



Our Ref: NH/24/08441

Your Ref:

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Via Email: [localplan@rutland.gov.uk](mailto:localplan@rutland.gov.uk)

Dear Sir/Madam

### **Rutland Local Plan Regulation 19 Consultation (Pre-Submission) – Preferred Options for the new Local Plan**

National Highways welcomes the opportunity to provide comments on the draft Regulation 19 consultation, in respect of the preferred options for the new Local Plan for Rutland.

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). 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 this consultation, National Highways' principal interest is ensuring the safe and efficient operation of the A1 trunk road which routes through Rutland on the eastern side of the county.

In responding to Local Plan consultations, we have regard to the Department for Transport's (DfT) Circular 01/2022 - Strategic Road Network and the delivery of sustainable development ("the Circular") which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:

*The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and*

*strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan.*

In addition to the DfT Circular 01/2022, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

### **Previous Consultations**

National Highways was previously consulted during the Regulation 18 Consultation in January 2024. The total demand identified included a minimum of 2,460 new homes over the plan period equivalent to at least 123 dwellings per year, together with approximately 27 Ha of employment land.

### **Regulation 19 Local Plan (Publication Version)**

The Regulation 19 Local Plan outlines locally specific policies and both strategic and non-strategic site allocations to meet the housing and employment needs of Rutland for the plan period from 2021 to 2041. We note that when adopted, this Local Plan will replace the following current Development Plan Documents; Minerals Core Strategy and Development Control Policies DPD (adopted in 2010), Core Strategy DPD (adopted in 2011) and Site Allocations and Policies DPD (adopted in 2014). We also note that the Local Plan includes a schedule of policies that remain saved from the previous plans, along with the inclusion of new policies, as detailed in Appendix 2 of the Local Plan (Publication Version) document.

National Highways agree in principle to the vision and objectives of the Regulation 19 Local Plan.

### **Comments on Specific Policies**

In addition to the above, National Highways has the following comments on specific sections of the local plan:

### **Employment and Housing Requirements**

Based on our review of the Regulation 19 consultation, we note that the housing requirement has not changed since the 'Regulation 18 – Draft Local Plan' consultation. It

outlines as part of Policy SS1 a requirement to deliver at least 123 dwellings per annum (2,460 over 20 years between 2021-2041). There is also consideration for an additional 10% allowance, increasing housing provision to 2,705 new dwellings and provision for approximately 27 Ha of employment land.

The largest allocation of housing is proposed in Oakham, Uppingham, and Stamford North. In terms of employment, the largest allocation is proposed at Tickencote.

### **Future Opportunity Areas**

St George's Barracks has the potential to deliver between 350 to 500 dwellings and Woolfox 4,000 dwellings and 100 Ha of employment. Although these two sites will not be allocated in the local plan, they have been identified as future opportunity areas (policy SS4). The policy includes a framework to secure the viability of these sites for future housing and employment provision through the Local Plan review or the preparation of separate Development Plan Documents (DPD).

National Highways welcomes the provision of a framework to require provision of a detailed transport assessment including proposals for the delivery of sustainable transport and active travel to minimise the reliance on private car use. In due course, we will welcome further engagement to understand and address transport-related matters, including access and potential mitigations, related to the A1.

### **Traffic Impact**

In terms of the proposed allocations, National Highways has raised specific interest in understanding the cumulative impacts of planned growth within the area, particularly regarding traffic generation and associated pressures on the A1 trunk road. Additionally, the future opportunity areas have the potential to generate a significant number of trips on the SRN.

Therefore, we await a detailed assessment to understand the impacts of this growth on the SRN and welcome further engagement with the Rutland County Council to develop a strategic approach for any necessary mitigation on the SRN to support the planned growth.

### **Impact Assessment**

As noted in our response during the Regulation 18 consultation, any potential sites anticipated to have an impact on the SRN in the area are subject to consultation with National Highways, and the proposal to be appropriately assessed in line with the DfT

Circular 01/2022, to determine the potential impacts on the SRN. Depending on the scale of likely impacts, the applicant may need to identify suitable mitigation measures.

It is to be noted that the cumulative impact of the proposed site allocations also needs to be assessed in line with the Circular for understanding the likely traffic impacts on the SRN, in terms of capacity and safety and identifying any possible mitigation measures required.

We note a commitment for a Transport Impact Assessment (Policy H2), this is welcomed and we look forward to receiving the document for review.

### **Rutland Traffic Modelling**

During the Regulation 19 consultation, we reviewed the Rutland Traffic Model (RTM) Options Scoping Note and agreed on a proportional approach for testing the Local Plan, considering limited housing allocations and timelines.

Subsequently, National Highways provided comments on the Local Model Validation Report (LMVR) and Forecasting Report (FR). Following this, to address some of our comments, we received updated versions of the LMVR (v1.02) and FR (v1.5) on 16 October 2024 along with an email providing further clarifications to outstanding queries.

From the review of the most recent information provided on 16 October 2024, our comments below provide our latest position on the traffic modelling evidence base for the Rutland Local Plan testing.

- a) We have reviewed the modelling methodology applied, which is sensible and proportional for providing an evidence base for the Rutland Local Plan Regulation 19 consultation.
- b) The evidence base is developed by creating a version of the Pan Regional Traffic Model (PRTM) developed by Leicestershire County Council to include areas within Rutland. As the model is proportional, the road network to the east of the A1 is less detailed, with the understanding that the Quarry Farm (Monarch Park) site in Stamford is being tested in another local model and other major sites in Oakham and Uppingham are away from the A1.
- c) Section 8.3.1 of the LMVR notes that C2 database counts used for validation were collected between September 2022 and November 2022 but were not rebased to 2023, as the factors were insignificant. This is not a concern to us.
- d) Thank you for providing us with screenline count details to the west of the A606 / A1 junction with a count ID PRTM-59.27. We note that this location fails in one of two directions in each time period, eastbound in the AM and westbound in the PM peak, overestimating the traffic in both directions while the overall screenline is a very good match to the observed counts. Though not ideal, such issues are not

uncommon in such a large regional model and any development traffic routed through this count ID should be monitored.

- e) We have noted that the proposed trip generation of future housing developments is proposed to be 0.45 two-way trips per dwelling. This number is acceptable.
- f) We are content with the sites chosen to be represented in each of the future scenarios presented and that they are reflection of the uncertainty log within the local plan.
- g) The distribution of traffic has been based on the PRTM model. However, we request that distribution flow plots be provided for our review, so we can assess the distributions and how the proposed sites in the local plan will impact the network.
- h) We are content with the growth of the network applied from the PRTM model.
- i) Several junctions along the A1 are noted as being nearly at or over capacity in all 2041 future-year local plan scenarios. This includes parts of all junctions on the A1 from A1 / A606 by Stamford to Wittering. We note that two of these fall within the Rutland County borders and are likely to require testing against future sites. The junctions are:
  - a. A1 / A606
  - b. A1 / A6121

Overall, progress has been made in developing RTM. We would welcome continued engagement and recommend that the modelling results be shared with us and included in the Regulation 20 submission. This inclusion will ensure that National Highways has sufficient information to understand the impacts of the Local Plan on the SRN.

### **Policy CC8 – Renewable Energy**

Policy CC8 of the local plan sets out the Council's policy on proposed development for the production of renewable energy. National Highways acknowledges that proposals will be considered in regard to their traffic impacts. As we have previously commented in Regulation 18, we recommend that you make note of the DfT policy included below with respect of proposals, including those delivering renewable energy, located close to the SRN.

As set out in DfT Circular 01/2022 paragraph 65-67, wind turbines should not be located where motorists need to pay particular attention to the driving task, such as the immediate vicinity of connections, sharp bends, and crossings for pedestrians, cyclists and horse-riders. To mitigate the risks to the safety of road users arising from structural or mechanical failure, wind turbines should be sited a minimum of, height + 50 metres, or height x 1.5 (whichever is the lesser), from the highway boundary of the SRN.

In addition, as per DfT Circular 01/2022 paragraph 70, some developments, notably solar farms, wind turbines and those with extensive glass facades, have the potential to create glint and glare which can be a distraction for drivers. Where these developments would be visible from the SRN, National Highways should be consulted on an appropriate assessment of the intensity of solar reflection likely to be produced. This should satisfy National Highways that safety on the SRN is not compromised.

### **Policy CC14 – Flood Risk**

As we have previously commented in response to Regulation 18, we note that Policy CC14 of the local plan sets out the Council's requirements of ensuring new development does not increase the risk of flooding. In doing so we note that the policy remains to allow for discharging surface water to highway drains. However, it should be noted that this would not be permitted with respect to the SRN (with reference to DfT Circular 01/2022 paragraph 59).

### **Policy INF1**

For new developments impacting the County's transport network, Policy INF1 makes provision to ensure sustainable transport measures are encouraged. We welcome the approach that major proposals, non-residential development, commercial, mineral extraction and waste proposals will need to prepare a Transport Assessments and Travel Plan to demonstrate how they propose to prioritise the provision for encouraging walking, cycling, and public transport use to minimise the use of vehicles and impacts on the road network.

Policy INF1 sets out the Council's policy on the provision and delivery of infrastructure. National Highways acknowledges that the mechanisms identified in this section focus on the use of Section 106 contributions and Community Infrastructure Levy (CIL) to deliver infrastructure. However, we note that the following comment detailed in our previous Regulation 18 response has not been addressed in Regulation 19: we recommend that the text be amended to state that, delivery mechanisms under the Highways Act 1980 through Section 278 Agreements are also included for the delivery of highway mitigation.

### **Sustainable Transport**

We acknowledge that the Regulation 19 Local Plan has specifically focussed on policies CC1 – CC14 to tackle climate change through a reduction in carbon emissions, improving sustainable modes of transport, and development of energy efficient buildings etc.

We note that the following policies remain the same as stated in the Regulation 18 consultation and we welcome this. Policy INF2 (Securing Sustainable Transport) sets out

the need for planning applications to demonstrate how the development ensures adequate accessibility and connectivity, measures to improve sustainable transport, and the requirement to produce a Transport Assessment and Travel Plan where necessary, and we welcome this. References have been made in Policy INF3 on how developers are expected to create an environment that encourages walking, cycling and public transport when designing their schemes.

Policies CC13 (Provision for Electric Vehicle charging and Electric Bike parking), INF2 (Securing Sustainable Transport) and INF3 (Walking and Cycling and non-car-based journeys) sets guidelines on improving sustainable transport. We appreciate the effort taken in developing these policies and consider this to be aligned with the expectations set out in the National Planning Policy Framework and National Highways' Net Zero Strategy.

We also note that Policy CC1 (Supporting a Circular Economy) sets out to support development proposals that will contribute to the delivery of circular economy principles. As such National Highways recommends the principles set out in the DfT Circular 01/2022 are considered, including, but not limited to, the following:

- Early engagement with National Highways to understand transport related impacts on the SRN from prospective development.
- Positive engagement and cooperation to proposals that encourage sustainable economic growth.
- Robust and transparent evidence base that demonstrates transport impacts on the SRN, including cumulative impacts, and informs the transport strategy for the area.
- Welcomes strategies and policies that reduce car dependency, need for travel and reliance on SRN, and maximises opportunities for sustainable travel solutions such as walking, wheeling, cycling, public transport and shared travel.

### **Infrastructure Delivery Plan (IDP)**

National Highways acknowledges that Regulation 19 has been drafted alongside an Infrastructure Delivery Plan (IDP) and we look forward to receiving the final version for our review.

The DfT Circular states in Paragraph 34 that *'our engagement with plan-making will help inform the preparation of the local authority infrastructure delivery evidence base. From a transport perspective, this evidence should provide a means of demonstrating to the examining inspector, development industry and local communities that planned growth is deliverable, and that the funding, partners and relevant processes are in place to enable the delivery of infrastructure; or that there is a realistic prospect that longer-term investment can be secured within the timescales envisaged'*.

National Highways would like to better understand the current position of the Local Plan in terms of anticipated future traffic growth (associated with applications) impacting on the SRN, and any mitigation measures (with the IDP) identified to offset these impacts.

It should be noted that National Highways is unable to participate in Section 106 contributions. Additionally, there are currently no planned projects under the Road Investment Strategy (RIS) within the Plan area. As such, it cannot be assumed that any necessary improvements to the SRN will be funded through a future RIS. Similarly, mitigation measures affecting the SRN are typically not included within the CIL at the planning application stage.

Therefore, we will welcome further engagement with the Council to stay informed and review the progress of the IDP to ensure that any strategic infrastructure requirements to support growth in the area are identified and included in the IDP.

### **Duty to Cooperate**

For any developments which have an impact on neighbouring Local Authorities (LA), National Highways advises a joined-up approach whereby National Highways, Rutland and the other Local Authorities attend joint meetings with future developers or applicants. This will ensure that the interests of all parties are protected, and a combined solution is derived. National Highways acknowledges that a Duty to Cooperate approach is already in effect arranged by Rutland County Council, with the neighbouring authorities of South Kesteven and Lincolnshire County Council and engaged with throughout the development of the local plan.

Once again, National Highways welcomes the opportunity to comment on the Rutland County Council Regulation 19 Local Plan (Publication Version) consultation. We look forward to working with the Council in a collaborative manner to aid and support the development and adoption of the Local Plan for Rutland.

### **Conclusion**

From our review of the Rutland Local Plan Consultation Draft Regulation 19, we are satisfied with the overall document and policies. We welcome continued engagement to support the progression of the Local Plan. We would expect to see the Infrastructure Delivery Plan (IDP), the modelling results, cumulative impacts on the Strategic Road Network (SRN) and any proposed mitigation, included in a Regulation 20 submission. This should be done before the examination in public takes place, which we understand is scheduled for 2025. We have also made a few recommendations to ensure that National Highways' assets and interests are safeguarded within the policies of the Local Plan.



Yours faithfully

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