



National Highways Planning Response (NHPR 24-02) Formal Recommendation to an Application for Planning Permission

From: Andrew Jinks (Regional Director)
Operations Directorate
Midlands Region
National Highways
PlanningM@nationalhighways.co.uk

To: Hinckley & Bosworth Borough Council (FAO Matt Jedruch)

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

Council's Reference: 23/01090/OUT

Location: Land At Cliffe Lane Markfield

Proposal: Outline Application for the construction of employment units (Use Classes E(g)(i), E(g)(ii), B2 and B8) (some matter reserved except for access).

National Highways Ref: NH/24/05771

Referring to the consultation on a planning application dated 3 April 2024 referenced above, in the vicinity of the M1 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: 23 April 2024	
 Signature:	
Name: Martin Seldon	Position: Assistant Spatial Planner
National Highways National Highways The Cube 199 Wharfside Street Birmingham B1 1RN	

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 further period of three months from the date of this response to allow the applicant to provide the additional information required by National Highways.

We reviewed the Highways Report, together with the supplementary planning documentation submitted by the applicant. We understand that the Highways Report is a scoping and methodology report outlining the process by which the likely impacts of the site will be identified. Based on our review of the information provided, we have set out below our specific and general recommendations to be included in the Transport Assessment.

Access

- The nearest SRN junction to the development is the M1 Junction 22. The proposed vehicular access will be taken from an improvement to an existing Public Right of Way (PROW) access on Cliffe Lane located circa 250 m south of the SRN M1 J22, which will then form an all-movement vehicle junction. The exact engineering design are not confirmed at this stage.
- The existing access on to the site connects directly onto the A511 westbound carriageway. This access is located in close proximity to the M1 Junction 22/A511 slip road (circa 250 m). We understand the applicant is seeking to retain, through planning conditions, this access for Non-Motorized Users (NMU) and emergency uses only.

Due to the close proximity of these two accesses to the SRN, we would welcome further engagement on these matters to ensure safety and operational impacts on the SRN are suitably considered.

Trip Generation

- For the trip generation analysis the applicant has used the TRICS database and land use types B2 (2D – Industrial Estate) and B8 (2F- Warehouse). These are considered suitable.

- We note trip rates have been extracted from TRICS version 7.10.3. The applicant needs to use the latest version, which currently is 7.11.1.
- The selection of regions should exclude Wales and Scotland and only consider regions within England and days should include Monday to Thursday only.
- Based on our checks we have noticed that the trip rates provided in Appendix C and Tables 2 to 11 differ. We recommend this is revised to ensure the information provided is consistent.
- For B8 land use in the PM peak we note that HGV trips are greater than the total vehicle trips. This seems inappropriate. We therefore recommend these figures are revised and updated accordingly.

Overall, we have undertaken a review of the trip generation analysis provided by the applicant and, although we accept the overall methodology to use TRICS database, we have found several discrepancies with the data and calculations provided. Based on our comments above, we recommend this analysis is revisited and updated accordingly for our review.

Trip Distribution

- We understand that the trip distribution analysis will be carried out based on Journey to Work (JtW) methodology utilising Bardon Hill industrial area Census data. This approach is acceptable.
- We understand that the assessment of potential traffic impacts from HGV trips will be confirmed in due course. We would welcome further engagement on this to ensure the use of the data, whether it is from surveys or extracted from the PRTM model, meets National Highways requirements.
- We recommend that the approach and methodology to assess potential traffic impacts on the Strategic Road Network (SRN) and the identification of other junctions that might be impacted by the site are agreed in a 'staged approach'. We therefore welcome further engagement with the applicant and its transport consultants to progress and agree on these matters in due course.

Tempo Growth factors

- The use of Tempo 8.1 version for extracting the growth factors is accepted, however, we recommend separate growth factors for AM and PM periods are provided. From the information provided in the Highways report, only AM peak period growth factors have been considered.

Travel Plan

- With regard to the Circular, the National Planning Policy Framework (NPPF) and other relevant policies, National Highways welcomes proposals that reduce car dependency, need for travel and reliance on the SRN, and maximises opportunities for sustainable travel solutions such as walking, wheeling, cycling, public transport and shared travel. We understand a Travel Plan will be provided in due course and as such we welcome this approach.

General Comments

- An assessment of transport related impacts of the proposal should be carried out and reported as described Circular 01/202 and the Department for Levelling Up, Housing, Communities and Local Government guidance on preparing Transport Assessments.
- In order to understand the impacts of the proposed site on the SRN, National Highways applies the guidance given in the DfT Circular 01/2022. Therefore, the development should be fully assessed at the opening year of the development:
 - Opening Year (the year in which the development is expected to be opened) Reference Case Scenario: This scenario should include trips generated by the proposed development, forecasted growth, and committed development to establish the residual transport impacts of the proposed development. For multi-phase developments, additional assessments shall be provided based on the opening of each phase.
 - Opening Year With Development Scenario – Opening Year Reference Case Scenario + Proposed development. This scenario will determine whether any mitigation is required for the SRN.
- We recommend you liaise with relevant local planning authorities to determine the consented developments and their likely build out by opening year which will need to be incorporated in the assessment.
- We recommend you include a Construction Traffic Management Plan (CTMP) and Travel Plan along with the Transport Assessment report.
- We recommend including traffic count data, traffic flow diagrams and calculation spreadsheets to facilitate and speed our review process.

All the methodology and assessment work should be as agreed and undertaken in a staged approach. This approach should avoid any abortive work and ensure the timely agreement of assessment methodology.

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 74 and 109 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 108 and 114 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.