



National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: Andrew Jinks (Regional Director)
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To: Hinckley & Bosworth Borough Council (FAO Alex Jelley)

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

Council's Reference: 24/00083/HYB

Location: Land At Burbage Fields Farm Bullfurlong Lane Burbage

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/24/04828

Referring to the consultation on a planning application dated 29 January 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 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 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.

Date: 16 February 2024	
 Signature:	
Name: Martin Seldon	Position: Assistant Spatial Planner
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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.

Recommended Non-Approval

It is recommended that the application should not be approved for a period of three months from the above date to allow the applicant to provide the additional information set out below.

The site is in the outskirts of Burbage village, Leicestershire. The closest point of impact with the Strategic Road Network (SRN) is the M69 junction 1 / A5 trunk road, circa 800m north from the junction. The site also abuts the M69 at the northbound side.

National Highways has previously engaged with the applicant at pre-application stage and provided comments to agree on transport matters.

The proposed development comprises 422 dwellings, 11 self-build plots and a residential care home for 66 members. Based on our review of the Transport Assessment (TA) we have the following comments:

The trip generation methodology utilised a combination of self-build plots and housing development to create a total of 433 dwellings. Trip rates were obtained from a traffic survey conducted in a nearby residential area at Ambion Way which comprises a total of 72 dwellings. The trip rates from TRICS are lower than the trip rates obtained from the traffic survey. We therefore consider that the approach undertaken by the applicant is suitable.

For the residential care facility, the trip rates are derived from the TRICS data, and this is confirmed by our independent checks. We are therefore content with the trip generation process overall.

National Highways had already agreed to adopt the PRTM model for the trip distribution process for the residential development consisting of 433 homes. It is noted that the applicant has used appropriate 2021 census data to calculate the trip distribution for the residential care home using a gravity model. Traffic assignment has

been assigned using the PRTM mode, this information matches with the number of trips calculated during the trip generation process.

In the TA, the TEMPro growth factor is based on Version 7.2C. We recommend growth factors are recalculated using the most recent version of TEMPro V8.1.

Traffic flows shown in Appendix CC do not match with those provided in Appendix QQ capacity assessment. This needs to be reviewed and corrected. In addition, we request the applicant provides the calculation spreadsheets used for the forecast year to validate the information provided.

There appears to be some confusion in the PRTM forecasting report between the trip distribution and trip assignment. The trip distribution involves determining origins and destinations for development trips, which are not impacted by the zone connection. On the other hand, the trip assignment relates to the path/route taken by the trips. We are agreeable to retaining the trip distribution, but we require a detailed explanation of the procedure for the trip assignments applied without an actual PRTM run. This is crucial, as the paths of the trips will change if the connection between two zones is removed. This isn't a straightforward case of simple addition and subtraction once the trips leave the zone connection, as additional traffic loaded onto the Coventry Road access will have different route choices based on generalised costs for various links in the assignment model. Consequently, this is likely to lead to discrepancies in the local area route choice.

It is noted that zone 6014 from the PRTM model, situated adjacent to the proposed development, is utilised as a representative zone for trip distribution. Given that this zone is primarily residential, it is deemed a suitable match for the proposed development. Additionally, we would like to review the absolute trip distribution from the two development parcels stipulated in the TA, delineating the specific values for each.

While we cannot find the Volume/Capacity (V/C) comparison within the Area of Interest (AOI) selection criteria, we are broadly content with the choice of junctions for the detailed assessment, which includes M69 Junction 1 and A5/Lutterworth Road.

We note that the initial proposal identified 11 junctions for detailed assessment, while the TA section 6.1.8 has excluded two junctions, namely:

- i. A5 Watling Street / Wolvey Road junction.
- ii. B4109 Rugby Road / Brookside junction.

While we are not concerned about the Rugby Road junction, given its location away from the site and not being near to the Strategic Road Network (SRN), we would like to request detailed results for the A5/Wolvey Road junction.

We are happy with the application of the Furnessing methodology. Notably, we have observed the use of 2020 data for two locations, Burbage Road and Sapcote Road, where 2021 data was not available. While this may not be considered a major issue, it is acknowledged that the 2020 data could have been adjusted further with a growth rate to align it with 2021.

We have undertaken a review of the modelling assessments and merge and diverge assessments for the A5 / B578 Lutterworth Road priority junction and M69 Junction 1 signalised junction as these are the only two junctions assessed that will impact the SRN. There are two junctions on the B4109 Rugby Road which queues appear small and therefore it is unlikely these junctions will affect the operation of the M69 J1.

A5 / B578 Lutterworth Road - Junctions 10 Modelling Assessment

We note that the applicant has supplied the Junctions 10 model inputs and results for the A5/B578 Lutterworth Rd junction. An independent check has been undertaken and has identified differences in some geometric properties input into the junction model. In order to validate the information provided in the TA, we request the applicant supplies a CAD drawing of the junction with annotated geometric measurements for our review.

We also note that traffic flows provided within Appendix CC for 2026 and 2031 forecast years, however the Junctions 10 report for the junction assessment in Appendix QQ only includes assessments for 2021 and 2026 scenarios. Similarly, to the above point, to validate the information contained within the TA, we request the applicant supplies 2031 models for our review.

M69 Junction 1 – LinSig Modelling Assessment

From a comparison of the phase diagram and link information provided in Appendix SS, signal phases G and H seem to be provided on the links the opposite way round. In the phase diagram Phase G is identified for the eastern circulatory and Phase H is for the M69 Westbound off-slip, however this is the opposite on the link information. This therefore needs reviewing and amending.

A few alterations to lane lengths are recommended for several long lanes within the model. These are where long lanes have been used but diverge from a single lane further upstream.

- For lane J2:1/2 and J2:1/3 a lane length of 32 PCUs is recommended to be used for one of the two long lanes due to the carriageway reducing to a single lane upstream.
- For lane J3:1/1 and J3:1/2 a lane length of 32 PCUs is recommended to be used for one of the two long lanes due to the carriageway reducing to a single lane upstream.

- For lane J4:1/2 and J3:1/3 a lane length of 37 PCUs is recommended to be used for one of the two long lanes due to the carriageway reducing to a single lane upstream.
- For lane J6:1/1 and J2:1/2 a lane length of 32 PCUs is recommended to be used for one of the two long lanes due to the carriageway reducing to a single lane upstream.

Saturation flow values of 1900 PCU/Hr have been used for each lane. We recommend the applicant provides justification for using this value.

A maximum flow giving way value of 1155 PCU/Hr has been used at the B4109 Hinckley Road give way approach. The applicant needs to clarify why this value has been used for National Highways consideration on the approach.

Similarly, a justification is required for a give way co-efficient of 0.27 being used at the B4109 Hinckley Road give way lane approaches.

The lane connectors provided for the M69 EB off-slip need reviewing. Lane J6:1/1 has a connector provided to lane J1:3/2 (A5 North), based on a review the satellite imagery of the road markings this should be removed and a lane connector between lane J6:1/2 and lane J1:3/2 should be provided for the M69 EB off-slip to A5 North movement.

The traffic flows provided within the models do not seem to match the flows identified within Appendix CC. It is appreciated that the values to be used in LinSig are required to be in PCUs and may not match, therefore the applicant should provide the flow calculation spreadsheet used within the LinSig assessments for our review and validation of the information provided by the applicant.

The traffic signal specification should be provided for us to review the signal controller elements.

For all assessments, the proposed opening year needs to be clarified, as well as how the modelling assessments undertaken satisfy the evaluation of the opening year and requirements of DfT Circular 01/2022.

In the assessments undertaken, no model validation appears to have been undertaken or reported within the TA. National Highways recommends that Degree of Saturation validation for the LinSig model assessments and queue comparison validation for Junctions 10 model assessments are undertaken. This will provide comfort that the models represent existing network conditions. We also request LinSig models are provided for our review.

Merge & Diverge Assessment

Initial checks of the assessments provided in appendices TT and UU indicate that the merge and diverge flows do not align with summations using the traffic flow diagrams provided with the TA. The applicant therefore needs to supply the flow data used for the merge and diverge assessment. This is for National Highways to complete the review including the mainline flow data for 2021, 2026 and 2031 scenarios. Paragraph 8.11.2 of the TA states that mainline flows were obtained from the TRIS database, we also seek clarification on the sites used from the database.

Construction Traffic

We note the applicant intends to submit a Construction Traffic Management Plan (CTMP) prior to the start of construction of the proposal and we welcome this approach.

The proposed site shares a boundary with the M69 and is near the M69 J1 and the A5 trunk road. We therefore recommend the submission and approval of the CTMP is managed through a suitable condition, prior to commencement of any works for our approval and agreement. This is to ensure that the structural integrity and safely operation of the SRN is maintained during the entire construction period of the development.

National Highways expects that the CTMP includes, as a minimum, the following:

- Hours of working; Date works will commence & anticipated completion date/duration;
- Site Contact Details responsible for ensuring Health & Safety;
- Location of the site compounds and offices, erecting fencing, etc in relation to the M69 boundary;
- Confirmation of the intended construction access arrangements to and from the site from the M69 and A5 trunk road;
- Review the standard of the access to be used as the construction access to and from the site from the M69 and A5 Details of any gates / security / barrier – location;
- Photographs and accompanying description of any defects within the M69 boundary prior to the commencement of activities on site [Before and after];
- Details of the management and routing of heavy goods vehicle to and from the site;
- Details of any proposed traffic management and signing arrangements to be implemented upon the M69 and A5 Trunk Road (TRSDG) [any implementation of such will require a Road Space booking with National Highways];
- Anticipated average two-way daily traffic numbers associated with the construction phase of the project;
- and in terms of accommodating the volume, nature and type of construction traffic vehicular movements;
- Consider any conflict between all vehicles associated with the construction site and existing users of the proposed construction access arrangements to and from the site;

- Details of any special or abnormal deliveries or vehicular movements;
- Pollution prevention of National Highways assets (if any);
- Arrangements for parking and turning facilities for the vehicles of all site personnel;
- Arrangements for visitor parking and directions;
- Arrangements for the loading and unloading of plant and materials;
- Areas of storage for plant and materials used during the construction of the development;
- Details of any temporary lighting, including the type, number, location, illumination details and hours of use;
- Measures to prevent the deposition of deleterious material on the public highway during the construction period;
- Measures to suppress noise and dust;
- Details of works or temporary works directly abutting the M69 boundary; example of issues of concern to National Highways, features causing a hazard to motorists, structural integrity of the M69 / protection of environment, habitat & trees / impact upon street furniture, drainage etc;
- This document should be used by the construction contractor in the development of their Construction Health and Safety Plan.

Boundary Treatment

The proposed development is adjacent to the M69. Details should therefore be provided of the proposed boundary treatment.

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 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

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.