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From: Bowie, David [REDACTED]
Sent: 09 September 2021 14:24
To: Planning.Responses <Planning.Responses@arun.gov.uk>

Subject: AL/107/21/PL - Woodgate Centre Oak Tree Lane Woodgate PO20 3GU FAO James Cross

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For attention of:	James Cross
Site:	Woodgate Centre Oak Tree Lane Woodgate PO20 3GU
Proposal:	Demolition of the Woodgate Centre buildings (including 3 No. residential dwellings) & the construction of 180 No. residential dwellings with the creation of new vehicular access with footways and cycleways, ancillary road infrastructure, emergency access arrangements, associated parking, public open space, including children's play space, landscape planting, surface water attenuation & drainage & other associated infrastructure. This site is in Cil Zone H SP2, BEW Strategic Site and is not CIL Liable.
Your Reference:	AL/107/21/PL

Dear Mr Cross,

Thank you for your email of 19 August 2021 consulting Highways England regarding the above referenced application, seeking a response by 23 September 2021.

Having assessed the application, we note that there are a number of matters requiring further clarification or information in order for us to be able to assess the implications of the proposal on the Strategic Road Network.

Until such time as the requirements are fully met, Highways England will not be able to assess whether the proposals comply with national planning and transport policy set out in DfT C2/13 (especially paras 8 to 11) and MHCLG NPPF2021 (especially paras 110 to 113); and hence will not be able to provide our formal planning response.

Accordingly, please find attached our formal HEPR holding response which sets out our requirements.

It is also important to note that, once all outstanding issues are resolved to our satisfaction, we will request that Arun District Council collect an appropriate proportional contribution of £91,257.66 (177 dwellings x £515.58/dwelling) from this particular site towards further mitigation of the A27 junctions in Arun.

If you or others have any questions regarding our response, please contact us at

Regards

David

David Bowie

Area 4 Spatial Planning Manager (Acting)

National Highways | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Web: <http://www.highwaysengland.co.uk>

Please note that for the foreseeable future we are all working from home. All meetings will be via telephone, Skype or similar. We will continue to seek to work to our statutory and other deadlines. In case of IT or other issues, as a precaution, please copy all emails to [REDACTED] Thank you.

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Highways England Company Limited | General enquiries: [REDACTED] National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |

<https://www.gov.uk/government/organisations/highways-england> [REDACTED]

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

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**Developments Affecting Trunk Roads and Special Roads
Highways England Planning Response (HEHR 2021)
Holding Recommendation in connection with an
Application for Planning Permission**

From: Nicola Bell (Regional Director, South East)
Operations Directorate
South East Region
Highways England
[REDACTED]

To: Arun District Council (FAO Case Officer James Cross)
planning.responses@arun.gov.uk

CC: [REDACTED]

Council's Reference: AL/107/21/PL

Location: Woodgate Centre Oak Tree Lane Woodgate PO20 3GU

Proposal: Demolition of the Woodgate Centre buildings (including 3 No. residential dwellings) & the construction of 180 No. residential dwellings with the creation of new vehicular access with footways and cycleways, ancillary road infrastructure, emergency access arrangements, associated parking, public open space, including children's play space, landscape planting, surface water attenuation & drainage & other associated infrastructure. This site is in CIL Zone H SP2, BEW Strategic Site and is not CIL Liable.

Highways England Reference: 92365 #14141

Referring to the planning application referenced above (received 19/08/2021) in the vicinity of the A27 (which forms part of the Strategic Road Network), notice is hereby given that Highways England's formal recommendation is that we:

- a) recommend that planning permission not be granted for a specified period* (see Annex A – further assessment required)

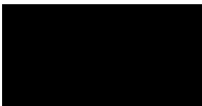
*The specified period is the time required for the applicant to meet the requirements set out in Annex A. Until such time as the requirements are fully met, Highways England will not be able to assess whether the proposals comply with national planning and transport policy set out in DfT C2/13 (especially paras 8 to 11) and MHCLG NPPF2021 (especially paras 110 to 113); and hence will not be able to provide our formal planning response.

If the Local Planning Authority wishes to determine the application ahead of this time, they must contact highways England and we will provide our assessment based on the evidence as it exists at that point.

HIGHWAYS ENGLAND (“we”) have 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.

This HEHR represents Highways England’s formal recommendation (prepared by the Area 4 Spatial Planning Team) and is made available to the Department for Transport as per the terms of our Licence.

Highways Act Section 175B (covering new access to the SRN) is not relevant to this application.¹

Signature: 	Date: 09 September 2021
Name: Kevin Bown	Position: Spatial Planning Manager
Highways England: Bridge House, 1 Walnut Tree Close, Guildford, GU1 4LZ 	

Annex A: Highways England Required Further Assessment

Highways England has carried out an assessment of application AL/107/21/PL. The assessment has been sent to the Local Planning Authority to place on the application file; and copied to the applicant or their agent for their response.

We will work with all relevant parties until we have sufficient information to complete our assessment of the impact of the proposals (individually and/or in combination with other developments/ plans as appropriate) on the safety, reliability and/or operational efficiency of the Strategic Road Network (reflecting the C2/13 and NPPF test). Once we are able to complete our assessment, we will provide our formal recommendation to the Council and applicant. It may comprise:

- a) No Objection
- b) No Objection subject to the imposition of conditions or the entering into of a legal agreement
- c) Refusal

Based on the above, our assessment is as follows:

We require further information to be provided by the applicant on this application in order that an informed decision can be made in relation to the potential impacts of the development on the strategic road network. In particular, the following comments should be passed onto the applicant:

Traffic Data

It is noted that the applicant has agreed with WSCC to use the A29 Realignment SATURN Model (developed by WSP on behalf of WSCC as part of the A29 Scheme Transport Business Case) to obtain traffic data for the assessment of this proposed development.

However, as Highways England were not party to these discussions, we would request that a copy of the Local Model Validation Report and any Forecast Reports be provided to Highways England for review, in order to confirm the suitability of any traffic data extracted from this model.

ACTION: SATURN Model reports to be submitted to Highways England for review

Trip Rates/Trip Generation

The TA states that trip rates were extracted from the WSCC Traffic Forecasting Report December 2018.

However, we note that the selection criteria within TRICS, utilised to obtain these trip rates, included sites on 'edge of town centre' which could result in lower trip rates than would be expected from the proposed development site. We would therefore request a sensitivity test to be undertaken whereby the selection criteria is tailored to the proposed development site.

ACTION: TRICS site selection criteria to be tailored to proposed development site and updated trip rates to be provided for review

Trip Distribution/Assignment

The TA states that, as suggested by WSCC, the trip distribution in the existing A29 scheme SATURN model has been utilised. However, we are unable to verify whether this methodology is suitable for the SRN until we have reviewed the SATURN model reports.

ACTION: All SATURN model reports to be provided to Highways England for a review of proposed development trip distribution and assignment methodology

Assessment Years

The TA states that the SATURN model included the forecast years 2023 and 2038.

However, the proposed development impact has only been assessed for the following two scenarios:

- **Scenario 1** -2038 DO MINIMUM - In this scenario the A29 Realignment scheme is complete and the whole BEW allocation built, except the proposed development.
- **Scenario 2** – 2038 DO SOMETHING - In this scenario the A29 Realignment scheme is complete and the whole BEW allocation built, including the proposed development.

It is important to note that the assessment year of 2038 does not meet the requirements of either the opening year or the review year assessments required by Highways England, in accordance with the guidance set out in DfT Circular 02/2013.

ACTION: Assessment years should be in accordance with guidance set out in DfT Circular 02/2013

Furthermore, the committed developments/committed schemes included within all SATURN model scenarios would now be out of date and would require to be updated with the latest committed development information from the LPA.

ACTION: The applicant should obtain an up to date list of committed developments/schemes from the LPA for submission to Highways England for review and approval

On this basis, the current proposed development impact assessments are not accepted.

Assessment of SRN

It is understood that WSCC requested the A29/A27 Junction to be assessed.

It is noted that the SATURN model flow difference between the '2038 DO SOMETHING' and '2038 DO NOTHING' scenarios for this junction to be of -1 PCU for the AM peak and +1 for the PM peak. On this basis, no further assessment was undertaken for this junction.

However, due to all the outstanding issues detailed above, we are unable to provide a substantive comment on the acceptability of the use of the SATURN model for proposed development impact assessments and cannot rule out the requirement for detailed SRN junction assessments.

ACTION: The information set out above is required for our review. Upon review of the requested further information, capacity assessment of the SRN may be required in accordance with DfT Circular 02/2013. This requirement will be confirmed in due course.

Other Matters

In addition to the above, please note that Highways England will require the applicant to make an appropriate proportional contribution towards further mitigation of the A27 junctions in Arun.

As the development is part of the BEW strategic allocation, a contribution of £91,257.66 (177 dwellings x £515.58/dwelling) is required.

This application has been assessed by the Highways England South East Region Spatial Planning Team. This HEPR form represents Highways England's formal recommendation regarding the application. It is copied to the Department for Transport as per the terms of our Licence.