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Rugby Borough Council
Issues and Options Consultation,
Development Strategy Team,
Town Hall,
Evreux Way
Rugby
CV21 2RR

2nd February 2024

via email localplan@rugby.gov.uk

Dear Sir or Madam,

RUGBY BOROUGH COUNCIL LOCAL PLAN ISSUES AND OPTIONS CONSULTATION – NATIONAL HIGHWAYS RESPONSE

National Highways welcomes the opportunity to comment on the Rugby Borough Local Plan Issues and Options document, ahead of upcoming public consultations. The document outlines the challenges and opportunities that Rugby will face up until 2050. The Local Plan Issues and options also sets out the visions and objectives of the local plan describing how these challenges and opportunities will be addressed.

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). 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 Rugby Borough, National Highways' principal interest is ensuring the safe and efficient operation of the SRN, notably the M6, M69, and the A5 and A45 Corridors.

In responding to Local Plan consultations, we have regard to DfT Circular 01/2022 - **Strategic Road Network and the delivery of sustainable development** ('the Circular') which sets out how interactions with the Strategic Road Network should be considered in the making of local plans. Paragraph 26 of the Circular sets out that:

'The NPPF prescribes that transport issues should be considered from the earliest stages of plan-making and in development proposals so that sustainable transport can be promoted. In relation to the preparation of local plans and spatial development strategies, the government expects that the relevant authorities will engage with the

company from the outset of this process, to understand the interaction between land use designations and the impacts on road safety and future performance of the SRN.' 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.

Issues and Options Consultation Question Responses

We have reviewed the document produced for public consultation relating to the Rugby Borough Local Plan Issues and Options. Based on this appraisal we provide comments to the following relevant consultation headings as below.

Land for Employment Uses

We note that the employment land requirement of 735 ha for Office, General Industry and Warehousing elements respectively during the HEDNA for the plan period of up to 2050. While we do not have any specific comments at this stage, it should be noted that any potential site identified through the Local Plan process, and which is anticipated to have an impact on the SRN in the area should be subject to consultation with National Highways, and appropriately assessed in line with the DfT's Circular 01/2022 to determine the extent of their potential impacts on the SRN in the area. Further to this, 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 the area in terms of capacity & safety, and identifying any possible mitigation measures (if required).

National Highways recommends that a Strategic Transport Assessment be produced to support the development of the Local Plan. To support this key piece of work we recommend the setting up of a Transport Working Group (TWG) at a later stage, who can work with the Local Planning Authority to agree the methodology, assessments and infrastructure requirements to support the Plan's development and adoption.

For any developments which have an impact on neighbouring Local Authorities (LAs), National Highways advises a joined-up approach in which National Highways, Rugby and the other LAs attend joint meetings with the future developer or applicants. This will ensure all parties interests are protected and a combined solution is derived.

M6 Junction 1

National Highways completed Step C and D studies in April 2021 at the A5 Gibbet Hill junction (immediately north of M6 J1). This forms part of the SRN and has been identified as a critical bottleneck, particularly given queueing on the A426 southern approach can extend to block back onto M6 Junction 1 during peak hours. The assessment of the current performance of the roundabout has shown that vehicles in the network face increased delay during AM and PM peaks when compared to IP,

indicating a high level of congestion in the network. This is more noticeable in the PM peak where delays almost double.

M6 Junction 2 Ansty Interchange

No recent studies have been conducted by our teams in the area. Based on a high-level review of current typical traffic conditions using Bing Traffic Data, the A46 Coventry Eastern Bypass westbound approach to M6 Junction 2 is subject to significant traffic delay during both the weekday morning and evening peak hours. Further significant delay is observed using Bing Traffic Data on the M69 / A46 southbound during the morning peak hour and A46 northbound during the evening peak hour.

National Highways has been engaged with a number of highway authorities and the developer regarding the proposed Project Alpha site adjacent to M6 Junction 2. The applicant indicates in their Transport Assessment that the junction is likely to be subject to significant traffic impacts as a result of the Project Alpha site and 19 other committed developments in the area (modelled to a 2031 forecast year). Our key concern is the safety and operation of the junction and we will continue to work with the applicant and other partners to explore options which enable a nil-detriment impact on the junction is achieved.

A46 Walsgrave Junction

Following on from the above, the A46 in Coventry has benefitted from a series of junction improvements designed to unlock congestion pinch points along the A46 Coventry Eastern Bypass. Mostly recently the A46 Coventry Junctions upgrade saw the completion of the A46 Binley junction improvement in February 2023. The A46 Walsgrave junction is the last remaining at grade junction on this corridor, creating a congestion pinch point due to increased pressure by traffic released as a result of Binley and other A46 junction improvements.

Junction improvements at Walsgrave have been designed to relieve traffic congestion, improve journey times and increase capacity on the A46, with work currently forecast to commence in Winter/Autumn 2026. It should be noted that implementing a free-flow arrangement at Walsgrave as planned could have significant implication on the operation of M6 J2 in the north, as a free flow arrangement is likely to release current congestion at Walsgrave junction onto M6 Junction 2.

Prologis Park Ryton Expansion

The site is near to the A46 Tollbar End junction, subject to an improvement which was completed in March 2017. The junction improvement included grade separation with a new underpass to avoid the Tollbar End roundabout and an additional lane on the A45 Stonebridge Highway. Prior to improvement, the junction was operating above design capacity for several years, suffering queues and delays in peak periods. The most recent information available regarding the current operation and capacity of the junction was sourced from the One-Year After POPE study for A46 Tollbar End (published in December 2023).

The study concludes that for customers using the new underpass link at Tollbar End, journey times and reliability improved. However, it was found that for customers travelling through the Tollbar End roundabout, journey times and reliability deteriorated in some movements. It is likely that the increased journey times are a result of traffic flow increases for certain movements at Tollbar End (A45 west to A45 south traffic increased by 45%, 4,000 vehicles), despite observed flows around the project being below forecast flows. The report also noted an overall net benefit on congestion in the study area, driven by savings from the new underpass link at Tollbar End.

A45/A4071 Junction

National Highways has recently conducted modelling reviews of the nearby A45/M45 Thurlaston Interchange junction as part of pre-application discussions for the Land South of Alwyn Rd site. The recent study conducted by SLR indicates that the roundabout might not generate a significant delay for both eastbound and westbound traffic on A45/M45 in 2026. Furthermore, the obtained queue results on the approaches to the roundabout demonstrate that the average maximum queue can be named as “moderate queue” for the future 2026 traffic conditions on both eastbound and westbound approaches to the roundabout. The journey time results show average speed for traffic on A45 / M45 which at around 50 mph in the eastbound direction and around 44 mph in the westbound direction for the AM peak hour. For the PM peak hour, the average speed of the traffic is around 55 mph in both directions.

A5 North of Houlton

No recent studies have been conducted at this location, although online traffic sites show this section of the A5 as being free-running across both peaks on every weekday. National Highways have reviewed planning applications related to the nearby DIRFT site which indicates that the A5 Lilbourne and A5 Catthorpe Crossroads are to benefit from improved signage, carriageway markings and anti-skid surfacing.

South of Hinckley

National Highways are currently building a new VISSIM model on A5 Dodwells to Longshoot section. This has included traffic data collection and reporting of observed conditions at Dodwells and Longshoot junctions to support evidence for forthcoming planning appeals in Leicestershire where impact on the SRN in this area may be expected if development goes ahead.

No eastbound congestion was observed east of the A5 Dodwells roundabout, consistent across both peak periods. The eastbound queue towards the roundabout was found to originate from the traffic signals at the arm and to extend back towards the Longshoot junction. The eastbound queue was observed to move more quickly in the AM peak. Along the westbound approach to the roundabout, the queues were found to extend further back along the A5 but do not reach the A5/Sketchley Ln/Logix Rd roundabout to the east for both peak periods. However, large westbound queues were also seen between the Longshoot junction and the Dodwells roundabout. This indicates that the main contributors to congestion are related to the capacity restraint at the Longshoot

junction and the lane reduction on the westbound exit at the Dodwells roundabout. This was seen to affect the operation of the Dodwells roundabout on all other arms, whereby westbound vehicles were blocking the whole roundabout.

During both peaks, the eastbound queue originating at the Dodwells roundabout also reaches the Longshoot junction in the eastbound direction leading to underutilised green time at the junction (six vehicles compared with eighteen vehicles crossing the stop line during peak and free-flow conditions respectively). In the AM peak, the eastbound queue was seen to extend beyond the A5 Watling St/Access to Gardens of Blessings Cemetery junction, where data suggests that the queue does not clear during the AM peak hour as at least 65 vehicles are queueing between the junction with the cemetery and the Longshoot junction. In the PM peak, the eastbound queue is shorter and does not reach beyond A5 Watling St/Access to Gardens of Blessings Cemetery junction. Additionally, in the peak period the eastbound queue further affects the A47 northbound at the junction, resulting in regular vehicle blocking the A5 and creating further delays and risks. As mentioned in the Dodwells roundabout analysis, the capacity restriction at the Longshoot junction also generates queues in the westbound direction, whereby the queue extends across the Dodwells roundabout and further beyond to the east.

Town Centre Regeneration

National Highways does not have any comments to make on the above due to the distance from the SRN.

Pitches For Gypsies and Travellers

At this stage, National Highways does not have any specific comments, however it is vital that we are consulted on potential sites that are in close proximity to the SRN to allow us to assess the impact of the proposals.

Houses in Multiple Occupation

National Highways does not have any comments to make on the above.

Climate Change Policies

National Highways are committed to reduce the environmental impact of our network to complement our ambition for Net Zero Carbon and we welcome policies focused on reducing carbon from development, and reaching net zero.

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 73 and 105 prescribing that significant development should offer a genuine choice of transport

modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of PAS2080 promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

Design Coding and Guidance

National Highways does not have any comments to make on the above.

Yours sincerely