

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
[REDACTED]

To: North Lincolnshire Council – Tanya Coggan

CC: [REDACTED]

Council's Reference: PA/2023/1607

Location: land south of A1077 Barrow Road, Barton upon Humber.

Proposal: Planning permission for a residential development with associated internal vehicular and pedestrian access, landscaping and infrastructure and formation of a new roundabout junction on Barton Road linking to a section of Barton upon Humber's relief road - NEW DOCUMENTS - AMENDED DESCRIPTION: Amended Site Layout and Housing Types and Boundary Treatments, updated Transport Assessment, Travel Plan, EVCP & Parking Plan, ... Construction Management Plan, Production Management Plan ... Construction Ecological Management Plan and updated Biodiversity Enhancement Management Plan.

National Highways Ref: NH/25/12072

Referring to the consultation on a planning application dated **July 22 2025** referenced above, 13km from the M180 at Junction 5 / A15 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 [REDACTED]

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: August 6 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 Approval

National Highways had no objection to a development on this site under PA/2023/1607 when we responded in November 2023. I am able to say now that the amendments do not alter our position. However, we would like to note the following deficiencies:

1. LTP did not include an overarching vision for the development, as required by [DfT Circular 01/2022](#) for transport assessments. This limits strategic alignment and scenario testing for transport design.
2. The 5% car mode share reduction target is considered too low, especially with good access to public transport. Targets remain unchanged from previous plans, which were already deemed insufficient.
3. LTP failed to forecast person trip generation, which is key for assessing overall demand and promoting sustainable travel modes.
4. LTP did not show how travel demand would be minimised via deliverable planning measures. LTP did not forecast the modal shift to sustainable transport. LTP did not fully evaluate the residual impact on the Strategic Road Network (SRN) post-mitigation.
5. LTP did not assign vehicle trips onto M180 J5 in its own Transport Assessment and JSJV had to fill this gap using National Highways' GraHAM model.

DevHU0157: Residential development at Barton

Case ref:	DevHU0157	Document ref:	AA.25.05.28	Date issued:	05/08/2025
Prepared for:	Simon Geoghegan	Prepared by:	Harry Robinson	Reviewed / approved by:	Terry Dale

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Headline summary

Planning Outcome	Site Location
<p>The recommendation to National Highways is no objection (although noting assessment deficiencies).</p>	

Technical Summary

No objection although assessment deficiencies are noted regarding:

1. Lack of a Vision Statement

- LTP did not include an overarching vision for the development, as required by Circular 01/2022 for transport assessments.
- This limits strategic alignment and scenario testing for transport design.

2. Inadequate Travel Plan Targets

- The 5% car mode share reduction target is considered **too low**, especially with good access to public transport.
- Targets remain unchanged from previous plans, which were already deemed insufficient.

3. Missing Person Trip Forecast

- LTP failed to forecast **person trip generation**, which is key for assessing overall demand and promoting sustainable travel modes.

4. Incomplete SRN Impact Assessment

- LTP did not:
 - Show how travel demand would be minimised via deliverable planning measures.
 - Forecast the modal shift to sustainable transport.
 - Fully evaluate the **residual impact** on the Strategic Road Network (SRN) post-mitigation.

5. Lack of Distribution on M180 J5

- LTP did not assign vehicle trips onto M180 J5 in its own Transport Assessment.
- JSJV had to fill this gap using National Highways' GraHAM model.

1 Introduction

- 1.1 In July 2024, an amended planning application (ref: PA/2023/1607) was submitted for a 196 dwelling residential development on land to the south of the A1077 in Barton-upon-Humber, North Lincolnshire. The development description is as follows:

“Amended Site Layout and Housing Types and Boundary Treatments, updated Transport Assessment, Travel Plan, EVCP & Parking Plan, Flood Risk Assessment and Drainage Strategy, Drainage Layout, Arboricultural Report, Impact and Method Statement, Sustainability Statement, Construction Management Plan, Production Management Plan Financial Viability Assessment, Air Quality Assessment, Landscape Management Plan, Landscape Masterplan and Planning Statement, Noise Impact Assessment, updated Ecological Impact Assessment, updated Biodiversity Metric, Construction Ecological Management Plan and updated Biodiversity Enhancement Management Plan.”

- 1.2 The Local Planning Authority [LPA] and Local Highway Authority [LHA] is North Lincolnshire Council [NLC] and the Applicant’s Transport Consultant is Local Transport Projects [LTP].
- 1.3 On behalf of National Highways, the Jacobs SYSTRA Joint Venture [JSJV] has reviewed the updated Transport Assessment [TA], and the Travel Plan [TP] prepared by LTP to accompany the amended application.

2 Background

Draft Local Plan

- 2.1 The application site is allocated for residential development (ref: H1P-13) within the draft North Lincolnshire Local Plan (NLC, 2022). H1P-13 was provisionally allocated for up to 225 dwellings.
- 2.2 The access and highway requirements for the site, as set out within the draft North Lincolnshire Local Plan (NLC, 2022), are as follows:
- *“Vehicular, pedestrian and cycle access point/s are to be taken from A1077 and will need to be agreed with the Local Highways Authority.*
 - *Good footpath and cycle provision are to be delivered throughout the site, linking the development with the town centre, local services and employment areas.*
 - *A Transport Assessment and Residential Travel Plan will be required to demonstrate that the development will have no adverse impacts on the highway network.*
 - *A new link road is to be constructed between A1077 and Caistor Road including a new roundabout. Developers will be required to enter into a legal agreement to implement this proposal or make an appropriate financial contribution towards its completion.*
 - *Financial contributions will be required for improvements to the Barrow Road/Falkland Way junction and other junctions on the A1077.” JSJV would note that there have been no previous planning applications relating to the proposed development site”.*
- 2.3 As noted in the next section, the emerging Local Plan has been withdrawn from Examination in October 2024. NLC is proposing a new Local Plan and has recently concluded an initial Issues and Options consultation, as well as a Call for Sites. These discussions have included National Highways.

October 2023 Application

2.4 The original planning application was submitted in October 2023 for a residential development comprising 173 dwellings, 23 more than proposed in the amended application. Following a series of discussions between the Applicant, NLC, Anglian Water, and Natural England, it was agreed to make amendments to the scheme. As stated in the Planning Statement Addendum, the notable changes to the original submission are as follows:

- *“The emerging Local Plan, in which the site was proposed to be allocated for housing with an indicative capacity of 225 dwellings, was withdrawn from Examination in October 2024.*
- *NLC are now proposing a new Local Plan and have recently concluded on an initial Issues and Options consultation, and Call for Sites, on 3 July 2025. The Reg 18 Plan is due for consultation in Autumn 2025, the Reg 19 plan in Winter 2025/26 and the Plan submitted for Examination by Spring 2026.*
- *The new link road bisecting the site received full planning permission on 6 September 2024 (ref. PA/2023/1981).*
- *NLC cannot demonstrate a five-year housing land supply¹.*
- *Revisions to the National Planning Policy Framework (NPPF) were made in December 2024 which seeks to (inter alia) tackle the critical national housing shortage.*
- *The Barton-upon-Humber Neighbourhood Plan was submitted to NLC for Examination.”*

2.5 Previously, after reviewing the 2023 Transport Assessment (2023 TA) and the 2023 Travel Plan (2023 TP), National Highways raised no objection to the original planning application, as the development was forecast to generate no more than seven two-way vehicle trips during the AM and PM peaks on any arm of M180 J5. However, the Company did note the following assessment deficiencies:

- The Transport Assessment and Travel Plan lacked a clear vision statement, which was necessary to guide scenario testing and optimise transport solutions.
- LTP’s targets were considered to reduce private car use by only 5% over five years to be insufficient, given the available access to active and public transport modes, and recommended setting a more rational target.
- A qualified Travel Plan Co-ordinator should have been firmly committed to, monitoring should have only end once travel objectives were met, and that clear financial commitments for proposed measures should have been included in the TP.
- LTP should have forecast person trip generation, outlined strategies to minimise travel demand, and assessed the impact of residual traffic on the Strategic Road Network.

3 Existing Situation

- 3.1 The location of the proposed development is located approximately 10km to the north of M180 Junction 5 [M180 J5], as shown in **Figure 1**.

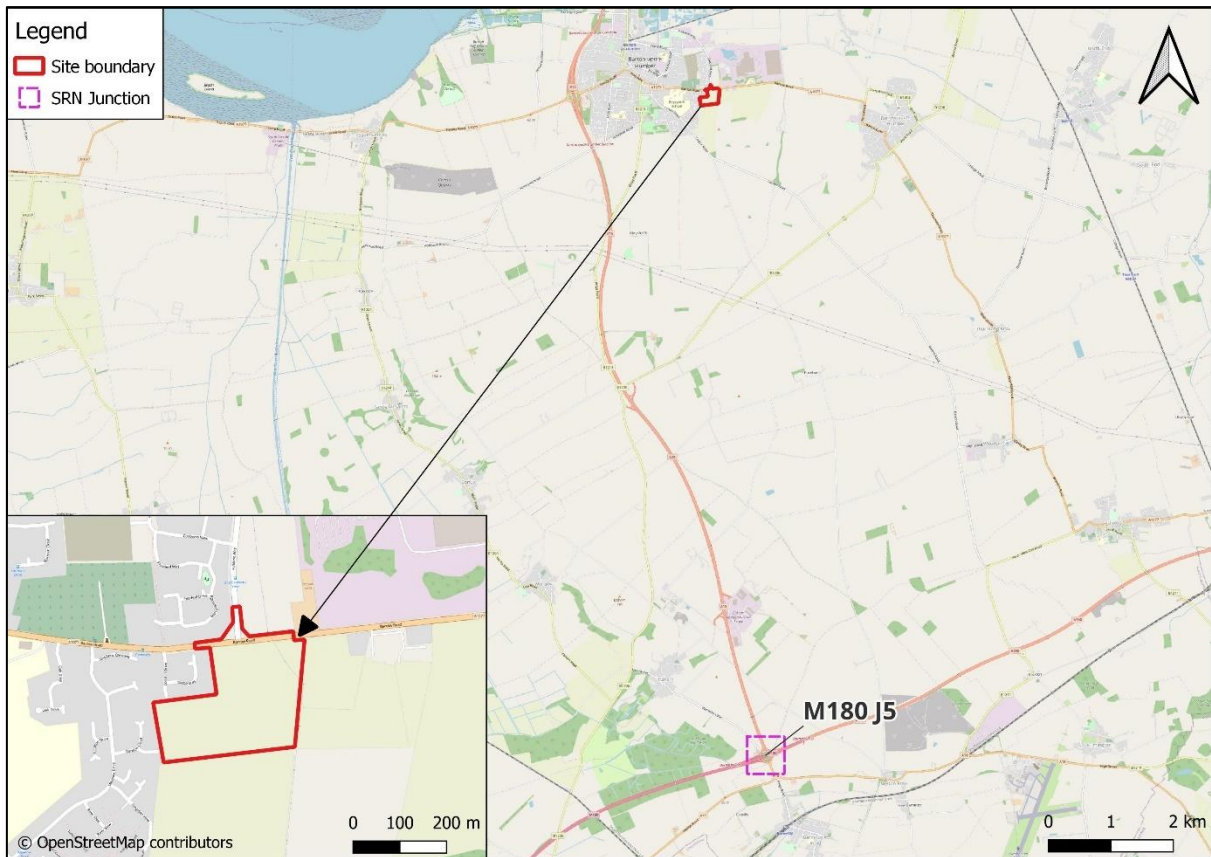


Figure 1. Proposed network route in relation to the SRN

4 Personal Injury Collision

- 4.1 Previously, it was noted that National Highways would typically expect the Applicant to provide an analysis of collisions at M180 J5. However, given the forecast traffic impact on the SRN, as highlighted in the previous review, it was not anticipated that the proposed development would have a significant material impact at the junction.
- 4.2 JSJV maintains that the previous response remains appropriate for the amended application.

5 Proposed development

- 5.1 LTP states that the proposed development will comprise of a mixture of dwelling sizes and types. The proposal includes 196 dwellings, an increase from 175 as part of the original application.

6 Vision

- 6.1 LTP has not provided an overall vision for the proposed development. The JSJV would note that Circular 01/2022 states that *“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.”*

7 Travel Plan

7.1 The TP was previously considered to be appropriate although noting the deficiencies as set out in paragraph 2.5. The JSJV has therefore reviewed the TP in line with National Highways previous comments.

Travel Plan Targets

7.2 Previously, it was suggested that LTP’s target of a 5% reduction in car mode share over five years was considered relatively low, given the available access to active and public transport modes.

7.3 The target mode share in the 2025 TP has not changed since the 2023 TP, therefore, the JSJV’s previous comment remains relevant.

Travel Plan Co-ordinator, Monitoring and Financial Commitments

7.4 LTP notes that the Applicant will appoint a suitably qualified Travel Plan Co-ordinator (TPC) at least 3 months prior to first occupation.

7.5 It is noted that the TP measures are going to be funded by the Applicant, with the TPC responsible for implementing the measures.

7.6 The JSJV would consider the above to be appropriate however we would reiterate that monitoring should only end once travel objectives are met.

8 Transport Assessment

Traffic Generation

8.1 LTP calculated the vehicle trip generation for the proposed development using the vehicle trip rates from the 2023 TA. These trip rates were derived from a Transport Assessment (BSP, 2020) produced for a proposed residential site at Pasture Road South (H1P-12), which were agreed upon with NLC Highways. National Highways previously agreed that these vehicle trip rates were appropriate; however, it was noted that LTP should have also forecast the person trip generation for the development, set out how the need to travel would be minimised based on sound, deliverable, and secured travel planning initiatives, and forecast the anticipated shift towards more sustainable modes. Once the residual traffic generation was determined, its impact on the operation of the SRN should then have been established.

8.2 LTP’s proposed vehicle trip rates and the resulting vehicle trip generation are shown in **Table 1**. The JSJV has also provided a comparison with the previously assessed 175 dwelling development, which received no objection in 2023.

Table 1. PH proposed vehicle trip rates

	AM Peak Period			PM Peak Period		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
Trip rate	0.122	0.360	0.482	0.333	0.158	0.491
Trip generation 196 dwellings	24	71	94	65	31	96
Trip generation 175 dwellings	21	63	84	58	28	86
Variance	+3	+8	+10	+7	+3	+10

8.3 As shown in **Table 1**, LTP forecasts that the proposed development will generate 94 two-way person trips during the AM peak period and 96 two-way person trips during

the PM peak period. This represents 10 more vehicle trips in both the AM and PM peaks compared to the previously assessed 175-dwelling development.

9 Distribution

9.1 Similarly to the 2023 TA, LTP has not distributed vehicle trips associated with the proposed development on to M180 J5. As a result, the JSJV has undertaken a vehicle trip distribution exercise using National Highways’ gravity model GraHAM. The JSJV’s residential development trip distribution results are presented in **Table 2**.

Table 2. GraHAM vehicle distribution results

Arm	AM Peak Period		PM Peak Period	
	Arrivals	Departures	Arrivals	Departures
Westbound merge	0%	11%	0%	11%
Eastbound diverge	12%	0%	12%	0%
Westbound diverge	0%	0%	0%	0%
Eastbound merge	0%	0%	0%	0%

9.2 As shown in **Table 2**, GraHAM predicts a maximum of 12% of traffic distributed at any junction movement across M180 J5. We have applied our trip distribution results to LTP’s proposed vehicle trip generation; the results are shown in **Table 3**.

Table 3. GraHAM vehicle trip assignment results

Arm	AM Peak Period			PM Peak Period		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
Westbound merge	0	7	7	0	3	3
Eastbound diverge	3	0	3	8	0	8
Westbound diverge	0	0	0	0	0	0
Eastbound merge	0	0	0	0	0	0

9.3 As is shown in **Table 3**, when applying GraHAM vehicle trip distribution results to LTP’s vehicle trip generation, the proposed residential development is forecast to generate no more than 8 vehicle trips in the AM and PM peaks across any arm of M180 J5. Therefore, similarly to the original application, the JSJV suggests that the residential aspect of the proposed development is unlikely to cause a severe impact on highway safety or a material impact on the operation of the SRN.

10 Conclusion

10.1 Despite several planning and technical shortcomings—primarily in strategic vision, modal shift analysis, and full trip-based forecasting—the JSJV concludes that the proposed residential development (196 dwellings) is unlikely to cause a severe impact on highway safety or result in a material impact on the operation of the Strategic Road Network at M180 Junction 5. Hence, while not ideal in execution, the development passes the threshold for acceptable impact, especially regarding safety and traffic generation.