

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

From: Head of Planning & Development
Operations Directorate
Highways England.
North East Region

To: North Lincolnshire Council – Dean Watson

CC:

Council's Reference: PA/SCR/2025/251

Location: Land to the east of the M181/A1077(M), Scunthorpe, DN17 1US

Proposal: EIA screening request Hybrid planning application comprising of: Full planning application for the construction of a new vehicular access off the M181/A1077(M) roundabout, a pedestrian and cycle link to Scotter Road, a foul pumping station, earthworks and 'off-plot' drainage, ecological and associated landscaping and infrastructure works. Outline planning application, with all matters reserved, for the development of up to 550 residential dwellings (Use Class C3), a local centre (Use Class E) and associated 'on-plot' landscaping, drainage and other infrastructure works.

National Highways Ref: NH/25/10137

Referring to the consultation on a planning application dated **February 24 2025** referenced above, in the vicinity of the M181 at Brumby Common 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.

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 PlanningYNE@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

Signature:

Date: March 18 2025

Name: Simon GP Geoghegan

Position: Planning and Development

National Highways, 2 City Walk, Leeds LS11 9AR

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.

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.

Recommended Non-Approval

It is recommended that the application should not be approved until **June 18 2025**.

Reason

- We note that there is no mention of the source of funding for the Travel Plan. Therefore, we suggest that firm financial commitments regarding funding for the proposed measures and the appointment of the Travel Plan Coordinator should be explicitly outlined within the Travel Plan.
- BWB should present Personal Injury Collision [PIC] data for the most recent 5-year period excluding the years 2020 and 2021.
- BWB should confirm whether the agreed vehicle trip distribution, previously accepted by National Highways, has been used or if the original vehicle trip distribution has been applied. National Highways previously considered this data insufficient for routing an appropriate volume of trips east on the M180.
- The Applicant should provide a review of the total vehicle trip generation that was considered within the original AAP for the Lincolnshire Lakes Site and what percentage of this has been taken by other planning applications as well as the proposed development in question.

Our ref: SE 866 094
Your ref: PA/SCR/2025/251

North Lincolnshire Council
Church Square House
30-40 High Street
Scunthorpe
North Lincolnshire
DN15 6NL

Simon GP Geoghegan
National Highways
Planning and Development
2 City Walk
Leeds
LS11 9AR

FAO: Dean Watson

March 18 2025

Dear Dean,

Lincolnshire Lakes Phase 1 | Hybrid for M181/A1077(M) and 550 houses

We have reviewed the hybrid planning application comprising of:

“Full planning application for the construction of a new vehicular access off the M181/A1077(M) roundabout, a pedestrian and cycle link to Scotter Road, a foul pumping station, earthworks and ‘off-plot’ drainage, ecological and associated landscaping and infrastructure works. Outline planning application, with all matters reserved, for the development of up to 550 residential dwellings (Use Class C3), a local centre (Use Class E) and associated ‘on-plot’ landscaping, drainage and other infrastructure works. Land to the east of the M181/A1077(M), Scunthorpe, DN17 1US.”

We have undertaken a review of the hybrid planning application offering comments to the following documentation:

- Planning Application 1 at Lincolnshire Lakes (North), Scunthorpe, North Lincolnshire Transport Assessment (ref: LLP1-BWB-GEN-XX-RP-TR-0004) [referred to as the TA];
- Framework Travel Plan (ref: LLP1-BWB-GENXX-RP-TR-0005-S2-P3) [referred to as the FTP]; and
- EIA Screening Report (ref: LLP1-BWB-ZZ-XX-T-EC-0001).

EIA Screening Opinion

We would note that it is for the planning authority to form and adopt a screening opinion. Nonetheless, with reference to Circular 01/2022 (para .55), we will engage in the relevant screening or scoping process where a potential impact on the SRN is identified.

In this instance, we would agree with the Applicant that the proposal does not comprise Schedule 1 development and, therefore, is not a type of development for which Environmental Impact Assessment is mandatory.

We note that the Applicant does acknowledge the potential for environmental impacts arising from the proposed development and states that these aspects will be considered and addressed through the provision of supporting reports, including:

- Transport Assessment; and
- Travel Plan.

Again, with reference to [DfT Circular 01/2022](#), we would expect the applicant to provide sufficient environmental information to satisfy the LPA, and any other consenting authorities, that all environmental implications of the proposals have been appropriately considered. As stated later, we would also recommend that a Construction Traffic Management Plan [CTMP] is submitted alongside the application. This should be provided to National Highways for review and agreement in writing prior to commencement of construction.

Any assessment undertaken by, or on behalf of, the Applicant should be sufficiently comprehensive to establish the likely transport related environmental impacts, including air quality, light pollution and noise, and to identify the measures to mitigate these impacts.

Travel Plan

We would note that there is no mention of the source of funding for the Travel Plan. Therefore, we suggest that firm financial commitments regarding funding for the proposed measures and the appointment of the Travel Plan Coordinator should be explicitly outlined within the Travel Plan.

Transport Assessment

We would recommend that BWB presents Personal Injury Collision [PIC] data for the most recent 5-year period excluding the years 2020 and 2021.

We would recommend that BWB confirm whether the agreed vehicle trip distribution, previously accepted by National Highways, has been used or if the original vehicle trip distribution—considered insufficient for routing an appropriate volume of trips east along the M180—has been applied.

The Applicant should provide a review of the total vehicle trip generation that was considered within the original AAP for the Lincolnshire Lakes Site and what percentage of this has been taken by other planning applications as well as the proposed development in question.

Construction Traffic Management Plan

Due to the proposed site location being in close proximity to the SRN, we would also recommend a Construction Traffic Management Plan [CTMP] is submitted alongside the application. This should be provided to National Highways for review and agreement in writing prior to commencement of construction. Construction will then be expected to proceed in accordance with the approved CTMP.

The CTMP will need to include at least the following:

- A dust management plan;
- A noise management plan;
- Pollution prevention measures;
- Staffing numbers;
- Contractor parking;
- Construction traffic routes;
- Details of delivery arrangements (including for any abnormal loads); and
- Measures to limit and manage transfer of debris on to the highway.

Boundary Treatment

The site is located adjacent to the M181 / A1077(M) roundabout. Its western boundary is coincidental with the highway boundary. Therefore, the Applicant should demonstrate to National Highways that there are no drainage, structural, boundary treatments or other constructions that would have an impact on National Highways land interests. It should be noted, for example, that the structural stability of the highway should not be undermined, and that surface water should not drain towards or into the highway. As stated within paragraph 57 of Circular 01/2022, for reasons of safety, liability and maintenance:

“...structures should be sited sufficiently far from the highway boundary of the SRN so that they cannot topple on to the SRN or undermine its geotechnical integrity. Alternatively, an appropriate structural assessment that accords with the DMRB must be provided. A Road Restraints Risk Assessment must also be carried out where any furniture, structures or other features would be sited adjacent to the SRN.”

Furthermore, to ensure the integrity of the highway drainage systems, paragraph 58 states:

“...no new connections into those systems from third party development and proposed drainage schemes will be accepted. Where there is already an existing informal or formal connection into the highway drainage system from a proposed development site, the right for a connection may be allowed to continue provided that the flow, rate and quality of the discharge into the highway drainage system remains unaltered or results in a betterment. The company may require a drainage management and maintenance agreement to be entered into to secure this requirement in perpetuity.”

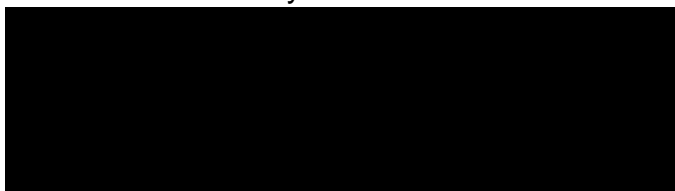
We would suggest therefore, that further information be provided with regards to the proposed boundary treatment between the M181 and the application site; particularly (but not exclusively), the information should consider:

- The impact of earthworks on the stability and integrity of the SRN;
- The impact of earthworks on drainage, and the drainage requirements needed to ensure that surface water does not flow from the application site on to the SRN;
- Access for maintenance of the highway boundary is maintained; and
- Boundary treatments are adequate and appropriate; particularly in regard to dazzle and distraction from opposing head lights

On the basis of the above, I enclose National Highways' formal response recommending a period of no determination.

I trust this response is helpful, but should you require any further information please do not hesitate to contact me.

Yours sincerely



Simon GP Geoghegan
Planning and Development

DevHU0161: Lincolnshire Lakes Phase 1

Case ref:	DevHU0161	Document ref:	TM05	Date issued:	17/03/2024
Prepared for:	Simon Geoghegan	Prepared by:	Harry Robinson	Reviewed / approved by:	Terry Dale

Limitation: This technical memorandum [TM] has been prepared on behalf of, and for the exclusive use of National Highways, and is subject to, and issued in accordance with, the provisions of the National Spatial Planning Contract. We accept no liability or responsibility whatsoever for, or in respect of, any use of, or reliance upon, this document by any third party.

Headline Summary

Planning Outcome	Site Location
<p>The recommendation to National Highways is holding recommendation.</p>	

Technical Summary

This review has highlighted the need for the following information:

- The JSJV notes that there is no mention of the source of funding for the Travel Plan. Therefore, we suggest that firm financial commitments regarding funding for the proposed measures and the appointment of the Travel Plan Coordinator should be explicitly outlined within the Travel Plan.
- The JSJV would recommend that BWB presents PIC data for the most recent 5-year period excluding the years 2020 and 2021.
- The JSJV recommends that BWB confirm whether the agreed vehicle trip distribution, previously accepted by National Highways, has been used or if the original vehicle trip distribution—considered insufficient for routing an appropriate volume of trips east along the M180—has been applied.
- The Applicant should provide a review of the total vehicle trip generation that was considered within the original AAP for the Lincolnshire Lakes Site and what percentage of this has been taken by other planning applications as well as the proposed development in question.

1 Introduction

- 1.1 In February 2025, Hargreaves Land Limited [the Applicant] submitted an EIA screening request hybrid application [ref: PA/SCR/2025/251] comprising of:

“Full planning application for the construction of a new vehicular access off the M181/A1077(M) roundabout, a pedestrian and cycle link to Scotter Road, a foul pumping station, earthworks and ‘off-plot’ drainage, ecological and associated landscaping and infrastructure works. Outline planning application, with all matters reserved, for the development of up to 550 residential dwellings (Use Class C3), a local centre (Use Class E) and associated ‘on-plot’ landscaping, drainage and other infrastructure works. Land to the east of the M181/A1077(M), Scunthorpe, DN17 1US.”

- 1.2 The Applicant’s Transport Consultant is BWB and the Local Planning Authority [LPA] is North Lincolnshire Council [NLC]. The JSJV would note that pre-application discussions between National Highways and BWB have been ongoing since December in the form of a number of Transport Scoping Notes [TSN’s].

Consultation History

- 1.3 Since the first TSN, National Highways has provided comments a number of BWB’s documents and emails. The following highlights the document or email prepared by BWB, followed by the corresponding National Highways/JSJV response:

- “Transport Scoping Note” [referred to as TSN] (ref: LLP1-BWB-GEN-XX-RP-TR-001_Transport Scoping Note P04) (December 2023).
 - TM01: “AA.23.19.22 Lincolnshire Lakes” (January 2024).
- “Transport Technical Note – Response To National Highways Scoping Comments” [referred to as TTN] (March 2024).
 - TM02: “DevHU0161: Lincolnshire Lakes” (March 2024).
- Email response to National Highways’ comments made to TTN [referred to as Email response 1] (May 2024).
 - TM03: “DevHU0161: Lincolnshire Lakes Phase 1 Scoping” (May 2024).
- Email update to National Highways regarding changes to forthcoming application [referred to as Email response 2] (December 2024).
 - TM04: “DevHU0161: Lincolnshire Lakes Phase 1 Scoping” (December 2024).

- 1.4 The JSJV would note that as part of TM03 and TM04, the following was agreed with National Highways:

- After an independent analysis using our own residential person trip rates and 70% car mode share, a similar volume of residential vehicle trips in the AM and PM peak is forecast compared to that assumed as part of the AAP. JSJV/NH were inclined to consider the Area Action Plan [AAP] vehicle trip rates quoted by BWB to be appropriate.
- After review, it was noted that the AAP B2 trip rates and traffic generation were considerably higher than both those proposed by BWB and the JSJV; as a result, we agreed that the original AAP B2 trip rates may have been excessive. We also noted that, as BWB’s B2 vehicle trip generation was significantly lower than the JSJV’s; consequently, we could not consider BWB’s B2 vehicle trip rates to be appropriate unless additional evidence is provided to justify their use.

- BWB forecast that 12.5% of vehicle trips would route east along the M180. JSJV confirmed that this aligned with our previous analysis using National Highways' gravity model GraHAM, which forecast 13% of vehicle trips to route east along the M180.
- The JSJV concluded that although the trip rates put forward by BWB were significantly lower in the AM peak, the variance in vehicle movements experienced at the SRN is not considered to be material.

1.5 The Jacobs SYSTRA Joint Venture [JSJV] has undertaken a review of the hybrid planning application, on behalf of National highways, offering comments in this TM05 to the following documentation:

- Planning Application 1 at Lincolnshire Lakes (North), Scunthorpe, North Lincolnshire Transport Assessment (ref: LLP1-BWB-GEN-XX-RP-TR-0004) [referred to as the TA];
- Framework Travel Plan (ref: LLP1-BWB-GENXX-RP-TR-0005-S2-P3) [referred to as the FTP]; and
- EIA Screening Report (ref: LLP1-BWB-ZZ-XX-T-EC-0001).

2 Background

Lincolnshire Lakes Area Action Plan

- 2.1 The Lincolnshire Lakes Area Action Plan [AAP] (adopted May 2016) sets out the planning policy framework within which the development will be delivered. BWB notes the emerging Local Plan separates Lincolnshire Lakes into two Strategic Allocations (Northern and Southern). The Northern Strategic Allocation is being delivered by Hargreaves Land Limited, with the Southern Strategic Allocation being delivered by Keepmoat Homes Ltd (AA.23.19.06/DevHU0097 Lincolnshire Lakes).
- 2.2 The wider Lincolnshire Lakes development, as set out within the AAP, will provide up to a total of 6,304 dwellings. Within the Southern Strategic Allocation, a full planning application (on Maltgrade owned land) has been submitted by Keepmoat Homes Ltd (planning ref: PA/2023/1124) for part of the Plot 6 and half of Plot 2 of the AAP for 599 dwellings.
- 2.3 **Figure 1** shows the indicative location/extent of the Wider Lincolnshire Lakes (North) and OPA#1.

Figure 1: Extent of LL Wider Site and LL OPA#1

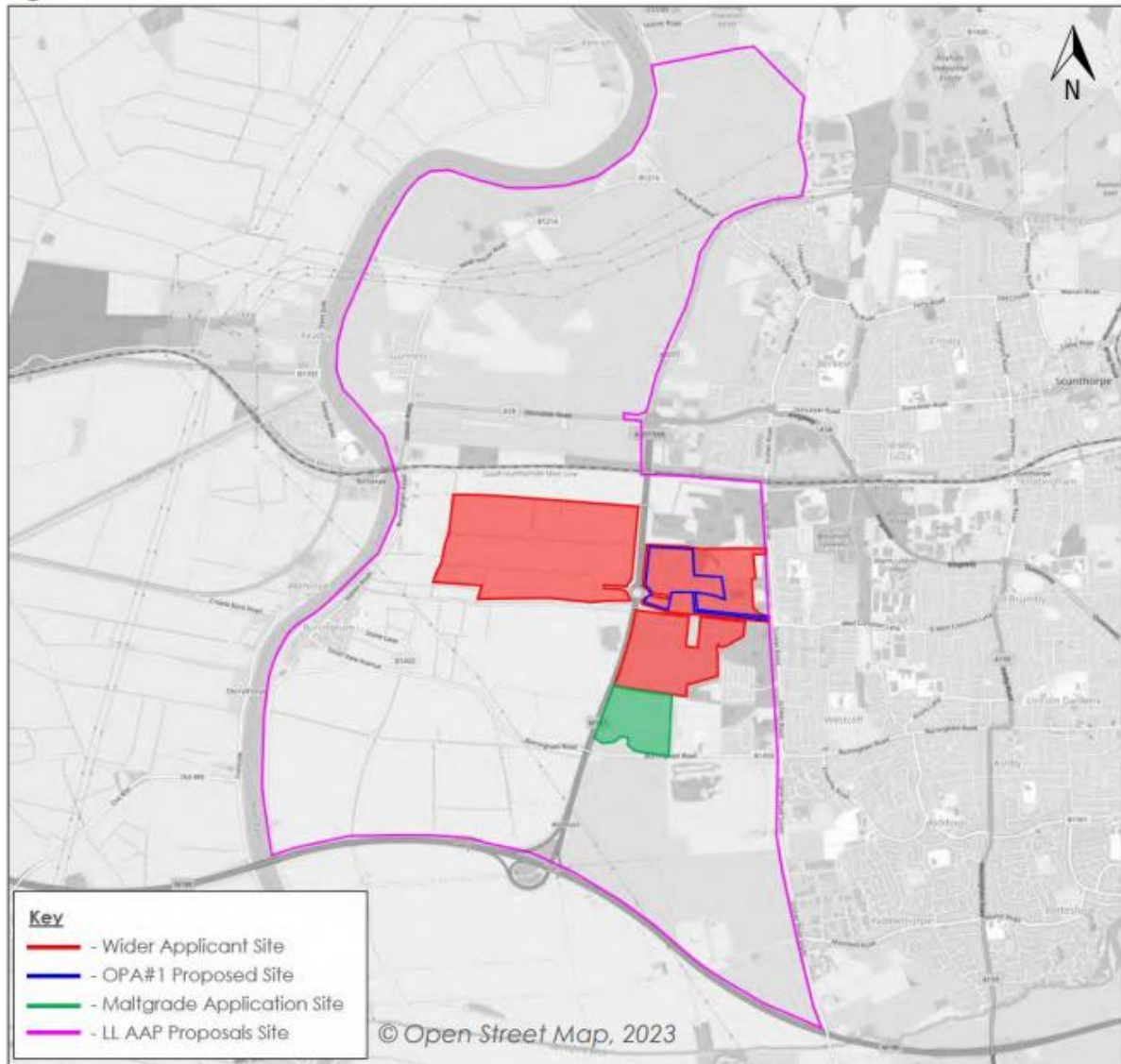


Figure 1. Northern Lincolnshire Lakes and OPA#1 (Extracted from TSN)

3 Existing Situation

- 3.1 The location of the application site, relative to the Strategic Road Network [SRN], is presented in **Figure 2**. The site is located approximately:
- 2.4km to the north of the M180 / M181 junction (M180 J3); and
 - Adjacent to the M181 / A1077(M) roundabout.

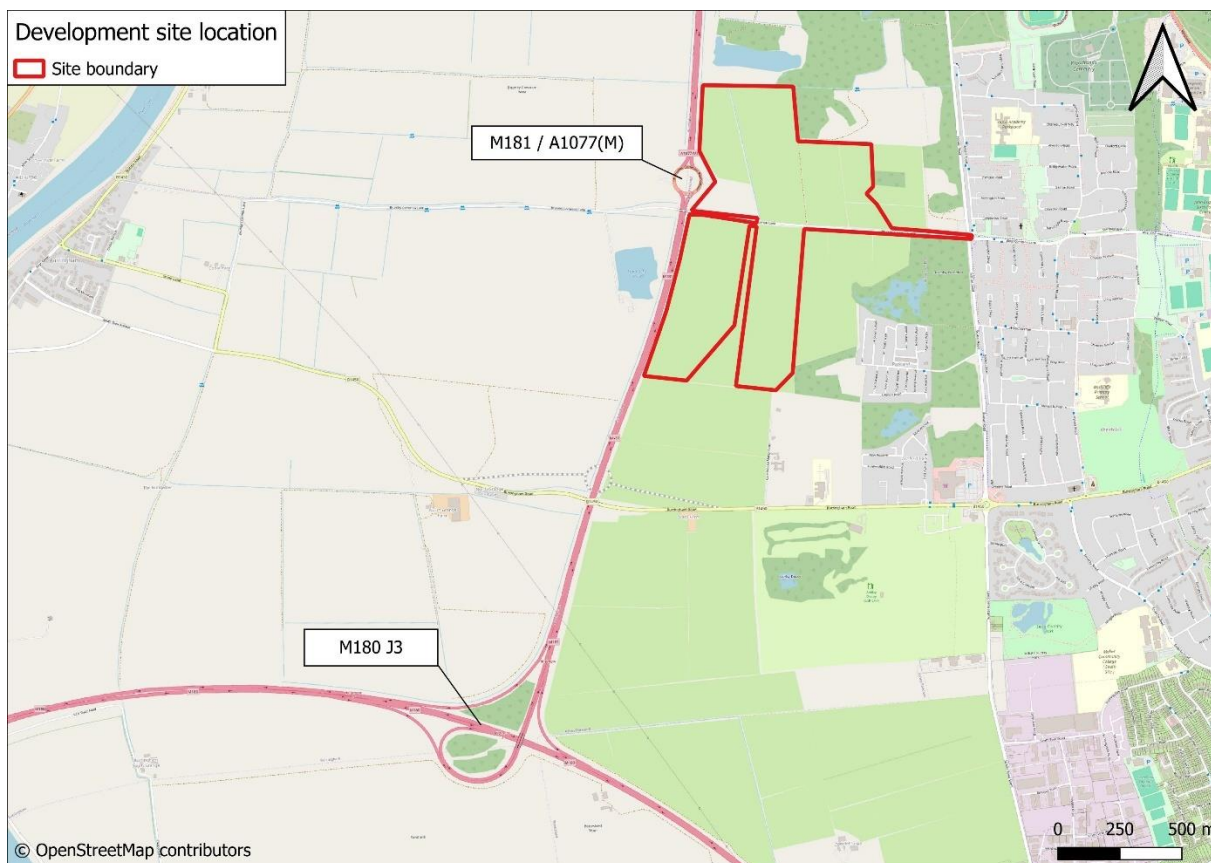


Figure 2. Development site in relation to SRN

4 Proposed Development

4.1 As part of the revised pre-application submission, BWB outline that the application will also comprise of:

- Up to 550 dwellings – an increase from the 430 considered to date;
- 2,499sqm local centre.
- 1,000sqm GP surgery; and
- 500sqm creche.

5 EIA Screening Opinion

5.1 The Applicant has submitted a request to NLC for an Environmental Impact Assessment [EIA] screening opinion.

5.2 Screening is the process by which the planning authority decides whether a development of the types listed in Schedule 2 of the EIA Regulations needs to undergo EIA before an application for planning permission is made. There are a number of circumstances that can prompt a planning authority to prepare and adopt an EIA screening opinion:

- Under Regulation 6 of the EIA Regulations a developer can ask the planning authority to give an EIA screening opinion before any application for planning permission is made. The planning authority must respond to such requests within three weeks unless an extension is agreed. Once the screening opinion has been adopted it will be made available for public inspection at the place where the Planning Register is held (the relevant borough or district council) for a period of 2 years;

- Under Regulation 8 of the EIA Regulations where a planning application has been made without an environmental statement and the planning authority has no record of having previously adopted a screening opinion for the proposal, the planning authority can adopt an EIA screening opinion. This will determine whether or not the scheme requires an EIA. This must be done within three weeks of the planning application being deemed valid (can be extended if the developer agrees). Once the screening opinion has been adopted it will be placed on the Planning Register (held by the relevant borough or district council) under the record for the submitted application.
- 5.3 The request for the Applicant for a screening opinion is submitted pursuant to Regulation 6 of the EIA Regulations.
- 5.4 We would note that it is for the planning authority to form and adopt a screening opinion. Nonetheless, with reference to Circular 01/2022 (para .55), National Highways will engage in the relevant screening or scoping process where a potential impact on the SRN is identified.
- 5.5 In this instance, we would agree with the Applicant that the proposal does not comprise Schedule 1 development and, therefore, is not a type of development for which Environmental Impact Assessment is mandatory.
- 5.6 The Applicant does state, however, that the development falls within Schedule 2 10(b) ('Urban development projects'), but conclude that, with regard to the Indicative Criteria and Thresholds within the Planning Practice Guidance and the screening criteria set out in Schedule 3 of the EIA Regulations, any impacts would not be 'significant' such as to warrant the submission of a formal EIA, and any potential temporary adverse effects could be managed in accordance with standard methods.
- 5.7 We note that the Applicant does acknowledge the potential for environmental impacts arising from the proposed development and states that these aspects will be considered and addressed through the provision of supporting reports, including:
- Transport Assessment; and
 - Travel Plan.
- 5.8 Again, with reference to Circular 01/2022, the JSJV would expect the applicant to provide sufficient environmental information to satisfy the LPA, and any other consenting authorities, that all environmental implications of the proposals have been appropriately considered. As stated later within this TM05, we would also recommend that a Construction Traffic Management Plan [CTMP] is submitted alongside the application. This should be provided to National Highways for review and agreement in writing prior to commencement of construction.
- 5.9 Further, National Highways will expect to see measures implemented that fully mitigate any and all environmental impacts arising from and relating to the interaction between developments and the SRN; there are three aspects to this:
- The environmental impacts arising from the temporary construction works;
 - The environmental impacts of the permanent transport solution associated with the development; and
 - The environmental impact of the road network upon the development itself.
- 5.10 Any assessment undertaken by, or on behalf of, the Applicant should be sufficiently comprehensive to establish the likely transport related environmental impacts, including air quality, light pollution and noise, and to identify the measures to mitigate these impacts.

5.11 Without prejudice to the planning authority’s screening opinion, therefore, JSJV welcomes the decision to submit the above-mentioned reports alongside the planning application.

6 Travel Plan and Sustainable Access

Vision

6.1 Although BWB has utilised a ‘vision and validate’ approach when considering trip generation targets, this has not been specifically presented for the proposed development. Circular 01/2022 paragraph 48 states that the vision should adhere to the following:

“Where a transport assessment is required, this should start with a vision of what the development is seeking to achieve and then test a set of scenarios to determine the optimum design and transport infrastructure to realise this vision.”

Accessibility by Walking

6.2 BWB notes that the guidance provided by the Chartered Institution of Highways & Transportation¹ (CIHT) suggests a preferred maximum walking distance of 2km for a number of trip types, including commuting and school trips. BWB has provided 2km and 5km isochrone map illustrating the existing amenities and facilities located within the catchments, as shown in **Figure 3**.

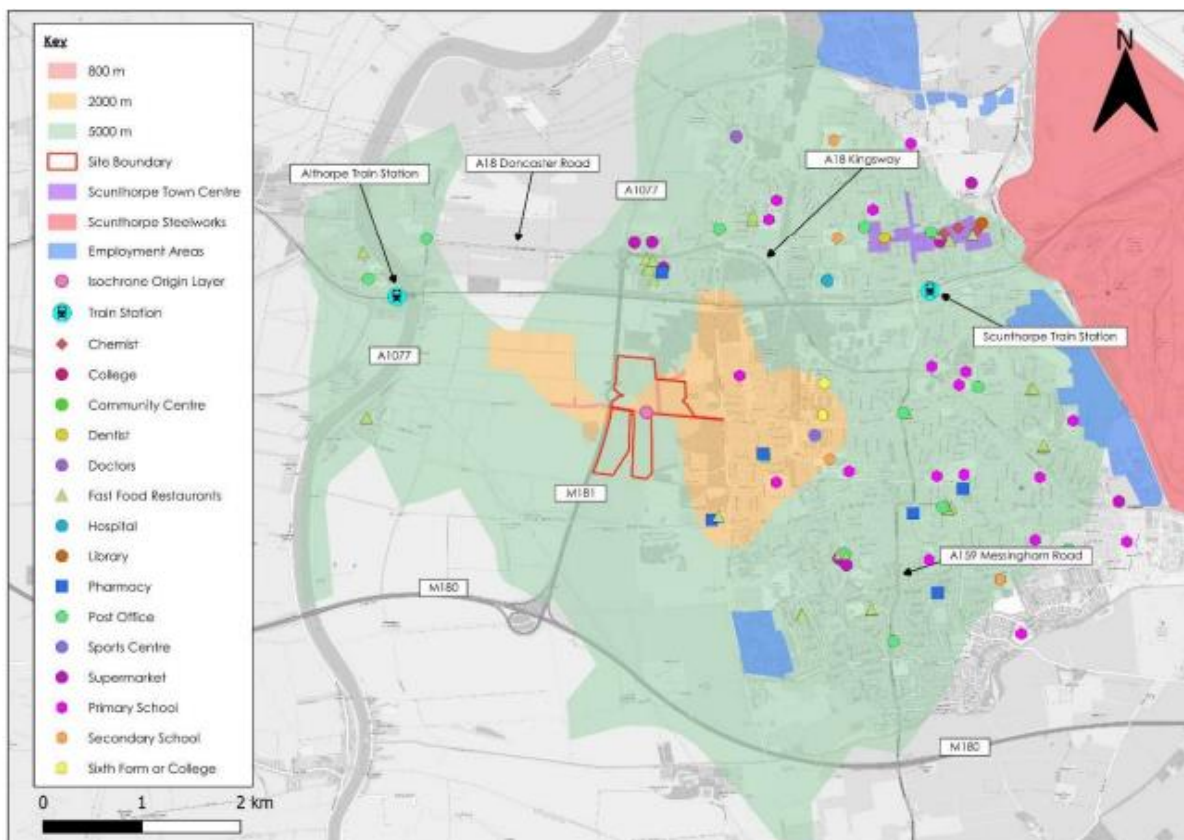


Figure 3. 2km and 5km walking and cycling isochrone²

¹ Guidelines for Providing for Journeys on Foot, CIHT

² Planning Application 1 at Lincolnshire Lakes (North) Scunthorpe, North Lincolnshire Framework Travel Plan

6.3 BWB has provided a list of key attractors within 2km walking distances, as shown in **Figure 4**.

Table 8: Key Local Amenities

Amenity type	Amenity	Approximate Walking Distance: metres (minutes)	Approximate Cycling time: metres (minutes)
Local Centre	Local Centre	On Site	On Site
Local Centre	Food Shop	On Site	On Site
Local Centre	Non-Food Shop	On Site	On Site
Health	Doctor's Surgery	On Site	On Site
Health	Pharmacy	On Site	On Site
Education	Creche	On Site	On Site
Health	West Common Lane Teaching Practice	1.2km (16 min)	1.2km (5 min)
Religion	The Haven Church of Reconciliation	1.4km (19 min)	1.4km (5 min)
Education	Oasis Academy Parkwood	2.0km (27 min)	2.0km (7 min)
Community Centre	Westcliff Community Association	1.7km (22 min)	1.7km (6 min)
Food Shop	Tesco Express	1.8km (24 min)	1.8km (7 min)
Takeaway	Sam's Plaice Westcliff	1.8km (24 min)	1.8km (7 min)
Takeaway	Pizza Plaza	1.8km (24 min)	1.8km (7 min)
Health	Co-op Pharmacy	1.8km (24 min)	1.8km (7 min)
Post Office	Westcliff Post Office	1.8km (24 min)	1.8km (7 min)
Education	Trent View Specialist College	2.0km (31 min)	2.0km (10 min)
Education	Westcliff Primary School	2.1km (28 min)	2.1km (8 min)
Shops	Asda Scunthorpe S'store & Subway	2.1km (27 min)	2.1km (7 min)
Education	John Leggat College	2.1km (30 min)	2.1km (10 min)
Shops	North Lincolnshire Shopping Park	3.4km (45 min)	3.4km (11 min)
Shops	Gallagher Retail Park	3.5km (46 min)	3.5km (12 min)
Place of Interest	Central Park	3.6km (47 min)	3.6km (15 min)
Health	Scunthorpe General Hospital	3.6km (49 min)	3.6km (15 min)
Shops	Ashby High Street	4.3km (59 min)	4.3km (17 min)
Transport	Scunthorpe Train Station	4.9km (1hr 4 min)	4.9km (19 min)
Town Centre	Scunthorpe Town Centre	4.9km (1hr 6 min)	4.9km (19 min)
Shops	Scunthorpe Retail Park	5.0km (1hr 7 min)	5.0km (17 min)

Figure 4. Key local amenities³

- 6.4 As can be seen in **Figure 4**, a number of existing amenities fall within a 2km walking distance from the proposed site, including a post office, pharmacy, Tesco Express, and a secondary school. Furthermore, the JSJV notes that, as the proposed development includes a local centre, a food shop, a non-food shop, a doctor's surgery, a pharmacy, and a nursery, a number of future amenities will be available on-site for the residents of the development, providing good opportunities for walking to local amenities.
- 6.5 Additionally, the JSJV would note that the ASDA Scunthorpe Superstore is only located within a 2.1km walking distance. However, we would also note a lack of employment opportunities within a 2km walking distance.

Accessibility by Cycling

- 6.6 BWB notes that the guidance provided by the Chartered Institution of Highways & Transportation⁴ suggests cycling has the potential to substitute short car trips, particularly those under 5km.
- 6.7 As can be seen in **Figure 3** and **Figure 4**, a number of existing amenities fall within a 5km walking distance from the proposed site, including all those stated within the 2km

³ Planning Application 1 at Lincolnshire Lakes (North) Scunthorpe, North Lincolnshire Framework Travel Plan

⁴ Guidelines for Providing for Journeys on Foot, CIHT

walking distance, as well as a primary school, North Lincolnshire Shopping Park, a retail park, a hospital, and Scunthorpe Train Station and town centre.

- 6.8 The JSJV would note that a number of employment opportunities fall within a 5km cycling distance.

Walking and Cycling Infrastructure

- 6.9 BWB notes that the proposal includes a:

“...high-quality network of active travel infrastructure, with segregated pedestrian and cycle links alongside the main spine road and the section of carriageway that will route along the eastern side of the local centre.

*Pedestrians and cyclists will be able to access the internal network of footways and cycleways via the active travel corridor proposed adjacent to Brumby Common Lane [as indicated in **Figure 5**]. The 5m wide corridor will provide an attractive non-motorised user connection from the Site to Scotter Road (and onwards into areas of Scunthorpe to the east, north and south). A signalised tiger crossing is proposed to route pedestrians and cyclists across Scotter Road and linking into the existing shared footway/cycleway provision on Scotter Road and West Common Lane.”*

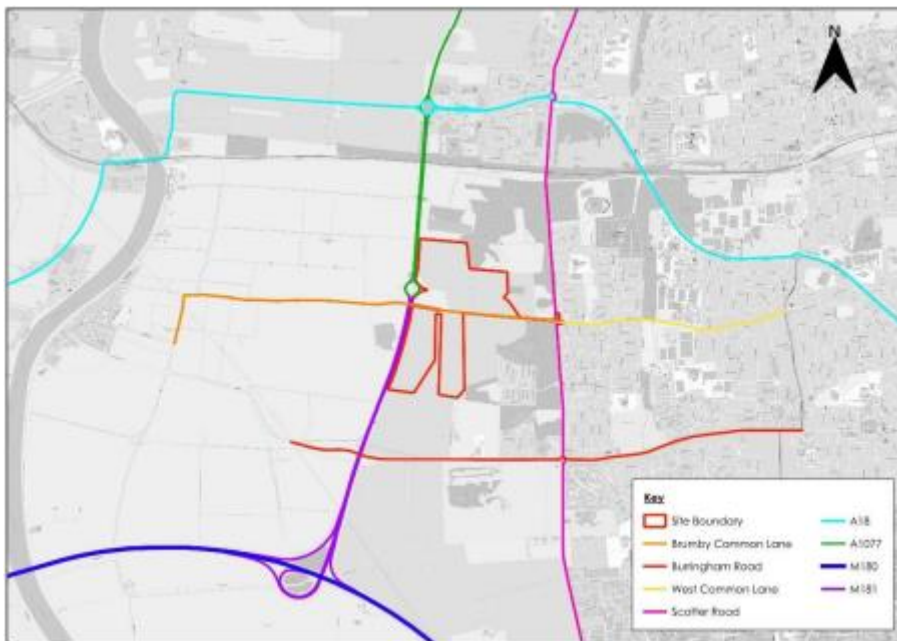


Figure 5. Local highway network⁵

- 6.10 The JSJV notes that providing walking and cycling infrastructure that connects to existing footways and cycleways offers a viable and sustainable transport option to and from the proposed development site.

Bus Provision

- 6.11 BWB notes that the closest bus stop are located approximately 800m to the east of the site access on Scotter Road; the JSJV would note the distance will be even further from the extremities of the residential development. BWB notes this stop is served by the number 3, which operates on an hourly basis serving the Scunthorpe Bus Station.
- 6.12 The proposed site is also located within the North Lincolnshire Demand Responsive Transport (DRT) bus service catchment area, which BWB states provides a flexible,

⁵ Planning Application 1 at Lincolnshire Lakes (North) Scunthorpe, North Lincolnshire Framework Travel Plan

on-demand public transport option for residents in rural and less-connected areas to access Scunthorpe. Seven vehicles operate within the service, running from 7am to 7pm on weekdays and from 8am to 6pm on Saturdays.

- 6.13 A dedicated app allows passengers to book journeys 24/7, track buses in real time, and receive journey updates. The app also informs users if a regular bus service would be more suitable, directing them to operator websites for timetable and ticketing information. Due to the availability of regular bus services within Scunthorpe, the DRT cannot be used for travel between two points within the town or within designated restricted zones. However, it facilitates travel into and out of Scunthorpe from areas without conventional bus services.
- 6.14 Residents of the proposed development will be able to access the DRT service from the first occupation of a dwelling. This service will complement a planned bus route, which is set to operate through the site upon the occupation of the 200th dwelling.
- 6.15 A public transport strategy has been proposed to maximise the accessibility to key destinations by rerouting bus service 35 into the site. BWB notes that following discussions with NLC’s public transport team, the service rerouting proposal, shown in **Figure 6**, will be implemented by no later than the occupation of the 200th dwelling.

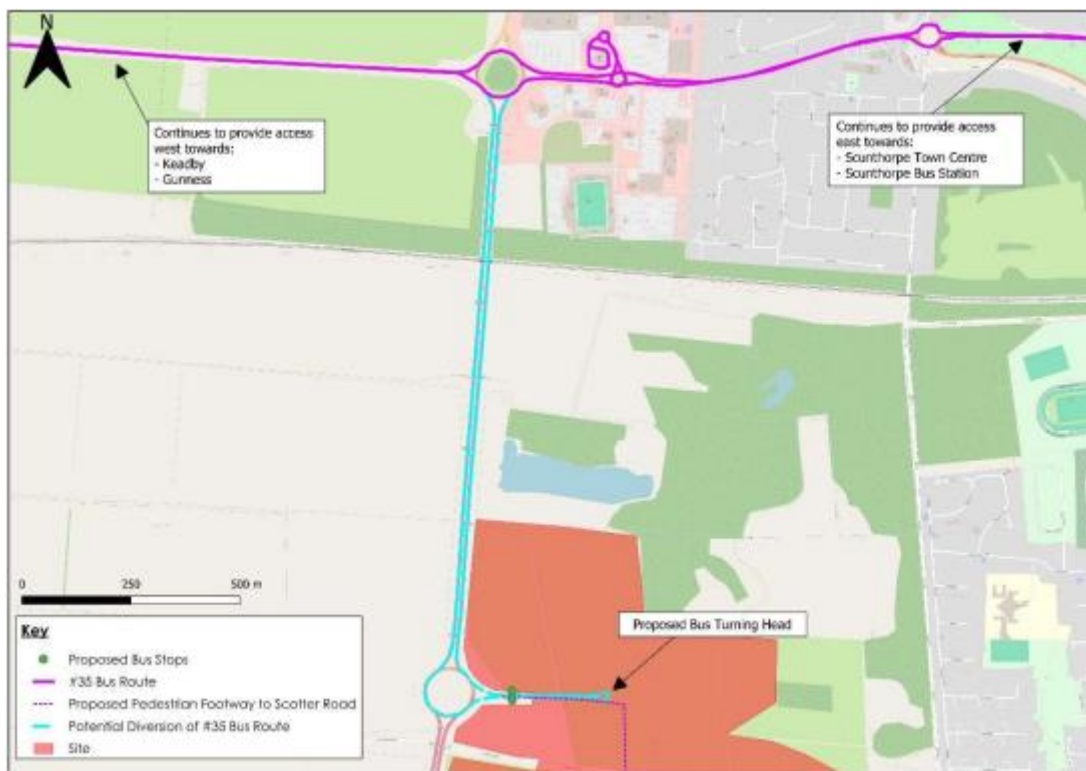


Figure 6. Bus service proposal⁶

- 6.16 Before the occupation of the 200th dwelling, residence will be able to use the North Lincolnshire DRT Service.
- 6.17 The JSJV would consider this approach to be appropriate and will offer a viable and sustainable alternative to driving a car.

⁶ Planning Application 1 at Lincolnshire Lakes (North) Scunthorpe, North Lincolnshire Framework Travel Plan

Travel Plan Measures

6.18 BWB has presented a range of measures and initiatives to promote active and sustainable travel to / from the proposed development site. The JSJV has presented the key measures in **Table 1** for reference.

Table 1. Proposed Travel Plan measures

Mode of transport	Measure
Walking and Cycling	Internal high quality segregated active travel infrastructure, including a connection with Scotter Road to the east. The link to Scotter Road to be open before 1st occupation.
	All residents and staff will be provided with detailed information about the transport facilities to and from the site through Travel Welcome Packs.
	Distribute a map showing key pedestrian features within the local network.
	Residents with school aged children will be encouraged to explore the sustainable travel plans offered by their local schools and take up initiatives such as walking buses.
	A cycle voucher (equivalent to the cost of Stagecoach's East Midlands Flexi10 ticket).
Public transport	The development will be served by a bus service (discussions ongoing to divert bus service no. 35 into the site). The bus will make use of the proposed internal bus stops and turning head to facilitate safe access and egress. The rerouted service will be implemented prior to the occupation of the 200th dwelling, of which prior to this residents will be able to make use of the North Lincolnshire DRT service.
	As part of a bus service routing through the Site, residents will be able to apply for a free Scunthorpe 28 Day MegRider pass.
Car sharing	The promotion of existing car sharing services such as www.carshare.com , www.shareacar.com , www.liftshare.com , and www.nationalcarshare.co.uk . These sites do not require members to have a car as some existing members will offer lifts in exchange for a contribution towards fuel costs.

6.19 Overall, the JSJV welcomes the proposed TP measures proposed by BWB and would suggest that they have the potential to reduce car use within the proposed development.

Mode share

6.20 BWB has presented a baseline mode share across the TA and TP derived from 'Method of Travel to Work' data from the 2011 National Census. The JSJV would note that the 2011 Census mode share has been derived from an average across the North Lincolnshire 012, 016, 017 and 018 MSOA's.

6.21 The JSJV has provided a comparison mode share using Method of Travel to Work data from the 2021 National Census for the same MSOA's. The proposed baseline mode share and JSJV's comparison is shown in **Table 2**.

Table 2. Proposed baseline mode share

Mode	2011 Census (MSOA 012, 016, 017 and 018)	2021 Census (MSOA 012, 016, 017 and 018)	Variance
Train	0.3%	0.2%	-0.10%
Bus, minibus or coach	4.6%	2.7%	-1.90%
Motorcycle, scooter or moped	1.8%	0.6%	-1.20%
Driving a car or van	71.7%	73.8%	+2.10%
Passenger in a car or van	8.3%	8.5%	+0.20%
Bicycle	6.2%	4.8%	-1.40%
On foot	6.6%	8.3%	+1.70%
Other method of travel to work	0.5%	1.0%	+0.50%

6.22 As can be seen from **Table 2**, the variance between the 2011 and 2021 Census data is relatively small, however, the 2021 baseline mode share for driving a car or van is slightly greater than presented by BWB. Considering the current lack of public transport provision and employment opportunities within walking distance of the site, and the small variance in mode share show in **Table 2**, the JSJV would suggest BWB’s baseline mode share is acceptable.

6.23 BWB has proposed a target mode share for the residential aspect of the proposed development of a 20% reduction in driving a car or van mode share, as shown in **Figure 7**.

Table 15: Residential Modal Split Vision and Validate Targets

Mode	Census Modal Split	Vision and Validate Modal Split	% Change
Car Driver	71.7%	57.4%	-14.3%
Car Passenger	8.3%	12.5%	4.2%
Motorcycle	1.8%	2.7%	0.9%
Public Transport	4.9%	7.4%	2.5%
On Foot	6.6%	9.9%	3.3%
Bicycle	6.2%	9.3%	3.1%
Other	0.5%	0.8%	0.3%

Figure 7. Residential target mode share

6.24 The JSJV would consider the targets presented in **Figure 7** to be ambitious, however, considering the proposed improvements to public transport and active travel infrastructure, we would consider a 14.3% reduction in car driver trips as achievable.

6.25 Notwithstanding the above, the JSJV would note that within the TA, BWB has assessed the impact of the proposed development on the SRN without taking into account the reduction in vehicle trips as a result of the target mode share, providing a worst-case assessment.

Travel Plan management, funding and monitoring

6.26 The JSJV would note the following information is provided by BWB:

- For the 550 dwellings proposed, a Site Wide Travel Plan Co-ordinator (SWTPC) will be appointed to oversee the TPC role for the whole of the residential development.
- The role of the SWTPC will be to secure any necessary funding to support the TP and ensure its efficient and effective use.
- An Annual Monitoring Report will be prepared by the SWTPC and issued to NLC.
- The TP will be reviewed against the targets annually as part of the monitoring report exercise. If the targets are not met and aspects of the TP are seen to be underperforming, the SWTPC will review the measures in place and revise them where appropriate in consultation with NLC.
- From first occupation until a period of five years after 50% dwelling occupation, each year during a neutral month, the SWTPC will organise a five-day automatic traffic count (ATC) at the Site access junction, in order to determine the number of vehicle arrivals and departures during the peak hour periods on an average week for the full Site.

6.27 The JSJV notes that there is no mention of the source of funding for the Travel Plan. Therefore, we suggest that firm financial commitments regarding funding for the proposed measures and the appointment of the Travel Plan Coordinator should be explicitly outlined within the Travel Plan.

7 Transport Assessment

Personal Injury Collision

- 7.1 BWB has reviewed of Personal Injury Collision (PIC) data for the 2019–2024 period, using data from North Lincolnshire Council (NLC). The JSJV would state that data from 2020 and 2021 should not be considered representative due to the COVID-19 travel restrictions; it should therefore not be used in the most recent 5-year period analysis for the SRN.
- 7.2 Notwithstanding the above, BWB notes that one fatal collision occurred on 24th February 2023 at 21:45 at the M181/A1077 roundabout.
- 7.3 The incident involved a car losing control and crashing into a barrier due to aggressive and reckless driving.
- 7.4 The road surface was wet/damp, but the collision was attributed to driver behaviour rather than road design.
- 7.5 Furthermore, BWB note a collision cluster at M181/A1077 Roundabout, including:
- One fatal collision.
 - One serious collision.
 - Two slight collisions.
- 7.6 The serious collision details was due to a car driver failing to look properly, losing control, and colliding with an HGV.
- 7.7 The driver was assigned the contributory factors "Failed to look properly" and "Loss of control."

- 7.8 BWB concludes that there are no clear road geometry or layout issues contributing to the recorded fatalities. Instead, driver error and impairment are the predominant causes of collisions at this location.
- 7.9 The JSJV would recommend that BWB presents PIC data for the most recent 5-year period excluding the years 2020 and 2021.

Residential Trip Generation

- 7.10 Previously, the AAP residential vehicle trip rates quoted by BWB, as shown in **Table 3**, were considered to be appropriate for the residential aspect of the proposed development after an independent review by the JSJV.

Table 3. AAP vehicle trip rates and generation (550 dwellings)

	AM Peak Period (08:00-09:00)			PM Peak Period (17:00-18:00)		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
Vehicle trip rate	0.130	0.552	0.682	0.354	0.211	0.566
Resi trip gen	72	304	375	195	116	311

Non-residential Trip Generation

- 7.11 As shown in **Table 4**, for the remaining aspects of the proposed development, BWB notes that TRICS has been used to inform the trip rates for the non-residential land uses. We would note that these land uses are:

- Local centre;
- GP surgery; and
- Creche.

Table 4. BWB non-residential vehicle trip rates and generation

	AM Peak Period (08:00-09:00)			PM Peak Period (17:00-18:00)		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
Local centre trip rate	4.644	3.9	8.544	6.045	6.447	12.492
Local centre trip gen	116	97	214	151	161	312
GP trip rate	3.118	1.559	4.677	1.216	2.174	3.39
GP trip gen	31	16	47	12	22	34
Creche trip rate	3.453	2.952	6.405	2.866	3.505	6.371
Creche centre trip gen	17	15	32	14	18	32

- 7.12 For comparison, the JSJV has undertaken a trip rate analysis using the TRICS Online Database (version 7.11.4), the results of this analysis and comparison to BWB’s vehicle trip generation are shown in **Table 6**, with the TRICS selection parameters outlined on **Table 5**.

Table 5. TRICS selection parameters

Parameter	Local Centre	GP Surgery	Creche
Land use category	Local Shops (01/I)	GP Surgeries 05/G	Nursery 04/D
Location	Suburban Area, Neighbourhood Centre	Suburban Area, Edge of Town, Neighbourhood Centre	Suburban Area, Edge of Town, Neighbourhood Centre
Actual range	1115-2700 sqm GFA	600-2150 sqm GFA	150-725 sqm GFA

Table 6. JSJV proposed vehicle trip generation analysis

	AM Peak Period (08:00-09:00)			PM Peak Period (17:00-18:00)		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
Local centre trip rate	4.613	4.053	8.666	6.161	6.603	12.764
Local centre trip gen	115	101	217	154	165	319
Variance	-1	+4	+3	+3	+4	+7
GP trip rate	2.546	1.317	3.863	1.23	2.028	3.258
GP trip gen	25	13	39	12	20	33
Variance	-6	-2	-8	0	-1	-1
Creche trip rate	3.563	3.175	6.738	3.253	3.841	7.094
Creche centre trip gen	18	16	34	16	19	35
Variance	+1	+1	+2	+2	+2	+4

7.13 As can be seen in **Table 6**, at most, the JSJV forecast the proposed development to generate 7 more two-way local centre vehicle trips in the PM peak.

7.14 Consequently, the JSJV would consider BWB’s proposed non-residential vehicle trip generation as appropriate.

7.15 BWB note that these non-residential uses essentially constitute a village centre, and that there are likely to be a significant number of internal and linked trips with the residential element. Such information will be available during the planning application stage, and the JSJV and National Highways will review this information when it is available.

Total Vehicle Trip generation

7.16 As can be seen in **Figure 8**, BWB forecast the proposed development to generate a total of 667 two-way vehicle trips in the AM peak and 689 two-way vehicle trips in the PM peak.

Table 24: Proposed Site Vehicle Trip Generation

Time Period	Trip Generation		
	Arrive	Depart	Two-Way
08:00 – 09:00	236	431	667
17:00 – 18:00	372	316	689
Total	3304	3893	7200

Figure 8. Total proposed development vehicle trip generation

Non-primary Trip Calculations

- 7.17 BWB notes it is necessary to calculate the type of trips that will be generated and attracted by the non-residential aspects of the proposal.
- 7.18 These calculations consider the vehicle types of trips generated and attracted by the development, focusing on non-primary trips, which are not entirely new to the network.
- 7.19 BWB refers to the TRICS Research Report 14/1 that provides guidance on the proportion of non-primary trips:
 - Pass-by trips can make up 20%-50% of total trips, with high pass-by rates observed for convenience stores and similar uses near major roads.
 - Pass-by trips are more common during peak commuting hours.
 - Differentiated rates should be applied for different land uses
- 7.20 As a result, BWB has proposed the following non-primary trip proportions, as shown in **Figure 9**.

Table 26: Non-Primary Trip Proportions

Land Use	Trip Type			
	Linked With Site Residential	Pass-By	Internal	Primary
Residential	0%	0%	0%	100%
Local Centre	30%	30%	10%	30%
GP Surgery	20%	20%	10%	50%
Creche	35%	35%	10%	20%

Figure 9. BWB non-primary trip proportions

- 7.21 The GP surgery, creche, and local centre are primarily intended to serve the Proposed Development (and the wider Lincolnshire Lakes development in future phases). It is expected that a small proportion of trips to and from these non-residential land uses will involve cars (due to factors like age, illness, or the need to drop off children at the creche). As a result, 10% of trips to these non-residential areas have been classified as internal trips.
- 7.22 The JSJV considers the proportions shown in **Figure 9** to be acceptable. Furthermore, given the size, nature, and location of the non-residential land uses, the JSJV does not anticipate that a large proportion of primary trips will impact the SRN, as it is unlikely that people will travel from the M180 to access the non-residential aspects of the development.

- 7.23 Furthermore, by providing a local amenity, residents will be able to access the non-residential aspects of the development by active methods of transport. Without the proposed amenities, residents would need to travel further, likely using private vehicles and possibly using the SRN.
- 7.24 In principle, therefore, we would suggest that the provision of a local amenities, such as a local centre, GP surgery and a nursery within walking distance of the residential area has the potential to reduce the number of trips using the SRN to access other areas. The JSJV would also note that the revised development is in line with Circular 01/2022 where it is stated that “New development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable”.
- 7.25 BWB’s proposed total vehicle trip generation by trip type and land use is shown in **Figure 10**.

Table 27: Proposed Vehicle Trip Generation by Trip Type

Trip Type	%	AM	PM	Daily
Residential				
Primary	100%	375	311	2,693
Pass By	0%	0	0	0
Linked with Resi	0%	0	0	0
Internal	0%	0	0	0
Total	100%	375	311	2,693
Local Centre (Including up to 1000sqm of Food Retail)				
Primary	30%	64	94	1,138
Pass By	30%	64	94	1,138
Linked with Resi	30%	64	94	1,138
Internal	10%	21	31	379
Total	100%	214	312	3,793
Doctors/Pharmacy				
Primary	50%	23	17	271
Pass By	20%	9	7	108
Linked with Resi	20%	9	7	108
Internal	10%	5	3	54
Total	100%	47	34	541
Creche				
Primary	20%	6	6	34
Pass By	35%	11	11	60
Linked with Resi	35%	11	11	60
Internal	10%	3	3	17
Total	100%	32	32	172
Total				
Primary	53%	469	428	4,136
Pass By	20%	85	112	1,306
Linked with Resi	20%	85	112	1,306
Internal	7%	29	38	451
Total	100%	667	689	7,200

Figure 10. BWB’s proposed vehicle trip generation by trip type

7.26 As can be seen in **Figure 10**, BWB forecast the proposed development to generate a total of 469 two-way primary vehicle trips in the AM peak and 428 two-way vehicle trips in the PM peak; the JSJV would consider this to be appropriate.

Distribution

7.27 As can be seen in **Figure 11**, BWB has presented the vehicle trip distribution for the proposed development.

Table 39: Distribution Route Proportions

Route	Description	%
A	M18 North of Junction 5	2.8%
B	A161 Crowle Bridge	0%
C	A18 Doncaster Road (West of Frodingham Grange Roundabout)	1%
D	Ferry Road W (West of A1077)	10.1%
E	Ferry Road W (East of A1077)	0%
F	Holyrood Drive	0%
G	A1077 Phoenix Parkway (East of Skippingdale Roundabout)	17.2%
H	Lunenburg Way (South of Skippingdale Roundabout)	0%
I	Scotter Road (North of Berkeley Roundabout)	0%
J	Doncaster Road (East of Berkeley Roundabout)	32.1%
K	A18 Kingsway (South East of Berkeley Roundabout)	8.1%
L	W Common Lane	0%
M	Burringham Road (East of Scotter Road)	1.9%
N	Scotter Road South	2.4%
O	Burringham Road (West of Scotter Road)	0%
P	Ermine Street (North of M180 Junction 4)	2%
Q	Barnetby Top	3.7%
R	A15 (North of M180 Junction 5)	4.7%
S	M180 East of Junction 5	3.5%
T	Kings Road (South of A18)	1.5%
U	A15 (South of M180 Junction 4)	3.2%

Figure 11. BWB proposed distribution

7.28 BWB notes that “NLC and NH have agreed that the distribution suitably represents the impact of the 550 dwellings”.

7.29 The JSJV would note that although National Highways has previously agreed to the trip distribution for the proposed development, the vehicle trip distribution presented in the TA and Figure 11 is not the distribution that was agreed.

7.30 The JSJV would note that the vehicle distribution that was previously agreed as appropriate by National Highways is shown in **Figure 12**.

Point	Network Periphery Point	BWB Residential Traffic Distribution Pattern (Original)	BWB Revised Residential Traffic Distribution Pattern in accordance of NH comments	Difference
A	M18 (N)	2.8%	2.8%	0%
B	A161 (N)	0.0%	0.0%	0%
C	A18 (W)	1.0%	1.0%	0%
D	A1077 (N)	27.3%	22.8%	-4.5%
E	Scotter Road (N)	0.0%	0.0%	0%
F	Doncaster Road	32.1%	27.6%	-4.5%
G	A18 (E)	8.1%	8.1%	0%
H	West Common Lane	0.0%	0.0%	0%
I	Scotter Road S)	4.3%	4.3%	0%
J	A15 (N)	2.0%	2.0%	0%
K	Barnetby Top	3.7%	3.7%	0%
L	A15 (N)	4.7%	4.7%	0%
M	M180 (E)	3.5%	12.5%	+9.0%
N	A18 (S)	1.5%	1.5%	0%
O	A15 (S)	3.2%	3.2%	0%
P	A161 (S)	1.2%	1.2%	0%
Q	M18 (S)	5.0%	5.0%	0%
R	B1538	0.0%	0.0%	0%

Figure 12. BWB updated vehicle trip distribution

- 7.31 The vehicle distribution shown in **Figure 12** was presented within BWB’s email response (May 2024). The updated distribution assigns a higher percentage of trips eastwards via the M180 towards Immingham and Grimsby. The JSJV considered this approach appropriate as it aligned with our previous analysis, using National Highways’ gravity model GraHAM, which forecast a higher percentage of vehicle trips to route east along the M180 through M180 Junction 4 and 5.
- 7.32 Therefore, the JSJV recommends that BWB confirm whether the agreed vehicle trip distribution, previously accepted by National Highways, has been used or if the original vehicle trip distribution—considered insufficient for routing an appropriate volume of trips east along the M180—has been applied.
- 7.33 Considering the difference in distribution percentages between the two sets of distribution data, the JSJV will refrain from commenting on the assessments carried out for M180 Junction 3, as there is likely to be a difference in the results.

Lincolnshire Lakes Remaining Trip Generation

- 7.34 Notwithstanding the above, as previously requested, the Applicant should provide a review of the total vehicle trip generation that was considered within the original AAP for the Lincolnshire Lakes Site and what percentage of this has been taken by other planning applications as well as the proposed development in question.

8 Construction Traffic Management Plan

- 8.1 Due to the proposed site location being in close proximity to the SRN, the JSJV would also recommend that a Construction Traffic Management Plan [CTMP] is submitted alongside the application. This should be provided to National Highways for review and agreement in writing prior to commencement of construction. Construction will then be expected to proceed in accordance with the approved CTMP.
- 8.2 The CTMP will need to include at least the following:
- A dust management plan.
 - A noise management plan.
 - Pollution prevention measures.
 - Staffing numbers.
 - Contractor parking.
 - Construction traffic routes.
 - Details of delivery arrangements (including for any abnormal loads); and
 - Measures to limit and manage transfer of debris on to the highway.

9 Boundary Treatment

- 9.1 The site is located adjacent to the M181 / A1077(M) roundabout. Its western boundary is coincidental with the highway boundary.
- 9.2 Therefore, the Applicant should demonstrate to National Highways that there are no drainage, structural, boundary treatments or other constructions that would have an impact on National Highways land interests. It should be noted, for example, that the structural stability of the highway should not be undermined, and that surface water should not drain towards or into the highway. As stated within paragraph 57 of Circular 01/2022, for reasons of safety, liability and maintenance:

“...structures should be sited sufficiently far from the highway boundary of the SRN so that they cannot topple on to the SRN or undermine its geotechnical integrity. Alternatively, an appropriate structural assessment that accords with the DMRB must be provided. A Road Restraints Risk Assessment must also be carried out where any furniture, structures or other features would be sited adjacent to the SRN.”

- 9.3 Furthermore, to ensure the integrity of the highway drainage systems, paragraph 58 states:

“...no new connections into those systems from third party development and proposed drainage schemes will be accepted. Where there is already an existing informal or formal connection into the highway drainage system from a proposed development site, the right for a connection may be allowed to continue provided that the flow, rate and quality of the discharge into the highway drainage system remains unaltered or results in a betterment. The company may require a drainage management and maintenance agreement to be entered into to secure this requirement in perpetuity.”

- 9.4 The JSJV would suggest therefore, that further information be provided with regards to the proposed boundary treatment between the M181 and the application site; particularly (but not exclusively), the information should consider:

- The impact of earthworks on the stability and integrity of the SRN;
- The impact of earthworks on drainage, and the drainage requirements needed to ensure that surface water does not flow from the application site on to the SRN;
- Access for maintenance of the highway boundary is maintained; and
- Boundary treatments are adequate and appropriate; particularly in regard to dazzle and distraction from opposing head lights.