Loughborough University Science and Enterprise Park (LUSEP)

784-B047965

Response to National Highways Consultation Response

Loughborough University

September 2025

Document prepared on behalf of Tetra Tech Group Limited. Registered in England number: 6595608

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1.0 INTRODUCTION

1.1 OVERVIEW

1.1.1 We are in receipt of National Highway's (NH) highways consultation response dated 22 May 2025 in relation to planning application P/25/0697/2 for:

"Outline planning application with all matters reserved, save for access for: a) Provision of up to 190,000 sq.m of floorspace within Use Classes E(g)(i); E(g)(ii);(E)(g)(iii);Class E(d) (indoor fitness); Class E(f) (creche); Class F1; Class E(a); Class E(b); Class F2;and Class C2, C1 and B2 and ancillary university uses; b) means of access onto Oakwood Drive, Holywell Park car park, multiple access off Snells Nook Lane; c)Public open space, landscaping and associated infrastructure; and d)Energy infrastructure. Detailed planning application for: a) the erection of a building comprising a total of 21,691sqm of floorspace within Use Class B2 alongside ancillary E(g)(i), E(g)(ii) and B8 uses, with associated landscaping and infrastructure; b) the formation of a vehicular access and link road from Ashby Road and Snells Nook Lane (to include associated earthworks); and c) the demolition of buildings."

1.1.2 Comments were provided in response to the Transport Assessment (TA) and supporting information prepared by Tetra Tech and submitted as part of the April 2025 planning application.

1.1.3 A meeting with senior NH representation is requested to discuss the NH response at a strategic level. In the meantime, this note provides a response to some of the queries and requests for clarification raised by NH in its consultation response to the Local Planning Authority.

1.1.4 NH's statutory highway consultation response is attached in **Appendix A**. Comments made in relation to additional modelling work at M1 Junction 23 (M1J23) are addressed below before the remainder of this document addresses each of NH's comments in turn.

1.2 M1 JUNCTION 23

1.2.1 The main area of interest for National Highways is M1J23. NH has recommended that a new traffic model is developed to assess the operation of M1J23. As explained in the TA submitted with the planning application and in Transport Working Group meetings, most recently on 12th August 2025 and 2nd September 2025, improvement works were completed at M1 Junction 23 and the A512 approaches in June 2021. The works were designed to help unlock land for growth, namely the Garendon Park SUE and LUSEP Phases 3 and 4.

Background

1.2.2 Policy CS22 of the Charnwood Local Plan Core Strategy 2011 – 2028 identified a requirement for dualling of the A512 between Snell's Nook Lane and M1J23, and capacity improvements to M1J23. Policy CS22 related to the Garendon Park SUE. Planning permission was approved for 3,200 dwellings at Garendon Park in 2014 and included junction improvement works at M1J23 and dualling of the A512 in accordance with Local Plan policy.

1.2.3 Following approval of the Garendon Park SUE, LCC assumed responsibility for the detailed design of the scheme. Works began on-site in 2019 and were funded by the Local Growth Fund, Getting Building Fund and the Growth and Housing Fund, with financial contributions from the Garendon Park SUE and LUSEP Phases 3 and 4 developments. Loughborough University's contribution to these works is circa £1.8m.

1.2.4 The design and development of the scheme progressed through a series of working groups which included CBC, LCC, NH (formerly Highways England) and Tetra Tech (formerly WYG). This collaborative approach means that assumptions associated with future demand were critically assessed and challenged.

TA Conclusions

1.2.5 As explained in the TA, the works were informed by a higher volume of traffic flows at M1J23 from LUSEP than is now forecast. Furthermore, the total traffic flows that were used as the basis for the M1J23 scheme design are higher than the 2026 'opening year' traffic flows in the TA. Traffic flow volumes considered are detailed further in Section 2.1.

1.2.6 Therefore, as demonstrated by modelling work undertaken as part of the Garendon Park TA and subsequent design of the M1J23 scheme, the improvement works already delivered at M1J23 and on the A512 approaches are suitable for accommodating proposed LUSEP development. No further assessment work should therefore be required at M1J23 and as such, no further assessment work is presented. The transport work undertaken to inform the scheme design will provide National Highways with the necessary evidence supporting the scheme design. This approach is in accordance with paragraph 45 of Circular 01/22 which states:

"Where development proposals are fully in accordance with an up-to-date development plan, considerations at planning application stage in respect of impacts on the SRN will normally be limited to agreeing the final form and phasing of any supporting infrastructure (where required), measures to reduce the need to travel by private car and any relevant environmental impacts."

Next Steps

1.2.7 Given the significant amount of work undertaken to inform the scheme design of the recent M1J23 and A512 works, and the commitment form Loughborough University to provide circa £1.8m towards the works as mitigation for development impact from LUSEP phases 3 and 4, no further modelling work should be required. A meeting with senior NH representation is requested to discuss this further at a strategic level with a view to agreeing that no M1J23 modelling work is required. Mitigation in the form of a circa £1.8m contribution has been agreed. Given that the development proposals are in line with previously assessed proposals, it is unreasonable for discussion in relation to mitigation to be revisited. The University will not be providing additional mitigation at M1J23. Further modelling work is not necessary to enable NH to assess the planning application.

2.0 BACKGROUND TRAFFIC FLOWS

2.1 TRAFFIC DATA COMPARISON

2.1.1 As requested, traffic count data used in the TA at M1J23 has been reviewed against WebTRIS traffic data from all neutral months in 2024 i.e. April May, June, September and October. Data has been obtained for all weekdays excluding school holidays. **Table 2-1** summarises WebTRIS traffic flows on each of the slip roads at M1J23 in PCUs. A comparison is shown with M1J23 traffic count data used in the TA.

Table 2-1: M1J23 Traffic Data Comparison

Month	M1 North Off-Slip		M1 North On-Slip		M1 South Off-Slip		M1 South On-Slip	
	AM	PM	AM	PM	AM	PM	AM	PM
April	737	425	788	696	988	733	417	642
May	717	437	741	628	909	650	443	635
June	728	442	727	623	885	692	432	632
September	684	464	777	685	963	706	369	633
October	714	434	798	701	1031	734	378	637
WebTRIS 2024 Average	**716**	**441**	**761**	**661**	**947**	**699**	**411**	**635**
2024 TA Count	**725**	**428**	**813**	**803**	**928**	**744**	**513**	**668**
Difference between TA Flows and WebTRIS Flows	+1.2%	-3.1%	+6.8%	+21.5%	-2.0%	+6.5%	+25.0%	+5.2%

2.1.2 As would be expected, there is variation in 2024 traffic flows throughout the months for which WebTRIS data has been obtained. When the average across all months is compared to the 2024 traffic flows used in the TA, traffic flows used in the TA are generally higher than the WebTRIS average. M1J23 traffic flows are therefore considered robust and appropriate.

3.0 JUNCTION CAPACITY ASSESSMENTS

3.1 LOCAL HIGHWAY NETOWRK JUNCTIONS

3.1.1 It is noted that NH has made comments in relation to three junctions on the local highway network for which Leicestershire County Council (LCC) is the local highway authority, namely:

- A512 Ashby Road Central / A512 Ashby Road East / B591 Ingleberry Road / Leicester Road
- A512 / Garendon Park Strategic Link Road (SLR) / LUSEP Access
- A512 / Newhurst Energy Recovery Facility

3.1.2 As explained in the TA, the LinSig model of the A512 Ashby Road Central / A512 Ashby Road East / B591 Ingleberry Road / Leicester Road junction was provided by Leicestershire County Council's traffic signals team. The assessment has been undertaken without making any changes to the received models (other than for signal timing optimisation). Given that this is an LCC approved model for a junction on the local highway network, no model calibration or validation has been undertaken as it has not been requested by LCC as the local highway authority. Flow inputs are presented in Appendix M of the TA. As requested, model input files will be emailed directly to NH.

3.1.3 The LinSig model of the A512 / Garendon Park Strategic Link Road (SLR) / LUSEP Access roundabout has been taken from the TA submitted with the planning application for Garendon Park. This was the LINSig model that informed the M1J23 and A512 scheme design. As the traffic signals have not been switched on yet, the LinSig model cannot be validated. This approach is appropriate and includes forecast traffic flows for when the Garendon Park SLR and LUSEP arms of the junction are in use. Given that this is an approved model that informed the A512 scheme design for a junction on the local highway network, no model calibration or validation has been undertaken as part of the LUSEP TA as it has not been requested by LCC as the local highway authority. Flow inputs are presented in Appendix M of the TA. As requested, model input files will be emailed directly to NH.

3.1.4 NH comments in relation to the A512 / Newhurst Energy Recovery Facility junction are unexpected. There were multiple opportunities to request this junction for assessment but it was not raised through any of the Transport Working Group meetings which occurred between [dates], nor in the scoping and response to Leicestershire's Pan-Regional Transport Model (PRTM) assessments which were all previously shared, discussed and agreed with NH. As an allocated strategic employment site, we expect that consideration to LUSEP traffic would have been accounted for within the Energy Recovery Facility TA. This junction is not modelled within the PRTM and we do not intend to model this junction given the volume of traffic likely to be associated with its operations.

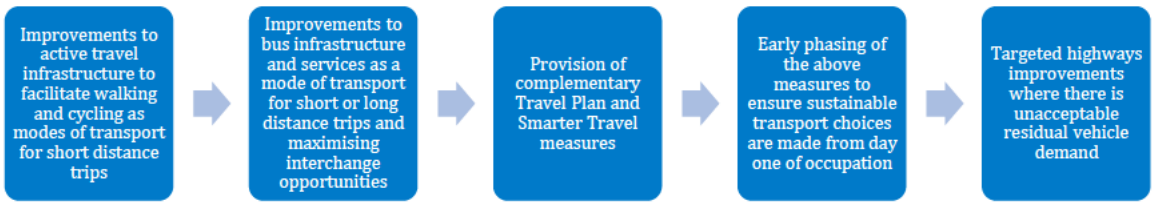
3.1.5 It is understood that the basis for the queries in relation to these three junctions centres around the interaction with M1J23. It is suggested that this forms part of discussion to be had with NH in relation to M1J23.

4.0 MITIGATION STRATEGY

4.1 OVERVIEW

4.1.1 As explained previously and as set out in Section 1.2, off-site impacts on the NH network have already been mitigated at M1J23 with Loughborough University contributing circa £1.8m towards the scheme, as agreed and signed off by all relevant stakeholders. The University will not be providing additional mitigation at M1J23.

4.1.2 In terms of impacts on the wider highway network and the need for mitigation, the mitigation strategy is set out in the TA and is the subject of ongoing discussions with LCC as the local highway authority. The approach to mitigation is summarised as follows:



4.1.3 The above approach is consistent with the priorities set out through the NPPF and Circular 01/22 which promotes a sustainable travel first approach.

5.0 PRTM BASE YEAR

5.1 TRAFFIC FLOWS

5.1.1 It is noted that NH has identified the Loughborough north-south screenline (Epinal Way) as under-estimating traffic volumes in the AM and PM peak periods. It is also noted that NH does not consider this to be a 'major concern' in the context of the NH road network. The NH comment is noted.

5.1.2 To clarify, it is not anticipated that any further future forecasting will be undertaken using PRTM.

6.0 PRTM FORECASTING REPORT

6.1 TRAFFIC PATTERNS

6.1.1 Previously discussed concerns in relation to unexpected traffic patterns from PRTM showing 'with development' flows to be lower than 'without development' flows at some locations were addressed in the TA as per the methodology discussed prior to submission of the planning application, and as referenced in the NH consultation response. This is outlined in Section 12.8 on the TA.

6.1.2 To clarify in relation to Appendix J of the TA (which is referenced in NH's consultation response), Appendix J contains PRTM outputs provided by LCC's PRTM team. As per the methodology outlined in Section 12.8 of the TA, adjustments to address the unexpected traffic patterns in the PRTM outputs have been made at an individual junction level to the A512 / Epinal Way and Nanpantan Crossroads junctions. These calculations are in Appendix M of the TA. To clarify in relation to Sections 13.2 and 13.3 of the TA (which are referenced in NH's consultation response), these relate to the content of the PTRM Forecasting Report provided by LCC's PRTM team (i.e. no sensitivity test adjustments).

6.2 COMPARISON WITH FLOWS USED TO INFORM M1J23 SCHEME DESIGN

6.2.1 As demonstrated in the LUSEP TA, the 2026 traffic flows in the LUSEP TA are lower than the traffic flows in the Garendon Park TA that were used as the basis for the scheme design. To inform this response, a sensitivity test has been undertaken to address NH concerns relating to unexpected traffic patterns from PRTM. A set of flows without the re-assignment impacts have been derived. This was done by utilising the relevant 'without development' flows (derived and furnessed as described in Chapter 12 of the TA) and simply overlaying the development flows from the select link analysis. This is the same as the approach taken at the A512 / Epinal Way and Nanpantan Crossroads junctions and is presented in **Table 6-1**.

Table 6-1: M1J23 Traffic Flow Comparisons

Scenario	AM	PM
2031 M1J23 Assessment Flows used in Garendon Park TA	5,650	4,845
2026 M1J23 Assessment Flows used in the TA (unadjusted)	4,994	4,529
2026 M1J23 Assessment Flows used in the TA (sensitivity test)	5,309	4,688

6.2.2 As demonstrated in **Table 6-1** the 2026 unadjusted and sensitivity test traffic flows are lower than the traffic flows in the Garendon Park TA that were used as the basis for the scheme design. This adds further weight to support the position that no further modelling work is required at M1J23 and the mitigation which was designed and now delivered remains suitable.

6.2.3 To clarify, it is not anticipated that any further future forecasting will be undertaken using PRTM.

7.0 TRIP DISTRIBUTION

7.1 OUTPUTS FROM LCC'S PRTM TEAM

7.1.1 Comments in relation to the PRTM outputs in Appendix L of the TA are noted. All plot outputs in Appendix L were provided by LCC's PRTM team and have not been created by Tetra Tech.

7.1.2 To assist NH, the individual pdf files for each of the plots in Appendix L will be emailed separately as the file names contain the scenario name for each plot.

7.1.3 Plots zoomed in on the development and separate plots for inbound and outbound development trips have not been provided by LCC's PRTM team.

7.1.4 To clarify, where development flows are referenced e.g. in PRTM plots or traffic flow diagrams, the 'development' is the complete phase 3 and phase 4 development. This is as per the agreed TA scope which confirms that the 2026 and 2056 assessments are of the full development. As agreed, individual phases of development have not been assessed. The inclusion of both Phase 3 and 4 in the 2026 'with development' assessment complies with the opening year test requirement as set out in Circular 01/22.

APPENDIX A: NH CONSULTATION RESPONSE

National Highways Planning Response (NHPR 25-01)
Formal Recommendation to an Application for Planning Permission

From: Kamaljit Khokhar (Head of Planning & Development)
Operations Directorate
Midlands Region
National Highways
PlanningM@nationalhighways.co.uk

To: Charnwood Borough Council - FAO [redacted]

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

Council's Reference: P/25/0692/2

Location: Loughborough University, Science and Enterprise Park, (Land east and west of Snells Nook Lane, Loughborough

Proposal:

Outline planning application with all matters reserved, save for access for: a) Provision of up to 190,000 sq.m of floorspace within Use Classes E(g)(i); E(g) (ii);(E) (g)(iii); Class E(d) (indoor fitness); Class E(f) (creche); Class F1; Class E(a); Class E(b); Class F2; and Class C2, C1 and B2 and ancillary university uses b) means of access onto Oakwood Drive, Holywell Park car park, multiple access off Snells Nook Lane; c) Public open space, landscaping and associated infrastructure; and d) Energy infrastructure.

Detailed planning application for:
a) the erection of a building comprising a total of 21,691sqm of floorspace within Use Class B2 alongside ancillary E(g)(i), E(g)(ii) and B8 uses, with associated landscaping and infrastructure
b) the formation of a vehicular access and link road from Ashby Road and Snells Nook Lane (to include associated earthworks); and c) the demolition of buildings.

National Highways Ref: NH/25/11091

Referring to the above referenced planning application and consultation dated 1 May 2025 in the vicinity of the M1 motorway (J23) 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.

Should the Local Planning Authority propose not 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.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

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

Signature:	**Date:** 22 May 2025
Name: [redacted]	**Position:** Assistant Spatial Planner
National Highways	
The Cube, 199 Wharfside Street, Birmingham, B1 1RN	

Annex A National Highways' 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.

In responding to strategic sustainable development consultations, we have regard to DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of plans and development management proposals. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

National Highways Comments

Further to the submission of the above referenced planning application we have reviewed the Transport Assessment and Travel Plan submitted by Tetra Tech Limited on behalf of Loughborough University for the hybrid planning application for phases 3 and 4 of Loughborough University Science and Enterprise Park (LUSEP), Loughborough. The site is located approximately 0.5km east of the M1 Junction 23, which forms part of the Strategic Road Network (SRN) in the area.

Based on our review, we have set out our comments below for your consideration.

Section 3
Background Traffic Flows
Thank you for providing the traffic survey information in Appendix D, including the dates when the survey was undertaken. We are content that the traffic surveys were carried out on a neutral date. However, we recommend that the traffic surveys are validated using other count sources (such as local counts from Leicestershire County Council (LCC) or WebTRIS data) to ensure that the data replicates a typical neutral period.

Collision Analysis
Thank you for providing an overview of collisions within the study area of the proposed development. The Personal Injury Collision (PIC) data has been obtained from LCC for the most recently available five-year period between 1 January 2019 and 19 March 2024. Based on our independent assessment of the collision data, we are content with the PIC data provided for the M1 Junction 23 in Table 3-5. We typically request that the pandemic years (2019 and 2020) from the five-year assessment period are excluded. However, our independent check indicates that no accidents were reported in 2018. Therefore, we are satisfied with the information provided.

Sections 6 and 7
Proposed Development and Access - Parcel 4.2
Sections 6 and 7 of the TA provide an overview of the detailed planning application for a 22,247 sqm advanced manufacturing building for the relocation of Druck Manufacturing from Groby to the Science Park, along with the associated access arrangements. Based on our review, we have no concerns regarding the relocation of the employment site, and in principle, are satisfied with the proposed access.

Section 8 – Parking Strategy
National Highways is content with a parking hub strategy being used for the site as opposed to plot-specific parking.

Section 12 – Trip Generation
We note that the proposed vehicular trip rates are extracted from the recorded arrivals and departures at LUSEP Phase 1 and 2 and have been agreed with LCC and National Highways prior to the TA submission. We are content that the trip rates proposed in Table 12-1 of the TA are the same as those accepted by National Highways in July 2024, following the review of Table 1 of the 'Trip Rate Technical Note' dated 31st May 2024. Table 12-1 shows that the site is proposed to produce 2,530 AM peak trips and 1,736 PM peak trips.

Section 15 – M1 Junction 23
Thank you for providing information regarding the potential impact on the M1 Junction 23. However, based on our review, we have noted that the Garendon Park SUE application was approved in 2018, and therefore uses traffic data which is now over seven years old. It is appreciated that the TA acknowledges that the Garendon Park SUE application identified greater levels of traffic flows, however, traffic patterns could have altered since the modelling from this application was undertaken, particularly given the highway network alterations undertaken in 2021.

Therefore, we recommend that a model assessing the impact of the site on the M1 Junction 23 is developed. This should include a calibrated base year assessment using the collected traffic survey data, as well as an opening year assessment, using the PRTM model outputs or the traffic flows from the traffic survey, and growth applied using TEMPro factors.

Section 16 – Junction Capacity Assessments
We are content with the assessment years provided and note the 30-year build-out period of the development.

Based on the current assessments, the queues from the site access are not expected to impact the M1 Junction 23. However, in the 2026 scenario 'with development', queues of 113 PCUs (650 metres) are predicted on the A512 westbound approach to the A512 Ashby Road / Leicester Road / Ingleberry Road Junction. This is in comparison to 32 PCUs (184 metres) in the 2026 'reference case' scenario. This almost extends into the M1 Junction 23 circulatory due to the development, and this is without considering the A512 / Newhurst Energy Recovery Facility Access Junction. Therefore, based on the assessment, National Highways has concerns with the queue increases identified, and we recommend that suitable mitigation measures are proposed for the junction.

In addition to the above, National Highways would like to enquire if any model calibration or validation has been undertaken for the A512 Ashby Road / Leicester Road / Ingleberry Road Junction, and for the A512 / Garendon Park SLR / LUSEP Access Junction. Could annotated geometry measurements, flow inputs, and model files for the junction be provided to allow us to review the model assessments.

National Highways also requests that the A512/ Newhurst Energy Recovery Facility Access Junction is modelled and assessed due to the proximity of the signalised junction to M1 Junction 23. We also recommend that suitable base model calibration and validation is undertaken for the base model assessment to ensure the junction suitably reflects the existing network conditions.

Section 17 – Mitigation Strategy

- As noted above, National Highways recommends that suitable mitigation should be considered at the A512 Ashby Road / Leicester Road / Ingleberry Road Junction.
- National Highways will be in a better position to comment on the potential impact on the SRN once our comments have been addressed.

Other Matters

Please could a traffic flow diagram for the trip distribution from the site be provided?

PRTM Base Year

- The PRTM base model zoning system appears logical and appropriate.
- Network representation around the proposed development site is comprehensive.
- Calibration and validation show reasonable coverage across screenlines, cordons, and journey time (JT) routes in the vicinity of the site. However, the Loughborough North-South Screenline (Epinal Way) consistently underestimates traffic volumes during both AM and PM peaks. This aligns with JT data, which suggests delays are similarly underestimated. Appendix L shows that development traffic along this screenline could exceed 30PCUs. While this area does not form part of the SRN and is not a major concern, this underestimation should be carefully factored into future forecasting.

Chapter 13 – PRTM Forecasting Report

- The PRTM forecasting report had previously raised concerns regarding an unexpected pattern of showing 'with development' traffic flows to be lower than the 'without development' scenario. To address this, it was subsequently communicated that the core / sensitivity models would be revised to overlay the development select link flows onto the 'without development' model outputs, thereby correcting the inconsistency. However, in the current version of the TA, while Appendix J is referenced, it does not clearly outline this revised methodology. Moreover, the content and findings presented in Sections 13.2 and 13.3 appear to align with the earlier modelling approach. We therefore request clarification on whether these sections reflect the updated methodology, and if not, when the revised modelling outputs will be available.
- Chapter 12.8 outlines a methodology for deriving junction traffic flows. Will a similar method be adopted for developing PRTM forecasting models?

- Thank you for including flow difference plots with clear labels. Please ensure forecast year and time period are labelled to avoid misinterpretation.

Appendix L – Trip Distribution

- Detailed review of trip distribution plots was constrained by the following issues:
  - The legend and plot details lack clarity as they do not specify the corresponding year or time period.
  - For each plot, a zoomed-in version around the development area would be helpful to assess immediate impacts.
  - Please share separate maps for "Flows from Development (Origin)" and "Flows to Development (Destination)".
  - Clarify whether plots represent combined traffic for Phase 3 and Phase 4 developments.
  - The zone loading points for Phases 3 and 4, as shown in Image 12-1, appear sensible.

Travel Plan

Thank you for providing the Travel Plan following DfT guidance. National Highways welcomes proposals that reduce car dependency, the need for travel and reliance on the SRN, and maximise opportunities for sustainable travel solutions such as walking, wheeling, cycling, public transport and shared travel, and as such, we welcome the proposed approach.

Standing advice

It is important to note that these comments imply no pre-determined view of the acceptability of the proposed development in traffic, environmental or highway terms and that 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 the DfT's Circular 01/2022 to support sustainable delivery of growth. Comments relating to the Local Road Network should be sought from the Local Highway Authority.

I trust that the above comments are helpful, and we look forward to receiving the Transport Statement for review in due course. Should you have any queries, please do not hesitate to get in touch.

Recommendation – Application not to be determined for a period of 3 months from the date of this notification.

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 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

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.