-to-stopline distances entered on the connectors and the arm lane lengths represent the available storage area on those arms.

On Arm 2 (Garden Centre), the applicant should confirm how the give way parameters were determined, and also review the Clear Conflict values that have been used on each movement. These Clear Conflict values should represent the time it takes vehicles from Arms 1 and 8 to clear the conflict point with Arm 2. Please refer to the LinSig User Guide for further details. Traffic coming out of Arm 2 only gives way to roundabout traffic on the lane it is entering and none of the adjacent offside lanes. The approach adopted risks being overly optimistic, as drivers are more likely to be more cautious when vehicles are on the lanes adjacent to the lane they are entering, in-case they change lanes. As such the applicant should review the opposing lanes which the movements give way to. The suitability of the give way parameters will be ultimately determined by the accuracy of the model validation.

The phase minimums for Phases J and K do not correspond to the values in the controller specification document. Although the models do not see these phase minimums violated, it is good practice to have the models match the controller specification document. Whilst you have included all the stages that are present in the controller, even if they are not modelled, the prohibited stage movements should also be shown. As we do not know how this LinSig model may be used in the future, we consider it should match the controller specification document as accurately as possible.

The applicant should explain how the cruise times have been determined. Some connectors have a mean cruise time and a custom lane length. The entered mean cruise times suggest mean cruise speeds between 30 and 40kph. As the roundabout has a speed limit of 40mph (64kph), the applicant should consider whether these modelled cruise times represent average undelayed cruise speeds observed at the junction.

Although we have not received any observed signal data, the stage sequence used should be explained. The CLF plans suggest that Stage 2 is not called. The applicant should present observed data to indicate that it is, if it is being modelled as such.

Please can you explain how the pedestrian intergreen values have been determined as they do not all correspond with the information in the controller specification document.

A52 Bardills Roundabout – Mitigation Tests

The applicant should provide the CAD files for the two mitigation options that have been modelled.

We note that the cycle time values have been changed in the Composite Mitigation model. These changes should be justified.

A52 Bramcote Island

As with the Bardills model, on the give way entries, the applicant should justify movements only giving way to movements they cross and those going into the lane being entered. Some drivers entering the roundabout would be cautious about vehicles on other lanes on the roundabout in case they changed lane. The suitability of the give way parameters will be ultimately determined by the accuracy of the model validation.

The applicant should provide the reasoning for reducing the clear conflict distances from the default value of 2 seconds. As the lane lengths on the adjacent roundabout circulatory lanes are the same for all lanes on those arms, we do not consider that the clear conflict values can be zero for all movements.

B6003 Toton Park & Ride Access – Existing

We recommend that the applicant update the lane lengths on Arms 1 and 3 so that they go back to upstream constraints (i.e. the A52 Bardills Roundabout and the mini-roundabout within the Park & Ride site). If queues reach this point in any scenario, the queue length value will be highlighted.

The applicant should explain how the pedestrian intergreen values have been determined. These values are variable and the controller specification document details how long they could be if they are fully demanded.

The applicant should ensure that all phase delay values correspond with those shown in the controller specification document as we have spotted a number of inconsistencies.

The junction has been double cycled with Stage 4 being called every other cycle. The applicant should provide evidence to demonstrate whether this is how the junction actually operates.

B6003 Toton Park & Ride Access – Proposed

The applicant should provide a CAD drawing of the proposed layout so that measurements can be checked, as well as some narrative to explain the new stage sequence and cycle time values that have been modelled.

To ensure consistency with the existing layout model when it comes to reporting overall junction results, we recommend that cruise times to the exit arms are the same between the two models.

Kind regards

Catherine Townend

Spatial Planner

Operations Directorate (Midlands) – *Nottinghamshire, Derbyshire, and North Leicestershire*

catherine.townend@nationalhighways.co.uk

Mobile: +44 (0) 7710 365579

Web: www.nationalhighways.co.uk

My working days are Monday to Thursday

Upcoming leave:

For information on working with National Highways on planning matters, please see the below guidance:

https://nationalhighways.co.uk/media/2depj2hh/final-cre23_0370-nh-planning-guide-2023.pdf

From: Darren Ottewell

Sent: 26 May 2026 14:07

To: Steve Freek

Cc: Catherine Townend

Subject: Planning application re-consultation - 25/00371/OUT Land west of Stapleford Lane

Importance: High

Some people who received this message don't often get email from darren.ottewell@broxtowe.gov.uk. [Learn why this is important](#)

Good Afternoon,

Following on from your email dated 15 May 2026, please find attached a file containing modelling information.

☐ [For NH](#)

I've also attached a copy of the email from the agent with an explanation included of the additional work.

Please advise if you would like a formal re-consultation?

Kind Regards

Darren Ottewell

Senior Planning Officer

Broxtowe Borough Council

Planning and Economic Development

Chief Executive's Department

Council Offices, Foster Avenue

Beeston, Nottingham NG9 1AB

www.broxtowe.gov.uk

0115 9173046

IMPORTANT:

The advice contained in this response is given in good faith but is not binding on the Council. The formal decision of the Council can only be given as a decision on a planning application. Notwithstanding the advice given, there is no guarantee that planning permission will be granted, or refused, for a future planning application relating to the matter which is subject to this enquiry.

From: Alan Siviter <Alan.Siviter@pegasusgroup.co.uk>
Sent: 26 May 2026 11:36
To: Darren Ottewell
Cc: Ryan Dawson; James Hicks
Subject: RE: Planning application re-consultation - 25/00371/OUT Land west of Stapleford Lane

Importance: High

Good morning Darren,

Please find below a response to National Highways comments (which also includes a link to the data requested).

Distribution Assumptions

NH state that: *"Following a request for further clarification, we now acknowledge that the traffic distributed to zone G: Swiney Way (E) includes traffic continuing past this zone and destined further to the east, via the A6005 Nottingham Road. From the information provided, it is not possible to distinguish what proportion of this zone G traffic is destined for zone G, and what is routeing through zone G. Further, the explanation given (paragraph 3.2.11) does not align with the distribution data in the Appendix D Excel Spreadsheet. This should be clarified or can be discussed on a call."*

Firstly, for clarity distribution zone G accounts for the majority of traffic which would wish to travel to/from the A6005 Nottingham Road as well as traffic who wish to travel to employment centres within the MSOA in which zone G sits within: MSOA: Broxtowe 013 (E02005862).

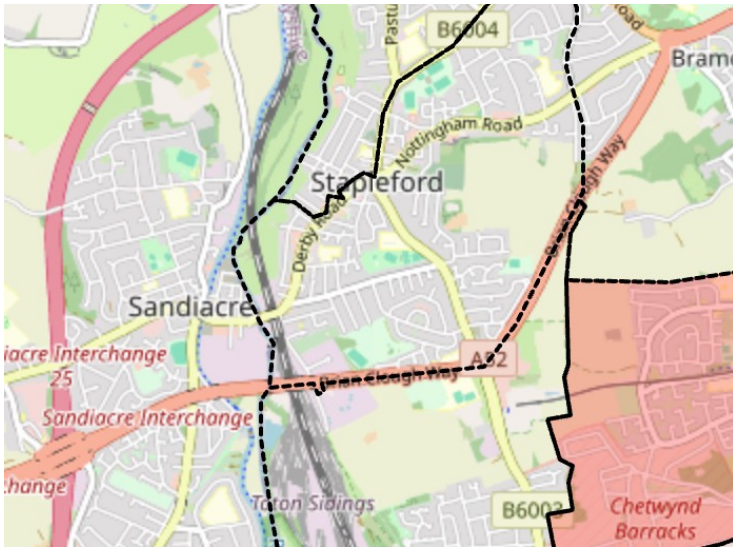
Paragraph 3.2.11 of the submitted TN states: *"Firstly, for clarity, distribution zone G accounts for the majority of traffic which would wish to travel east of the site, towards Nottingham via the A6005 Nottingham Road as well as traffic who wish to travel to employment centres within the MSOA in which zone G sits within: MSOA: Broxtowe 013 (E02005862)."* It is appreciated that the above may have been interpreted to read that Zone G would account for the majority of the trips heading east of the site.

However, for completeness, the meaning of this paragraph was to set out that to get to/from **the A6005 Nottingham Road**, the majority of these trips would go via Zone G, owing to the fact that some trips (to reach the A6005) would travel via Zone H and Stapleford Lane. It is hoped that this clarification addresses any confusion NH had in connecting the conclusion reached within this paragraph with the data presented within Appendix D of the submitted TN.

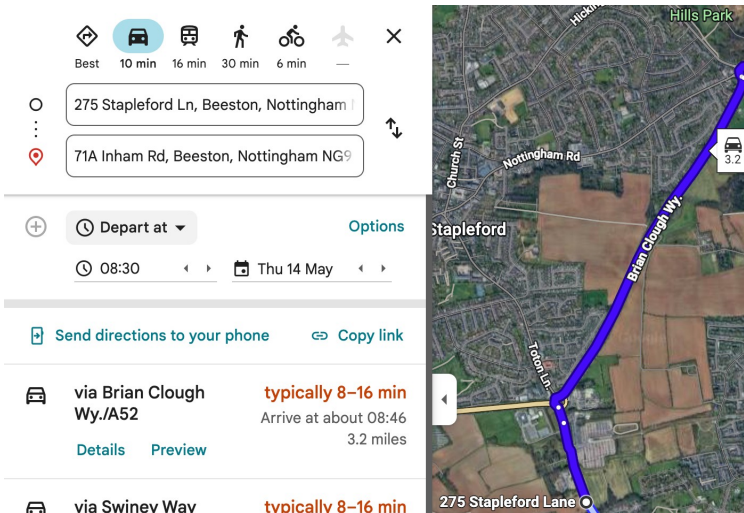
Notwithstanding the clarification above, the following further analysis is provided to help inform NH on the assumptions made on the distribution profile to Zone G (MSOAs Broxtowe 013 & 015) but also through Zone G.

To Zone G

Zone G represents a location where onward trips (eastbound) would pass through but also accounts for trips to the MSOA in which Zone G sits: Broxtowe 013 (E02005862), as illustrated below in the excerpt from NOMIS:

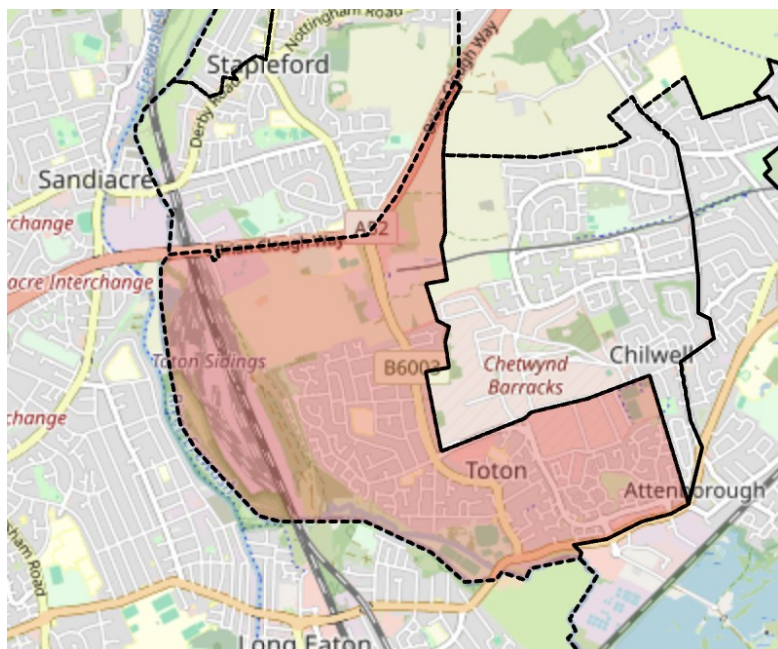


As shown in the distribution assumptions attached in Appendix D, 75% of traffic to the MSOA Broxtowe 013 (E02005862) has been routed through to / through Zone G to reach the employment destinations in this MSOA. 25% of traffic to this MSOA has been assumed to travel to the northern section of this MSOA, via distribution zone F, given this is a recommended route put forward by Google Map's Journey Planning Tool:



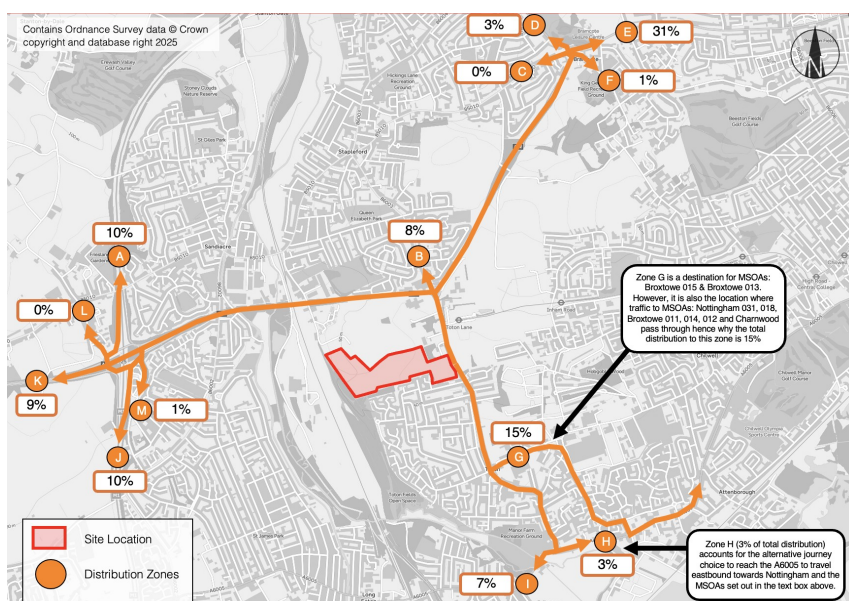
As such, it is considered reasonable and robust that a modest allowance has been made that to reach employment destinations (Broxtowe Day Service Assisted Living, Chilwell Family Hub Educational Centre, Sunnyside Spencer academy, Inham Nook Library and other commercial land uses in this northern section of Broxtowe 13) that some traffic may use Zone F, hence the proportionate split.

In consideration of the MSOA: Broxtowe 015 (E02005864) which encompasses the area to the south of Broxtowe 013 (containing the Tesco Superstore and industrial / commercial land uses to the south of Chetwynd Road), it has been assumed that 100% of traffic to this MSOA would travel to Zone G to reach these destinations, given routing via Zone F would not be a practical journey (noting these key destinations fall someway further south in comparison to the aforementioned possible destinations in the northern section of MSOA Broxtowe 013). For NH's reference, please see the below excerpt from NOMIS illustrating the location of Broxtowe 015:



Through Zone G

In terms of clarifying the status of traffic which would pass through Zone G, please see the below figure (and associated table) which set out the distribution routes from the site and identify the MSOAs in which traffic would travel through Zone G to reach:



Distribution Assumptions

MSOA	Destination to Zone G	Destination Via Zone G	Alternative
E02002898 : Nottingham 031	No	Yes	Zone E
E02005864 : Broxtowe 015	Yes	No	No alternative
E02005860 : Broxtowe 011	No	Yes	Zone E
E02005863 : Broxtowe 014	No	Yes	Zone H
E02005862 : Broxtowe 013	Yes	No	Zone F

It is hoped that the above information provides further clarification on the distribution assumptions applied to route traffic to Zone G and also through it to onward destinations and that NH can now agree to the distribution methodology which has underpinned the capacity assessments undertaken to take.

LinSig Modelling Information

It is understood that NH require the following further information to complete their review:

- The actual LinSig models
- Existing Signal Controller Specification documents so that we can confirm the models have been built accurately
- Any observed signal timing data and analysis to support the modelled stage durations and cycle times
- Traffic flow analysis spreadsheets
- AutoCAD drawings of the junctions so that measured distances can be checked
- Calculations of the give way parameters
- Calculations of the saturation flow calculations

As such, please find the full suite of modelling files using the following We-Transfer link: <https://we.tl/t-ATMd5SJAYcCZRTwU> This link also provides access to the signal controller specifications and information utilised to build the model.

Could this be provided to National Highways as soon as possible.

Many thanks

Alan

Alan Siviter

Associate Planner – Planning

E Alan.Siviter@pegasusgroup.co.uk

M 07971 539832 | T 01509 670806

4 The Courtyard | Lockington | Derby | DE74 2SL



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**Please
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extreme
caution with
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and website
links or
instructions
to undertake
financial
transactions.**

From: Darren Ottewell

Sent: 20 May 2026 14:35

To: Alan Siviter

Subject: FW: Planning application re-consultation - 25/00371/OUT Land west of Stapleford Lane

Importance: High

Alan,

Please see comments below received from National Highways.

Regards

Darren Ottewell
Senior Planning Officer

Broxtowe Borough Council
Planning and Economic Development
Chief Executive's Department
Council Offices, Foster Avenue
Beeston, Nottingham NG9 1AB
www.broxtowe.gov.uk

0115 9173046

IMPORTANT:

The advice contained in this response is given in good faith but is not binding on the Council. The formal decision of the Council can only be given as a decision on a planning application. Notwithstanding the advice given, there is no guarantee that planning permission will be granted, or refused, for a future planning application relating to the matter which is subject to this enquiry.

From: PABC <pabc@broxtowe.gov.uk>

Sent: 15 May 2026 15:20

To: Darren Ottewell <Darren.Ottewell@broxtowe.gov.uk>

Subject: FW: Planning application re-consultation - 25/00371/OUT Land west of Stapleford Lane

Afternoon Darren

Please see below regarding 25/00371/OUT

Kind Regards,

Harvey Virgo

Business Support Administrator

Broxtowe Borough Council

Executive Director's Department
Council Offices, Foster Avenue
Beeston, Nottingham, NG9 1AB

Tel: 0115 9173764

www.broxtowe.gov.uk



From: Steve Freek <Steve.Freek@nationalhighways.co.uk>

Sent: 15 May 2026 14:04

To: PABC <pabc@broxtowe.gov.uk>

Cc: Catherine Townend <Catherine.Townend@nationalhighways.co.uk>; Daniel Law <daniel.law@aeacom.com>; Jessica Leung <jessica.leung@aeacom.com>

Subject: Planning application re-consultation - 25/00371/OUT Land west of Stapleford Lane

FAO Mr D Ottewell

Hi,

I refer to the attached re-consultation in relation to the above referenced planning application. We have reviewed the traffic related submission dated April 2026, prepared by Pegasus group and the consultant, Mode transport planning on behalf of Bloor Homes for Outline Planning Application for up to 420 residential dwelling on the land located to the west of the B6003 Stapleford Lane in Broxtowe, Nottinghamshire (Broxtowe Borough Council's Application reference 25/00371/OUT) (Toton West).

We note there is another live Hybrid application of Full Planning permission for 69 dwellings and Outline Planning Permission: for the Construction of up to 351 at the same site (Broxtowe Borough Council's Application reference 25/00928/FUL). Both applications are proposing a total of up to 420 residential dwellings at the site.

The submitted documents include the Main Response Document titled "Highways Response to Consultee Comments" dated 17 April 2026, supporting appendices and signalised junction model reports.

Based on our review of the traffic related submission for this application, our comments are summarised as follows:

This is one of three sites where the live planning applications in the north of Toton area. The other two applications are 25/00306/OUT Outline planning application up to 880 dwellings (Toton North) and: 25/00255/FUL Full Planning Application for 155 dwellings (Toton East).

We acknowledge the statement from the applicant that a cumulative assessment for Toton West, East and North is now being prepared using the East Midlands Gateway Model (EMGM).

When the full results of the cumulative assessment modelling exercise are completed, we will be in a better position to comment on any assessment of the impacts of the proposed development on the SRN and any need for mitigation which may be required to facilitate the development.

Nevertheless, we also acknowledge the applicant has used the standard approach to demonstrate the potential development traffic onto the highway network from this development proposal as a standalone site. Although we have reviewed this, we do advise that the position remains unchanged and aligned with the requirements of the SPD for a cumulative assessment being required to understand the implications of the full allocation before any individual sites within the allocation come forward.

Trip Distribution

As stated in our previous comments, we are generally content with utilising 2011 Census 'Location of usual residence and place of work by method of travel to work' data in MSOA level to distribute the Toton West development onto the road network. We welcome the applicant in providing us the Census data used for deriving the distribution in "Appendix D - Distribution Assumptions / Workings" of the Main Response Document.

Following a request for further clarification, we now acknowledge that the traffic distributed to zone G: Swiney Way (E) includes traffic continuing past this zone and destined further to the east, via the A6005 Nottingham Road. From the information provided, it is not possible to distinguish what proportion of this zone G traffic is destined for zone G, and what is routing through zone G. Further, the explanation given (paragraph 3.2.11) does not align with the distribution data in the Appendix D Excel Spreadsheet. This should be clarified or can be discussed on a call.

Background Growth Rate

We welcome the applicant in correcting the TEMPro growth factors and we are now content with the amended growth factors as listed in Table 3.2 of the Main Response Document. We also welcome the applicant confirming 2028 as the opening year of the development.

Junction Model

The following junctions on the SRN have been assessed in LinSig within the report:

- Junction 1 – M1 Junction 25
- Junction 2 – A52 Bardills Roundabout
- Junction 3 – A52 Bramcote Island

The Park & Ride access junction should also be included in this list if the modelling for this junction or A52 Bardills Roundabout shows any queue interaction between the two in any of the scenarios modelled.

For us to undertake a thorough review of the LinSig modelling work, we require the following supporting documentation for each of the modelled LinSig junctions highlighted above:

- The actual LinSig models
- Existing Signal Controller Specification documents so that we can confirm the models have been built accurately
- Any observed signal timing data and analysis to support the modelled stage durations and cycle times
- Traffic flow analysis spreadsheets
- AutoCAD drawings of the junctions so that measured distances can be checked
- Calculations of the give way parameters
- Calculations of the saturation flow calculations

Regards

Steve Freek, MCIHT

Assistant Spatial Planner – Nottinghamshire, Derbyshire, N Leicestershire

National Highways (Area 7), Stirling House, Lakeside Court, Osier Drive, Sherwood Business Park Nottingham NG15 0DS

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My working days are Tuesday - Friday

For information about our engagement with the planning system please visit :

<https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>



-----Original Message-----

From: Planning M <PlanningM@nationalhighways.co.uk>

Sent: 28 April 2026 14:06

To: Steve Freek <Steve.Freek@nationalhighways.co.uk>; Catherine Townend <Catherine.Townend@nationalhighways.co.uk>

Cc: Planning M <PlanningM@nationalhighways.co.uk>

Subject: FW: Planning application consultation - 25/00371/OUT

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<https://nationalhighways.co.uk> | info@nationalhighways.co.uk

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APPENDIX I

**National Highways written representation to the Greater
Nottingham Strategic Plan EiP, June 2026**

Sima Odedra

From: Catherine Townend <Catherine.Townend@nationalhighways.co.uk>
Sent: 28 July 2026 14:04
To: Catherine Townend
Subject: Appendix I - National Highways written rep to GNSP - EiP, 26 June 2026
Attachments: National Highways response - Greater Nottingham Strategic Plan - EiP Written Rep .pdf

From: Catherine Townend
Sent: 26 June 2026 10:18
To: 'ian@localplanservices.co.uk' <ian@localplanservices.co.uk>
Cc: Daniel Law <daniel.law@aecom.com>; Kate Stephen <Kate.Stephen@nationalhighways.co.uk>; Jessica Leung <Jessica.Leung@aecom.com>
Subject: National Highways response - Greater Nottingham Strategic Plan (GNSP) - EiP Written Rep

Dear Ian,

Please find attached National Highways response.

Kind regards

Catherine Townend

Spatial Planner

Midlands Operations Directorate – *Nottinghamshire, Derbyshire, and North Leicestershire*

catherine.townend@nationalhighways.co.uk

Mobile: +44 (0) 7710 365579

Web: www.nationalhighways.co.uk

My working days are Monday to Thursday

Upcoming leave: 6th – 17th July 2026

For information on working with National Highways on planning matters, please see the below guidance:

https://nationalhighways.co.uk/media/imvluu5w/final-cre23_0370-nh-planning-guide-2023.pdf



Our Ref: NH/24/08627

Ian Kemp
Programme Officer
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PO Box 241
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Via Email: ian@localplanservices.co.uk

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www.nationalhighways.co.uk

26 June 2026

Dear Ian,

Greater Nottingham Strategic Plan Examination (GNSP)

National Highways welcomes the opportunity to comment on the Matters, Issues and Questions (MIQs) dated 21 May 2026 as part of the Greater Nottingham Strategic Plan Examination. This letter identifies the Matters, Issues and Questions (MIQs) that are directly relevant to the Strategic Road Network (SRN) and therefore require consideration in the context of our statutory responsibilities. Past consultations on the GNSP include supporting the progress of the strategic modelling transport evidence base, and the production of the Memorandum of Understanding (MoU).

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 SRN. It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. The SRN is a critical national asset and as such we work 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.

In relation to the Greater Nottingham Strategic Plan, National Highways' principal interest is in safeguarding the operation of the M1, A52 and A453 which route through the Greater Nottingham area.

National Highways has reviewed the transport modelling and supporting evidence prepared for the Plan. We consider that the strategic modelling provides a reasonable

basis for assessing cumulative impacts on the SRN. However, further clarification is required in relation to background growth assumptions, the treatment of committed developments, the inclusion of Road Investment Strategy (RIS) schemes within the Reference Case, and the deliverability and timing of the proposed mitigation measures. National Highways continues to work with the Councils to ensure that the evidence base is sufficiently robust to demonstrate that SRN impacts can be mitigated effectively.

While National Highways is actively engaging with the Councils on the SRN impacts, we await clarity regarding the deliverability and funding of the proposed mitigation schemes, which is expected to be outlined in the GNSP's Infrastructure Delivery Plan (IDP). Where the IDP identifies National Highways as the delivery body, this cannot be agreed unless the scheme is included within the current or emerging RIS. For schemes not currently within [our RIS programme](#), National Highways should instead be identified as a supporting stakeholder, with delivery dependent on developer-led schemes, local authority-led delivery, or future RIS consideration. National Highways emphasises that RIS funding cannot be assumed unless formally committed.

MIQ Q67 specifically queried the capacity of M1 Junction 24 and its implications for the phasing and delivery of strategic allocations. National Highways notes that M1 Junction 24 is a known constraint and that further work is required to confirm the scale of mitigation needed. Funding and delivery mechanisms must be clearly identified to ensure that development can proceed without causing unacceptable impacts on the SRN.

National Highways expects that where development impacts the SRN, proportionate and timely mitigation will be secured through appropriate mechanisms such as a Section 278. It should be noted that National Highways is not able to accept S106 contributions and could not be the delivery body for schemes secured through this mechanism. We may however be supportive of schemes on our network to be delivered by other bodies using S106 contributions, for instance the local highway authority.

Early engagement is essential to ensure that mitigation is deliverable and aligned with development phasing. National Highways' position is that viability considerations should not compromise the delivery of essential SRN mitigation.

As advised following review of the strategic modelling transport evidence base, the Plan must provide clarity on SRN modelling assumptions and mitigation, ensure that the IDP reflects RIS constraints, demonstrate that SRN impacts can be mitigated in a deliverable and fundable manner, and provide robust evidence for logistics and

strategic allocations. National Highways would like to reserve the right to provide further representations at the Examination should these matters remain outstanding, although we are unavailable for the transport hearing session scheduled for 16 July.

Subject to the resolution of the matters identified in this letter, National Highways considers that the Plan can be found sound.

Notwithstanding this, we note an infrastructure proposal to serve the Toton & Chetwynd Barracks allocations within the Broxtowe Borough area via a new junction onto the A52 trunk road. The A52 serves as a major strategic link for long distance trips into Nottingham via the M1. The A52 between the M1 and Nottingham is already congested due to high strategic demands, as well as serving its secondary purpose as a local commuter link road connecting the west of Nottingham area with the wider city. The provision of an additional junction onto the A52 will accommodate increased traffic flows onto a severely strained strategic link.

It should be noted that any proposal to deliver a new junction on the SRN will require a Strategic Business Case demonstrating the need, impacts, benefits, and evidencing that the growth aspirations cannot be accommodated via upgrade to the existing junctions on the network. Decision to grant or refuse permission will not be made by National Highways, but by the Department for Transport (DfT) and there is no guarantee that the provision of this new junction will be approved.

National Highways however remains committed to working collaboratively with the Greater Nottingham authorities to ensure that planned growth is supported by a safe, reliable and resilient SRN. We welcome continued engagement as the Plan progresses toward Examination.

In the meantime, if you have any questions or comments then please do not hesitate to contact me on the details provided, and through our email address PlanningM@nationalhighways.co.uk

Yours sincerely,

Catherine Townend

Catherine Townend

Spatial Planner

Email: catherine.townend@nationalhighways.co.uk

APPENDIX J
Engagement Timeline

Appendix J: Engagement Timeline

Colour Key				
Pre-App (Toton East, North and West)	Toton East Outline	Toton North Outline	Toton West Outline	Toton West Hybrid

Item	Date	Item	Detail	Appendix Reference
Pre-Application Engagement				
	27/02/25	NH received informal consultation from ADC Infrastructure regarding x3 upcoming planning apps being prepared for sites in the Toton area ('Toton North', 'East' and 'West' parcels)	The email set out that Bloor Homes are preparing to submit three separate planning apps and contained a link to two of the Transport Assessments and Travel Plans. The email stated that the TA for Toton West was still being finalised	
	27/03/25	NH issued email response to the 27/02/25 consultation	This response provided advice on the submitted Transport Assessments. This included an explanation of why the cumulative impacts of the three sites together should be assessed. It also set out that a case for a new junction on the SRN (i.e.: A52 link road) would need to be demonstrated. Finally, it also requested submission of the LinSig junction models	
Post Application Submission Engagement				
	16/04/25	NH received formal LPA consultation for 25/00255/FUL (Toton East)		
	30/04/25	NH received formal LPA consultation for 25/003036/OUT (Toton North)		
	07/05/25	NH issued response to LPA consultation 16/04/25 consultation (Toton East)	Though tailored to the Toton East application, NH advice aligned with that provided on 27/03/25 and recommended a 'holding' position of three months. In this response NH again request the LinSig model files and associated raw data	
	22/05/25	NH issued response to the 30/04/25 LPA consultation (Toton North)	Though tailored to the Toton North application, NH advice aligned with that provided on 27/03/25 and recommended a 'holding' position for a period of three months. In this response NH again requested the LinSig model files and associated raw data	

	03/06/25	NH received LPA Consultation for 25/00371/OUT (Toton West)	The TA (April 2025) and Planning Statement (May 2025) acknowledge that further cumulative modelling work is required	
	18/06/25	NH issued response to the 03/06/25 LPA consultation	This response remained in line with NH previous responses and recommended a 'holding' position for a period of three months. In this response NH again requested the LinSig model files and associated raw data	Appendix A
	26/06/25	NH received email from LPA with correspondence from Pegasus on behalf of the applicant in respect of 25/00255/FUL (Toton East)	The email contained a one page note from ADC Infrastructure. The note sets out reasons for not undertaking a cumulative assessment	
	08/07/25	NH issued response directly to Pegasus email of 26/06/25	NH response sets out that it disagreed with ADC and reiterated why a cumulative assessment for all three parcels is necessary	
	01/08/25	NH received email from Pegasus	The email contained a three-page application note by Pegasus dated 01/08/25 setting out the approach to the highways assessment for Toton East. It referenced extant planning permission under 17/99131/ROC for 282 dwellings, though restricted to 180 dwellings due to a condition requiring a southern access point (with that land now under the control of the Toton West parcel)	
	04/08/25	NH received email from LPA	The email contains the same application note by Pegasus dated 01/08/25	
	05/08/25	NH issued formal response to LPA	NH extended holding recommendation for a further three months. This included a copy of NH original response containing a request for the LinSig files and associated raw data	
	19/08/25	NH issued updated response to LPA	NH extended holding recommendation for a further three months. This included a copy of NH original response containing a request for the LinSig files and associated raw data	
	28/08/25	NH received email from LPA	The email contained a highways technical note (TN) by ADC Infrastructure dated 21/08/25	

	11/09/25	NH issued response to LPA email of 28/08/25	This email responds to the ADC technical note (TN) of 21/08/25 and reiterates NH requirement for a cumulative assessment of the three Toton parcels	
	16/09/25	NH issued updated response to LPA	NH extended holding recommendation for a further three months. This included a copy of NH original response containing a request for the LinSig files and associated raw data	Appendix B
	26/09/25	NH issued response to LPA in response to 04/08/25 and 28/08/25 consultations	The email responds to TN of 01/08/25 and states that NH response of 11/09/25 remains valid. It set out NH views with regards the extant consent from 17/00131/ROC. Essentially, NH state that the conditions under which the extant permission was approved are very different	
	07/11/25	NH issued updated response to LPA	NH extended holding recommendation for a further three months. This included a copy of NH original response containing a request for the LinSig files and associated raw data	
	18/11/25	NH issued updated response to LPA	NH extended holding recommendation for a further three months. This included a copy of NH original response containing a request for the LinSig files and associated raw data	
	20/11/25	NH received email from Mode	The email from Mode advised that they had commissioned SYSTRA to undertake cumulative modelling using the EMGM and that the model had been deemed 'fit for purpose' for this work based on an Area of Influence (AoI) model run, with details set out in a technical note (TN01). The email also requested comments on a second technical note (TN02) which set out the assumptions (inputs) for the reference case (without development) modelling runs. Email also offers willingness for a Teams meeting to go through points	
	20/11/25	NH issued interim response to Mode email of 20/11/25	The email states that the technical notes TN01 & TN02	

			will be reviewed by COP on 04/12/25 and suggests holding a meeting after this review is complete if required	
	05/12/25	NH issued full response to Mode email of 20/11/25	NH highlighted that the EMGM has base year of 2016 so is considered old, but given that an alternative EMCA model is under development, NH accepted its use. NH advised that it was consent with the Aol outputs. NH requested further information with respect to link calibration and highlighted certain links which did not meet TAG criteria for journey time validation. NH also raised some queries with regards to the reference case assumptions	
	16/12/25	NH issued updated response to LPA	NH extended holding recommendation for a further three months. This included a copy of NH original response containing a request for the LinSig files and associated raw data	Appendix C
	13/01/26	NH received formal LPA re-consultation on 25/00371/OUT (Toton West)		
	26/01/26	NH received formal LPA consultation on 25/00928/FUL (Hybrid)	This is the same site as 25/00371/OUT but considers full planning consent for 69 dwellings and outline consent for the remaining 369 dwellings	
	28/01/26	NH issued response to the LPA 13/01/26 consultation	The consultation did not follow the advice previously provided in relation to opening year or cumulative, nor had the LinSig models NH requested been submitted	Appendix D
	05/02/26	NH received email from Mode	The email contains a note from SYSTRA in response to NH comments on the TN01 and TN02 technical notes issued on 05/12/25 and the update TN01 (V.1.4)	
	11/02/26	NH issued response to the 26/01/26 consultation regarding 25/00928/FUL (Hybrid)	NH reiterated the need for a cumulative assessment, but NH also provided comments on the standalone assessment for the West parcel. Specifically, NH requested further evidence in relation to trip distribution and asked for the opening year	

			assessment to be updated to reflect the opening year of the full development i.e.: 420 dwellings (not the start of construction). This was to align with DfT Circular 01/2022	
	25/02/26	NH issued updated response to LPA	NH extended holding recommendation for a further three months. This included a copy of NH original response containing a request for the LinSig files and associated raw data	
	06/03/26	NH issued updated response to LPA	NH extended holding recommendation for a further three months. This included a copy of NH original response containing a request for the LinSig files and associated raw data	Appendix E
	28/04/26	NH received formal re-consultation on 25/00371/OUT (Toton West)		
	01/05/26	NH received appeal notification with respect of 25/00371/OUT		
Post Appeal Submission Engagement				
	08/05/26	NH issued updated response to LPA	NH extended holding recommendation for a further three months. This included a copy of NH original response containing a request for the LinSig files and associated raw data	
	08/05/26	NH received email from Pegasus	The email sets out that the main difference in parties is the need for a cumulative assessment. It also states that NH & NCC have refused to look at the Dec 2025 updated TA. The email also contains a link to a highway technical note (TN) and access update, and requests a meeting with NH & NCC to discuss outstanding matters	
	12/05/26	NH issued email response to Mode email of 05/02/26	The email contains comments and questions on the SYSTRA note relating to technical notes (TN01 & TN02) received via Mode on 05/02/26. This included comments on link calibration & validation, journey time validation, and NH accepted the reference case assumptions	

			The email states that this response should have been issued on 20/02/26	
	14/05/26	NH issued response to Pegasus email of 08/05/26 with availability for meeting	Meeting was held 01/06/26	
	15/05/26	NH issued response to the LPA 28/04/26 consultation	NH response acknowledged the statement from the applicant that the cumulative assessment for all parcels (Toton West, East and North) was now being prepared using EMGM. NH reiterated the requirement for this cumulative assessment but NH nonetheless provided comments on the standalone assessment. Specifically, NH welcomed the attempt to answer previous query in relation to trip distribution although highlighted a discrepancy with this explanation and requested further clarification. NH also advised that it was content with the TEMPro growth factors being used to forecast background traffic growth and welcomed the applicant confirming 2028 as the opening year of the development. With regards to the junction impact assessments, NH confirmed the three SRN junctions that had been included and asked for the addition of the Park & Ride junction. NH also again requested the LinSig model files and other data relating to model inputs to enable NH review	Appendix F
	19/05/26	NH issued updated holding recommendation to the LPA for 25/00371/OUT (Toton West)	In light of the outstanding matters set out in NH 15/05/26 re-consultation response, Nh extended the holding recommendation for a further three months. This included a copy of NH original response containing a request for the LinSig files and associated raw data	Appendix G
	26/05/26	NH received re-consultation email from the LPA	The email contained a link to the LinSig model files and an email from Pegasus (on behalf of the applicant). This email provided a detailed explanation to address NH query on the trip distribution.	

			It also set out a summary of everything included in the WeTransfer link	
	29/05/26	NH received email from Mode	The email contained an attachment prepared by SYSTRA in responses to NH questions around the TN01 and TN02 technical notes. The email also states that SYSTRA has commenced the Do Something (with development) model testing	
	02/06/26	NH received email from Mode	The email set out the proposed methodology for undertaking a cumulative assessment. It stated that it would include the 155 houses at Toton East and 100 (of the 800) houses at Toton North (the part allocated in the Broxtowe Local Plan). It also set out a proposal for using TEMPro to calculate the growth associated with these committed developments	
	03/06/26	NH issued response to Mode email of 02/06/26	NH email stated that the full Toton North allocation of 800 houses should be included rather than just the 100 houses to conform with paragraph 49 of DfT Circular 01/2022, the Toton & Chetwynd SPD and the Broxtowe Local Plan. NH also set out that TEMPro should not be used to with respect to committed/allocated sites as this would not accurately reflect demand in the localised area	
	03/06/26	NH received email from Mode in response to NH email of 03/06/26	The email asked if NH would agree to the principle of updating the TA methodology in the absence of the EMGM being available	
	03/06/26	NH issued response to Mode email of the same date	NH email accepted the principle of this alternative approach but could not guarantee that the results would be acceptable until NH had reviewed these	
	03/06/26	NH received email from Mode	The email contained a list of specific questions around what is outstanding and what would be acceptable	
	05/06/26	NH issued written rep to PINs	This letter set out the reasons for NH Holding recommendation	

	05/06/26	NH issued response to Mode	The email provides brief responses to the list of questions and attaches NH written rep to PINs for more detail	
	08/06/26	NH received email from Pegasus	The email asked for NH to list outstanding matters to inform SoCG drafting	
	08/06/26	NH issued response to Pegasus email of the same date	The email states that NH formal responses set out the outstanding matters and invites Pegasus to begin drafting SoCG for NH to review	
	12/06/26	NH received email from Mode	The email contained a draft Strategic Modelling report (TN04) prepared by SYSTRA with a description of the report in the body of the email. This sets out that a cumulative assessment has been carried out which includes the three Toton sites and the Chetwynd Barracks allocation	
	15/06/26	NH issued response to the LPA re-consultation of 26/05/26	This email contained NH formal NHPR but also more detailed comments in the body of the email. This set out that NH accepted the majority of the trip distribution assumptions but asked the applicant to revisit one particular assigned route which looked inaccurate. In addition, NH advised that the WeTransfer link received on 26/05/26 only contained the LinSig model files and controller specification documents for the 4 junctions, and NH highlighted that it did not contain the remaining sets of data that NH requested on 15/05/26. NH also described a number of inaccuracies with the LinSig models and requested that these be updated	Appendix H
	18/06/26	NH received email from Mode Transport consultants in response to NH email of 15/06/26	This set out that the LinSig models had been updated to reflect NH comments. The email states that the model updates resulted in no material change. The email did not contain any link to model files	
	24/06/26	NH received email from Mode	The email contains technical note TN004 and a Wetransfer link to appendices. TN004	

			relates solely to the standalone assessment to address previous comments from NH and NCC. This includes a section on off-site pedestrian improvements (on NCC's network) and minor changes to the proposed Bardills island improvement scheme associated with lane markings.	
	02/07/26	NH sent email to Mode	The email contains NH's review of technical notes TN01, TN02, and TN04 associated with the cumulative assessment. NB: TN03 (<i>reference case definitions and modelling scenario</i>) was not received by NH and hence not reviewed. The email highlights some issues with the EMGM base model validation. In particular, three links where the modelled flows are much higher than observed flows, and one link where the modelled flows are considerably lower. The email also requested some clarifications in relation to TN04 (strategic modelling draft report).	
	02/07/26	NH received email from Mode in response to NH email of 02/07/26	Email acknowledges NH email and raises concern over NH having issues with EMGM validity as it is not their model to influence and that these issues won't be resolved quickly.	
	08/07/26	NH received email from Mode in response in response to NH's email of 02/07/26	The email contains an attachment by SYSTRA in response to NH's comments on technical notes TN01, TN02, and TN04 relating to the cumulative assessment.	
	14/07/26	NH issued email to Mode in response to TN004 dated 26/06/26 relating to standalone assessment	In this email, NH confirmed acceptance of the trip distribution methodology for the standalone assessment. NH also requested some further data necessary to validate the LinSig (junction capacity) modelling.	
	23/07/26	NH received email from Mode with a link to SYSTRA files.	The email and SYSTRA files relate to the scenario 4 cumulative assessment (sensitivity test) which includes the Chetwynd Barracks site	

			NB: NH has not reviewed started a review of these files as NH previous comments on the EMGM model validation have not been closed out. Inaccuracies with the model will affect all scenarios	
	30/07/2026	NH issued email to Mode	Email summarises the outstanding modelling matters ahead of submitting proof of evidences. Email also acknowledges receipt of email from Mode of 23/07/26 but explains reasons for not reviewing it at this stage.	
	31/07/2026	NH received an email from Mode	The email contained a WeTransfer link and states that the link is for the updated LinSig files	
	31/07/2026	NH received email from SYSTRA	Email states that they cannot provide the SATURN model files (requested by NH on 30/07/26) and suggests an alternative i.e.: screenshots of coding plus model outputs.	
	03/08/2026	NH received email from SYSTRA	Email contains a link to the draft modelling report for Scenarios 1, 3 and 4	

APPENDIX K

Managing Impacts on The Strategic Road Network, October 2025

Managing Impacts on the Strategic Road Network

Spatial Planning Advice Note
SPAN-17-DM



October 2025

SPATIAL PLANNING ADVICE NOTE: SPAN-17-DM Managing Impacts on the Strategic Road Network

Summary

This note provides guidance for National Highways Spatial Planning Teams on appraising development impacts on the congestion and capacity, and potential arising safety implications, of development proposals on the Strategic Road Network (SRN).

Key areas covered by this note include the legal framework, key policy guidance and procedures together with advice on the fundamentals on appraising development impacts.

This includes outlining the broad principles for appraising impacts, explaining under what circumstances it may be appropriate to advise mitigation is required to reduce impacts so they are below the severe and unacceptable thresholds, and where impacts cannot reasonably be mitigated, the justification for a recommendation to refuse.

This note is primarily intended for **internal** use by National Highways officers and service providers that make up the **Spatial Planning Community of practice** within the Operations Directorate (OD). This note will also be useful for the national Planning Policy team within the Customer, Strategy and Communications (CSC) Directorate.

This note may be used as a reference for discussions led by the Spatial Planning Community with stakeholders including Local Planning Authorities (LPAs), scheme promoters and other third parties involved in the Spatial Planning process.

This note may also be referred to by other teams across the National Highways business with an interest in this topic area.

This SPAN fits within the overarching legislation, policy and guidance applicable to all SPANs set out in **SPAN-01-SP – Spatial Planning Handbook**.

This advice should also be read alongside the following:

- **SPAN-05-MS** **Modelling Studies and Assurance**
- **SPAN-16-DM** **Guidance on the use of Planning Conditions**

Document Control

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V1.1	March 2024	Rachel Smith (JSJV), Laura Knowles (JSJV)	Update following refresh of NPPF in December 2023
V1.2	August 2025	Rob Murphy (Assistant Planning Manager, CSC)	Minor review to update particularly with reference to NPPF December 2024 publication

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1. Introduction

1. During the spatial planning and development management processes, National Highways' Spatial Planning Teams will undertake appraisals of a wide array of development proposals, assessing their implications on the safe operation and long-term integrity of the SRN.
2. This work includes identifying the scale of development impact on the existing network and in relation to traffic impacts, ensuring that the risk of otherwise *unacceptable safety* or *severe congestion impacts* are managed either through the recommendation of planning conditions which restrict the development in line with suitable mitigation or the recommendation of refusal (here impacts cannot be mitigated through planning conditions or obligations) of the planning application.
3. When assessing the impact of development sites on the SRN through the development plan or planning application process, the Spatial Planning Team should only advise refusal if there are unacceptable impacts upon highway safety, or *severe* residual cumulative impacts on capacity/congestion, taking into account all reasonable future scenarios, in accordance with paragraph 116 of the National Planning Policy Framework (NPPF). In accordance with DfT Circular 01/2022 paragraph 51, where a transport assessment (TA) indicates that a development would have an unacceptable safety impact or the residual cumulative impacts on the SRN would be severe, the developer must identify when, in relation to the occupation of the development, transport improvements become necessary.
4. Neither the Circular nor the NPPF includes definitions of what constitutes an *unacceptable* or *severe* impact. In practice, this is left to professional judgement, which can lead to differences in application. It should be noted that, the NPPF does not state that development should be prevented or refused on the highway grounds of *unacceptable* or *severe* impact (paragraph 116 of the NPPF), instead stating it should only be refused on highway grounds in these circumstances. Some Local Plans seek to provide clarification on this through the Development Management Policies and where this is the case, reference to those policies should be made in any response to the LPA in order to strengthen National Highways recommendations.
5. There are two matters of principal each of which is reflective of a National Highways' imperative:
 - Road Safety – the prime consideration (Circular 01/2022 paragraph 51); and
 - Congestion – which can have a cost to the economy arising from environmental, business and social impacts (Circular 01/2022 paragraph 51).
6. It is clear from the NPPF that the current national policy threshold regarding the levels of congestion that could result in the prevention or refusal of a development on highway grounds sets a high benchmark. This is reflective of the fact that "...mere congestion and inconvenience [is] not sufficient to trigger the 'severe' test but rather it [is] a question of the consequences of such congestion" which need to be considered. Ref (APP/D3315/W/16/3157862 Inspector, Mike Fox).
7. Through the spatial planning process, it is therefore necessary to identify operational risks and to evaluate what impacts associated with new development proposals are likely to constitute an unacceptable safety impact or a severe congestion impact on the SRN, and ensure that these are satisfactorily mitigated and/or managed.

8. It should be noted that this note **is not prescriptive**; there is no rigid framework for Spatial Planning Teams to follow when appraising the scale of development impacts. Developments are assessed on a case-by-case basis and each circumstance and local context are highly relevant. It is important to distinguish between the different measures of acceptability and to use the appropriate terminology in all cases. For example, it has often been the case that an impact has been judged as being severe because it has consequent unacceptable impacts on road safety. The Spatial Planning team should primarily consider all elements of road safety through the appraisal of a planning application or development plan and if there are none, only then go on to consider the consequential effects of congestion, in terms of increased delay for example.

Note Structure

9. The remainder of this note is as follows:
- **Section 2** - provides background information about the legal framework and policy guidance;
 - **Section 3** - sets out the context and pre-requisites of appraising development impacts; and,
 - **Section 4** - outlines the broad principles to be followed when appraising and suggests indicators that impacts are severe leading to an unacceptable impact on road safety.

2. Legal Framework and Policy Guidance¹

10. National Highways has an important role to support the planning process as a proactive partner committed to working with organisations and stakeholders when considering planning applications that impact upon the SRN. LPAs are legally required to consult with National Highways as a statutory consultee before reaching a decision on planning applications relevant to the SRN.

National Planning Policy Framework (December 2024)

11. NPPF Section 9 outlines the highway and transport considerations for new development proposals, with paragraphs 115 and 116 being particularly relevant.

12. Paragraph 115 of the NPPF states:

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) *sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*
- b) *safe and suitable access to the site can be achieved for all users;*
- c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
- d) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.*

13. Paragraph 116 of the NPPF states:

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

14. Evaluating the threshold of unacceptable safety impact presents its own challenges to Spatial Planning Teams; however, the burden of proof and the balance of judgement is evidently of a lower order; safety being paramount. For both safety and congestion, the resulting harm must be reasonably and adequately considered by the Spatial Planning Teams when appraising development impacts.

15. The term 'residual' (in the context of NPPF Para 116) refers to those impacts which remain after the implementation of any identified mitigation measures. Therefore, when looking at the overall impact of a proposal, it must be considered in the light of any transport improvements (both hard and soft measures²).

¹ Note: specific reference made to the NPPF, PPG, DfT Circular 01/022 and other relevant Policy may be superseded by updates. As such, updates to this Advice Note will be necessary at appropriate intervals.

² Note: Mitigation may be in the form of 'hard' measures such as physical highway improvements and/or 'soft' measures such as a reduction in vehicular trips as a result of an effective Travel Plan.

DfT Circular 01/2022: ‘The Strategic Road Network and the Delivery of Sustainable Development’

16. The DfT Circular 01/2022: ‘The Strategic Road Network and the Delivery of Sustainable Development’ provides details for determining whether development proposals are likely to be acceptable (or can be made acceptable) when SRN impact and accessibility are considered.
17. Development proposals should set out the interaction between land use and the impacts on road safety and future performance of the SRN. Where mitigation measures are required to address these impacts, the developer must identify when, in relation to the occupation/phasing of the development, these measures become necessary. For both safety and capacity considerations, it may be necessary to secure interventions or enhancement measures by way of a planning condition to ensure the development proposals comply with Circular 01/2022 paragraph 51 and can be made acceptable in strategic highway and transport terms.
18. At the time of writing, Spatial Planning, CSC and Legal Services are considering the practical implementation of vision-led approaches including ‘Vision and Validate’, ‘Decide and Provide’ and ‘Monitor and Manage’ as per paragraph 15 of the DfT Circular 01/2022. Notwithstanding, it is considered that any *vision* should be site specific and appropriately seek to manage the impacts on the SRN particularly in relation to managing unacceptable impacts upon highways safety.

3. Context and prerequisites of appraising development impacts on capacity and congestion

Planning Context

19. National Highways is a proactive partner in the delivery of sustainable development, committed to working with organisations and stakeholders through the planning application process in relation to proposals that impact on the SRN.
20. LPAs are also legally required to consult with National Highways, as a statutory consultee, before reaching any decision on relevant planning applications (i.e. those that have the potential to affect the SRN).
21. National Highways' substantive and formal response to planning application consultations is set out in a National Highways Planning Response (NHPR). The NHPR should provide the rationale that supports the recommendation made by National Highways in its consultation responses, including, where relevant, the technical appraisal of transport assessments/statements and other material that the applicant submitted supporting the planning application. This includes confirming the scale of development impact on the existing network and the conditions necessary to manage the development in relation to the availability of the transport interventions, (including physical improvements), necessary to mitigate against otherwise *severe* or *unacceptable* impacts.
22. When assessing sites that may be allocated for development in plans, or specific applications for development, the NPPF states it should be ensured that any significant impacts from the development on the transport network can be cost effectively mitigated to an acceptable degree through a vision-led approach (Paragraph 115).
23. There may however be other economic, social and/or environmental aspirations that influence the local plan and its transport strategy, which could result in a different emphasis on the requirements of a transport strategy needed to support a local plan; an example would be resolving pre-existing issues.
24. In all cases, however, the NPPF criteria for the acceptability of a transport strategy **should be seen as the minimum transport requirement by the Spatial Planning Teams**. The content of the supporting transport strategy is, in most cases, presented in a TA.
25. Whilst the thrust of this note relates to understanding and managing unacceptable impacts on highway safety and/or *severe* impacts on congestion and capacity in the development management context, i.e. through the life of a planning application, the broad principles and best practice guidance set out below can also be considered relevant in the generality of the context of the plan making process.

The role of Transport Assessments and Traffic Models

26. The NPPF encourages all developments that will generate significant amounts of movement to provide a travel plan, and such applications should be supported by a transport statement or TA to assess the likely impacts of the proposal (paragraph 118).
27. The requirement for a Developer/ Applicant to produce a TA to evidence the impacts on the SRN will be a judgment for the relevant area Spatial Planning Team. Specific regional knowledge can be a significant deciding factor in the requirement for and scoping of a TA, where Spatial Planning Teams have the benefit of expert local knowledge of the SRN and associated issues relevant to that area.
28. On the issue of local knowledge, when deciding on whether a TA is required, LPAs may not be fully aware of sensitive locations on the SRN (or, similarly, on the local highway network), which could lead to them not requesting a TA be produced, when in fact National Highways would expect this to be the case. Such risks can be mitigated in part by regular dialogue with the LPA (see paragraph 34 of this SPAN) and proactively engaging with site promoters through the pre-application process (see paragraphs 36 - 38 of this SPAN).
29. The National Planning Policy Guidance (NPPG) on *Travel Plans, Transport Assessments and Statements* (DLUHC and MHCLG) sits alongside the NPPF and states the following in terms of why Travel Plans, Transport Assessments and Statements are important. They can positively contribute to:
 - encouraging sustainable travel;
 - lessening traffic generation and its detrimental impacts;
 - reducing carbon emissions and climate impacts;
 - creating accessible, connected, inclusive communities;
 - improving health outcomes and quality of life;
 - improving road safety; and
 - reducing the need for new development to increase existing road capacity or provide new roads.
30. DfT Circular 01/2022 paragraph 47 states:

Where the company is requested to do so, it will engage with local planning authorities and development promoters at the pre-application stage on the scope of transport assessments/statements and travel plans. This process should determine the inputs and methodology relevant to establishing the potential impacts on the SRN and net zero principles that will inform the design and use of the scheme. Development promoters are strongly encouraged to engage with the company to resolve any potential issues and maximise opportunities for walking, wheeling, cycling, public transport and shared travel, as early as possible.

31. The Applicant's / Developer's evidence base for appraising the impacts of development should be set out in supporting transport documents, and where possible, pre-application engagement with prospective developers is encouraged to ensure adequate scoping and assessment of the SRN.
32. Early and ongoing engagement with the relevant LPA and the Applicant is recommended from the outset of development proposals, particularly in the case of complex applications, and carried through to the final determination. This presents an opportunity to draw developers' / LPA attention to issues on the SRN that may be relevant in the context of a particular development or developments. Sharing network intelligence with site promoters has the potential to lead to positive outcomes ensuring that the most up-to-date and relevant information is used to form a robust evidence basis for appraisal.
33. This is particularly important as the evidence produced within a TA and supporting traffic models form the fundamental basis upon which judgements and decisions are made by the Spatial Planning Team when advising the relevant planning authority on the impacts of developments on the SRN. There may be cases where other information is utilised to inform the judgment of the Spatial Planning Teams, such as existing transport models owned and operated by National Highways. However, in either situation, information taken into consideration when appraising development impacts must be robust, reliable and publicly available.
34. The role of traffic models to quantify impacts of development robustly and objectively is generally fundamental when appraising and subsequently judging development impacts on the SRN.
35. Traffic models are objective tools, most often testing a 'without development' scenario compared to a 'with development' scenario, quantifying the differences, and testing potential forms of mitigation, where necessary, on the SRN. Traffic models vary in type and application, and **SPAN-05-MS – Modelling Studies and Assurance** provides further guidance on the use of traffic modelling software through each of the stages of any model development. In the case of development planning, the DfT Circular 01/2022 "opening year assessment" forms the primary assessment scenario (paragraph 50).
36. For models submitted to or developed by the Spatial Planning Team for appraising development impacts, it should be ensured that there is a clear and agreed evidence log of the model development. Model reviewers should provide the Spatial Planning Teams with evidence to support their work, including what matters have been checked and how the review was undertaken.
37. Assumptions and outcomes should be clearly documented in a model development report, clearly describing the outputs of the modelling and implications of the development impacts. All information should be made available to the relevant planning authority. Where the Spatial Planning Team do not consider information provided to be sufficient to enable a robust conclusion to be formed on whether the impact is or is not acceptable, then a holding recommendation should be made to the LPA in a NHPR setting out clearly what additional information/ clarifications are required.

4. Assessing development impacts, Broad Principles, and indicators of Severity and Unacceptable Impacts

Introduction

38. This section sets out the broad principles of assessing development impacts with particular emphasis on the context of *severity* and introduces indicators that may show a development impact meets, or breaches, the *severe* threshold and may consequently lead to *unacceptable* impacts upon road safety.
39. The following section provides a framework of best practice and considerations; it does not provide a prescribed 'pass / fail' criteria for assessing impacts and whether they would be ranked severe/ or unacceptable or not. For all cases where impacts are assessed, in both the spatial planning and development management scenarios, national and local policy, local considerations and the robust assessment of the consequences of impacts, are of the upmost importance.

Prerequisites

40. When appraising development impacts, as detailed above, it is important that development assumptions and inputs are agreed with the developer/ transport consultant at the earliest possible stage.
41. The agreed development parameters will consist of traffic generation and traffic distribution. These are then applied to a baseline case either through the use of a traffic model and/or a simple traffic flow diagram. It is essential that the base case is validated to observed data and forecast growth is applied to the assessment year to form the comparator case where appropriate (in accordance with paragraph 49 of DfT Circular 01/2022).
42. Outputs will be in terms of traffic flows, journey times and queue lengths. The results of the analysis of development impact then needs to demonstrate the extent of change to these parameters to determine network performance change as a result of development, i.e. comparing the network conditions of the 'without development' scenario to those of the 'with development' scenario.
43. The extent of change to network performance, such as an increase in queue length or delay on the SRN as a result of development, is not in itself sufficient to judge whether an impact 'is' or 'is not' severe. Rather, the 'implication' (i.e. the perceived consequences) of predicted changes to network performance is the relevant indicator, in essence demonstrating the 'harm' that the resultant change would cause.

The broad principles when appraising development impacts on congestion and capacity

44. With any model, either traffic model or traffic flow comparison, the critical matters to be considered are:
- **Existing Conditions**; the current traffic flow, levels of delay, queue lengths and capacity inhibitors, providing an accurate representation of base conditions on the network as it operates currently;
 - **Forecast Conditions**; predicted levels of delay, queue length and capacity in both 'without' and 'with' development traffic scenarios;
 - **Magnitude of Change** i.e. comparing the quantum in the 'with' and 'without' development cases; and

- **Implication of Change** i.e. the consequences of the specific anticipated impacts on the network.

Existing Conditions

45. Accurately representing the existing (often called 'base') conditions at relevant times, usually peak periods, is a sound basis from which the development of forecast scenarios can proceed.
46. As detailed above, it is important to ensure that critical inputs and assumptions are agreed by the respective parties. Where the assessment utilises traffic models, it is essential that base models are suitably validated.
47. Network intelligence and area specific understanding is critical for any analysis, and particularly when developing a traffic model that adequately accounts for existing conditions. Consequently, where the outputs from the proposed base model do not align with the Spatial Planning Team's collective and evidenced understanding of how the SRN operates, it is necessary to challenge the outputs and seek to resolve any issues which may be leading to the model under or over stating performance and capacity on the SRN.

Forecast Conditions

48. It is important that that the Applicant / Developer provides a robust, reliable and agreed forecast case using agreed parameters and predictions, to compare a 'with' and 'without' development scenario.
49. Where development can be accommodated within the **existing capacity** of a section (link or junction) of the SRN, or they do not increase demand for use of a section that is already operating at over-capacity levels, **this does not indicate a severe impact** and they are likely to be considered favourably.
50. Where the existing link or junction is operating **at within-capacity levels**, but the development impacts result in the section of the SRN operating over capacity, then the magnitude of change, comparing 'with' and 'without' development scenarios, needs to be compared and the implication of changes needs to be understood. **This principle applies irrespective of the degree of change.** This is detailed further in the following section.
51. Where the existing link or junction is **operating at over-capacity levels** in both the 'with' and 'without' development scenarios, then the same considerations apply as described above.

Magnitude and Implications of Change

52. In all cases, the prime consideration of National Highways will be the continued safe and effective operation of the SRN.
53. When comparing the '*with development*' and the '*without development*' cases in those circumstances where the network is already over capacity or where the 'with' development scenario results in the network operating over capacity, then quantifying the magnitude of change is key to understanding the significance of the change itself.
54. Capacity indicators, such as a ratio of flow to capacity (RFC) above 100%, or a Practical Reserve Capacity (PRC) of less than 0%, can be useful initial gauges that help to understand where impacts of development may potentially be judged to be *severe*. On their own, however, such indicators are of limited value in assessing development impact as a whole.
55. Traffic flow, queue lengths and delay are essential quantified metrics for the judgements that need to be made and the Spatial Planning Team need to ensure they are satisfied that the analysis, from inception to output, is adequately robust.

Indicators of a severe impact and arising impacts on safety on network operation

56. Having ensured that the degree of magnitude or change is quantified (i.e. the increases in traffic flow, delay and queue length), then the consequences of the change on the network can be determined.
57. An important factor the Spatial Planning Teams should remember is that impacts on the SRN are a network operational issue. TA's stating impacts are not severe as increases in trip making amounts 'to only 1 vehicle every minute' or 'queues increase by just 2 vehicles' (or similar conclusions) offer little insight into the operation of the network.
58. The distinction between **unacceptable impacts upon highway safety** and **severe impacts upon congestion and capacity** is clearly differentiated in policy. Where there are safety concerns these are paramount. Safety issues may be separate to capacity issues and can be dealt with on their own. For clarity, the impact of additional traffic on a junction or link will: reduce any available spare capacity; will result in a capacity exceedance; or will exacerbate an existing capacity exceedance.
59. The latter two circumstances will lead to congestion characterised by slower speeds, longer trip times, and increased vehicular queueing. Slower speeds can have the effect of improving road safety by reducing collision severity. Increased journey times can, however, have economic implications although are commonly associated with driver inconvenience while increased queueing can increase road safety risk in certain circumstances.
60. In the latter case, the relevance of the highway safety issue would clearly take precedence in the evaluation of the acceptability or otherwise of the proposals. But where congestion and capacity are a factor without highway safety implications, the severity test on its own should be applied.
61. Changes to each of these and the consequences for unacceptable safety impacts or severe congestion on the network is discussed below:

Traffic Flow

62. Can the development traffic be adequately accommodated on the SRN, including:
 - Priority Junction Provision?
 - Link Capacity?
 - Weaving Sections?
63. Can development traffic be accommodated on the existing merge or diverge layout where merging or diverging traffic joins or leaves the mainline carriageway?
64. Can adequate visibility be provided for the merge/ diverge? (full Sight Stopping Distance (SSD) shall be provided along the length of the connector road up to the back of the nose with the SSD being available at any point along this length).
65. In the above cases, if the answer is 'no', then the highway arrangement would not be suitable for the amount of traffic using it and road safety risks would arise. The highway arrangement could be made suitable in certain cases by, for example, a change in junction or merge/diverge layout.

66. Is the capacity of affected links adequate to accommodate forecast traffic flows? In this case, if the answer is 'no', congestion is likely to occur and further investigation of the upstream highway arrangement may be needed to ensure that other consequential effects do not also arise.

Queue Length and Delays

67. Does the extension of queueing on the SRN block back to other junctions (on the SRN or local road network) upstream leading to further network performance deterioration or deterioration that can have safety implications (e.g. at pedestrian crossing facilities)? Alternatively, can the predicted increased queueing be safely accommodated within available stacking space?

Economic Appraisal

68. In some cases, it may be appropriate to undertake a broad-brush economic appraisal to assess the journey time impacts of a development particularly on the motorway. This is based on the differences between forecasts of the 'without development' and 'with development' cases. In addition, analysis of the impact on the frequency and severity of collisions as part of the economic appraisal for a developer proposed scheme can be used as comparator test.

69. This follows the principles of the Cost-Benefit Analysis (CBA) in accordance with the Department for Transport's TAG Unit A.1. This allows the benefits or disbenefits to be monetised. This can be done using a number of metrics and the metric chosen can affect how impacts are classified as costs or benefits. The two most commonly used metrics are the 'benefit-cost ratio' (BCR) and the 'net present value' (NPV).

70. The COBALT software undertakes the analysis of the impact of accidents as part of highway related economic appraisals, in accordance with the Department for Transport's Transport Analysis Guidance. COBALT assesses the safety aspects based on a comparison of accidents by severity and associated costs, across an identified network and a comparison of cost between the 'without development' and 'with development' forecasts could be used to monetise development impact on highway safety. The analysis and appraisal is undertaken using details of the individual link and junction characteristics, their forecast traffic volumes and relevant accident rates and costs. Spatial Planning Teams can seek support to undertake these appraisals from CSC and Spatial Planning consultants.

Determinant Test Table

71. The tables below set out a series of indicators, based upon collective regional practice, showing whether or not development impacts might be judged *unacceptable* or *severe*. This is not an exhaustive list, and in all cases the context of the local SRN under review is the most important consideration. It should be borne in mind that even when an impact does not meet the indicators set out below, it does not unquestionably mean that the specific impact 'is not unacceptable or severe'.

Table 1: Determinant test table summary

Determinant	Applies to:				
	Links	Rbt's	GSJ's	Priority Junctions	Signal Controlled
Queue Length	No	Yes	Yes	Yes	Yes
Delay	No	Yes	Yes	Yes	Yes
Traffic Flow	Yes	Yes	Yes	Yes	Yes
Economic Appraisal	Yes	Yes	Yes	Yes	Yes

Table 2: Determinant test table full

Network Impacts	Considerations	Determinant Test	
		Severe Impact Implications	Unacceptable Safety Impact Implications
Queues	Have queues increased as a result of development and does development traffic cause blocking back to an adjacent junction or to the SRN/ LHN? (not present previously). Does the increased queueing occur in both peak periods? Do queues adequately dissipate at the end of the peak period?	Queueing is either a sign that the network is having difficulty coping with the volume of traffic which directly impacts on the driver's journey time (regardless of journey purpose) or that an incident has occurred. Traffic modelling (assuming the model is robust in the area of influence) would be capable of assessing the increase in level of queueing. The extension of queueing on the SRN blocking back to other junctions (on the SRN or local road network) upstream may lead to further and wider network performance deterioration. However, additional queueing may not trigger the severe threshold and the Spatial Planning Team should consider the consequence of increases of queueing (see Unacceptable Safety Impact Implications).	If this occurs, it should be ensured that the knock-on effects have been included in the assessment. This includes: • If the upstream junction is a diverge from a free running carriageway, does the queue introduce or exacerbate conflict with the through moving traffic? • Does the back of the queue remain clearly visible to approaching vehicles (beyond the absolute minimum SSD)? • Does the queue introduce or exacerbate conflict with pedestrian/cycle/horse rider crossing facilities? If yes, the Spatial Planning Team should consult with Safety, Standards and Engineering (SES) colleagues.
Delays and Journey Times	Have delays significantly increased? Are queues and delays increasing exponentially in a highly congested situation?	Significant increase in journey time are considered to be a cause for concern, encapsulating long and shorter distance journeys. It may lead to driver impatience causing re-routing to less appropriate routes. On its own it is difficult to differentiate between 'driver inconvenience' effects and 'road safety' effects and if delay on its own is the determinant of acceptability, further advice needs to be sought from SES.	Congestion based collisions can be influenced by a number of factors including the free flow speeds. In a highly congested situation, the Spatial Planning Team should consider the existing safety record and the consequences additional development traffic may have. Further advice may need to be sought from SES.

Traffic Flow – DMRB Compliance and Road Safety	Can the development traffic be safely accommodated on the SRN? Including: • Priority Junction Provision • Link Capacity • Weaving Sections • Diverge layouts and auxiliary lanes • Merging layouts		Can development traffic be safely accommodated on the existing merge or diverge layout? Can adequate visibility be provided for the merge/diverge? (full SSD shall be provided along the length of the connector road up to the back of the nose with the SSD being available at any point along this length). Have link capacity calculations been provided to determine the requirements for overall carriageway width based on the forecast traffic flows? Spatial Planning Teams should engage with SES on the appraisal of these submissions. If 'no' to any of the above, then cost effective mitigation should be sought.
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Identifying impacts and next steps

72. Where it has been identified that a severe or unacceptable impact on the SRN is predicted to occur, it is important that dialogue is had with the relevant LPA, local highway authority and site promoter to develop a mitigation strategy. Prior to that, it may be necessary for the Spatial Planning Team to take advice internally from SES and asset teams, exploring the implications of development impact, particularly where there are concerns relating to highway safety.
73. It is important to note that the absence of existing historic collisions on a link or junction does not indicate that a development impact or access is safe; this is particularly true of greenfield development on rural high-speed links where existing traffic volumes may be low.
74. In line with the NPPF, sustainable development must be pursued in a positive way; at the heart of the Framework is a presumption in favour of sustainable development. To achieve transport sustainability, Spatial Planning Teams should ensure the Developer explores sustainable and non-highway investment initiatives when seeking to mitigate severe impacts. Only where all such reasonable opportunities have been pursued, should the promotion of 'hard measures' as described on page 7 of this SPAN, that would physically improve capacity on the SRN, be explored.
75. Where 'hard' measures have been shown by robust evidence to be necessary in order to mitigate the residual cumulative impacts of development (i.e. provide additional capacity on the SRN), then the same process appraisal methodology of engineering and safety evaluation, and traffic modelling, conducted through the development planning process, should be undertaken by the Spatial Planning Teams.
76. Where the need for mitigation on the relevant local highway network by the Local Highway Authority has been identified, the Spatial Planning Team should ensure the resultant impacts of such mitigation measures on the SRN are quantified and appraised. Equally, vice-versa, the teams must ensure that 'hard measures' on the SRN do not lead to unreasonable and unintended deterioration to network performance on the Local Highway Network without the agreement of the Local Highway Authority.
77. Following agreement by the Spatial Planning Team that mitigation measures identified by the Developer are sufficient, safe, necessary and deliverable, those measures should form the basis of a planning condition, the effect of which would be to limit the development to a suitable trigger point, with further development being conditional on the implementation of the identified measures. In accordance with DfT Circular 01/2022 paragraph 51, where a TA indicates that a development would have an unacceptable safety impact or the residual cumulative impacts on the SRN would be severe, the developer must identify when, in relation to the occupation of the development, transport improvements become necessary.
78. The scope and phasing of necessary transport improvements will normally be defined by the company in planning conditions that seek to manage development in line with the completion of these works. In such circumstances, modifications to the SRN must have regard to the need to future-proof the network, while its delivery may require a funding agreement between the development promoter and the company (DfT Circular 01/2022 paragraph 52).
79. When imposed, planning conditions help to ensure that the delivery of the development (for which permission has been granted) is appropriately managed. This can include the management and delivery of necessary interventions, such as pursuing sustainable 'soft' measures as defined on page 7 of this SPAN or physical improvements to the SRN. For more information, see **SPAN-16-DM – Guidance on the use of Planning Conditions**.

80. It is important to note that the lack of compliance with a particular design standard does not automatically constitute a *severe* or *unacceptable* impact and dialogue with SES should be maintained through the evaluation process. In addition, the lack of adherence to an adopted Local Plan does not constitute a severe impact. Spatial Planning Teams should ensure that the appropriate level Road Safety Auditing is undertaken once the principle of any 'hard measures' are agreed. For more information, see **SPAN-13-TSPE Road Safety Audits in the Planning Process**.

Summary

81. Spatial Planning Teams should consider the need for mitigation and requirements of the NPPF on the basis of a robust testing platform. The first 'test' is the unacceptable safety test: does the impact of development lead to an unacceptable impact upon road safety?
82. The Spatial Planning Team's judgement should in all cases be based on the principle of 'reasonableness', deriving their position from the robust evidence available at that time. If the need for soft and/or hard measures is considered necessary to mitigate impacts, the relevant test must be that without mitigation, the development should be recommended for refusal by the LPA on either safety or severity grounds.
83. Where development is advised to be refused by National Highways, it is vital to ensure a reasonable case can be made based on evidence and context relevant to the application when/ if challenged at appeal. This should be discussed with the specific area Spatial Planning Manager and escalated where relevant.
84. Through effective and pro-active dialogue, Spatial Planning Teams should seek to promote development of a holistic transport package to manage growth assisting all stakeholders in shaping and responding to a proposed transport strategy. Ideally, all significant developments would emerge through the plan process where the opportunity for comprehensive network review can be best achieved with benefit to all, and sound parameters to guide the later detailed work at planning application stage, will have been set.

APPENDIX L

**National Highways response to the Toton & Chetwynd SPD, May
2022**

Sima Odedra

From: Catherine Townend <Catherine.Townend@nationalhighways.co.uk>
Sent: 03 August 2026 14:53
To: Catherine Townend
Subject: Appendix L - NH response to Toton & Chetwynd SPD - 19 May 2022
Attachments: 220119 Toton and Chetwynd SPD.pdf

From: Freek, Steve
Sent: 19 May 2022 13:42
To: Hannah Barrett <Hannah.Barrett@nottsc.gov.uk>; Hatton, Rebecca <Rebecca.Hatton@broxtowe.gov.uk>
Cc: Law, Daniel <Daniel.Law@aec.com>
Subject: FW: Toton & Chetwynd SPD Consultation now live

Hi Both,

I have noticed that whilst reviewing recent correspondence related to Chetwynd Barracks/Toton Link, due to an administrative error, National Highways response to the consultation below does not appear to have been delivered.

I understand the consultation period for the Chetwynd SPD has long passed but for your records I attach the response prepared in January 2022.

Regards

Steve Freek

Assistant Spatial Planner

National Highways (Area 7), Stirling House, Lakeside Court, Osier Drive, Sherwood Business Park Nottingham NG15 0DS

Tel: 0300 470 4457

Mob: 07712 543047

Email: steve.freek@highwaysengland.co.uk

From: Hannah Barrett [<mailto:Hannah.Barrett@nottsc.gov.uk>]

Sent: 02 November 2021 18:44

To: andrew pritchard <Andrew.Pritchard@emcouncils.gov.uk>; Andy Gibbard <andrew.gibbard@derby.gov.uk>; 'Bernard Evans' <Bernard.Evans@leics.gov.uk>; CHRIS ELSTON <CHRIS.ELSTON@NWLeicestershire.gov.uk>; David Wright <David.Wright@beis.gov.uk>; Wong, Eri <Eri.Wong@highwaysengland.co.uk>; Garry Scott <Garry.Scott@leicester.gov.uk>; 'Geoff Blissett (Economy Transport and Environment)' <Geoff.Blissett@derbyshire.gov.uk>; 'Jeremy.Dixon@highwaysengland.co.uk'; Jim Seymour (Economy Transport and Environment <Jim.Seymour@derbyshire.gov.uk>; Jon Bottomley <Jon.Bottomley@magairports.com>; Ken Harrison <ken.harrison@emdevco.co.uk>; Kevin Sharman <kevin.sharman@nottsc.gov.uk>; Kevin Towle <Kevin.Towle@networkrail.co.uk>; Leics CC HS2 Mailbox <hs2@leics.gov.uk>; Louise Clare <louise.clare@dft.gov.uk>; Mark Bayley <Mark.Bayley@dft.gov.uk>; Oliver Dove <Oliver.Dove@erewash.gov.uk>; Fisher, Peter <Peter.Fisher@highwaysengland.co.uk>; Richard Mann <RichardMann@Midlandsconnect.uk>; Richard Mapletoft <rmapletoft@rushcliffe.gov.uk>; Ryan Dawson <Ryan.dawson@broxtowe.gov.uk>; Simon Statham

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<Steve.Tough@nottinghamcity.gov.uk>; Tom Pooler <Tom.Pooler@hs2.org.uk>; Wenda Leslie
<wenda.leslie@hs2.org.uk>

Subject: Toton & Chetwynd SPD Consultation now live

Dear all,

I am pleased to let you know that the Toton & Chetwynd Barracks Supplementary Planning Document (SPD) formal consultation is now live and can be accessed here: <https://toton-and-chetwynd.virtual-engage.com/>.

The consultation is being led by Broxtowe Borough Council with support from EM DevCo and will run until midnight on Monday 13 December. Please do share widely with any people or organisations who may be interested and wish to comment. Leaflets will be sent in the coming weeks to all households in the local area.

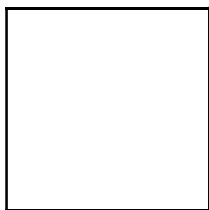
Many thanks,
Hannah

Hannah Barrett
Economic Development Officer
EM DevCo
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www.emdevco.co.uk

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www.highwaysengland.co.uk

19 May 2022

Dear Sir / Madam,

**Consultation on the Toton and Chetwynd Barracks Strategic Masterplan
Supplementary Planning Document**

National Highways welcomes the opportunity to comment on the Toton and Chetwynd Barracks Strategic Masterplan Supplementary Planning Document (SPD), which has been produced to inform the development of the Broxtowe Borough Council Local Plan Part 2, and guide planning application decisions within the masterplan area.

The submission provides a vision for the future of the Toton and Chetwynd Barracks areas and sets out a number of key objectives and planning policies which will be used to help support growth across the region.

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). It is the role of National Highways to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Broxtowe Local Plan, our principal interest is safeguarding the operation of the A52 and M1 which bisect the Local Plan area.

The growth aspirations across Toton and Chetwynd Barracks aim to deliver 1,000 to 1,300 new homes during the Part 2 Local Plan period up to 2028, however we note that going beyond 2028 the site has the capacity to provide approximately 4,500 in total. The Masterplan also aspires to deliver a total of 53,000sqm of employment use development (of which at least 35000sqm shall be B1 use).

We note however that the SPD does not appear to have been updated to account for the HS2 East Midlands Hub station no longer being situated at Toton. We therefore expect that the development aspirations, and potentially transport infrastructure proposals, will change from that set out in this consultation.

The SPD aims to deliver growth supporting net zero carbon ambitions, with shared living and working spaces, and local centres in both Chetwynd and Toton providing sustainable transport, retail and service facilities.

We note the highway infrastructure proposal to serve the masterplan site via new junction onto the A52 located approximately 500m to the north of the Bardills roundabout. Although multiple connections to a particular highway link can be necessary to enable high demands from the local urban area to flow out onto the highway link, increased permeability of a strategic link such as the A52 can present major concerns.

The A52 serves as the major strategic link for long distance trips into Nottingham via the M1. The A52 between the M1 and Nottingham city centre is already congested due to high strategic demands, as well as serving its secondary purpose as a local commuter link road connecting the west of Nottingham area with the wider city. The provision of an additional junction onto the A52 will accommodate increased traffic flows onto a severely strained strategic link.

Any proposal to deliver a new junction on the SRN requires a Strategic Business Case demonstrating the need, impacts, benefits, and evidencing that the growth aspirations cannot be accommodated via upgrade to the existing junctions on the network. Decision to grant or refuse permission will not be made by National Highways, but by the DfT.

An additional concern is that this proposed junction will be located in close proximity to the existing Bardills roundabout, which itself suffers from capacity constraints and would be expected to interact with the new junction, with queues from one reaching back to and interfering with the other. This proposal will require an application for Departures from Standards to be approved.

National Highways is concerned that the delivery of this new connection to the A52 shall have a major detrimental impact on journey times, reliability of the SRN to serve both local and long distance trips, as well as highway safety.

We have no further comments to provide at this stage but reiterate that Highways England is committed to continued engagement with the Local Planning Authority in order to agree an approach for any future mitigation needed on the A52 to support the delivery of the growth aspirations.

Yours sincerely,

S Freek

Steve Freek

Midlands Operations Directorate

Email: Steve.freek@highwaysengland.co.uk

APPENDIX M

List of Acronyms

Appendix M: List of Acronyms

Acronym	Definition & Explanation
AOI	Area of Influence – used with a strategic transport model. It defines the spatial or temporal boundary within which surrounding road networks, intersections, or developments impact traffic flow.
CAD	Computer-Aided Design - software used to create precise 2D or 3D technical drawings and blueprints
CLF	Cableless Linking Facility - a control method used to coordinate the timings of adjacent signal junctions
DoS	Degree of saturation – a measurement within a junction model that indicates how close an intersection or road is to its maximum theoretical capacity
EMGM	East Midlands Gateway Model – a SATURN transport model covering large parts of Nottinghamshire & Derbyshire
LinSig	A traffic model used to assess performance of individual signalised junctions
LHA	Local Highway Authority
LPA	Local Planning Authority
MOVA	Microprocessor Optimised Vehicle Actuation – technology which uses hidden sensors cut into the road and adjusts the ‘green time’ of traffic lights based on real-time traffic queues
MSOA	Middle Layer Super Output Area – a specific Geographical location, typically a Ward used in Census data
NCC	Nottinghamshire County Council
NH	National Highways
NPPF	National Planning Policy Framework – the principle policy document for planning in England
PCU	Passenger Car Unit – a metric that converts various vehicle types into a standard car equivalent based on their size, speed, and impact on road capacity
RIS	Roads Investment Strategy
SATURN	Simulation and Assignment of Traffic to Urban Road Networks – a traffic model usually covering a large geographical area that simulates traffic congestion, junction delays, and routing choices
SRN	Strategic Road Network – roads managed and operated by National Highways
V/C	Volume to capacity ratio – a measurement of road congestion that compares actual traffic volume (V) to the maximum safe capacity (C) of a road