

From: Gaynor Gallacher

Sent: Tuesday, December 5, 2023 3:14 PM

To: Neighbourhood Planning

Subject: Wellow Neighbourhood Development Plan: Reg 16 Consultation - National Highways comments

Dear Neighbourhood Planning Team

Wellow Parish Neighbourhood Development Plan – Regulation 16 Submission Consultation

Thank you for providing National Highways with the opportunity to comment on the submission version of the Wellow Neighbourhood Development Plan 2016-2036 (v2.11 Sept 2023). National Highways 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). The SRN is a critical national asset and as such National Highways works 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. The SRN comprises the A36 trunk road within the Plan area. It is in this context that our comments are made.

Having reviewed the document, we offer a number of comments in respect of specific proposed policies as set out below.

Policy WP-L3 Local Green Space

It is noted that the site previously identified as “Land along stream west of School Road, Palmers Bridge to Bridge Farm” has been removed from the list of proposed designated local green spaces. This is welcomed as acknowledgement that the Parish Council have accepted our representations made as part of the Regulation 14 Pre-Submission consultation process.

Site LG11: Buxton Land, on corner of A36 and Canada Road: the table and mapping provided within Appendix G to the Plan identifies the Buxton land as Wellow Parish Council owned land that sits to the south-west of the highway boundary at the junction of the A36 and Canada Road. We understand the extent of this land is as shown edged in pale blue in the map extract below. National Highways does not object to the designation of site LG11 on the understanding that the designation only applies to the Council's title extent and does not encroach into neighbouring operational highway land. As previously stated in respect of the land at Palmers Bridge, highway land is not suitable for designation which would conflict with our ability to manage our asset in the interest of all road users and fulfil our statutory function as the strategic highway authority. Operational highway land has highway rights upon it (as provided by the Highways Act 1980 and associated legislation), and is subject to permitted development rights under the Town and Country Planning (General Permitted Development) (England) Order 2015, and may be utilised in bringing forward future highways/transport schemes which may not be compatible with Local Green Space

designation which also requires a site to be capable of enduring beyond the end of the Plan period.



Policy WP-H2: Sites Allocated for Housing Development

It is noted that 6 sites were identified as potentially suitable for development to meet local needs and subject to assessment during the preparation of the Plan. Of the 6 sites assessed, 2 have been taken forward to form allocations within the Plan as follows:

WP1 – land adjacent to Rowden Close (SHELAA site 261). This site is adjacent to the A36 and has been identified as suitable for 9 dwellings. The policy plan for the site indicates access can be provided via Rowden Close and on this basis National Highways would have no objection in principle to the development. National Highways is unlikely to accept a new access junction onto the A36 in this location. Any prospective developer will need to take account of the requirements contained within DfT Circular 01/2022 *The strategic road network and the delivery of sustainable development*, particularly in this case in relation to boundary treatments to ensure adequate noise and visual screening is provided by and within the development. National Highways soft estate should not be relied upon to contribute any mitigation as the management of our estate may from time to time affect any real or perceived benefits.

WP2 – land adjacent to Meadow Close (a rural exception site). This site has been identified as potentially suitable for 10 dwellings and is some distance from the A36. We therefore have no comment in relation to this site.

Of the remaining sites which were assessed but not taken forward as allocations we would wish to make comments to inform any further consideration which may be given to their allocation or development potential in future. These sites, as identified in the Plan, are:

- SHELAA 75 – land east of School Road
- SHELAA 6 and 37 – field at Crawley Hill and land to the rear of Iona/Bellevue Garage, Crawley Hill
- SHELAA 16(b) – land east of School Road, Pottery Farm.

Site 75 and sites 6 and 37 combined appear to be dependent on the A36 to provide access with both having existing agricultural field accesses which would require substantial improvement to demonstrate that safe and suitable access could be provided in accordance with the NPPF and DfT Circular 01/2022. Any scheme for access improvements would also need to demonstrate compliance with design standards as set out in the Design Manual for Roads and Bridges. Site 16b is accessed via School Road, which forms a priority junction with the A36. This junction is currently subject to turning restrictions and any emerging development in this location will need to demonstrate it is suitable for intensification of use.

In all cases, we would expect any proposals that come forward and which impact on the SRN to be supported by an appropriate assessment of traffic impacts in accordance with DfT Circular 01/2022 and planning practice guidance. Any impacts on the SRN which are considered severe or unacceptable in capacity or safety terms will require mitigation to be provided by the development in line with current policy.

WP-T1 Accessibility, Road Safety and Sustainable Transport

We are generally supportive of the policy, but under a) development will need to consider the impacts on the strategic as well as the local highway network. The text should therefore be amended to reference the highway network as a whole.

WP-E1 Employment Development

Again, under a) the reference to the local highway network should be amended to the highway network, as consideration will need to be given to impacts on both strategic and local roads. It should be noted that National Highways will expect any development proposals with the potential to impact on the safe and efficient operation of the A36 to be supported by an appropriate assessment of traffic impacts in accordance with DfT Circular 01/2022 and planning practice guidance. Any impacts on the SRN which are considered severe or unacceptable in capacity or safety terms will require mitigation to be provided by the development in line with current policy.

Community Aspirations

Whilst not forming policies within the Plan, we have noted a number of comments in respect of community concerns with highway safety, particularly in respect of adequacy of crossing provision and speed issues along the A36. We have therefore shared these comments with our operational route management team to inform any future engagement with the Parish Council.

Summary

National Highways is generally supportive of those proposed policies which seek to support sustainable growth and improved facilities for pedestrians, cyclists and equestrians. We acknowledge that the Plan recognises both the potential safety and capacity implications of development in respect of the A36 corridor, however we have made comments in respect of some policies as set out above. Any development that comes forward within the Plan area that has the potential to impact on the safe and

efficient operation of the A36 will need to be supported by an appropriate assessment of traffic impacts in accordance with DfT Circular 01/2022 and planning practice guidance. Any impacts on the SRN which are considered severe or unacceptable in capacity or safety terms will require mitigation in line with current policy.

These comments do not prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, which will be considered by us on their merits under the prevailing policy at the time.

Kind regards
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