



TOWN & COUNTRY PLANNING ACT 1990

STATEMENT OF CASE FOR NATIONAL HIGHWAYS

Appeal Reference –	6006412
LPA Planning Ref –	25/00371/OUT
Site Location –	Land West of Stapleford Lane, Stapleford, Nottingham, Nottinghamshire, NG9 6JG
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). The proposed development is classified as EIA development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
Appellant –	Bloor Homes Limited
Date –	10 June 2026



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APPENDICIES

- Appendix A:** National Highways Planning Response – 18 June 2025
- Appendix B:** National Highways Planning Response – 16 September 2025
- Appendix C:** National Highways Planning Response – 16 December 2025
- Appendix D:** National Highways Re-Consultation Response – 28 January 2026
- Appendix E:** National Highways Planning Response – 6 March 2026
- Appendix F:** National Highways Re-Consultation Response – 15 May 2026



1 INTRODUCTION AND CONTEXT

- 1.1 This is the Statement of Case for National Highways. It has been prepared in accordance with the Planning Inspectorates Procedural Guidance (March 2026) pursuant to rule 6 of the Town and Country Planning (Inquiries Procedure) (England) Rules 2000.
- 1.2 On 10 May 2025, the appellants applied to Broxtowe Borough Council for 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. At the time of writing this Statement of Case, the application remains undetermined.



2 APPEAL PROPOSAL

- 2.1 The development proposal, submitted by the appellant constitutes 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.



3 NATIONAL HIGHWAYS ASSESSMENT

- 3.1 National Highways (“we”) has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such 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.
- 3.2 National Highways acts as a statutory consultee within the planning system. Our role is to provide advice to the Local Planning Authority on proposals that may have an impact on the safety and operation of our network. We consider planning proposals in accordance with the National Planning Policy Framework (NPPF), and under the requirements of DfT Circular 01/2022: Strategic Road Network and The Delivery of Sustainable Development (“the Circular”).
- 3.3 In considering any planning proposal, our primary consideration is the continued safe operation of the SRN. Where proposals may directly affect a road under our jurisdiction, we require that the application includes sufficient evidence as to how the proposal can be safely accommodated within the affected section of road. Where the proposals include for a mitigation or access scheme this should also be supported by evidence that demonstrates the proposals are deliverable in accordance with appropriate policy, standards and guidance. The burden of proof to demonstrate that any proposal is suitable fundamentally lies with the applicant and it is necessary that they demonstrate to us that their proposal can be safely delivered.



3.4 **Assessment of the Application:**

3.5 National Highways was first consulted on the planning application on the 3 June 2025.

3.6 Following our review, we submitted a recommendation that the *'planning permission is not granted for a specified period'*, an initial holding response on the 18 June 2025 (Appendix A), with further holding responses on 16 September 2025 (Appendix B), 16 December 2025 (Appendix C), 28 January 2026 (Appendix D), 6 March 2026 (Appendix E), and 15 May 2026 (Appendix F) . These set out the requirement for the applicant to provide further information to understand the impact of the development on the SRN. The matters of clarification identified were as follows:

1. Assessment of the transport impact of the development on the SRN

Post Appeal Submission:

3.7 Since submission of the appeal and our request to participate as a Rule 6 Party for the public inquiry, the appellants have engaged with us to seek to identify where matters can be agreed, and where disputes remain. At the time of writing, we have not entered a Statement of Common Ground (SoCG) with the appellant although we understand the appellant to be in the process of drawing up a first draft of this document for our consideration.



4 SUMMARY OF NATIONAL HIGHWAYS CASE

4.1 National Highways will call a Spatial Planner whose evidence will be to provide clarity, information and guidance on the approach, analysis and considerations which were undertaken to inform our recommendation of '*planning permission is not granted for a specified period*'. This evidence will cover the following aspects;

- Government policy in regard to the requirements to assess transport implications of the development proposals.
- Existing and emerging local development plans with respect of policies for the allocation of which the appeal site is part of.
- The need for an agreed Transport Assessment methodology.
- The need for agreed cumulative modelling methodology, scenarios, and outputs.
- The need to identify the development impacts on the SRN both in isolation and cumulatively with other developments.
- The need to supply certain inputs, outputs and traffic modelling files so that their reliability and validity can be verified.
- The need to identify and assess the acceptability of mitigation measures with respect of traffic impacts on the SRN.
- The need to agree an appropriate delivery mechanism in respect of SRN mitigation measures.



4.2 Summary of Outstanding Matters

4.3 Our reasons for our recommendation of '*planning permission is not granted for a specified period*' relates to a number of outstanding matters which are necessary for understanding the developments impact on our network and assets. These can be grouped into four main areas:

- Standalone Assessment
- Cumulative Assessment
- Proposed Mitigation on the SRN
- Clarification on the infrastructure delivery mechanism

4.4 Standalone Assessment

4.5 The standalone assessment considers the appeal site as an isolated site. The appellants transport consultants have used a computer software package called LinSig to assess the impact of development trips on three SRN junctions. Whilst the outputs of this assessment were presented in the appellant's TA and appendices, we have requested the actual LinSig model files so that we can verify these. We first requested these files on 27 March 2025, yet only received these on 26 May 2026. Our review of these files is in progress.

4.6 Without prejudice to this review, our position is that this development will exacerbate existing congestion on the A52 potentially resulting in a severe impact and safety concern.

4.7 The appellant's TA has recognised that mitigation is necessary at the A52 Bardills junction (an SRN junction) and Appendix H of the TA contains an indicative scheme to that affect. To avoid abortive work, our approach is to review the proposed mitigation in more detail once the modelling has been signed off.



4.8 Cumulative Assessment

4.9 Even if the standalone assessment can demonstrate that the development can be accommodated on the existing highway network, we have maintained our position that part of this strategic allocation should not be allowed to come forward before the wider infrastructure needed to accommodate the full allocation is identified and a delivery mechanism set out.

4.10 We understand that the cumulative modelling work which should underpin this assessment is now being carried out. Once we are in receipt of this work, we will need to undertake our review. As such this piece of work is still ongoing.

4.11 Proposed Mitigation on our network

4.12 The standalone assessment has identified the requirement for a capacity improvement scheme on the A52 Bardills roundabout which constitutes part of our network. The need for further mitigation on the SRN is likely to be identified through the cumulative modelling work.

4.13 Once the modelling has been signed off, we will need to consider the proposed mitigation schemes. In accordance with our policy, processes and design standards, preliminary approvals for these will be required to ensure that these schemes are deliverable from a safety and engineering perspective. This includes but is not limited to a Stage 1 Road Safety Audit which must be carried out prior to planning consent.



4.14 Delivery Mechanism

4.15 The appellant's TA acknowledges that mitigation on the SRN is required (in the form of the Bardills improvement scheme) but we cannot find any discussion around the delivery mechanism for this. For the avoidance of doubt, it should be noted that National Highways expects any mitigation on the SRN to be designed and delivered by the applicant/appellant via a Section 278 agreement under the Highways Act 1980. Planning conditions will therefore be necessary to link the appeal site to the required infrastructure improvements on the SRN. Planning obligations linked to financial contributions towards SRN improvements will not be acceptable.



5 SCHEDULE OF POLICIES, DOCUMENTS AND PLANS TO WHICH NATIONAL HIGHWAYS INTENDS TO REFER

5.1 The following text sets out the policies, documents and plans to which National Highways intends to refer to during the appeal process.

5.2 The appellant's planning application and supporting documents

We will refer to the appellant's planning application including documents submitted in support of their application, in particular their Transport Assessment(s) and appendices.

5.3 National Planning Policy Framework (December 2024)

We will refer to the NPPF and relevant planning practice guidance (PPG) and will set out how we believe the appeal site is contrary to these. Specific reference will be made to paragraphs 48, 49, 56, 116, and 118 of the NPPF.

5.4 The Broxtowe Part 2 Local Plan (October 2019)

We will set out how the appeal site is contrary to policies set out in this document focusing on the requirement for the full allocation to be planned and delivered in a cohesive way, including the provision of highways infrastructure. Specifically, we will refer to policies 3.1 and 3.2.

5.5 The Emerging Greater Nottingham Strategic Plan (GNSP)

We will refer to the above document to establish that the site is included in the emerging strategic plan. We will make the case that approving the site prior to the wider highway infrastructure needs for the full allocation being set out and planned for, would be contrary to policies of this plan. Specifically, we will refer to Policy 21.



5.6 Department for Transport Circular 01/2022: Strategic Road Network and the of sustainable development

We will refer to this document to make the case that the transport impacts of the proposal have not been satisfactorily assessed. This applies to the highways impacts on the SRN both with and without any proposed mitigation measures. In particular, we will draw attention to paragraphs 23, 24, 25, 28, 29, 40, 45, 47, 48, 49, 50, 51, 52 and 53 to highlight matters outstanding.

5.7 The Toton and Chetwynd Barracks Strategic Masterplan Supplementary Planning Document (February 2023)

We will draw on paragraphs 1.7, 1.13, and 3.53 of the above document to reinforce our position that the traffic impacts of the proposal are required to be considered jointly with nearby sites in accordance with the Local Plan.

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

We will refer to this guidance document which should be read alongside DfT Circular 01/2022. Specifically, our reference to this document is to support our case that the appellant has not provided the necessary information to satisfactorily demonstrate the traffic impact on the SRN, nor that proposed mitigation with respect of the SRN can be safely delivered in accordance with our policies, procedures and design standards. In particular, we will refer to paragraphs 39, 40, 41, 42, 43, 45, 46, 74, 75, 76, 90, 91, 92, 93, 105, 106, and 107.

5.9 Design Manual for Roads and Bridges (DMRB)

We will refer to specific chapters within this document (listed below) which set out the process for obtaining approval in respect of physical changes to our network. Specifically, we will set out why these approvals are required and the



extent of information that is required to planning consent being given. We will highlight that these approvals are outstanding. In particular, we will make reference to the following chapters:

GG104 – Requirements for safety risk assessment (June 2018)

GG119 – Road Safety Audit (January 2020)

GG142 – Walking, cycling and horse-riding assessment and review (November 2019)

5.10 Timeline of Communication

We will present a timeline setting out how we have actively engaged with the appellant to set out what we require to determine the impact of the proposal on the SRN. We will use this timeline to dispute the appellant's basis for appeal that 'highway authorities refused to engage'.