

Planning Ref: 25/00371/OUT
Appeal Ref: 6006412

FAO: Inspector J Gilbert
The Planning Inspectorate

Cc:
Rodwell St Clair
Bloor Homes
Broxtowe Borough Council
Nottinghamshire County Council

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Sent via email: caseofficers@planninginspectorate.gov.uk
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Dear Inspector Gilbert,

Re: Toton West Planning Inquiry

I am writing with reference to the above-mentioned Planning Inquiry, which was adjourned on 24 August 2026.

The adjournment was agreed to allow the appellant's transport consultants sufficient time to submit further information. This evidence was required to satisfy the relevant highway authorities—National Highways and Nottinghamshire County Council—regarding the traffic and transport impacts of the development proposal.

The request encompassed both the standalone impact of the Toton West site (comprising 422 dwellings) and the cumulative impacts alongside the wider Toton Strategic Location for Growth and Chetwynd Barracks.

In accordance with the deadline set at the hearing on 24 August, I am now writing to update you on National Highways' position. Consistent with my Proof of Evidence, I will summarise National Highways' position on the Toton West standalone site and the cumulative assessments separately.

Toton West Site

The appellant's original Transport Assessment evaluated the Toton West proposal as a standalone site. Because this assessment did not use a strategic model to distribute traffic onto the surrounding highway network, it did not account for the complexities of route choice. Consequently, concerns were raised regarding the reliability of this methodology.

At the request of National Highways and Nottinghamshire County Council, the appellant subsequently used a strategic model, in this case, the East Midlands Gateway Model (EMGM)—managed by SYSTRA—to enable route choice to be accounted for.

Specifically, the appellant applied the agreed trip generation figures for the development to the EMGM to generate a more accurate trip distribution prediction. This was used to identify which junctions on the surrounding highway network required further detailed assessment.

This specific model run was referred to as Scenario 1. Although this run was completed prior to the opening of the Inquiry, National Highways held outstanding queries regarding the reliability and validity of the EMGM in the specific context of the appeal site.

Helpfully, SYSTRA has since shared the raw EMGM model files with National Highways, rather than just the model outputs. This access allowed National Highways' consultants to evaluate the extent to which the remaining areas of model validity would affect overall confidence in the data. It was ultimately concluded that these minor discrepancies would not materially impact the outputs for the Toton West site on the Strategic Road Network (SRN). This provided sufficient confidence that the traffic flows derived from the EMGM and used in individual junction models are reliable.

Regarding individual junction models, National Highways' secondary concern related to the validation of the LinSig models. For the Strategic Road Network, this principally concerned the models for the A52 Bardills and Bramcote roundabouts.

As a reminder, the appellant's Transport Assessment and subsequent technical notes maintained that the LinSig junction assessments indicated no severe impact on these junctions. However, National Highways was initially unable to validate the accuracy of these models in accordance with the Department for Transport's (DfT) Transport Analysis Guidance (TAG) and requested further supporting data.

Over the past few weeks, National Highways has worked collaboratively with the appellant's consultants to obtain this necessary validation data. I can now advise that although the level of validation falls slightly outside the standard thresholds, the variance is modest. Accordingly, we consider the risk to the accuracy of the Scenario 1 modelling run to be low.

In light of these findings, National Highways now accepts the conclusions of the Scenario 1 traffic modelling assessment and concurs with the appellant that the impact on the SRN is not severe.

Cumulative Assessment

Regarding the cumulative assessment, the Scenario 4 modelling run using the EMGM accounted for the full Toton allocation, Chetwynd Barracks, and the proposed Toton link road.

The appellant's transport consultants (mode) presented a summary of this run in technical note TN008, which identified a residual impact at the A52 Bramcote roundabout. Consequently, mode submitted technical note TN009, which outlines a proposed mitigation scheme for the Bramcote roundabout. These technical notes maintain that the full Toton and Chetwynd allocations can be accommodated on the surrounding network, following the provision of the Toton Link Road and subject to additional mitigation at Bramcote roundabout.

National Highways acknowledges this position but requires further supporting data to validate the LinSig junction models used in these assessments. Further details regarding this requirement are set out in the attached technical summary (Appendix 1).

Mitigation Strategy

Following the completion of the cumulative assessment, it will be necessary to establish the wider mitigation strategy required to deliver the full allocation. For Toton West, this means determining its proportional impact collectively with the wider site, and consequently its fair financial or infrastructural contribution to the overall mitigation infrastructure.

From a planning perspective, National Highways considers it necessary to explicitly link the Toton West site to both the cumulative assessment and the wider mitigation strategy.

Way Forward

While some matters remain outstanding regarding the cumulative assessment, National Highways recognises the vast amount of work undertaken since the appeal was first submitted, particularly over recent weeks.

In light of this progress, and following discussions with Broxtowe Borough Council, Nottinghamshire County Council and the appellant, I believe the remaining matters can be successfully resolved post-planning consent via a planning condition and a Memorandum of Understanding (MoU).

While the precise wording of the planning condition is still to be finalised, high-level discussions suggest that the following wording is broadly acceptable:

“No more than 300 of the dwellings authorised by this permission shall be occupied until a Strategic Highway Assessment and Mitigation Strategy (SHAMS) has been submitted to and approved in writing by the Local Planning Authority, in consultation with the relevant highway authorities. The details of the SHAMS shall be agreed via a Memorandum of Understanding (MoU) between the LPA, Nottinghamshire County Council, National Highways, and the appellant.”

Assuming this condition remains acceptable to all parties, National Highways is content to withdraw its objection to this appeal site.

Finally, I am grateful to the Inspector for allowing the adjournment, which provided the necessary time to achieve the progress detailed above.

Yours sincerely,



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Appendix 1: Technical Summary

On behalf of National Highways, AECOM has reviewed mode's technical notes TN005, TN006, TN008, and TN009. In addition, AECOM has reviewed Appendix D of SYSTRA's technical note TN04 regarding the surveyed traffic flows. The surveyed flows were found to be acceptable.

Since the submission of mode's technical notes, mode has updated the LinSig models to incorporate the traffic survey data. Consequently, the models reviewed by AECOM supersede those reported in the aforementioned technical notes.

In its latest data submission, mode provided saturation flow and queue length surveys captured at the time of the traffic surveys. This combined dataset has enabled AECOM to evaluate how effectively the base models validate against observed conditions, thereby increasing overall confidence in the modelled results.

However, mode was only able to supply observed data for the roundabout approaches. Had data for the circulatory lanes on both roundabouts also been provided, confidence in the models would be further enhanced. mode has not confirmed whether this circulatory data is available.

A review of the observed queue data revealed that it was not possible to quantify the full extent of queuing on certain arms during some peak periods due to the limitations of the camera coverage. Without additional data collection, determining the true extent of queuing on these arms remains difficult. Given the constraints and timescales of the Planning Inquiry, no further data collection or improvements have been possible. Accordingly, AECOM has evaluated the modelling results within the context of the available data.

To clarify the approach to queue length comparison, AECOM does not require an exact match between modelled and observed queue length values. Rather, it seeks general alignment and similarities that demonstrate the model is operating in a manner consistent with observed conditions.

With this context in mind, AECOM's verification of the LinSig models is summarised below.

Model Validation

A52 Bardills Roundabout

- AM Peak: The results demonstrate a reasonable level of validation on the A52 East approach. On the A52 West approach, camera limitations prevented the full extent of the queues from being recorded on one lane, and the model underreports this queue value. However, as the variance is not substantial, AECOM is minded to accept the results.
- PM Peak: Modelled queues on the A52 East approach are slightly lower than what is typically accepted. The observed queues on the A52 West approach

exceeded the camera's field of view; while the modelled queues are lower, they remain on the threshold of acceptability.

- Local Network: In both peaks, queues on some of the local road network approaches are substantially lower than observed values. While AECOM would ideally prefer these to be refined, these are local road approaches that will not materially affect the operation of the SRN.

A52 Bramcote Roundabout

- AM Peak: The validation profile is similar to Bardills, though slightly improved. The modelled queues are only marginally lower than observed data.
- PM Peak: The queues on the A52 East approach and both A52 approaches show a strong correlation with observed data.
- Local Network: The two northern, non-SRN arms do not validate particularly well in either peak. However, as with Bardills, these discrepancies will not have a material effect on the operation of the SRN.

Technical Conclusion: Validation

Overall, the level of validation is suboptimal. AECOM's specialist modelling team advises that the current outputs fall slightly outside standard acceptance thresholds. More significant validation issues exist on the non-SRN approaches, though these do not directly impact the SRN.

Consequently, accepting the current validation for the purposes of the Scenario 1 (Toton West) standalone assessment is considered a low-risk approach. Had more time been available, AECOM would have requested that these matters be formally addressed.

AECOM notes, however, that this analytical risk will compound when higher volumes of traffic are introduced to the network. Therefore, while the current level of validation is deemed acceptable for the Scenario 1 standalone assessment, the information gaps and inaccuracies detailed above must be resolved to improve model validation for the Scenario 4 cumulative tests.

Scenario 1 (Toton West) Impact

Following the validation of the LinSig models for the Scenario 1 assessment, AECOM has reviewed the impact assessments for both the Bardills and Bramcote junctions.

These assessments evaluate the 2026 and 2041 modelling horizons across two distinct scenarios: the Reference Case (without development) and the Do-Something Case (with development). A comparison of the 2026 results for the A52 approaches highlights the following impacts when contrasting the Reference Case against the Do-Something Case:

Bardills AM Peak

- A52 West: Max Degree of Saturation (Dos) – 87.8% to 87.1%. Mean-Max Queue (MMQ) – 18.6pcu to 18.2pcu
- A52 East: Max Dos – 82.0% to 81.8%. MMQ – 14.0pcu to 13.7pcu

Bardills PM Peak

- A52 West: Max Dos – 85.2% to 85.5%. Mean-Max Queue (MMQ) – 16.7pcu to 16.4pcu
- A52 East: Max Dos – 68.2% to 64.9%. MMQ – 8.3pcu to 7.2pcu

Bramcote AM Peak

- A52 West: Max Degree of Saturation (Dos) – 95.5% to 96.4%. Mean-Max Queue (MMQ) – 22.5pcu to 24.1pcu
- A52 East: Max Dos – 52.9% to 52.9%. MMQ – 8.2pcu to 8.2pcu

Bramcote PM Peak

- A52 West: Max Dos – 75.4% to 76.3%. Mean-Max Queue (MMQ) – 12.5pcu to 12.8pcu
- A52 East: Max Dos – 45.4% to 42.7%. MMQ – 6.5pcu to 6.1pcu

Based on the data above, the primary area of concern is the A52 West approach at the Bramcote roundabout during the AM Peak, where the Degree of Saturation (DoS) values exceed 95%. However, capacity is already constrained within the Reference Case (i.e. without development), and the subsequent increase generated by the development is marginal. Consequently, the standalone impact of the development is considered acceptable.

Technical Conclusion: Impact

AECOM has reviewed the LinSig models for the Bardills and Bramcote junctions to evaluate the traffic impact of the Scenario 1 development flows. Although reservations remain regarding validation accuracy on certain network arms, AECOM is satisfied that these models are sufficiently reliable for the exclusive purpose of assessing the standalone Scenario 1 development impacts. A review of the 2026 forecast data indicates that these impacts fall within acceptable operational limits.

However, AECOM expects model validation to be improved as part of the future assessment work required for the Scenario 4 cumulative development flows.