



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

From: Kamaljit Khokhar (Head of Planning & Development)
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To: Hinckley & Bosworth Borough Council (FAO Alex Jelley)
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CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 24/00083/HYB

Location: Land At Burbage Fields Farm, Bullfurlong Lane, Burbage, Leicestershire

Proposal: Hybrid planning application for 422 dwellings, public open space, associated infrastructure and the demolition of 65 and 65a Coventry Road, and Burbage Fields Farm and outline planning application for a residential care home and up to 11no. self-build plots (all matters reserved except for access)

National Highways Ref: NH/24/05928

Referring to the consultation on a planning application dated 2 September 2024 referenced above, in the vicinity of the M69 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is as follows:

- ~~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~~ 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 not propose 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: *Russell Gray*

Date: 12 September 2025

Name: Russell Gray

Position: Spatial Planner

National Highways, Three Snowhill, Snow Hill Queensway, Birmingham, B4 6GA

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.

Thank you for providing the Response to Statutory Highways Consultees document (Ref: 21390-RLL-25-XX-TN-D-5028), dated 8th August 2025 and prepared by RLRE Consulting, in connection with a residential planning application for the Land South of Burbage (ref: 24/00083/HYB). The Technical Note (TN) has been produced to respond to the latest round of highway comments made by statutory consultees.

Section 3 of the TN (page 28) notes that the latest response from National Highways was dated 25th September 2024 to which RLRE responded in February 2025 via a Technical Note (Ref: 21390-RLL-24-XX-TN-D-5021). Following review National Highways seek to rectify this within our comments below:

As several of the comments raised by LCC align with our own, we note that the Technical Note provided by RLRE is primarily focused on addressing LCC's comments, with some of our concerns addressed sporadically throughout various responses. Consequently, it has been challenging to track which responses relate specifically to our queries. Nonetheless, we have reiterated our outstanding comments below, along with the responses we were able to extract from the Technical Note and have provided further comments accordingly. We kindly request that any further comments be itemised to ensure clarity.

PICADY Model Review

Junction 10 Modelling – A5/B578 Lutterworth Rd

Based on our review of the junction parameter drawing provided and our independent checks, we are content that a 100m visibility splay is acceptable. Therefore, we are content that the PICADY model is acceptable.

Growth Factors

While we acknowledge that changes at some junctions are minor or localised, there are instances where the impacts are more significant. We previously identified such locations on the SRN in our earlier response, including M69 Junction 1 and the B578 Lutterworth Road / A5 junction approaches. We would expect further evidence to be provided demonstrating that the flow changes at these junctions are robust and that sufficient capacity exists elsewhere in the network. This is particularly important if these junctions are becoming increasingly congested, to ensure that traffic is not

simply being redistributed through various minor junctions connecting to the SRN within the PRTM model, many of which may have limited capacity.

PRTM Model

We thank the applicant for sharing the link to Appendix O on the Hinckley and Bosworth Borough Council website. The PRTM assignment plots indicate that the majority of links utilise the Coventry Road access in the through-link model.

Therefore, the approach of adjusting the PRTM model flows to exclude the through road, without undertaking additional model runs, is acceptable, provided a detailed explanation is given on how this adjustment has been implemented. We request that a spreadsheet outlining the manual routing adjustments be shared with us for further review.

Appendix P - PRTM Furnessing Results

NH comments (September 2024): There are a few areas that require clarification related to the outputs of the PRTM Furness results compared with PRTM outputs. There are significant changes in some movements as mentioned below. Please can it be confirmed as to whether the final proportions represent the observed data.

- In the AM peak, there is a significant reduction in traffic on the A5 in the northbound direction and from the B578 in the southbound direction at the A5/B578 junction.
- In the PM peak, there is a significant reduction in traffic on the A5 in both directions and in the right turn from the A5 south to the B578 at the A5/B578 junction.

While comparing the '2021 - 2026 PRTM Growth', we have observed many locations where traffic is decreasing in the forecast year 2026, we would appreciate some clarification on this.

In the AM peak, where traffic is reducing in 2026:

- A5 / B 578 NB on A5 and SB turn from B 578 to A5
- Hinckley Rd/ B578 SB movement through junction

In the PM Peak, where traffic is reducing in 2026:

- A5 / B 578, NB and SB on A5
- Hinckley Rd/ B578, NB and SB movement through junction and right turn from South to Coventry Rd
- A5 /Wolvery Rd, traffic at South approach on A5 to straight ahead and right turn.

Similarly, in the AM peak, where traffic is reducing in 2031 as compared to 2021:

- Hinckley Rd/ B578/Coventry Rd junction
- B578 to A5 south

In the PM Peak, where traffic is reducing in 2031 as compared to 2021:

- Hinckley Rd/ B578/Coventry Rd junction has much less through traffic on Lutterworth Road
- A5 at A5/ B578 junction
- NB traffic on A5 is decreasing at Wolvey Rd junction

Further to the response provided by RERL (February 2025): Sections 2.5.17 to 2.5.22 state that the reduction in traffic in future years, or under the 'with development' scenario, may be due to certain junctions being relatively small and potentially operating near capacity. This appears to have a knock-on effect on traffic conditions at other locations.

These responses appear rather generic in relation to our specific comments above. Firstly, we expect that each of the issues raised is addressed with a specific response. Secondly, if these locations are indeed congested, with limited capacity resulting in additional delays and subsequent rerouting, then the affected SRN junctions should be assessed in greater detail. This should include agreement on a reasonable representation of traffic in the forecast years for junction modelling assessments. Where confidence in the PRTM outputs at these locations is limited, turning movement calculations should be derived using observed data, with the distribution of likely trips reaching the SRN agreed in consultation with National Highways.

Appendix – Q Trip Distribution and Assignment

NH comments (September 2024): *PRTM Residential Distribution Calculations*

We require further elaboration as to what these plots (AM/PM) represent and their purpose. It is not clear as to whether these distribution plots from PRTM parent zone 6014 are showing how much traffic uses the local network around the development site. We would also appreciate explanation as to what the internal trip numbers represent in these two plots.

Coventry Road Access Plot

For the Coventry Road access plot in the AM, 56% of trips are reported to arrive from Coventry Road in the eastbound direction. Tracking it back to the previous junction with Rugby Road, we can only see 20% of trips coming from Rugby Road North and 20% from Rugby Road South. As 16% of trips appear to be missing, we will require further information about this. Similarly, total outbound trips from the development on Coventry Road west are 54%, but some of the individual turn percentages at the Rugby Road junction are 44%. Similar observations are noted in the PM peak. It needs to be explained as to why there are missing trips from this data. If the trips are using other minor roads in between, these trips should be recaptured and presented at the Sketchley Road/Rugby Road and Grove Road/B578 junctions for clear interpretation.

Further to the response provided by RERL (February 2025): Sections 2.5.13 to 2.5.16 suggest that the missing trips are localised and do not reappear on any other roads within the schematics provided in Appendix Q.

From this response, we understand that the trips missing from the plots are local in nature, with origins or destinations on nearby local roads. National Highways seek to obtain the working spreadsheet that outlines how this has been applied within the overall trip generation, distribution, and route choice processes as presented in Appendix Q.

Boundary Issues

Lighting

Having reviewed the lighting details provided, National Highways is content that details of the lighting strategy may be secured through an appropriate planning condition.

Acoustic Fencing

Having reviewed the fencing details provided, National Highways is content that details of proposed acoustic fencing and its maintenance for the lifetime of the development may be secured through an appropriate planning condition.

Drainage

Having reviewed the fencing details provided, National Highways may seek further details of the proposed drainage strategy and maintenance plan. This may be permissible through appropriately worded conditions.

Planting

Having reviewed the planting details provided, National Highways is content that details of proposed planting strategy and its maintenance for the lifetime of the development may be secured through an appropriate planning condition.

Recommended Non-Approval

Based on the above, we recommend that the application not be determined for a period of three months from the date of this notice. This is to enable the applicant to provide further information with regards to the information/requirements detailed above and the potential impacts on the SRN.

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.