

Planning Policy Team
via Email: Localdevelopment@rushcliffe.gov.uk

Scarlett Griffiths
The Cube
199 Wharfside Street
Birmingham B1 1RN

Direct Line: 0300 470 3034
Date: 28th March 2017

Dear Sir/Madam

Rushcliffe Local Plan Part 2 Further Options, CIL and Green Belt Review Part 2(b)

Highways England welcomes the opportunity to provide comment on the Rushcliffe Local Plan Part 2: Further Options (LPP2), the Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule and the Rushcliffe Green Belt Review Part 2(b).

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 the role of Highways England to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this particular consultation, Highways England's principal interest is safeguarding the operation of the A52, A46 and the A453 which route through the borough.

Highways England has had extensive previous engagement with Rushcliffe Borough Council in the progression of its Core Strategy. Significant strategic development is set out in the Core Strategy, 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 strategic road network. In this regard, Highways England has 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.

Highways England most recently responded to the Issues and Options stage of the LPP2 in March 2016 which set out non-strategic development allocations and a number of detailed policies for managing new development. It noted that some of these allocations had 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 to determine the level of impact and to identify any requirement for a contribution in accordance with the MoU, or the need for any future mitigation.

Highways England notes that the current consultation document constitutes an additional stage of consultation to supplement the Issues and Options stage. It considers some further issues relating to housing development and identifies a number of extra potential housing site options to deal with the issues identified.

It is noted that the LPP2 needs to identify land for housing development to meet Rushcliffe's housing target of 13,150 new homes between 2011 and 2028. This is in addition to the land that has already been allocated for housing development by the 2014 Core Strategy. However, Highways England understands that the Core Strategy allocated six large sites for housing development and that the development of these sites is taking longer to get underway than anticipated.

This means that the sites are unlikely to deliver as many new homes as previously expected by the end of the plan period or during the next five years. Indeed it is calculated that there could be around 900 fewer homes being built than is required over the subsequent five years (2019 to 2024). During consultation on the Issues and Options consultation last year, it was estimated that land for around 1,100 dwellings was required. Therefore this figure has now risen to 2,000 dwellings, given the additional 900 dwelling shortfall.

Highways England notes that numerous potential sites are identified in the current consultation document for development at 'key settlements' across Rushcliffe including at Cotgrave, East Leake, Keyworth, Radcliffe-on-Trent and Ruddington. The potential sites are for a range of different scales and given the fact that there are three sections of SRN routing through the borough, are all in relative proximity to the SRN. Indeed it is expected that sites, particularly at Cotgrave and Radcliffe-on-Trent may result in additional traffic using the A52; however in the short term at least it is considered that impacts would be offset by the reduction in housing that will be delivered up to 2028 at the strategic sites identified in the Core Strategy. Additionally, Phase 1 of the A52 junction improvements scheme at junctions between Gamston and Bingham from 2017 will also provide short term mitigation for any smaller sites coming forward as identified in the current consultation document.

Highways England is of the understanding that the total amount of housing being delivered up to and post 2028 may be higher than previously planned for (as a result of the additional smaller sites being found as set out as part of this consultation to make up for the shortfall associated with the delayed delivery of the strategic sites). It considers that this may present medium to longer term issues for the SRN which we would wish to consider further with relevant partners. However at this stage, it would not be possible for strategic transport modelling to be undertaken to consider post 2028 development growth figures. This is due to the fact that, for this modelling to be robust, it would also need to consider post 2028 development growth across the other HMA authorities and this has not yet been considered by these authorities.

However it is expected 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 are subject to the MoU process as necessary and until such a time that funding for the improvement works has been completed.

Highways England has limited further comments to provide in relation to specific sites identified throughout the consultation document. This is with the exception of four of the sites identified for potential development at Radcliffe-on-Trent; namely RAD3 – Land off Shelford Road, RAD5 – Land North of Grantham Road (South of railway line (1)), RAD7 – Land North of Grantham Road (South of railway line (2)), and RAD8 – Land South of Grantham Road. It is considered that all of these may require direct access 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, Highways England would prefer other options to be considered ahead of these sites and would expect the Council to demonstrate that no reasonable alternative options exist before considering access on to the A52 as a possibility.

With regard to the accompanying CIL Preliminary Draft Charging Schedule, Highways England has limited comments to provide. It notes that the project for a package of junction improvements for the A52 between the A6005 and A46 has not been included within the Regulation 123 List as this scheme is covered by the A52 MoU. This is considered to be an accurate position.

It is not considered to be Highways England’s position to provide comments on the Green Belt Review Part 2(b).

Highways England has no further information to provide at this stage but would like to remain engaged with Rushcliffe Borough Council as the LPP2 progresses.

Yours sincerely,

Scarlett Griffiths
Assistant Spatial Planning and Economic Development Manager
Email: [S](#)