
From: Patrick Thomas <Patrick.Thomas@nationalhighways.co.uk>
Sent: 19 December 2024 12:36
To: Planning Folder New
Cc: Adrian Chadha; Searle, Jen; HE instructions
Subject: 24/00610/OUT - Brick Kiln Street, Hinckley
Attachments: 24_00610_OUT_NHPR_241217.pdf

Dear Sullivan,

I refer to the above planning application. National Highways does not appear to have been formally consulted on the application, despite being engaged in pre-application discussions with the developer in February this year.

Please see the attached letter and our recommended response, following our receipt and review of a PRTM Scoping report prepared by the developer's consultant.

Kind Regards
Patrick

Patrick Thomas, Spatial Planner
Operations Directorate
Midlands South and East

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

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

To: Hinkley & Bosworth Borough Council (FAO Sullivan Archer)
planning@hinckley-bosworth.gov.uk

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

Council's Reference: 24/00610/OUT

Location: Cadent Brick Kiln Street Hinckley Leicestershire LE10 0NA

Proposal: Outline planning application for the provision of up to 195 dwellings including affordable housing, landscaping, drainage, and associated infrastructure (All matters reserved except for access).

National Highways Ref: NH/24/04877

Referring to the consultation on planning application reference above registered on 19 June 2024, in the vicinity of the A5 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 PlanningEE@nationalhighways.co.uk.

Signature:



Date: 19 December 2024

Name: Patrick Thomas

Position: Spatial Planner

National Highways

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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 until 19th March 2025.

Reason

Further to our pre-application advice of 22 February 2024 provided to the applicant, National Highways has reviewed the PRTM Scoping Note by The Transport Consultancy (TCC) dated October 2024 and Transport Assessment and Framework Travel Plan by TCC dated May 2024. Based on the review of the above documents provided by the applicant, we have provided further comments that required to be addressed. These are summarised below.

Trip generation

The trip generation has been completed using trip rates extracted from the TRICS database 7.7.2 for 195 dwellings and has been compared against trip rates for the former employment site. Based on our independent checks, we are content with the residential trip rates provided and these provide an acceptable assessment for this application. However, for future applications we recommend that the trip rates are recalculated using the latest version of the TRICS database as well as filtering to regions in England, excluding Greater London and including only surveys from Monday to Thursday.

Growth factors

Based on our independent checks, we do not believe the TEMPro growth factors provided in the TA are accurate. Therefore, we require that the methodology including road type selection is provided to allow our independent checks to resume.

Trip distribution

Due to the length of time since the employment site was last used, we will only consider the traffic generation from the proposed residential development to determine the impact on the Strategic Road Network (SRN). We are content with both the trip generation and the trip distribution provided. Thank you for providing traffic flow diagrams and a detailed breakdown for our review and we are content with the outputs.

PRTM scoping note

1. Standalone Junction Modelling

The Dodwells and Longshoot junctions are known hotspots for delays and is expected to be worse in the 2029 model. Considering the sensitivity of these junctions, we request that these junctions are included in the initial capacity assessment.

Furthermore, careful consideration should be given to a “standalone” junction model if it would be able to model the delays on both junctions. The VISSIM model managed by National Highways is a more detailed model in the area capable to analyse the impact of the development on the Dodwell’s and Longshot junctions.

2. PRTM Model

Prior to using the PRTM model link flow data, a model suitability study needs to be conducted to see how the PRTM modelled flow and journey times compare against the observed data. In case of the model not validating in the study area to a satisfactory standard, modelled flows from the PRTM need to be adjusted before using them for furnishing.

3. PRTM model outputs

The following additional outputs should be provided to aid our review of the PRTM model runs:

- Highways Delay changes within AoI
- Individual Junction Plots – V/C ratios for SRN junctions breaching the AoI criteria
- Select Link Analysis of Development traffic

Travel plan

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 and as such we welcome the proposed approach.

We note that you will be preparing the Full Travel Plan based on the principles set out in the Framework Travel Plan and we look forward to reviewing this in due course.

Conclusions

It is important to note that these comments imply no pre-determined view of the acceptability of the proposed development in traffic, environmental or highway terms.

These comments relate specifically to matters arising from National Highways’ responsibilities to manage and maintain the SRN in England in line with DfT’s Circular 01/2022 to support sustainable delivery of growth. Comments relating to the Local Road Network should be sought from the Local Highway Authority.

As such we recommend that the application should not be decided until 19th March 2025. If we are in a position to remove this holding recommendation prior to this date we will of course do so.

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 Switch and Improve criteria as set out in clause 4.3 of PAS2080:2023 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.