



National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: Andy Jinks (Regional Director)
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Midlands Region
National Highways
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To: Rushcliffe Borough Council

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

Council's Reference: 24/00161/FUL

Location: Land West Of Bradmore Road and North Of Wysall Road Land

Proposal: Construction, operation and subsequent decommissioning of a renewable energy park comprising ground mounted Solar PV with co-located battery energy storage system (BESS) at the point of connection, together with associated infrastructure, access, landscaping and cabling.

National Highways Ref: 24/00161/FUL

Referring to the consultation on a planning application referenced above, in the vicinity of the **A52 and A46 trunk roads** that form 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

¹ Where relevant, further information will be provided within Annex A.

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.

Signature:

Date: 29 February 2024



Name: Catherine Townend

Position: Spatial Planner

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Annex A National Highway's assessment of the proposed development

This response represents our formal recommendations and has been prepared by Catherine Townend, Spatial Planner for National Highways.

National Highways (formally Highways England) 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.

National Highways considers planning applications for new developments under the requirements of the National Planning Policy Framework (NPPF) and DfT Circular 01/2022: The Strategic Road Network and The Delivery of Sustainable Development ("the Circular"). The latter document sets out our policy on sustainable development and our approach to proposals which may have an impact on our network.

The SRN in the vicinity of the proposed development is the A52 and A46 trunk roads.

Development Proposal

The proposed development consists of the construction, operation and subsequent decommissioning of a renewable energy park with an export capacity of up to 49.9MW of renewable energy per year. The Site would comprise ground mounted Solar PV with co-located battery energy storage system (BESS) at the point of connection, together with associated infrastructure, access, landscaping and cabling.

National Highways Comments

As the Site does not share a common boundary with the SRN, we have assessed the proposal in relation to traffic impacts only.

Operational Traffic

According to the Transport Assessment (dated January 2024), during the operational phase, traffic movements are expected to be minimal. Operational traffic would comprise one van accessing the Site twelve times per month i.e. twenty-four two-way vehicle movements per month. In light of the above, National Highways has no comments to make about the traffic impacts for the operational phase of the development.

Construction Traffic

According to the Transport Assessment, construction traffic will take the A60 South exit off the roundabout connecting with the A52. As the A52 constitutes part of the SRN, National Highways will have an interest in traffic generated by this proposal.

The Transport Assessment for the proposal discusses the traffic generation across the two separate parcels (north and south). This states that for the northern parcel, the construction period is anticipated to last for a period of 24 weeks. It has been estimated that across this construction period there would be 1,578 two-way HGV deliveries to Site, equating to an average of 12 two-way HGV movements per day.

The Transport Assessment however states that, for initial site set up for the first 2-3 weeks of construction that two-way HGV deliveries will be higher than the average of 12 two-way HGV deliveries. No further details are given.

It is also stated that up to 5 light vehicles will also attend the Site per day (10 two-way vehicle movements).

For the Southern parcel, the construction period is also expected to last for a period of 24 weeks. This is estimated to generate a total of 2,514 two-way HGV movements, equivalent to an average of 19 two-way HGV movements per day. It is stated however though that for the first 2-3 weeks of construction that two-way HGV deliveries will be higher than the average of 19 two-way HGV deliveries over the 24-week construction. No further details are given.

It is also stated that 10 light vehicles will also attend the Site per day.

The purpose of the 'light vehicles' mentioned above has not been explained and we note no mention of vehicle trip generation for construction worker staff.

It should be noted the Transport Assessment and Construction Traffic Management Plan should set out the traffic generation and distribution for the entire construction phase including staff trips. To satisfy National Highways, the hourly trip generation broken down into the different vehicle types should be presented.

In light of above, further information should be provided by the applicant, to set out the construction traffic impacts of the proposal.

Abnormal Loads

National Highways has a process for managing Abnormal Loads on our network. More information can be found on [our website](#).

Summary & Recommendation

In summary, insufficient information has been submitted for National Highways to understand how the proposal will affect the Strategic Road Network.

We therefore **recommend that this application not be approved for a period of up to three months from the date of this letter**. This is to give that applicant time to address the matters set out in this letter.

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.