

Your ref: 24/01117/EAS

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Dear Sullivan,

**A5 – EIA Scoping Request for construction of a B2/B8 employment development at Chase Fields Farm, Watling Street, Nuneaton, Warwickshire, CV11 6BG**

Thank you for inviting National Highways to provide comments on the Environmental Impact Assessment (EIA) Scoping Opinion request regarding the forthcoming planning application for the above proposal.

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.

As part of this application, our interest is the A5 which forms part of the SRN in the area. The nearest points of impact from the development on the SRN will be the proposed access point of a signalised T-junction onto the A5 Watling Street.

National Highways has outlined below both the general and specific matters that we would wish to see considered as part of the Environmental Impact Assessment (EIA).

**General aspects to be considered in all cases include:**

- We acknowledge that you will prepare a Transport Assessment (TA) and Travel Plan (TP) in support of the forthcoming planning application and look forward to receiving these for review.

- An assessment of transport-related impacts of the proposal should be carried out and reported as described in the Department for Transport's 'Guidance on Transport Assessment (GTA)' and DfT Circular 01/2022. Although the GTA guidance has been archived, it still provides a good practice guide in preparing a TA. In addition, the Department for Levelling Up, Housing, Communities and Local Government also provides guidance on preparing TAs.
- Environmental impact arising from any disruption during construction, traffic volume, composition or routing change and transport infrastructure modification should be fully assessed and reported.
- Adverse changes to noise and air quality should be considered, in relation to compliance with the Air Quality Standard Regulations, EU Exit regulations, and/or in local authority designated Air Quality Management Areas (AQMAs).

### **Site-Specific considerations:**

Following a review of the EIA, we have set out our comments below.

- We acknowledge that baseline traffic flows for 2024 (Base Year) will be reported as 18-hour AAWT and 24-hour AADT and will be provided as total traffic flows and HGV flows separately. We recommend that the traffic data collected from the surveys is collected in a neutral period. We look forward to receiving the traffic flows for review.
- It is mentioned that collision data for the study area will be obtained and analysed within the TA. Depending on the date of the planning submission, we recommend that collision data for the most recent 5-year period is assessed. As a minimum, we would require the study area to also include the A5 in proximity to the site. We look forward to receiving the collision data for review.
- We appreciate that the highway assessment methodology has been set out within the report and note that 2024 (Existing Base Year), 2028 (Opening Year) and 2036 (Completion Year) are proposed. We request that the construction year be confirmed.

### **Other matters:**

- We welcome the preparation and submission of the Construction Environmental Management Plan (CEMP) in support of the forthcoming planning submission.
- We also acknowledge that Air Quality and Noise Assessments will be included as part of the Environmental Statement. We look forward to reviewing these assessments in due course.

## **Transport Scoping Note, Masterplan and Updated Trip Rates**

In November 2024, we reviewed the Transport Scoping Note (TS) and Masterplan, dated September 2024, prepared by Stantec. In January 2025, we reviewed the updated trip rates, provided by Stantec via email on 23<sup>rd</sup> December 2024. As our comments from these reviews are still outstanding, we have provided them below for future reference.

### **Land Use Split:**

Please could you provide confirmation on the planned split between B8, B2 and Eg (iii) land use. The current trip generation assumes a 70/25/5 split, respectively. However, to ensure a robust assessment of the potential trip generation from this site, we require that the land use combination which generates the most trips should be used for future assessments.

### **Trip Rates:**

We appreciate the submission of updated trip rates following our guidance however we kindly request that the trip rates be recalculated using the “calculate trip rates for vehicles” option at the beginning of the TRICS process. This approach would eliminate the need for applying the journey-to-work modal split from census data, which is not appropriate for this site as it is not a residential development.

### **Modelling Comments:**

#### **Traffic Flow Data**

It is proposed that PRTM model and WCC Paramics will be used to extract the flows for with and without development (DM and DS) scenarios. It is suggested that a study be carried out prior to this to determine if the PRTM and WCC base and forecast models are suitable for the study. Earlier as part of the review of the “Land of Wellington” proposal, the base LMVR of the PRTM model was studied and calibration/validation issues were identified which are likely to be relevant to the current proposal. Any discrepancies between observed and modelled should be highlighted to ensure that we understand the robustness of the baseline.

#### **Paramics Models**

We request that further details be provided on the Paramics model, including the year validated, so that National Highways can determine its suitability for determining the impacts the site may have on the Strategic Road Network. We recommend that the models that are planned to be used are provided to National Highways in advanced to allow us to provide comments on the model. This will prevent any abortive work as it is likely that models may require local recalibration and revalidation.

We recommend that committed development assumptions within the PRTM and WCC Paramics model be provided in order to determine model suitability.

We also request the applicant provide confirmation as to why the A5 Atherstone Paramics model is not being considered given that it covers the A5 between M69 and M42 and is more up to date.

### **PRTM Outputs Required:**

In addition to the outputs listed in Section 2.2 of the Note, the following outputs should also be extracted from the model and provided for National Highways review:

- Flow Difference Plots.
  - Base vs DM Forecast models.
- Paramics Outputs Required: Section 2.5.
  - Latent / Unreleased demand.

### **Trip Distribution and Assignment**

The methodology states that trip distribution and assignment of development traffic will be extracted from both Leicestershire's PRTM and WCC's Paramics model. We request that details of trip distribution assumptions be provided for our review and note that the distribution will have to be agreed with National Highways.

### **Study Area**

National Highways will be in a better position to confirm the suitability of the study area once the trip generation methodology and trip distribution are agreed upon.

### **Traffic Surveys**

Notwithstanding the above, we recommend that Figure 2.1 in the Note be updated to reflect all of the junctions to be surveyed as listed in sections 2.10 – 2.12 of the Note. The surveys should also account for:

- Collection of current signal phasing information in the model study area; especially for the A5 Long Shoot junction.
- Junction turning counts for Redgate Junction - A444 Atherstone Road / A444 Weddington Lane and A5.
- ATC count data on the A5 between Wolvey Rd and M69 Junction 1.

Surveys should be undertaken during typical neutral months of April, May, June, September and October. We recommend that the MTC and queue length surveys are undertaken on neutral weekdays during school term time, with confirmation that no road works/diversions are in place at the time of the surveys.

We recommend that the survey data is validated against other data sources where possible (such as DfT or WebTRIS survey sites) and this validation is provided for our review to ensure that they are representative of typical traffic conditions. We also require the data collected from these surveys and validation checks be appended to any subsequent TA for our review.

## **Traffic Signals**

A review of the signals within the study area should be undertaken to ensure the forecast models reflect current timings/phasing data.

## **National Highways VISSIM Models:**

- We request further information regarding how National Highways' VISSIM model is proposed to be used for the proposal in combination with Paramics WCC and PRTM model.
- Given the data being collected, has the applicant considered the expansion of the VISSIM model to cover the relevant junctions?
- Model suitability study needs to be conducted on the VISSIM model before proceeding with using the model for the current proposal.

## **Model Years**

The modelling is planned to include a 2024 Base Year, as well as 2028 and 2036 future years. If the development is to be delivered in a phased manner, then the modelling scenarios also need to reflect the phased delivery in line with the DfT Circular 01/2022.

## **Hours of Assessment**

We consider that highway capacity assessments should be conducted during the weekday morning and evening peak hours in line with the peak operational hours of the proposed employment development. Nonetheless, we would also require that the highway network peak be established based on the baseline traffic surveys to ensure that assessments are conducted robustly.

## **Scope of Standalone Junction Modelling**

National Highways will be in a better position to comment on the scope of standalone junction modelling following agreement of the trip generation, distribution and strategic modelling approach. AutoCAD (.DWG) files of the geometric parameters pertaining to any SRN junctions for which standalone junction modelling would be required should be provided to National Highways such that they can be reviewed.

## **Mitigation Measures**

Depending on the results of the junction capacity assessments, suitable mitigation measures where issues are identified at the SRN junctions should be provided proportionate to the level of traffic impact caused by the development proposals.

## **Other Matters**

### **Collision Data Analysis**

For robustness, we recommend that collision data is assessed for the most recent five-year period for which data is available at the time of any planning submission. As a minimum we would require the study area to also include the A5 in proximity to the site.

### **Framework 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.

Further concerns have been raised in terms of the following:

- The interface/overlap between the proposed junction and those junctions already permitted along the A5 at this location,
- There being no secondary point of access for resilience purposes,
- Apparent lack of consideration in terms of direct access for walking and cycling (sustainable modes and permeability),
- Local demand for HGV parking on the SRN.

### **Road Safety Audit (RSA)**

The submitted Stage 1 Road Safety Audit (RSA1) is invalid as it has not followed the process requirements of GG 119. It is, however, noted that the report recommends a change to the existing 50mph speed limit, the principle of which may not be acceptable to National Highways. Early consultation in terms of the principle of a permanent Traffic Regulation Order (TRO) will be required if such a change is essential to the principles of the junction layout and development.

There is an existing parking layby within approximately 200 metres (northwest) of the commencement of the proposed junction. Paragraph 3.7 of CD 169 (The design of lay-bys, maintenance hard standings, rest areas, service areas and observation platforms) states “The separation between a lay-by and an at-grade junction or access (excluding field accesses) on the same side of the road, both upstream and

downstream, shall be at least  $3.75V$  metres where  $V$  is the design speed in kph.” The requirement for a 50mph (85kph) design speed is 318.75 metres and so the separation falls short of this mandatory requirement.

A shortfall would still be evident if the speed limit was changed to 40mph (70kph). A Departure from Standards will be required for this element of the design. Some of the notation on the Illustrative Masterplan – Alternative Site Access drawing does not appear to be shown or is not explained in the documents provided. The relevance of the STW pipeline route and extensive Gas Pipe Easements are unclear.

There is no information concerning the justification for the choice of junction. Were other junction forms considered before arriving at the traffic signal-controlled arrangement currently submitted?

The Illustrative Masterplan – Alternative Site Access drawing suggests that other means or forms of access may have been considered.

## **Scheme Layout**

While the comments above concerning the principle of the development should take precedence in any response, a high-level review of the submitted junction layout has been undertaken and further comments are below.

The A5 Access Signalised T-Junction Scheme Visibility to Traffic Signals drawing is to a scale of 1:1000 only. The A5 Access Signalised T-Junction Scheme drawing is to a scale of 1:1000 with 1:500 insets. Both drawings are labelled “indicative” and lack sufficient details and dimensions to enable full consideration against DMRB standards. The drawings also differ from each other in terms of the junction layout and geometry of the traffic islands.

Forward visibility to the signal head within the central traffic island for drivers approaching from the northwest could be impeded by vehicles waiting in the ghost island right-turn lanes.

Dimensions for lane widths and junction radii are missing from the design. Paragraph CD 123 (Geometric design of at-grade priority and signal-controlled junctions) paragraph 7.14 states “Where provision is to be made for large goods vehicles, the values for corner radii and associated tapers shall be the same as for a priority junction ...”

Significant allocated and permitted residential development exists on the opposite side of the A5 at this location, which appears not to have been fully considered and/or reflected in the submitted junction design. A complex road layout is potentially being created along the A5, between the A47 Long Shoot junction and new junctions to the northwest serving significant allocated or permitted residential developments.

The form of any permitted junctions and/or pedestrian/cycle facilities will need to be shown on the scheme drawings to enable consideration of the current or any subsequent junction layout proposed.

The proposed junction would be within an existing 50mph speed limit at present. The A5 Access Signalised T-Junction Scheme drawing notes “Access to approved Meadowcroft farm development ...” however, no further information is provided, and it is unclear if the permitted/required junction form is as currently shown. The continuation of the note “... with integrating informal pedestrian crossing with the traffic signals” is not explained but suggests that a required pedestrian route to an uncontrolled crossing is now being incorporated within the proposed signalised junction layout. CD 123 paragraph 7.17.4 states “A single pedestrian crossing route through a signal-controlled junction should not include a mix of controlled and uncontrolled crossing points.”

CD 143 (Designing for walking, cycling and horse-riding) England National Application Annex Paragraph E/4.6 is also considered to be relevant and states “Refuge islands shall not be provided where the speed limit is greater than 40 mph except where the refuge island is incorporated into a single lane dualling design.”

In terms of the current 50mph speed limit, the proposed shared footway/cycleway geometry does not comply with the recommended separation from the carriageway as set out in CD 143 paragraph E/3.5.1 (1).

It should be noted that where a DMRB “should” recommendation is not followed, GG 101 (Introduction to the Design Manual for Roads and Bridges) states “Recommendations with this verb form are good practice and can be varied without recourse to the departures process but require justification and a safety risk assessment where the recommendation is not followed.”

The lane markings and kerb-lines within the proposed horizontal alignment are irregular and appear to vary along their length. There appears to be a change in the alignment of the kerb-line within the 100m lane width reduction length noted to the southeast of the junction radius shown, the change appears to be dictated by the land ownership (red-line boundary). The kerb alignment on the southern side of the A5 appears to change abruptly at the traffic island.

It is unclear what clearance is provided to the traffic signals as the traffic islands are not dimensioned. Traffic Signal controller cabinets, feeder pillars and pedestrian guard railing will all need to be incorporated within the limited areas shown, along with maintenance laybys. CD 123 paragraphs 7.19 and 7.19.1 are relevant.

Boundary details appear to be missing along the southwestern side of the scheme, suggesting possible third-party land issues/constraints. It is unclear if a pedestrian and/or cycle connection can be made long the southwestern side of the A5.

The need for compliance with CD 127 (Cross-sections and headrooms) will also need to be demonstrated in principle, containing all necessary existing and proposed Highway assets.

The swept-path analysis inserts only show turning movements for the site access junction, however, the right-turn into the site for a 16.5 metre articulated vehicle has been omitted. Through traffic movements for a combination of vehicles will be required to demonstrate that the alignment shown can accommodate simultaneous through and turning vehicle movements without encroachment into adjacent lanes. The speed of any swept-path manoeuvres and through vehicle movements will need to be provided along with confirmation that “turn on the spot” is disabled in the software.

The deflection arrows shown are suggesting the need to merge to a junction exit lane which is physically reducing over the 100-metre distance shown. This is misleading and would be likely to result in vehicle conflicts (side-swipe incidents).

The overall junction layout appears irregular and potentially misleading for drivers. The “driveability” at the design speed is both questionable and potentially unsafe. It is noted from GG 119 (Road Safety Audit) that aspects that typically form the focus of an RSA1 include the following from the Appendix B check list: -

- “Will the proposed scheme be consistent with the standard of provision on adjacent lengths of road and if not, is this made obvious to the road user? ...”
- “Does adjacent development cause interference/ confusion? ...”
- “Is the junction type appropriate for the traffic flows and likely vehicle speeds?”
- The above aspects appear not to have been considered

## **Other matters**

Some mandatory requirements of DMRB appear not to have been addressed, as below:

- EqIA - Equality Impact Assessment screening (GG 101 paragraphs 1.8 – 1.10.1)
- WCHAR - Walking, cycling and horse-riding assessment and review (WCHAR) assessment report in accordance with GG 142 (paragraph 4.2) requirements.
- MRS - A Maintenance and Repair Statement is a mandatory requirement in accordance with GD 304 para. E/1.1

Visibility is not shown in the vertical plane as required by paragraphs 3.1/3.2 of CD 109 and paragraph 7.3 of CD 123.

Please note that these comments imply no pre-determined view of the acceptability of the proposed development in terms of traffic, environmental, or highway considerations.

These comments relate specifically to matters arising from National Highways' responsibilities to manage and maintain the Strategic Road Network (SRN) in England, in line with DfT's Circular 01/2022 to support sustainable delivery of growth. For comments related to the local road network, please consult the appropriate local highway authority. The Local Planning Authority will determine the final scope of the Environmental Statement.

Please do not hesitate to contact me if you require any further information or clarification.

Yours Sincerely,



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