



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

From: Regional Director, South West Operations Division, National Highways
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To: Cornwall Council
FAO [REDACTED]

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

Council's Reference: PA24/05578 and PA24/05579

Location: Treguddick Farm, South Petherwin, Launceston, PL15 7JN

Proposal: Fodder beet store 1 and Fodder beet store 2

National Highways Ref: NH/24/08684 and NH/24/08685

Referring to the consultation of the planning applications referenced above, in the vicinity of the A30 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.

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

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 Planningsw@nationalhighways.co.uk .

Signature: [REDACTED]	Date: 26 November 2024
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Annex A National Highway's 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.

We have undertaken a review of the relevant documents supporting the planning application to ensure compliance with the current policies of the Secretary of State as set out in DfT Circular 01/2022 "The Strategic Road Network and the Delivery of Sustainable Development" and the National Planning Policy Framework (NPPF). This response represents our formal recommendations with regards to planning applications reference PA24/05578 and PA24/05579.

Reasons

The proposals

The two related applications seek permission for agricultural storage (specifically for the storage of fodder beets). Each application comprises one storage barn providing approximately 465sqm of floorspace with associated works. Each barn is to be sited adjacent to the other, and both are located to the south of, but in close proximity to, the existing Treguddick Farm buildings.

Access to the site will be taken from a side road which provides a direct connection to the A30 westbound carriageway via a priority junction approximately 300m to the north of the application site. The side road currently provides access to the existing Treguddick Farm buildings and agricultural land, Treguddick Manor and Distillery, and a small number of dwellings.

Background and existing conditions

National Highways primary responsibility is the ongoing safe and efficient operation of the strategic road network, which in this case comprises the A30. In this location the A30 is dual carriageway and subject to the national speed limit. The Treguddick junction is located on the westbound carriageway and is of a very compact nature, at grade, located just below the brow of the hill and on the inside of a curve in the road. Associated with the junction are two at-grade central reserve crossovers. Due to the nature of the junction, the layout of which would not comply with current design standards, we are concerned with regards to development that will increase turning movements and thereby have the potential to impact on highway safety. As we have previously stated in response to other applications for development in this location, National Highways would be unlikely to support development which resulted in an intensification of use of the junction on highway safety grounds.

National Highways has recently completed its A30 Kennards to Five Lanes Safety Study, which includes the Treguddick junction and associated crossing points. This study proposes options for safety improvements along this corridor, particularly in respect of managing the risk associated with at grade cross-carriageway movements.

These proposals have recently been shared with Cornwall Council and the local community.

Assessment of the proposed development

The two barns for which permission is sought would ordinarily fall under permitted development rights given their scale and proposed use, which reflects the extant permitted agricultural use of the land. The vehicle trips associated with the barns once operational would therefore be considered to reflect those that could already occur as part of the permitted agricultural land use and in respect of which there are no current restrictions. National Highways therefore considers that it would be unable to sustain an objection to the barns as they reflect an existing permitted use. However, given our previously stated concerns with regards to intensification of uses at Treguddick on highway safety grounds, we would expect the planning authority to apply planning conditions to ensure that the barns remain for agricultural storage use ancillary to Treguddick Farm only, and no change of use shall be permitted. Nonetheless, it would be helpful if the applicant provided information to enable us to better understand how the operation of the barns could impact vehicle movements.

It has been confirmed by the planning authority that the requirement to submit planning applications for the proposed barns has been triggered by the associated land-reprofiling works which will be necessary to provide a level platform for the barns construction. From a review of information currently available on the planning portal, limited detail has been provided with regards the associated vehicle trips that will be necessary to import fill material.

To enable National Highways to provide informed advice to the planning authority with regards traffic management measures during the construction phase of the development, further information is required to enable us to understand the potential number, type, frequency and routing of proposed construction vehicle movements, and the anticipated duration over which these movements are expected to occur. This information will inform our requirements in respect of a planning condition to secure a detailed construction traffic management plan prior to the commencement of development. Any agreed traffic management measures will need to be implemented in full for the duration of construction works, with all costs to be met by the applicant. We consider this will be necessary to safely manage the increased highway safety risk arising from the addition of construction vehicle movements at the A30 Treguddick junction.

Summary

National Highways requires further information with regards to the potential vehicle movements associated with the construction phase of the development. This information will enable National Highways to provide informed advice to the planning authority with regards necessary planning conditions to safely manage the impact of construction traffic on the SRN.

It would also be helpful if the applicant could provide further information with regards the predicted change in vehicle movements that may result once the barns are operational.

Recommendation

National Highways recommends that Cornwall Council does not grant permission in respect of applications PA24/05578 and PA24/05579 for a period of 6 months from the date of this recommendation.

This is to allow time for the applicant to submit further information to enable National Highways to fully understand the impact of the development on the safe and efficient operation of the SRN in line with the requirements of DfT Circular 01/2022 and the NPPF, and thereby provide informed advice to the planning authority.

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.