



National Highways
Toto
Catherine Townend, Spatial Planner

PROOF OF EVIDENCE

TOWN & COUNTRY PLANNING ACT 1990

Appeal Reference	6006412
Planning Reference	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

August 2026

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1 Introduction

National Highways: Role & Responsibility

- 1.1 National Highways is 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, consisting of all motorways and trunk roads in England, is a critical national asset and as such National Highways works 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.
- 1.2 National Highways is a statutory consultee under the Town and Country Planning Act 1990 and consider planning proposals with regards to their potential impacts on the SRN in accordance with relevant policies and design standards.

Case Officer

- 1.3 My name is Catherine Townend, and I am employed by National Highways as a Spatial Planner within the Midlands Operations Directorate.
- 1.4 I have over 16 years of experience working within National Highways (and its predecessors). I first joined National Highways (then The Highways Agency) in 2010 in the Midlands Regional Intelligence Unit as a Tactical Analyst. Following that, in 2014 I joined the Midlands Spatial Planning Team where I worked as an Assistant Spatial Planner covering the West Midlands area.
- 1.5 I was promoted to Spatial Planner in 2022 since which time I have covered Spatial Planning matters across the areas of Nottinghamshire, Derbyshire, and North Leicestershire.
- 1.6 My role involves advising Local Planning Authorities (LPAs), developers, and other key stakeholders on the impact that proposed developments may have on the safety and operation of the SRN. I also attend planning committees, if requested, to provide support or provide clarification on matters which relate the SRN.
- 1.7 In addition to this, I provide advice and guidance to LPAs through the local plan process, assessing the impact of projected growth on the SRN along with the identification of potential infrastructure mitigation to support proposals. I attend Examinations in Public where necessary to provide technical information and advice to aid the LPA and Planning Inspector.
- 1.8 I have worked on this appeal application since National Highways were first notified of the appeal in May 2026. Before that, the planning application and pre-application consultations were handled by an Assistant Spatial Planner within my team. Throughout National Highways' engagement on this site, my review of the planning application has been aided by Transport Consultants, AECOM, who have

undertaken the traffic modelling reviews and advised National Highways accordingly.

1.9 Declaration:

The evidence prepared and provided within this Proof of Evidence is true and accurate to the best of my knowledge. The opinions expressed represent my true, independent, and professional/objective views on the planning merits of this case. I understand that my primary duty is to assist the Inspector by providing objective, factual, and relevant evidence to the inquiry.

1.10 Signed

A handwritten signature in cursive script that reads "Catherine Townend".

Catherine Townend, Spatial Planner

Date: 4 August 2026

1.11 Reason for Proof

1.12 National Highways is submitting this proof of evidence as a Rule 6 party in the appeal following refusal by Broxtowe Borough Council (“the Council”) as the Local Planning Authority for planning application reference 25/00371/OUT (appeal reference 6006412).

1.13 In formal responses to the Council, National Highways’ recommendation has not been one of refusal, but that planning permission is not granted for a specified period. A series of holding recommendations, extended on a three-monthly basis, were to allow the appellant further time to provide the necessary supporting information for National Highways to fully consider their proposed developments’ potential impact on the SRN.

1.14 Prior to lifting National Highways’ holding recommendation, the likely impacts of the proposed development and any associated highway mitigation measures must be reliably demonstrated. This should be through a robust transport assessment underpinned by traffic modelling. At present, National Highways is not content that the appellant’s Transport Assessment is robust.

1.15 My position, as such, is that the appellant has not sufficiently demonstrated that the impact on the SRN would not be severe or unsafe, and to approve this application would be in contradiction with the National Planning Policy Framework (NPPF¹).

¹ National Planning Policy Framework, December 2024

2 Development Proposal

2.1 The development proposal, submitted by the appellant constitutes an 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).

2.2 The site, comprising approximately 19 ha of land to the north of Toton is located approximately 2.2km northeast of Long Eaton, 1.5km south of Stapleford and 8km west of Nottingham city centre.

2.3 Vehicular access to the site is proposed to be provided via a new signal-controlled crossroads with the B6003 Stapleford Lane, a road managed and operated by Nottinghamshire County Council (“the County Council”) as the local highway authority. The site access would form the western arm of the crossroads.

2.4 The site forms part of the wider Toton Strategic Location for Growth allocation under Policy 3.2 of the adopted Broxtowe Part 2 Local Plan (2018-2028)².

2.5 The site is also allocated in the emerging Greater Nottingham Strategic Plan³ (Policy 21) which was submitted in December 2025 with an Examination in Public

² Broxtowe Part 2 Local Plan (2018-2028), October 2019

³ The Greater Nottingham Strategic Plan Publication Draft, March 2025

(EiP) held in July 2026. National Highways submitted a written representation to the EiP in June 2026 (Appendix I).

3 Operational Context

3.1 The SRN within the context of the appeal site consists of the A52 Brian Clough Way and the M1 motorway.

3.2 The A52 Brian Clough Way lies to the north of the site, with the A52 Bardills roundabout (the closest SRN junction) approximately 0.5km north of the site. The A52 is a dual carriageway within the vicinity of the site and is subject to the national speed limit (70mph), except on the approaches to the Bardills roundabout, where it reduces to 40mph through the junction.

3.3 Bardills is a four-arm roundabout junction with the western arm facing towards the M1 motorway and Derby, and the north-east arm facing towards the centre of Nottingham. The northern and southern arms of the junction access onto the B6003 Stapleford Lane operated by the County Council, with this southern arm providing onward access towards the Site. Between Bardills roundabout and Nottingham, Bramcote roundabout lies to the north-east of the site. Traffic signals manage the flow of traffic at both Bardills and Bramcote roundabouts and both have movements that 'cut-through' the junction (A52 west to B6003 south at Bardills, and A52 west to A52 east at Bramcote), adding a level of complexity to their layout.

3.4 Traffic on the A52 Brian Clough Way tends to be heavily congested during morning and evening peak periods with queuing frequently observed, particularly at Bardills and Bramcote roundabouts and the approach to M1 Junction 25.

- 3.5 The M1 motorway runs north to south approximately 2.5km west of the site. M1 Junction 25 is a grade separated signalised gyratory providing connectivity to the A52 to the east and west, plus Long Eaton to the south-east of the junction and the villages of Risley and Stanton by Dale to the north-west of the junction. To the north and south of the junction, the M1 motorway operates as a smart motorway with 'all lanes running'. This means that the hard shoulder has been converted into a permanent 'live lane' and variable speed limits control the flow of traffic.
- 3.6 M1 Junction 25 is a heavily congested part of the network during the morning and afternoon peak periods. During these times, queues can build on the northbound entry and exit slip roads causing a safety concern.
- 3.7 National Highways is currently undertaking an M1 J23a – J25 corridor study to look at potential long-term improvements to this junction. There are currently no existing planned junction improvements committed in the Government's third Roads Investment Strategy (RIS 3⁴).

⁴ Road Investment Strategy 3 (RIS3): 2026 to 2031

4 Planning Context

4.1 I consider that the following policies are of relevance to this appeal.

4.2 *The National Planning Policy Framework (NPPF), revised December 2024.*

Particular attention should be drawn to paragraph 49 (determining planning applications in accordance with the development plan); paragraph 116 (highway impact); and paragraph 118 (requirement for a vision-led transport assessment).

4.3 *DfT Circular 01/2022: Strategic Road Network and the Delivery of Sustainable Development ('the Circular')⁵*

The Circular sets out National Highways' approach to planning proposals which may have an impact on the SRN. Of specific relevance to this appeal are paragraphs 23 (the requirement for capacity enhancements); paragraph 24 (viability of developments following capacity enhancements); paragraph 25 (the standards and approvals with respect to changes to the SRN); paragraph 28 (the strategic role of the SRN); paragraph 29 (new connections to the SRN); paragraph 48 (transport assessments); paragraph 49 (inclusion of committed developments); paragraph 50 (opening year assessment); paragraph 51 (identifying trigger points for mitigation); and paragraph 52 (the scope, phasing and delivery mechanism of any mitigation).

⁵ DfT Circular 01/2022: Strategic Road Network and the Delivery of Sustainable Development ('the Circular')

4.4 The Broxtowe Part 2 Local Plan, October 2019

The Site was allocated in the Broxtowe Borough Council Local Plan (Part 2) under Policy 3.2 as part of the wider Toton Strategic Location for Growth. This set out how the Toton allocation, along with the neighbouring Chetwynd Barracks allocation should be brought forward together under a clear vision.

At the time of the Plan, it was envisaged that a planned HS2 station in the Toton area would be a catalyst for growth. Although plans for the HS2 station were subsequently withdrawn by the then Government in 2023, the housing growth aspirations have been retained.

4.5 The Toton and Chetwynd Barracks Strategic Masterplan Supplementary Planning Document, February 2023⁶

Following the adoption of the Broxtowe Local Plan, the above-mentioned SPD set out further detail on the two allocations and reinforced the desire to bring forward the sites in a cohesive and joined up manner (paragraphs 1.7, 1.13 & 3.53).

4.6 The Toton & Chilwell Neighbourhood Plan (2020-2040), May 2024⁷

Policy INF01 sets out that infrastructure proposals must be in accordance with the Toton & Chetwynd Barracks SPD.

⁶ The Toton and Chetwynd Barracks Strategic Masterplan Supplementary Planning Document, February 2023

⁷ The Toton & Chilwell Neighbourhood Plan (2020-2040), adopted May 2024

4.7 The Emerging Greater Nottingham Strategic Plan (GNSP)

Broxtowe Borough Council alongside Nottingham City Council and Rushcliffe Borough Council have jointly prepared a strategic plan which was submitted for examination in December 2025. The Greater Nottingham Strategic Plan comprises Part 1 of each authority's Local Plan, replacing their Aligned Core Strategies. Within the emerging GNSP, the appeal site has been brought forward from the previously adopted Broxtowe Local Plan (Part 2), allocated under Policy 21.

5 National Highways Position on the Appeal Proposal

5.1 National Highways was first consulted on the planning application for this appeal site on 3 June 2025 and formally responded to the Council on 18 June 2025 (Appendix A). National Highways provided subsequent formal updated positions to the Council at regular intervals thereafter (Appendix B to H).

5.2 As the Site does not share a common boundary with the SRN, National Highways' consideration of the proposal has focussed on the traffic and transport impacts of the development, as set out in the Transport Assessment and appendices. When National Highways was initially consulted on the planning application, this review was based on a Transport Assessment prepared by ADC Infrastructure dated April 2025⁸. However, when later re-consulted on the same development proposal on 13 January 2026, the ADC Transport Assessment had been superseded by a new Transport Assessment prepared by Mode, dated December 2025⁹.

5.3 This section will set out National Highways' current position based on a review of the traffic and transport impacts of the site on the SRN. Unless otherwise stated, reference to the Transport Assessment relates to the most recent document prepared by Mode.

5.4 The appellant has undertaken both a standalone assessment and a cumulative assessment (to include neighbouring sites). To avoid confusion, I will discuss

⁸ Transport Assessment by ADC Infrastructure dated April 2025 (report reference: ADC3648-RP-A).

⁹ Transport Assessment by Mode, December 2025 (report reference: 004- 251222_J328827_)

National Highways' position on these respective matters under separate headings.

Standalone Assessment

Vehicular Access

5.5 As set out in the Transport Assessment, the proposed access to the site is via a new signalised crossroads on the B6003 Stapleford Lane. As this road is managed by Nottinghamshire County Council, National Highways had no comments in relation to the access proposal and has not considered this in any detail.

Trip Generation

5.6 The number of new vehicle trips that would be generated by the development proposal has been estimated using built-in trip rates from a strategic transport model, the East Midlands Gateway Model (EMGM).

5.7 Using those trip rates, the Transport Assessment indicated that the proposed development was predicted to generate 230 two-way trips in the morning peak hour (08:00-09:00 hrs) and 203 two-way trips in the evening peak hour (17:00-18:00 hrs).

5.8 National Highways is content with the methodology used to predict vehicular traffic generation and considers that the numbers presented in the appellant's Transport Assessment are robust.

Trip Distribution and Assignment

5.9 Trip distribution is the likely direction that new vehicle trips on the surrounding highway network would take.

5.10 The Transport Assessment used 2011 Census data relating to the locations of workplaces where existing residents in the local Broxtowe 015 MSOA travel to by car. They then applied this data in Google Maps journey planning tool to assign trips along the fastest route to the end distribution zones during the peak periods.

5.11 Using this trip distribution, a percentage and number of vehicle trips has been assigned to junctions on the surrounding highway network. This trip assignment is presented in section 6.5 of the Transport Assessment.

5.12 In terms of SRN junctions, this indicated that 74 per cent of new vehicle trips generated by the proposal would use the A52 Bardills roundabout. This equates to 171 and 151 vehicle trips in the AM and PM peaks respectively. A smaller proportion (35 per cent) of vehicle trips were predicted to travel through the A52 Bramcote roundabout equating to 81 and 72 vehicle trips during the AM and PM peaks respectively. Finally, 31 per cent of vehicle trips were predicted to travel through M1 junction 25 equating to 71 and 62 vehicles in the AM and PM peaks respectively.

5.13 National Highways has reviewed the above-mentioned methodology and associated data and is content with the trip distribution proposed for the standalone assessment.

Highway Impact Assessment

5.14 Following the assignment of new vehicle trips onto the highway network, the appellant has looked at how nearby junctions will accommodate those new vehicle trips. With respect to the SRN, the appellant has undertaken junction capacity assessments for the A52 Bardills roundabout, the A52 Bramcote roundabout, and the M1 junction 25 circulatory. National Highways is content that no further SRN junctions need be assessed.

Assessment Scenarios

5.15 The above-mentioned junction assessments have been undertaken under different scenarios both with and without the proposed development over different time periods.

5.16 Paragraph 7.2.4 of the Transport Assessment sets out the different assessment scenarios. One of the key scenarios for National Highways, and to comply with paragraph 50 of DfT Circular 01/2022 is the opening year assessment. As set out in the Circular, this should include the trips generated by the proposed development, forecasted growth (i.e.: background traffic uplifted to future traffic growth) and committed development.

5.17 For this site, an opening year assessment of 2028 was used based on the year the development is predicted to first open. Following National Highways' request to comply with the Circular, this opening year has included the full development (i.e.: 420 dwellings). National Highways is content with 2028 being used for the opening year assessment.

5.18 Further scenarios were undertaken for the year 2041 to correspond with the end of the emerging GNSP period. Whilst the 2041 assessment is informative, only the opening year assessment is strictly necessary to comply with The Circular.

Junction Assessments

5.19 Section 7.4 of the Transport Assessment describes findings of the junction capacity assessments under the different scenarios.

5.20 For all three of the SRN junctions, the capacity assessments were undertaken using a computer software package called LinSig. This software is typically used with respect of signalised junctions, and National Highways considers it to be appropriate for assessing the impact on the SRN junctions listed above.

5.21 Whilst the Transport Assessment presents a summary of the LinSig assessment and related outputs, National Highways needs to audit the actual LinSig model files and associated raw data to validate the outputs and assumptions. Following a number of requests as set out in an Engagement Timeline (Appendix J), National Highways received the LinSig files and some associated raw data for review on 26 May 2026. However, this review of the LinSig assessment cannot be fully validated until key remaining raw items of data are submitted. This includes the existing observed signal data and proof of validation of the model, both first requested in March 2025. In addition, since being sent to National Highways, the LinSig models have been updated. National Highways received the updated LinSig files on 31 July 2026 and is still reviewing these.

- 5.22 It should be emphasised that National Highways' request for this data is neither unusual nor unreasonable. The review of junction models is standard practice undertaken by highway authorities to confirm the results of junction assessments as part of a transport assessment review.
- 5.23 Once National Highways is satisfied with the reliability and validity of the traffic modelling used in respect of the standalone assessment, it will then be in a better position to understand the impact on National Highways' network.
- 5.24 In accordance with paragraph 116 of the NPPF, National Highways needs to be satisfied that there will be no unacceptable impact on highway safety, and that the residual cumulative impacts on the road network, following any mitigation, would not be severe, taking into account all reasonable future scenarios.
- 5.25 As the NPPF does not define what constitutes an unacceptable safety, or severe congestion impact, National Highways refers to an internal guidance document *Managing Impacts on The Strategic Road Network, October 2025* (Appendix K) to assist this decision making.
- 6 As this document sets out, impacts on the SRN are a network operational issue, and will be judged based on the local context.
- 7 Following the validation of the LinSig files received 31 July 2026, National Highways will consider the operational impact of development traffic, reflecting on the above-mentioned document.

Cumulative Assessment

Need for cumulative assessment

7.1 The appeal site is part of a wider allocation known as the Toton Strategic Location for Growth in the adopted Broxtowe Part 2 Local Plan and emerging Greater Nottingham Strategic Plan. Whilst the appeal site forms the western part of this allocation ('Toton West'), the appellant has submitted two further planning applications for sites in the eastern part of Toton ('Toton East') for 155 dwellings (25/00255/FUL), and the north part ('Toton North') for 800 dwellings (25/003036/OUT).

7.2 Altogether therefore, the appellant has submitted three separate planning applications totalling 1,375 dwellings, with three separate Transport Assessments (one for each application). The Transport Assessment for Toton West has been undertaken independently of the other sites and does not consider their cumulative impacts.

7.3 DfT Circular 01/2022, paragraph 49 sets out that a transport assessment must consider existing and forecast levels of traffic on the SRN, alongside any additional trips from committed developments that would impact on the same sections (link or junction) as the proposed development. Footnote 21 goes on to define committed development and stipulates that the inclusion or exclusion of specific developments should be agreed with the local planning authority at pre-application stage.

7.4 Since first being consulted on the Toton allocation at the pre-application stage, National Highways has maintained that the traffic impacts of all three Toton parcels should be considered jointly through a cumulative assessment.

- 7.5 This approach is necessary to satisfy Policy 3.2 of the Broxtowe Part 2 Local Plan which together allocated the Toton West and Toton East parcels, and part of the Toton North parcel, and which set out a clear aspiration for the whole site to be delivered in a cohesive and coordinated manner, along with the neighbouring Chetwynd Barracks allocation.
- 7.6 This position is unaltered by the emerging Greater Nottingham Strategic Plan which brings forward the Toton West parcel, alongside the Toton East parcel and the majority of the Toton North parcel. Within the GNSP, the Toton and Chetwynd Barracks sites are combined under one allocation, and Policy 21.D.9 references highway infrastructure on the SRN “to which all development must contribute”.
- 7.7 It has been National Highways position that the mechanism for understanding what specific highway infrastructure is required, whether it is deliverable, and to what extent each site needs to contribute to it, begins with this cumulative assessment.
- 7.8 It is worth noting at this point that whilst the Broxtowe Local Plan and emerging Greater Nottingham Strategic Plan undertook cumulative modelling to assess the wider local plan growth impacts, this was at a much higher (strategic) level to give a broad overview of local plan impacts and the potential infrastructure needed to address those impacts. It is worth noting too that the Toton & Chetwynd SPD was not underpinned by any transport modelling.
- 7.9 It is also National Highways’ concern that allowing the Toton West site (this appeal site) to come forward before the wider infrastructure and delivery mechanism is fully identified presents a significant risk to the remainder of the allocation. This is because the off-site highway mitigation for the remainder of the site is likely to be required prior to first occupation, and without the responsibility

(and cost) of delivering that mitigation being distributed proportionately, the remaining parcels could be left to bear the full cost, potentially rendering those developments unviable.

7.10 In summary, it is National Highways' view that bringing forward the three Toton parcels independently of each other does not constitute good planning and would be in contradiction with Development Plan policies, and subsequently paragraph 48 of the NPPF.

Review of Cumulative Assessment

7.11 It wasn't until 12 June 2026 (after the appeal was submitted) that National Highways received a draft report summarising the cumulative modelling assessment¹⁰.

7.12 In view of this late submission, National Highways has had limited time to consider the cumulative assessment which ought to have been provided at planning application stage. This has included significant amounts of traffic modelling to review, including new traffic models themselves. As this modelling review is still ongoing, National Highways is not able to call a separate modelling witness.

7.13 Notwithstanding the above, I can confirm that an assessment has now been undertaken for the three Toton parcels and that this assessment has been undertaken using the East Midlands Gateway Model (EMGM).

¹⁰ TN04 – Strategic Modelling Draft Report V1.0

- 7.14 However, National Highways has raised a concern that the base model validates poorly in some areas and has asked that this be addressed.
- 7.15 Some may note that National Highways approved the same model for use with respect to the transport evidence base for the emerging Greater Nottingham Strategic Plan. However, for clarification, local plan traffic modelling is undertaken at a much higher level and a validation exercise for every small section of the network would be disproportionate. As such, I do not consider the same validation issue to have any bearing on the Local Plan evidence.
- 7.16 Whilst the cumulative traffic modelling remains an area outstanding, I consider it worth setting out at this stage, where this should ideally lead to. This is essentially a high-level understanding of the infrastructure needed to support the full allocation and any phased development, and a degree of confidence that the required infrastructure is acceptable, deliverable, and that any potential interim mitigation is not abortive. I will now discuss this in more detail below.
- 7.17 Firstly, the cumulative traffic modelling assessment is expected to show that the full allocation will be dependent on a new junction on the A52 Brian Clough Way.
- 7.18 As per National Highways' response to the Toton & Chetwynd SPD in May 2022 (Appendix L), decision to grant or refuse permission for new junctions on the SRN is not made by National Highways, but by the Department for Transport (DfT).
- 7.19 As per DfT Circular 01/2022, the SRN's primary function is to enable the long-distance movement of people and goods rather than the transport accessibility of

new sites (paragraphs 28). As such, I cannot guarantee that the provision of this new junction will be approved. Its viability needs to be demonstrated via a Strategic Business Case setting out the need, impacts, benefits, and evidence that the growth cannot be accommodated via upgrades to existing junctions.

7.20 Given that the full allocation may be dependent on this new junction, it is prudent that this permission in principle is obtained prior to any part of the allocation being approved.

7.21 The traffic modelling will be key to this Business Case, and should be used to identify a high-level scheme, for which permission in principle will be sought.

7.22 Other changes to the SRN, if required, can be agreed by National Highways and do not require business case justification.

7.23 It may be for instance, that capacity enhancements at Bardills roundabout are required. This potentially could consist of the Bardills scheme consented under planning reference 17/00131/ROC. If the evidence deems this mitigation sufficient, this could be conditioned as a referenced scheme at a given trigger point. However, National Highways would firstly wish to ensure that this scheme is in alignment with the new junction scheme and not majorly abortive.

7.24 Any alternative to the consented Bardills scheme would be subject to further approvals which became National Highway policy following the publication of DfT Circular 01/2022, as discussed below.

8 Approvals for Physical Changes to the SRN

6.1 Only the opening year assessment is strictly required to comply with DfT Circular 01/2022. As such, if the opening year assessment (2028) does not indicate the need for any physical changes to the SRN, it will not be necessary to review any proposed mitigation schemes in more detail.

6.2 Should traffic modelling however indicate that SRN mitigation is necessary for the opening year, then any proposed mitigation on the SRN will need to be considered in more detail.

6.3 Since the publication of DfT Circular 01/2022, third-party schemes on the SRN need to be designed to a certain level of detail to ensure that they are deliverable in both safety and engineering terms. This certainty cannot be obtained through traffic modelling alone. Paragraph 25 of Circular 01/2022 sets out the main requirements prior to planning consent with further detail covered in National Highways' planning guide¹¹.

6.1 Specifically, paragraph 93 of the planning guide sets out that a preliminary drawing of the scheme, also referred to as a general arrangement drawing, in accordance with the Design Manual for Roads and Bridges (DMRB¹²) is necessary, and it sets out what should be included on this drawing.

6.2 Importantly, the scheme should be designed to consider the requirements of both motorised and non-motorised users, and as such, before a general arrangement drawing is finalised, a Walking, Cycling, Horse-riding Assessment

¹¹ Planning for the future: A guide to working with National Highway on planning matters (October, 2023)

¹² The Design Manual for Roads and Bridges (DMRB)

and Review (WCHAR) in accordance with the DMRB Chapter GG142¹³ should be undertaken.

6.3 The preliminary drawing is then to be subject to a Stage 1 Road Safety Audit (RSA) in accordance with DMRB Chapter GG119¹⁴. This process is to ensure that all potential safety hazards associated with the scheme have been identified and considered.

6.4 On occasion, the design of a scheme on the SRN may include some Departures from Standard (DfS). This is where certain elements of the scheme do not comply with the DMRB. It is the responsibility of the designer (the appellant in this instance) to identify any departures associated with their scheme which are proposed to be retained (either new or existing). Where any departures are identified, an agreement in principle (AiP) for those departures is to be obtained from National Highways.

6.5 In a small number of cases, particularly where departures exist, a Safety Risk Assessment undertaken in accordance with DMRB Chapter GG104¹⁵ may also be required.

¹³ The Design Manual for Roads and Bridges (DMRB) GG 142 Walking, Cycling, Horse-riding Assessment and Review

¹⁴ The Design Manual for Roads and Bridges (DMRB) GG 119 Road Safety Audit

¹⁵ The Design Manual for Roads and Bridges (DMRB) GG 104 - Requirements for Safety Risk Assessment

7 National Highways' Engagement with the Appellant

7.1 The appellant's Statement of Case¹⁶ maintains that the highway authorities refused to engage in the determination of the application, citing the absence of a wider cumulative assessment (paragraph 16). This statement is unfounded.

7.2 Appendix J is a table setting out a timeline of National Highways' engagement on this and the other two Toton sites, from pre-application through to now. This summarises the many pieces of correspondence received from the appellant (via their consultants or the Council), and National Highways' responses to each.

7.3 As can be seen from this timeline and the items of correspondence to which it refers, National Highways did indeed highlight the need for a cumulative assessment on multiple occasions. However, National Highways also provided timely comments and queries on the appellants' standalone assessment and requested supporting information to enable the validation of this assessment. Most notably this includes a request of the LinSig (junction model) files and associated raw data. The LinSig files were requested on no less than sixteen separate occasions before finally being received (although not all the associated raw data) on 26 May 2026, three weeks after the appeal had been submitted and fourteen months after they were originally requested.

7.4 In addition, as can be seen from the timeline, the appellant's initial Transport Assessment (April 2025) acknowledged the requirement for a cumulative

¹⁶ Pegasus Group Statement of Case, March 2026, Reference P23/2379

assessment of the wider allocation, yet this was not submitted to National Highways until June 2026, over a year later.

8 Summary and Conclusion

8.1 The appellant has submitted three separate planning applications to the Council:

25/00371/OUT – ('Toton West') for 420 houses (this appeal site)

25/00255/FUL ('Toton East') for 155 houses

25/00306/OUT – ('Toton North') for 800 houses

8.2 The Toton West, Toton East and part of the Toton North sites were allocated as the Toton Strategic Location for Growth in the adopted Broxtowe Part 2 Local Plan. These sites are carried forward in the emerging Greater Nottingham Strategic Plan (submitted December 2025), including most of the Toton North site.

8.3 It is evident that the three Toton applications equate to a single development being brought forward over three phases. However, the Transport Assessment for the appeal site was undertaken independently of the other two planning applications and no consideration was given to the cumulative impacts and requirements of the entire site.

8.4 National Highways' position is that the above-mentioned approach does not equate to vision-led planning and is therefore contrary to the NPPF paragraphs 109 and 115 and DfT Circular 01/2022 paragraph 48.

8.5 The approach is also contrary to policies in the Broxtowe Local Plan (Part 2), the Toton & Chetwynd SPD, and the Toton & Chilwell Neighbourhood Plan as these emphasise the need for a comprehensive assessment of the Toton allocation alongside the neighbouring Chetwynd Barracks allocation.

- 8.6 A truly vision-led development might have been underpinned by a single transport assessment to consider the cumulative impacts and requirements of the entire site, whilst identifying those for each development phase.
- 8.7 Whilst the requirement for this holistic assessment has been disputed by the appellant in recent months, paragraph 7.71 of the appellants Planning Statement¹⁷ did in fact acknowledge that “further modelling work using EMGM is likely to be required to adequately reflect proposed revisions to development proposals and infrastructure requirements for the wider Toton Strategic Location for Growth”. The initial Transport Assessment by ADC Infrastructure also acknowledged this required.
- 8.8 However, it was months later in June 2026 after an appeal for non-determination had been submitted, that a draft report summarising this “further modelling work” was finally submitted for review.
- 8.9 In the period since receiving this draft report, National Highways has undertaken a review of the traffic modelling underpinning the report. However, this has raised some questions about the validity and reliability of the model for this purpose. The cumulative modelling assessment is subsequently an outstanding matter.
- 8.10 Whilst the requirement for the cumulative assessment may still be an area of disagreement between the appellant and highway authorities, the ‘standalone assessment’ itself has not satisfied National Highways with regard to paragraph 116 of the NPPF.
- 8.11 This is primarily because National Highways has been unable to validate the LinSig models used to identify specific junction impacts on the SRN. Had the modelling files and associated raw data been submitted to National Highways

¹⁷ Planning Statement by Pegasus Group on behalf of Bloor Homes, May 2025

when first requested in March 2025, this verification would undoubtedly have been completed some time ago. As it stands, some of the requested modelling items were only received on 31 July 2026.

8.12 National Highways' barrister, Mr Smyth, advised the appellant at the 2nd CMC that National Highways consultants require 2-3 weeks to review new submissions (what he described as "the lead-in time"). Given this information was provided so late (without explanation), National Highways has been unable to review it to inform this proof. I cannot guarantee that the review will be complete by the time of the Inquiry commencing, but I will do my best to expedite it so that I can give an oral update during my evidence in chief.

8.13 Without the verification of the LinSig models, the outputs and assumptions must be viewed with caution at the very least. However, a greater concern is that the impacts on the SRN junctions have been under-estimated at junctions that are already heavily congested. As such, a severe impact cannot be ruled out at this time, with or without mitigation.

8.14 Whilst the above-mentioned outstanding matters are both associated with the traffic modelling, the completion of this modelling alone does not address National Highways full concerns.

8.15 As continuously maintained by National Highways, the issue is one of understanding the infrastructure requirements for the full allocation and ensuring that any essential highway infrastructure is acceptable, deliverable in a timely manner, and avoids any abortive works. These matters are outstanding.

8.16 In summary, National Highways' position is that appeal site conflicts with national and local planning policies and should be dismissed.

9 References

1. The National Planning Policy Framework, December 2024
2. The Broxtowe Part 2 Local Plan (2018-2028), October 2019
3. The Greater Nottingham Strategic Plan Publication Draft, March 2025
4. Road Investment Strategy 3 (RIS3): 2026 to 2031
5. DfT Circular 01/2022: Strategic Road Network and the Delivery of Sustainable Development ('the Circular')
6. The Toton and Chetwynd Barracks Strategic Masterplan Supplementary Planning Document, February 2023
7. The Toton & Chilwell Neighbourhood Plan (2020-2040), May 2024
8. Transport Assessment by ADC Infrastructure dated April 2025 (report reference: ADC3648-RP-A).
9. Transport Assessment by Mode, December 2025 (report reference: 004-251222_J328827_)
10. TN04 – Strategic Modelling Draft Report V1.0
11. Planning for the future: A guide to working with National Highways on planning matters, October 2023
12. The Design Manual for Roads and Bridges (DMRB)
13. The Design Manual for Roads and Bridges (DMRB) GG 142 Walking, Cycling, Horse-riding Assessment and Review
14. The Design Manual for Roads and Bridges (DMRB) GG 119 Road Safety Audit

15. The Design Manual for Roads and Bridges (DMRB) GG 104 - Requirements
for safety risk assessment
16. Statement of Case by Pegasus Group on behalf of Bloor Homes, March 2026,
Reference P23/2379
17. Planning Statement by Pegasus Group on behalf of Bloor Homes, May 2025

10 Appendix List

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 Planning Response, 28 January 2026

Appendix E – National Highways Planning Response, 6 March 2026

Appendix F – National Highways Planning Response, 15 May 2026

Appendix G – National Highways Planning Response, 19 May 2026

Appendix H – National Highways Planning Response, 15 June 2026

Appendix I - National Highways written representation to the Greater Nottingham
Strategic Plan EiP, June 2026

Appendix J – Engagement Timeline

Appendix K - Managing Impacts on The Strategic Road Network, October 2025

Appendix L - National Highways response to the Toton & Chetwynd SPD, May 2022

Appendix M – List of Acronyms