



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

From: Kamaljit Khokhar (Head of Planning & Development)
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To: Herefordshire County Council

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 243045

Location: Land off Clubtail Drive Holmer Hereford

Proposal: Proposed erection of 31 no. key worker dwellings, including access from Clubtail Drive with associated infrastructure and landscaping.

National Highways Ref: NH/25/10822

Referring to the consultation on a planning application dated 14th April 2025 referenced above, in the vicinity of the A49 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.¹

¹ Where relevant, further information will be provided within Annex A.

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 propose not 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 PlanningM@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: *Ellie Smith*

Date: 23rd April 2025

Name: Ellie Smith

Position: Assistant Spatial Planner

National Highways

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Annex A **National Highways' assessment of the proposed development**

This response represents our formal recommendations and has been prepared by Ellie Smith, Assistant Spatial Planner for National Highways.

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.

National Highways considers planning applications for new developments under the requirements of the National Planning Policy Framework (NPPF) and DfT Circular 01/2022: The Strategic Road Network and The Delivery of Sustainable Development ("the Circular"). The latter document sets out our policy on sustainable development and our approach to proposals which may have an impact on our network.

The SRN in the vicinity of the proposed development is the A49 trunk road.

Development Proposal

The application is for the development of 31 dwellings off Clubtail Drive.

Traffic

The Transport statement (Dated November 2024) states that there will be eleven additional trips in the AM peak and nine additional trips in the PM peak. This should have a negligible impact on traffic, therefore, National Highways has no further comments to make on this.

Construction Impact

National Highways would expect to see a Construction Traffic Management Plan (CTMP) which should include the following details:

1. Hours of working; date works will commence & anticipated completion date/duration.
2. Anticipated average two-way daily traffic numbers associated with the construction phase of the project.
3. Confirmation of the intended construction access arrangements to and from the site from the SRN (A49).
4. The arrangements for routing of construction vehicles to and from the site.

5. Details of any special or abnormal deliveries or vehicular movements.
6. Site Contact Details responsible for ensuring Health & Safety and handling of complaints.

With respect of a CTMP however, National Highways is content that the above can be undertaken post-planning consent ensured through a suitably worded planning condition.

National Highways Considerations

Condition 1: Prior to the commencement of the development hereby permitted a Construction Traffic Management Plan shall be submitted to and approved in writing by the Local Planning Authority (in consultation with the Highway Authority for the A49 trunk road). The plan shall include as a minimum:

- a) Construction phasing
- b) An HGV routing plan to include likely origin/destination information, potential construction vehicle numbers, construction traffic arrival and departure times, signage, accesses and construction delivery times (to avoid peak hours)
- c) Details of any special or abnormal deliveries or vehicular movements.
- d) Clear and detailed measures to prevent debris, mud and detritus being distributed onto the Local highway and SRN.
- e) Mitigation measures in respect of noise and disturbance during the construction phase including vibration and noise limits, monitoring methodology, screening, a detailed specification of plant and equipment to be used and construction traffic routes.
- f) A scheme to minimise dust emissions arising from demolition/construction activities on the site. The scheme shall include details of all dust suppression measures and the methods to monitor emissions of dust arising from the development.
- g) Waste management.
- h) Wheel washing measures.
- i) Protection measures for hedgerows and grasslands.

Thereafter all construction activity in respect of the development shall be undertaken in full accordance with such approved details unless otherwise approved in writing by the Local Planning Authority in consultation with the Highways Authority.

Reason: To mitigate any adverse impact from the development on the A49 trunk road and to satisfy the reasonable requirements of road safety.

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.