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From: Matthew Lewis [REDACTED]
Sent: 10 October 2024 09:31
To: Planning.Responses <Planning.Responses@arun.gov.uk>
[REDACTED]

Subject: Holding Response - NH/24/05130 - AL/11/24/OUT - Land East of Westergate, Westergate

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Dear Mr Easton,

Our previous response is due to expire on 12 October 2024, and as such we are required to resend an updated response. At this time, we have not been provided with sufficient information to address the previously stated concerns and as such our recommendation is that we request the planning authority does not determine the application for a period of 6 months (until 10 April 2025) to allow the applicant time to address the outstanding issues raised in the attached NHPR.

Thank you for consulting with National Highways and please continue to consult on other planning applications via our inbox [REDACTED]

Regards,

Matt Lewis (he/him) Assistant Spatial Planner

Planning and Development

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

Web: nationalhighways.co.uk

From: planning.responses@arun.gov.uk <planning.responses@arun.gov.uk>

Sent: Friday, June 21, 2024 3:49 PM

To: Planning SE [REDACTED]

Subject: #23312 Planning Consultation on: AL/11/24/OUT

To: **National Highways**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	AL/11/24/OUT
Registered:	12th February 2024
Site Address:	Land East of Westergate Westergate
Grid Reference:	493930 104881
Category:	Plan App with EIA
Description of Works:	Hybrid application consisting of: 1) Outline permission for all matters reserved (except access) for up to 400 No dwellings and associated works and 2) Full planning permission for alterations to site access off Westergate Street and through Pine Close and east-west link road including a bridge over the Lidsey Rife. This application also lies within the parish of Barnham, falls within Strategic Site SD5, CIL Zone 1 (Zero Rated), affects the setting of listed buildings, affects the character and appearance of the Eastergate Church Lane Conservation Area, affects public rights of way. This application is the subject of an Environmental Statement.

I am able to inform you that I have received an amendment to the above application dated 19th June 2024 relating to:- Transport Assessment Addendum 17th June 2024.

[Click here to view the plans and documents](#)

If you should wish to make further representations as a result of this amendment you should click the link below and then click on 'Enter comment'.

[Click here to make further comments](#)

Please make any further comment by **15th July 2024**.

Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. We will aim to redact signatures, telephone numbers and email addresses but please help us by not incorporating them in the body of your text. Please make sure that you only include information that you are happy will be published in this way. If you supply information belonging to a third party, you must make sure you have their permission to do so.

Yours sincerely

Jessica Riches

Planning Case Officer- Arun District Council

Telephone: 01903 737852

Email: jessica.riches@arun.gov.uk

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

[REDACTED]

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

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National Highways Planning Response (NHPR 24-02)

Formal Recommendation to an Application for Planning Permission

From: Regional Director South East
Operations Directorate
South East Region
National Highways



To: Arun District Council (FAO Mr D Easton)
planning.responses@arun.gov.uk



Council's Reference: AL/11/24/OUT

Location: Land East of Westergate, Westergate

Proposal: Hybrid application consisting of: 1) Outline permission for all matters reserved (except access) for up to 400 No dwellings and associated works and 2) Full planning permission for alterations to site access off Westergate Street and through Pine Close and east-west link road including a bridge over the Lidsey Rife. This application also lies within the parish of Barnham, falls within Strategic Site SD5, CIL Zone 1 (Zero Rated), affects the setting of listed buildings, affects the character and appearance of the Eastergate Church Lane Conservation Area, affects public rights of way. This application is the subject of an Environmental Statement.

National Highways Ref: NH/24/05130

Referring to the consultation on a planning application dated 15 February 2024 referenced above, in the vicinity of the A27 that form 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);**

National Highways Planning Response (NHPR 24-02) February 2024

~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

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 not propose 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, [REDACTED] 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 [REDACTED]

Signature:

[REDACTED]

Date: 10 October 2024

Name: Matt Lewis

Position: Assistant Spatial Planner

National Highways

Bridge House, 1 Walnut Tree Close, Guildford, Surrey, GU1 4LZ

[REDACTED]

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

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

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.

Since our previous response dated 12 July 2024, no further information has been received. As such we are extending our holding response for a further 6 months to allow the applicant time to address the previously raised concerns.

Recommended Non-Approval

National Highways would recommend that planning permission not be granted for a specified period of 6 months from the date of this response (until 10 April 2025).

Reasons

National Highways has been consulted on a Transport Assessment Addendum (TAA), dated June 2024, related to planning application AL/11/24/OUT. The site is part of SB5 Barnham/ Eastergate/ Westergate (BEW) included within the adopted Arun Local Plan and allowing for 2,300 dwellings.

The proposed development site is located on land to the east of the A29 Westergate Street. The nearest access point on the strategic road network (SRN) is the A27/ A29/ Arundel Road junction (Fontwell West Roundabout), approximately 2 miles to the north of the site.

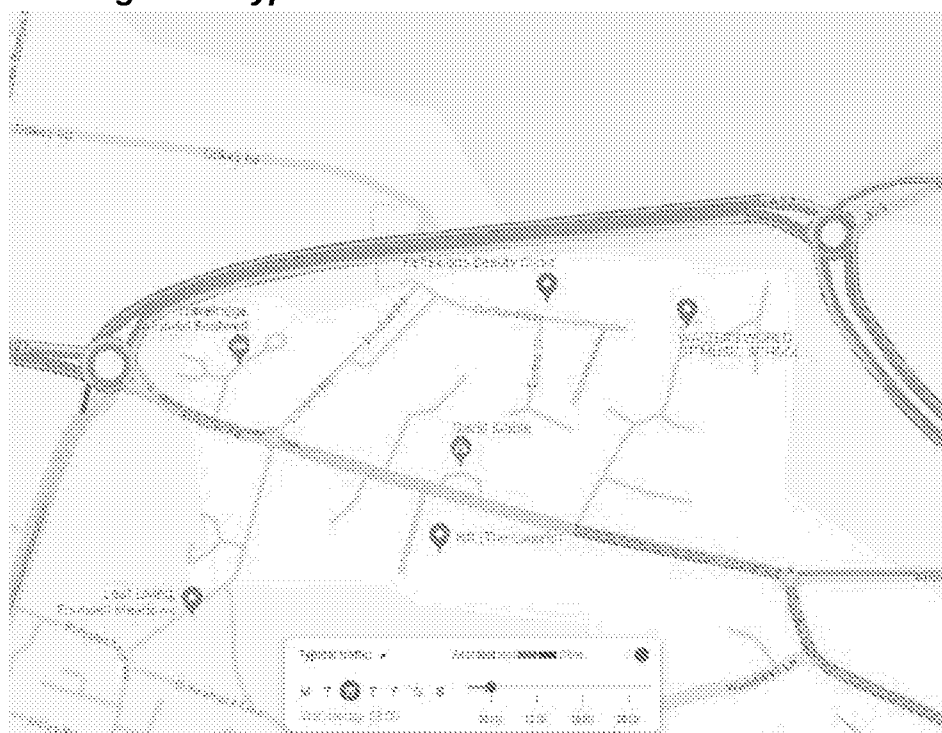
The typical traffic conditions from Google Maps shown in Figures 1 and 2 overleaf highlight that Fontwell West Roundabout and, to a lesser extent, the A27/ A29 junction (Fontwell East Roundabout) each experience delay during the AM and PM peak hours.

A previous application for this site by Cala Homes for 350 dwellings was submitted under the reference AL/15/17/PL. The planning application was refused by ADC on 26 March 2020 for reasons relating to 'mineral safeguarding, impact on ecology and trees and ensuring that the development complies with the Lifetime Homes Standard'.

A planning application (reference BN/11/22/OUT) for BEW Parcel SC1 (directly adjacent to the Cala Homes site considered in this application) was submitted in 2022 and is currently undetermined. BN/11/22/OUT comprises 1,250 dwellings together with realignment of the existing A29 to the east.

National Highways provided pre-application advice to the applicant in August 2022.

Figure 1: Typical Traffic Conditions – AM Peak Hour



Source: Google Maps

Figure 2: Typical Traffic Conditions – PM Peak Hour



Source: Google Maps

National Highways were then consulted by the LPA in respect of planning application AL/11/24/OUT on 12 February 2024. A review of the documents submitted in support

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of the application identified a number of matters requiring further information to be submitted.

Consequently, a holding response was issued to the LPA, dated 25 March 2024, recommending that planning permission not be granted for a period of three months. This holding response has recently been extended by National Highways on 17 June 2024 for an additional three-month period.

Previous Comments

The previous review identified the following matters where additional information was required:

- Policy Context
- Collision Analysis
- Trip Rates and Trip Generation
- Trip Distribution/ Assignment
- Assessment Scenarios
- Committed Development and Background Traffic Growth
- Junction Assessment
- Appendix C – Junction Capacity Assessments
- Appendix F – Traffic Flow Diagrams
- Framework Travel Plan
- Construction Traffic Management Plan

Policy Context

In accordance with DFT Circular 01/2022, there should be a vision provided. Subsequently there is then a need to identify the measures which will be implemented to achieve the aims of the vision.

The TAA states that the proposed development forms part of the Barnham Eastergate Westergate strategic allocation which under Policy H SP2c of the Arun Local Plan 2011-2031 must include the following:

‘The development must include at least 2,300 dwellings, provide a new community hub, high quality imaginative design layout for pedestrians, cyclists, equestrians and vehicles, access to local community, recreational and shopping facilities, jobs and accessible transport.’

It also refers to the Framework Masterplan for the BEW strategic allocation approved by Arun District Council in November 2020.

It is noted that this provided guidance (the vision) for all future planning applications on the site to demonstrate how the requirements of Policy H SP2c can be delivered.

In relation to highways and transport the masterplan includes the following commitments:

- Delivery of the realigned A29 include a bridge across the railway line
- Integration with existing pedestrian and cycle links to the surrounding villages
- Delivery of an East-West link between the existing A29 and realigned A29
- Establishment of a sustainable link to Barnham railway station

The masterplan also states that infrastructure will be provided in a timely manner to mitigate the impact of the development.

The TAA further states that *‘The vision for the development has therefore already identified through the adopted policy contained within the Arun Local Plan 2011-2031 and approved Framework Masterplan.’*

It should be noted that the transport vision for the site should be supported by a Travel Plan, which should have clearly stated modal shift targets for all modes and include site with the guidance set out in DfT Circular 01/2022.

Collision Analysis

In our previous response we stated that we will consider the collision analysis further when the scope of SRN junctions requiring assessment has been agreed, the degree of traffic impact has been agreed and that the necessary traffic modelling exercises have been satisfactorily completed. This is still the case and we will provide further comments in due course.

Trip Rates and Trip Generation

It was previously requested that the trip rates be reviewed considering the proposed vision for the development and the measures which are planned to achieve the vision. The impact on the trip rates (e.g. modal shift to sustainable transport modes) was to be identified.

The TAA compares the proposed trip rates with those utilised within the Chichester Area Transport Model (CATM) and other planning applications accepted by National Highways, demonstrating that the proposed trip rates are comparable.

National Highways accept that the proposed development trip rates are comparable with the CATM trip rates, and these are accepted as a *‘pre-vision’* scenario.

The TAA states that a 15% reduction in private car trips, which is to be achieved via the Travel Plan has been assessed.

The TAA further states that this is not a short-term target and should be considered in the context of the wider BEW strategic allocation, as it relies on measures outside of the control of this individual developer (Cala Homes).

However, we have been unable to verify the 'Existing Mode Split (Census 2011)' percentages as presented in Table 4-4 of the TAA, upon which the Travel Plan (TP) targets have been based.

As such the trip generation adjustments based upon TP targets, as presented in Table 4-5 of the TAA, cannot yet be accepted.

We therefore require that the original raw Census 2011 data used to calculate these existing mode split percentages is submitted for our review.

Trip Distribution/ Assignment

It was previously requested that the detailed trip distribution calculations should be provided to demonstrate the data used to obtain the trip distribution for each trip type, the route choice for each distribution and the numbers of trips within each of the three types.

However, the detailed methodology has not been provided. Instead, the TAA presents a high-level comparison of the methodology utilised within the TA and that of the CATM in respect of overall percentage impact on the A27 and how this percentage of trips has been split between North/South for arrivals and departures.

We therefore re-iterate our request for the detailed trip distribution and assignment calculations to be provided for review. This should include details of all trips assigned via the SRN junctions.

Assessment Scenarios

It was previously requested that the applicant demonstrate how the assessment scenarios contained within the TA align with the requirements of DfT Circular 01/2022. National Highways have reviewed the response provided in the TAA to this request and note that there appears to be some confusion. It is important to note that the definition of 'Opening Year' is the date at which the development first becomes available for occupation, unless agreed otherwise.

In this case, assuming that construction starts in 2025 as stated in the TAA, the opening year could potentially be 2026 (first home becomes available for occupation).

However, the TAA states that 2031 and 2038 have been assessed, in line with the CATM forecast years.

The applicant should note that any mitigation requirements would be based on the Opening Year assessments.

The applicant is therefore required to confirm that they wish 2031 to be treated as the 'Opening Year' for their development assessment purposes.

Committed Development and Background Traffic Growth

Whilst it was understood that all future year traffic flows have been obtained from the WSCC CATM, the applicant was required to demonstrate how the committed development and background growth align with the requirements of DfT Circular 01/2022.

The updated TAA does not appear to directly address our comments on committed development and background traffic growth and this information remains outstanding.

We therefore reiterate our previous comments regarding this matter.

SRN Junction Assessment

It is important to note that whilst the junction assessment locations were agreed between the applicant and WSCC at scoping stage, National Highways were not involved in these discussions.

As such, the extent of SRN junctions requiring capacity assessment will be confirmed once the outstanding issues concerning trip generation, distribution and assignment are satisfactorily resolved.

Nevertheless, as previously, in order to expedite matters, we have reviewed the junction assessments undertaken at each SRN location and our updated comments are provided below.

We note that the results for each assessment scenario are now presented by junction in the TAA, as previously requested.

A27 Fontwell East Roundabout

Modelled Peak Hours

We previously requested clarification of the modelled AM (07:15-08:15) and PM (16:30-17:30) peak hours.

The TAA states that all assessments undertaken have been based upon AM and PM peak hour traffic flows derived from the Chichester Area Traffic Model (CATM).

Traffic Flow Inputs

A 'One Hour' profile has now been utilised as requested.

Junction Geometry

We previously requested a few clarifications regarding the modelled junction geometry, as they were not clear in the submitted PDF, and assessment was only undertaken for the existing layout and not the 2017 Enterprise Bognor Regis Transport Review (EBTR) mitigation.

The TAA states that the geometries for this model of the A27 Fontwell East roundabout have been updated to match the geometries for the previously accepted Land West of Bersted application modelling (LPA ref: BE/134/22/OUT).

Following a review of the updated model outputs contained within Appendix F of the TAA, we can confirm that the geometric inputs are now accepted.

Model Calibration/ Validation

We previously requested the 2016 observed queue data, as referenced within the TA, to be provided for review noting that the observed queue data which is used for calibration/ validation is required to be the highest average 15-minute queue data on each arm (as opposed to lane).

Calibration and validation details were also to be provided, including details of intercept/ capacity adjustments (typically we expect 'direct' intercept adjustment, rather than capacity adjustment) and the resulting queue alignment against observed queues.

Furthermore, an updated report was to include calibration / validation tables which show the 2019 model queue against the observed queue for each time period, before and after calibration.

However, we note that no observed queue data has been provided as part of the TAA. The TAA also states that:

'Calibration and validation of the model is consistent with models used in support of planning application BN/11/22/OUT and BE/134/22/OUT and therefore is it not considered necessary to provide further information.'

Whilst the above statement is noted, we still require evidence of calibration and validation to be provided and this should include the observed queue data, as referenced in the TA.

Future Year Assessments

Until the above issues, in addition to other outstanding matters as detailed earlier in this advice note, are resolved, we will not be able to comment on any of the future year assessment results, as they could be subject to change.

Model Files

We would also reiterate our request for electronic copies of all model files to be provided for review.

A27 Fontwell West Roundabout

Base Model Assessments

We previously noted that Appendix C of the TA contained the LinSig outputs, however the 2019 baseline junction assessment was not provided, and this was to be clarified. The TAA states that: *'It is noted that the signalised roundabout was not in place in 2019 and therefore it would not be appropriate to complete a LinSig assessment of this layout.'*

Whilst we accept that the A27 Fontwell West roundabout was not signalised in 2019, this does not negate the need for a calibrated and validated base model to be provided based on the signalised junction scheme layout (implemented in June 2023).

Geometry

Several comments were made in relation to model geometries, and we note that some of these have now been addressed within the TAA, but some remain outstanding.

We therefore re-iterate our request for the original CAD drawing demonstrating measurement of all the geometric parameters to be provided.

Signals Data

Traffic signal details including stage/ phase arrangements, intergreens and cycle time should be consistent with what is currently operating on site, suitable information was requested to be provided to demonstrate this.

However, the TAA does not appear to include any signals data and this is still outstanding.

Future Year Assessments

Until the above issues, in addition to other outstanding matters as detailed earlier in this advice note, are resolved, we will not be able to comment on any of the future year assessment results, as they could be subject to change.

Model Files

We would also reiterate our request for electronic copies of all model files to be provided for review.

A27 Nyton Road Junction

Modelled Peak Hours

We previously requested clarification of the modelled AM (07:15-08:15) and PM (16:30-17:30) peak hours.

The TAA states that all assessments undertaken have been based upon AM and PM peak hour traffic flows derived from the Chichester Area Traffic Model (CATM).

Traffic Flow Inputs

A 'One Hour' profile has now been utilised as requested.

Junction Geometry

We previously requested a few clarifications regarding the modelled junction geometry, as they were not clear in the submitted PDF, and assessment was only undertaken for the existing layout and not the 2017 Enterprise Bognor Regis Transport Review (EBTR) mitigation, as timeframe for mitigation is stated not to be confirmed. The TAA states that the geometries for the A27 Nyton Road junction has been based on the geometries for the previous BEW Parcel SC1 Barnham application (LPA ref: BN/11/22/OUT).

Following a review of the updated model outputs for the A27 Nyton Road junction, as provided in the TAA, we note that the geometries for this junction model generally match those of the modelling for application BN/11/22/OUT.

However, we have also carried out a high-level review of the modelled geometries against the current junction layout (google satellite imagery) and have noted the following deficiencies that would need to be addressed in order to ensure an accurate assessment:

- **The blocking queue value has been left blank for the right-turn storage in the Junctions 10 model, which infers that there is infinite stacking space in the right turn bay. In reality, the right-turn bay provides 90m of stacking space, and thus the equivalent number of PCUs that can be stored in this space (15 PCU) should be input as the blocking queue value**
- **The width of the carriageway has been measured at 15.73m, but based on Google maps measurements, this figure includes both the two-lane mainline carriageway and the right-turn storage bay. The measurement of the carriageway should only include the two mainline carriageway lanes, as the right-turn bay is an additional element of the junction with its own measurement (Width for right-turn storage (m))**

Model Calibration/ Validation

We previously requested the 2016 observed queue data, as referenced within the TA, to be provided for review noting that the observed queue data which is used for calibration / validation is required to be the highest average 15-minute queue data on each arm (as opposed to lane).

Calibration and validation details were also to be provided, including details of any capacity adjustments and the resulting queue alignment against observed queues. However, the TAA states:

‘Calibration and validation of the model is consistent with models used in support of planning application BN/11/22/OUT and BE/134/22/OUT and therefore is it not considered necessary to provide further information.’

Whilst the above statement is noted, we still require evidence of calibration and validation to be provided and this should include the observed queue data, as referenced in the TA.

Future Year Assessments

Until the above issues, in addition to other outstanding matters as detailed earlier in this advice note, are resolved, we will not be able to comment on any of the future year assessment results, as they could be subject to change.

Model Files

We would also reiterate our request for electronic copies of all model files to be provided for review.

Appendix C – Junction Capacity Assessments

As part of our previous response, we required that the junction’s assessment of the Fontwell East Roundabout 2017 Enterprise Bognor Regis Transport Review (EBRTR) scheme be included alongside the junctions assessment of unsignalised Fontwell West Roundabout.

We also required the model outputs for the interim assessment in 2026 and 2028 be provided and clarified.

In response, the TAA states that the Fontwell East Roundabout 2017 EBRTR scheme was not assessed within the TA and the existing junction was demonstrated to be operating within capacity in all scenarios.

It also states that the unsignalised Fontwell West roundabout was not assessed as the signalised scheme had already been constructed.

It is also noted that updated interim assessments for 2028 are provided in Section 2 of the TAA with junction capacity outputs included in Appendix A. These capacity assessments however had only been completed for the A29/ Nyton Road priority junction and A29/ Barnham Road roundabout as requested by WSCC. No interim junction capacity assessments had been completed for junctions on the A27. This addresses our previous comments on Appendix C.

Appendix F – Traffic Flow Diagrams

In our previous response we required clarification of how the 2019 Baseline Traffic Flows for the AM/PM peaks were derived from the CATM model. We also required that the CATM outputs for the 2031 Do Something Traffic Flows AM/PM, that were noted to be marginally different from figures contained within the BEW Parcel SC1 TA, required further reasoning as to these results.

We also noted that paragraphs 6.6.2 and 6.6.3 provided information on how the Scenario 3 (including BEW Parcel SC1 without East-West Link Road) traffic flows were produced, but further explanation was required as the information presented at that stage was not clear.

As per the latest TAA, no updated information for the turning flow diagrams has been provided, and thus we reiterate our previous comments regarding this matter.

Framework Travel Plan

In our previous response, we had noted that the proposed measures were not deemed to be sufficient, and that additional measures should be developed associated with physical infrastructure/services out with the red line boundary, in alignment with the development vision.

The Framework Travel Plan (FTP) included for monitoring to be undertaken annually, together with setting targets. However, there was also a need for the FTP to include identifying the requirement for additional measures to be considered. Furthermore, there was a need for firm financial commitments to support the objectives of the FTP, to be provided within the FTP document.

An updated FTP dated June 2024 prepared by WSP has been included as Appendix E of the TAA. We have reviewed the updated FTP with reference to our previous comments.

With regard to the baseline mode share, we have been unable to match the 'Barnham Average Share/Baseline Mode Share – Year 1' percentages which are understood to be based on 2011 UK Census data, as presented in Tables 4-1 and 4-2 of the FTP.

We therefore require that the original 2011 UK Census raw data used to calculate these percentages is submitted for our review.

Consequently, we are currently unable to comment on the individual Year 3 and Year 5 mode share targets presented within Table 4-2 of the updated FTP.

Additionally, we cannot comment on whether any of the additional measures are sufficient to achieve the overall target of 15% reduction in Car (driver) mode share.

Notwithstanding the above, we would re-iterate that revised measures, in combination with the level of funding to be made available for further measures should the Travel Plan fail to achieve its targets, should be clearly stated in the document.

CTMP Requirements

At the appropriate stage of the planning process, we suggest that National Highways recommends a suitable planning condition in relation to the need for a Construction Traffic Management Plan (CTMP) to be prepared, agreed with National Highways and adhered to.

Conclusion

Given the above, it is currently not possible to determine whether the application would have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN (the tests set out in DfT Circular 01/2022 and DLUHC NPPF December 2023 [particularly paras 114 to 117]). This response details the steps that need to be taken in order to resolve this issue.

In light of the above, National Highways currently recommends that planning permission not be granted (other than a refusal if the Council so wishes) for a period of six months from the date of this response (until 10 April 2025) to allow the applicant to resolve the outstanding matters.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

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 74 and 109 prescribing that significant development should offer a genuine choice of transport

modes, while paragraphs 108 and 114 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.

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.