



Preferred Option Consultation,
Development Strategy Team,
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19 May 2025

Via Email:

localplan@rugby.gov.uk

Dear Sir/Madam,

Rugby Borough Local Plan – Preferred Options Consultation

National Highways welcomes the opportunity to provide comments on the Local Plan (Preferred Options Consultation) prepared for Rugby Borough Council, which is expected to cover the plan period from 2024 – 2045.

National Highways has been appointed by the Secretary of State for Transport as a Strategic Highways Company under the provisions of the Infrastructure Act 2015. It serves as the highway authority, traffic authority, and street authority for the Strategic Road Network (SRN), with responsibility for ensuring its safe and efficient operation while supporting national economic growth as a key delivery partner.

In relation to this consultation, National Highways' primary concern is the safe and efficient operation of the Strategic Road Network (SRN), particularly the M1, M6, M69, A5, A45, and M45, which pass through the Local Plan boundary.

In responding to Local Plan consultations, we have regard to the Department for Transport's (DfT) revised Circular 01/2022 – Strategic Road Network and the Delivery of Sustainable Development (the Circular), which outlines how interactions with the Strategic Road Network should be considered in the preparation of Local Plans. Paragraph 28 of the Circular states that:

The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore

opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan.

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.

General Observations

We note that the Preferred Options Consultation identifies land for over 14,000 dwellings, around 9% above the minimum requirement, and approximately 1.23 million m² of employment floorspace.

National Highways recognises the role that planned growth plays in supporting local and national objectives. However, it is essential that this growth is underpinned by a robust and coordinated transport evidence base that addresses:

- The cumulative impact of proposed allocations on SRN capacity and safety.
- The need for early and sustained engagement between local planning authorities, National Highways, and developers.
- Consistency with the requirements of DfT Circular 01/2022 and alignment with Local Transport Plans.
- The identification and timely delivery of any necessary infrastructure mitigation.

To support this, we strongly recommend the preparation of a Strategic Transport Assessment (STA) to inform the next stage of the Local Plan, alongside a detailed Infrastructure Delivery Plan. We would also welcome the establishment of a Transport Working Group to enable coordinated technical input across all relevant parties.

Key Sites of Interest

National Highways is particularly concerned with:

- Residential sites proposing 100 dwellings or more; and
- Any development site that directly borders or accesses the SRN.

We have identified several allocations within the Local Plan that are either of a significant scale or located close to key SRN junctions. These are summarised in the table below:

Ref	Site Name	Dwellings / Employment Floorspace	Likely SRN Junction Affected
96	Land at Coventry Road, Wolvey	500	M69 J1
334	Land off Barby Lane, Hillmorton	380	A5 Halfway House
316	Land at Long Lawford	400	A45 – A4071 – B4453
59	Newton Manor Lane, Brownsover	240	M6 J1
338	Land south of Crick Road, Houlton	250	A5 Halfway House
134	Land north of Plott Lane, Stretton	125	A45 School Lane
40	East of Kilsby Lane, Hillmorton	125	A5 Halfway House

341	Land south of Coventry Road, Dunchurch	180	M45 J1
328	Prologis Park West and Mountpark	350,000 m ²	A46 Tollbar / Ryton Island
95	Crowner Fields Farm, Ansty	275,000 m ²	M6 J2 (Ansty Interchange)
17	South West Rugby Employment Phase 2	130,000 m ²	A45 – A4071 – B4453

We expect that each of these sites is supported by detailed, site-specific transport assessments prepared in accordance with DfT Circular 01/2022. These assessments should address both direct and cumulative impacts on the SRN and identify necessary mitigation measures.

In the case of the employment sites, we would expect comprehensive transport modelling and clearly phased infrastructure proposals. Freight routing strategies and any associated highway mitigation must be developed in close collaboration with National Highways. We welcome early and proactive engagement as these sites are brought forward.

South West Rugby (Policy S8 / S9)

We note the proposed allocation at South West Rugby, comprising approximately 4,000 dwellings and 130,000 m² of employment land. To support effective planning and delivery, we request further detail on the phasing of development, associated infrastructure commitments, and anticipated delivery timelines.

A key element of this allocation is the South West Rugby spine road network (Policy S9), which includes the proposed Postford Dam Link connecting the A45/M45 roundabout to the A4071. Given the potential interface with the Strategic Road Network (SRN), we would draw your attention to Section 5 of DfT Circular 01/2022, which states:

“Proposals for new or amended accesses to the SRN will need to demonstrate that they are consistent with the role of the SRN as a strategic network. New accesses will not be permitted unless it can be shown that the resulting impact on the SRN is acceptable, and where appropriate, mitigation is provided.”

In light of this guidance, and the potential impacts on the A45/M45 interchange, National Highways requests:

- Early confirmation of the route alignment and proposed delivery phasing;
- Inclusion of the full spine road scheme within the Infrastructure Delivery Plan;
- Evidence of secured funding and delivery mechanisms for the spine road; and
- Comprehensive assessment of the cumulative impact of the proposed spine road and wider development on the SRN.

Strategic Transport Assessment and Cumulative Impact

National Highways reiterates the importance of assessing the cumulative traffic impacts of all proposed site allocations through a Strategic Transport Assessment (STA). Site-by-site assessments alone are unlikely to reflect the full extent of pressure on the SRN, and therefore risk underestimating the overall impact.

We encourage Rugby Borough Council to agree a clear and robust assessment methodology in collaboration with National Highways and Warwickshire County Council. This should be developed through joint technical work and include:

- Agreed assumptions on trip generation and distribution.
- Detailed junction modelling at key SRN locations.
- The identification of appropriate mitigation measures and associated funding mechanisms.

Boundary Considerations

We note that there are a number of proposed sites which would share a border with the SRN. Where this is the case, relevant boundary considerations relating to drainage, lighting, fencing and other treatments will need to be explored and agreed with National Highways as part of the application process for the individual sites.

Duty to Cooperate and Cross-Boundary Coordination

We also recommend continuing and proactive collaboration between Rugby Borough Council, National Highways, and neighbouring authorities to address cross-boundary transport impacts. We support the use of Statements of Common Ground to formalise shared objectives and responsibilities, particularly where joint infrastructure solutions may be required.

Next Steps

National Highways would welcome further engagement as the Local Plan progresses to Regulation 19. We look forward to reviewing additional technical evidence, including the Strategic Transport Assessment and Infrastructure Delivery Plan.

Please do not hesitate to contact us should you require clarification or further discussion.

