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Dear Sir/Madam

## **CONSULTATION ON THE RUSHCLIFFE BOROUGH LOCAL PLAN PART 2: LAND AND PLANNING POLICIES DOCUMENT PREFERRED HOUSING SITES**

Highways England welcomes the opportunity to comment on the Local Plan Part 2: Land and Planning Policies Preferred Housing Sites (LPP2) document. The LPP2 sets out the non-strategic development allocations to ensure the Borough meets its housing target over the plan period 2011-2028. It also sets out a number of detailed policies for managing new development, following on from the strategic framework set out in the Local Plan Part 1 (LPP1). When adopted, it will sit alongside the LPP1 as the statutory development plan for the whole of the Borough.

Highways England has been appointed by the Secretary of State for Transport as 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). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Rushcliffe LPP2, our principal interest is safeguarding the operation of the A52, A453 and A46 which all route through the Plan area.

We have had extensive previous engagement with Rushcliffe Borough Council in the progression of the LLP1. Significant strategic development is set out, including sites at Melton Road, Edwalton; South of Clifton and East of Gamston which have the potential to significantly impact upon the operation of the SRN. In this regard, we have worked collaboratively with Rushcliffe Borough Council and Nottinghamshire County Council to agree a package of junction improvements on the A52 and A606 to support growth in Rushcliffe, and a Memorandum of Understanding (MoU) has been agreed with the Councils to secure proportionate developer contributions towards this package of improvements.

As part of the A52 junctions project, we are aware that there are also likely to be numerous active travel improvements that will be delivered. We would welcome these improvements as a means of providing alternative modes of travel to the private

vehicle, whilst at the same time improving accessibility for local people across the network and helping to avoid instances of segregation. We would be happy to work with partners in this regard.

We most recently responded to the LPP2 Further Options document in March 2017 which followed on from the Issues and Options consultation for the LPP2 in March 2016. These documents set out non-strategic development allocations and a number of detailed policies for managing new development. We noted that some of these allocations have the potential to impact upon the operation of the SRN, including options for development at West Bridgford, Keyworth, Radcliffe-on-Trent and Ruddington. It was considered that, where any of these sites had not been considered as part of the MoU, Transport Assessments would be required. The Transport Assessments should determine the level of impact and identify any requirement for a contribution in accordance with the MoU, or the need for any future mitigation.

We understand that the LPP2 needs to identify additional sites to ensure Rushcliffe Borough Council meets its housing target of 13,150 dwellings over the Plan period. At the time of the Further Options consultation in March 2017, it was set out that land would be found to allocate 1,100 dwellings across non-strategic sites in the LPP2. However, owing to a shortfall in land available for housing development over the next few years at sites previously identified in LPP1, an additional 900 dwellings are required to be found, therefore setting a minimum requirement of 2,000 dwellings. We now understand that the Council is proposing the allocation of 25 sites which would be expected to deliver around 2,550 new homes in total and would help to guard against any further housing delivery shortfalls.

We have carried out a high level review of the locations being proposed for the delivery of non-strategic sites that will equate to this total and have the following comments. We note that growth is planned at 'key settlements' including 350 dwellings at Cotgrave, 580 dwellings at Keyworth, 410 dwellings at Ruddington and 820 dwellings at Radcliffe-on-Trent. We note that these allocations are split across several sites. Whilst most of the sites are relatively small in scale, we consider that their proximity to the SRN could lead to additional traffic using the SRN and some potential impacts upon its operation.

We consider that Phase 1 of the A52 junction improvements scheme at junctions between Gamston and Bingham will provide short term mitigation for the smaller sites coming forward as identified in the current consultation document. However, we expect that Transport Statements / Transport Assessments will still be required to support individual planning applications as and when any of the non-strategic sites come forward and that they will be subject to the MoU process, as necessary, until such a time that funding for the improvement works has been completed.

We have limited further comments to provide in relation to specific sites identified throughout the consultation document. This is with the exception of the Land North of Grantham Road (South of railway line) site where we consider that direct access may be required from the site on to the A52. It should be noted that 'the creation of new accesses on the strategic road network can impact on its ability to fulfil the function of facilitating the safe and efficient movement of goods and people in the support of

economic growth by compromising traffic movement and flow', as stated in the DfT Circular 02/2013. As such, we would prefer other options to be considered ahead of this sites and would expect the Council to demonstrate that no reasonable alternative options exist before considering access on to the A52 as a possibility.

We trust that the above is useful in the progression of the Rushcliffe Borough LPP2 and would welcome further engagement with the Council as the plan progresses.

Yours sincerely,

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