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Request for Comments

Publication of the Christleton and Littleton Neighbourhood Development Plan

Thank you for inviting National Highways to provide comments regarding the above proposals.

Policy Overview

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). 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. It is an ambition to ensure that major roads are more dependable, durable, and most importantly – safe.

National Highways' approach to engaging with the planning system is governed by the advice and guidance set out in:

- The Strategic Road Network Planning for the Future - A Guide to Working with National Highways on Planning Matters (October 2023).
- The document is written in the context of statutory responsibilities as set out in National Highways' licence, and in the light of government policy and regulation, including the:
- National Planning Policy Framework (NPPF);

- Town and Country Planning Development Management (Procedure) Order (England) 2015 (DMPO)
- DfT Circular 01/2022 The Strategic Road Network and the Delivery of Sustainable Development ('The Circular').

National Highways comments

National Highways has reviewed the Christleton and Littleton Neighbourhood Development Plan and its associated documents. As a general observation, it would be appropriate for proposed policies to be reviewed against relevant national policy, including the National Planning Policy Framework and Department for Transport guidance. It is noted that some proposed policies appear to be inconsistent with national guidance; however, where these relate to locally maintained roads, this is a matter for the local highway authority to consider and comment on further.

Notwithstanding this, National Highways makes the following specific comment on the policy set out below:

Policy **HT1** (Signage to direct traffic via M56/M6 rather than down the A41 and A51) is not supported by national planning or transport policy and conflicts with established DfT principles on the role of traffic signing and the NPPF's requirements for evidence-based transport planning.

The National Planning Policy Framework is explicit that transport impacts must be addressed through assessment and mitigation, not avoided through aspirational rerouting assumptions. Paragraph 111 states:

“Development should only be prevented or refused on highways grounds where there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe.”

Policy **HT1** does not propose mitigation of impacts on the A41 or A51; instead, it assumes that traffic can be redirected elsewhere by signage alone. This approach sidesteps the NPPF test by seeking to displace traffic impacts rather than assess or mitigate them, contrary to national policy.

The NPPF further requires transport planning to be vision-led but evidence-based, with realistic and deliverable measures. Paragraph 109 requires plans to:

“Understand and address the potential impacts of development on transport networks” and to “identify and pursue opportunities to promote sustainable transport solutions.”

Directional signage is not a transport solution in NPPF terms. It does not reduce trip generation, does not secure mode shift, and does not guarantee changes in driver

behaviour. As such, **HT1** relies on an unproven assumption, rather than addressing impacts through measurable, enforceable mitigation.

DfT guidance on traffic signing is clear about the limited purpose of signs. The Traffic Signs Manual (DfT Traffic Signs Manual, Chapter 2) explains that the function of directional signing is:

“to guide road users along appropriate routes to their destinations.”

There is no support in DfT guidance for using signage as a mechanism to:

- manage development impacts,
- discourage use of certain roads for environmental reasons, or
- force traffic onto longer or faster routes.

Using signage in this way moves beyond guidance and into behavioural control, which DfT policy does not endorse.

It is also important to emphasise the intended role of the SRN. The SRN is designed to facilitate safe, reliable and efficient strategic and often long-distance journeys, particularly movements between major centres of population, ports, airports and key economic locations. DfT Circular 01/2022 explains that the principal purpose of the SRN is to support strategic movement and economic activity, rather than to address localised impacts arising from development proposals. Paragraphs 4–5 of the Circular set out that the SRN is critical infrastructure for long-distance travel and freight and plays a distinct role within the wider transport network.

Paragraph 28 of the Circular further makes clear that the SRN should not be relied upon to accommodate general development traffic where suitable alternatives exist, and that new or intensified access to the SRN must be carefully justified.

“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).”

In particular, the Circular highlights that direct access to the SRN is generally appropriate only for road-reliant development, where there is a clear functional need or locational requirement for such access, and not as a default means of serving residential development. Development proposals are expected to demonstrate that reliance on the SRN is necessary and appropriate, and that impacts have been properly assessed and mitigated through evidence-based analysis rather than assumed outcomes.

Accordingly, the use of SRN junctions as the primary means of access for housing development, or as a mechanism to reduce impacts on the local road network, would not align with the principles set out in DfT Circular 01/2022. The Circular highlights that planning should focus on managing and mitigating impacts at the appropriate network level, and not on transferring local impacts onto the SRN in a manner inconsistent with its strategic function.

Although DfT Circular 01/2022 applies to the Strategic Road Network, it reinforces a broader principle that is relevant in this context: planning policy should address transport impacts through assessment and mitigation, rather than prescribing detailed traffic management or routing outcomes. Operational traffic measures are matters for the highway authority, informed by evidence and network operation considerations, not for pre-determination through land-use policy.

Finally, **HT1** raises a fundamental deliverability and governance issue, which the NPPF requires plans to address. The Framework expects policies to be effective and capable of implementation. Directional signage:

- requires separate highway authority approval,
- must meet necessity tests under DfT regulations,
- cannot be guaranteed to influence driver choice.

As such, **HT1** relies on outcomes that cannot be secured through the planning system, undermining its effectiveness. It is for this reason National Highways would not be in a position to support this specific policy.

Taken together, the proposed policies would benefit from a more rigorous review against national policy to ensure they are evidence-based, proportionate and deliverable. National planning policy is clear that transport impacts should be assessed and addressed through appropriate analysis and mitigation, and that assumptions about driver behaviour, traffic displacement or network performance should not be relied upon in place of proper assessment. Policies which presume outcomes, prescribe operational solutions, or seek to displace impacts rather than understand and manage them risk falling out of step with this approach.

There is also a need to consider the cumulative effect of multiple transport-related policies operating together. Individually, measures such as restricting development, directing traffic elsewhere, or assuming alternative routes may appear benign. However, when taken collectively, they risk embedding a set of assumptions that are not supported by evidence and which may transfer impacts to other parts of the network, increase vehicle mileage, or constrain sustainable growth in ways not intended by national policy.

A compliant neighbourhood plan, in accordance with the basic conditions, should therefore focus on setting a clear policy framework that enables impacts to be assessed

transparently, mitigated where necessary, and determined in cooperation with the relevant highway authority, rather than seeking to predetermine outcomes – as per national policy. A review of the proposed policies with these principles in mind would help ensure consistency with national policy, improve robustness at examination, and reduce the risk of unintended or cumulative adverse consequences.

I trust the above observations will be helpful in informing further consideration of the proposed policies and strategic routing of traffic (including emergency division routes), with further conversation with National Highways welcomed.

Kind Regards,

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North-West Spatial Planning Team