



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
[REDACTED]

To: Arun District Council (FAO Mr D Easton)
[REDACTED]

CC: [REDACTED]

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, via [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: 17 June 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.

Recommended Non-Approval

National Highways would recommend that planning permission not be granted for a specified period of 3 months from the date of this response (until 17 September 2024).

Reasons

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of the A27 near Fontwell.

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:

Throughout this response **ACTION points** for the applicant are highlighted in **underlined bold**.

Policy Context

There is a requirement for reference and adherence to DfT Circular 01/2022. **In accordance with DFT Circular 01/2022 there is a requirement for the vision for the development to be provided. Subsequently there is then a requirement to identify the measures which will be implemented to achieve the aims of the vision.**

Existing Traffic Data

The TA notes that 2019 baseline traffic flows have been obtained from the Chichester Area Transport Model (CATM). Furthermore, the TA notes that the use of the CATM data is consistent with the approach adopted by Pell Frischmann in support of planning application BN/11/22/OUT for BEW Parcel SC1 and also that this approach was agreed with us during pre-application scoping discussions.

We acknowledge that CATM was updated for use by WSP to inform both the A29 realignment scheme and the BEW Transport Assessment and was then used by Pell Frischmann on BEW Parcel SC1. As such, we agree to the CATM forecasts being used for the purposes of this TA.

Collision Analysis

The TA contains personal injury collision (PIC) data which has been obtained from WSCC and has been recorded by Sussex Police. The data covers the period five-year period up to 30th April 2023 and this is considered to be acceptable time period.

The data highlights 13 PIC at Fontwell West Roundabout, 4 PIC at Fontwell East Roundabout and 3 PIC at the A27 / Nyton Road priority junction. The TA notes that the main cause of the accidents was driver error and that there are not significant existing operational issues with the SRN.

An improvement scheme was implemented at Fontwell West Roundabout in the summer of 2023. This scheme consists of signalisation of the west and north arms of the roundabout and was associated with planning application WA/22/15/OUT. Therefore, much of available accident data does not reflect the current junction layout. 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.

Trip Rates and Trip Generation

The trip rates adopted within the TA are stated to be based on trip generation surveys which were undertaken at the nearby Meadow Way development, opposite the proposed site access. The TA notes that this approach was agreed with WSCC and National Highways at the scoping stage.

The trip rates which have been used in the TA are shown below.

Table 6-1 - Vehicle Trip Rates

Time Period	Arrival	Departure	Two-way
AM	0.151	0.362	0.533
PM	0.290	0.142	0.432

Source: Transport Assessment (WSP, September 2023)

The vehicle trip generation based on 400 dwellings is shown below.

Table 6-3 - Vehicle Trip Generation

Time Period	Arrival	Departure	Two-way
AM	60	153	213
PM	116	57	173

Source: Transport Assessment (WSP, September 2023)

The trip rates should 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) should be identified.

Trip Distribution/ Assignment

The trip distribution is noted within the TA to have been developed based on the 'previously agreed methodology with WSCC as part of the AL/15/17/PL planning application', the previous application for 350 dwellings on this site.

The trip types are stated to have been grouped using three journey types, travel to work, education and other trips with the split based on National Travel Survey Table NTS0502. The TA notes that travel to work trips have been distributed based on 2011 census data, education trips have been distributed based on the education facilities in proximity to the development, retail split 50:50 between north and south, family and friends trips split 50:50 between north and south and leisure based on two nearby sports facilities.

The trip distribution detailed 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.

Assessment Scenarios

The TA contains future year assessment in 2031 and also 2038. In addition, Interim assessment is provided in 2026 and 2028 for 200 and 300 Cala Homes respectively.

We acknowledge it is beneficial to have the 2031 and 2038 assessments which align with the BEW Parcel SC1 TA. Interim assessments are beneficial where mitigation is required as this can assist to identify when any mitigation should be implemented, as stated in DfT Circular 01/2022 paragraph 51.

The SRN junction assessment is, however, also required to be in accordance with other requirements of DfT Circular 01/2022. As the site is within the adopted Local Plan, assessment is required to be undertaken at the development opening year and include '*all relevant development that is consented or allocated where there is a*

reasonable degree of certainty will proceed within the next 3 years and include the full amount of development to be built'.

There is need to demonstrate how the assessment scenarios align with the requirements of DfT Circular 01/2022.

Committed Development and Background Traffic Growth

All future year traffic flows have been obtained from WSCC CATM and are noted to comprise:

- *The background growth consists of predicted traffic growth as a result of general increase in driving over time, calculated by taking account of NTEM-adjusted TEMPro growth, known committed developments, and the allocated sites within adopted local plans.*
- *The committed developments consist of other developments which have been approved, such as those not contained within the adopted local plan;*
- *The wider infrastructure changes are schemes that are committed projects; and*
- *Other local plan developments consist of sites in adopted Local Plan, including developments by Church Commissioners (Parcel SC1), Barratts, Landacre, Boweries and Pye Homes, which make up the rest of the BEW allocation.*

There is need to demonstrate how the committed development and background growth align with the requirements of DfT Circular 01/2022.

Junction Assessment

The TA notes that the junction assessment locations have been agreed with WSCC at scoping stage, however, there has been no discussion with us.

The TA notes that all assessment has been undertaken for the following hours:

- AM Peak: 08:00-09:00
- PM Peak: 17:00-18:00

The TA contains junction assessment undertaken at the following SRN junctions:

- Site 1: A27/ A29 junction (Fontwell East Roundabout)
- Site 2: A27/ A29/ Arundel Road junction (Fontwell West Roundabout)
- Site 4: A27/ Nyton Road priority junction

The extent of SRN junctions requiring capacity assessment will be confirmed once the above issues related to vision, trip distribution and trip assignment are satisfactorily resolved. In order to expedite matters, we have reviewed the junction assessment undertaken at each location and our comments are provided below.

The presentation of results would be more helpful if the results for each assessment scenario are presented by junction, to allow clear comparison between scenarios at each junction.

The Fontwell East Roundabout junction assessment has been undertaken using Junctions 10 and we note the following:

- Separate models are provided for AM and PM assessments, allowing separate calibration for each time period
- **The AM assessment period in the model is 07:15 to 08:15 – this is unusually early for an AM peak hour and does not align with the times stated above, clarification is required**
- **The PM assessment period in the model is 16:30 to 17:30 – this does not align with the times stated above, clarification is required**
- The 'direct' traffic profile has been adopted, rather than the more typical 'one hour' profile
- **The traffic data has been input with the exact same data for each 15-minute time period (e.g. the demand profile is entirely flat during the assessment period) – justification for this is needed, what we typically expect is the 'one hour' profile to be used**
- Geometry has been reviewed and we note the following:
 - **The geometry figures are not clear in the submitted PDF; hence clarifications are needed**
 - **Assessment appears to have been undertaken based on existing geometry, the report text noted that at para. 7.2.4 that the 2017 Enterprise Bognor Regis Transport Review (EBRTR) mitigation has been considered 'only where the existing layout is forecast to operate close to capacity or over capacity' therefore clarification is required**
- **The 2016 observed queue data which is referred to should be provided**
- **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 should 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**
- **The report should include calibration/ validation tables which show the 2019 model queue against the observed queue for each time period, before and after calibration**
- **The soft copy Junctions 10 input file should be provided for review**

At the time of the TA being prepared the Fontwell West Roundabout had recently been signalised on the north and west arms and this is reflected in the future year

assessment. **We note that Appendix C of the TA contains the LinSig output, however we cannot see the 2019 Baseline Junctions assessment, and this should be clarified.** The Fontwell West Roundabout junction assessment has been undertaken using LinSig and we note the following:

- One model is provided to cover the AM and PM assessments
- The AM assessment period is 08:00-09:00 and the PM assessment period is 17:00-18:00
- Geometry has been reviewed and we note the following:
 - **A27 (north): lane widths are input as 5m, please review as we observe these lanes to be in the order of 4.5m, lane lengths are acceptable, radius to be reviewed**
 - **Arundel Road: lane widths are input as 3m, please review, based on aerial imagery lanes appear wider, we acknowledge parked cars, lane lengths are not reasonable, lane 2/1 is input as 5 PCUs, this appears to be 3 PCU, radius to be reviewed**
 - **A29 Fontwell Avenue: lane widths are input as 3.75m, please review, based on aerial imagery lanes appear narrower, lane lengths are not reasonable, lane 3/1 is input as 5 PCUs, this appears to be 1 PCU, radius to be reviewed**
 - **A27 (west): lane widths are input as 4m, please review as we observe these lanes to be in the order of 3.75, lane lengths should be 60 PCU for 4/1 and 4/2 and 10 PCU for 4/3, radius to be reviewed**
 - **Circulatory carriageway: radii to be reviewed, input values are too large**
 - **Please provide CAD drawing demonstrating measurement of all the geometric parameters**
- We note geometry is being used to calculate saturation flows
- **Traffic signal details including stage / phase arrangements, intergreens and cycle time should be consistent with what is currently operating on site, suitable information should be provided to demonstrate this**
- Traffic flows are noted to accord with Appendix F Traffic Flow Diagrams
- **The soft copy LinSig input file should be provided to allow a full review to be undertaken, including consideration of queue limits and connector details**

The A27/ Nyton Road priority junction assessment has been undertaken using Junctions 10 and we note the following:

- Combined model for AM and PM assessments
- **The AM assessment period in the model is 07:15 to 08:15 – this is unusually early for an AM peak hour and does not align with the times stated above, clarification is required**
- **The PM assessment period in the model is 16:30 to 17:30 – this does not align with the times stated above, clarification is required**

- The 'direct' traffic profile has been adopted, rather than the more typical 'one hour' profile
- The traffic data has been input with the exact same data for each 15-minute time period (e.g. the demand profile is entirely flat during the assessment period) – justification for this is needed, what we typically expect is the 'one hour' profile to be used
- Geometry has been reviewed and we note the following:
 - The geometry figures are not clear in the submitted PDF; hence clarifications are needed
 - Assessment has been undertaken based on existing geometry, 2017 EBRTTR mitigation has not been considered as timeframe for mitigation is stated to be not confirmed.
- The 2016 observed queue data which is referred to should be provided
- 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 should be provided, including details any capacity adjustments and the resulting queue alignment against observed queues
- The soft copy Junctions 10 input file should be provided for review

The locations for junction assessment will be confirmed once the trip generation and trip distribution/ assignment are confirmed.

Appendix A – Transport Assessment Scoping Note

Appendix A of the TA contains the Transport Assessment Scoping Note (TASN) dated July 2023 and produced by WSP. We believe that this TASN was not provided to us for review previously, and hence the document has no formal status as far as the SRN is concerned.

Appendix C – Junction Capacity Assessments

As noted above, Appendix C of the TA has been reviewed and we note the following:

- The Junctions assessment of the Fontwell East Roundabout 2017 EBRTTR is not included, this should be provided if available including soft copy model input files and PDF outputs
- The Junctions assessment of unsignalised Fontwell West Roundabout is not included, this should be provided, including soft copy model input files and PDF outputs
- The TA includes details of Interim assessment at 2026 and 2028, however the model outputs are not provided within Appendix C, this should be clarified

Appendix F – Traffic Flow Diagrams

The traffic flow diagrams included within Appendix F of the TA have been reviewed and we note the following:

- 2019 Baseline Traffic Flows AM/PM – **how was this derived from CATM, please provide details**
- 2031 Do Minimum Traffic Flows AM/PM – derived from CATM, confirmed to be consistent with BEW Parcel SC1 TA
- 2031 Do Something Traffic Flows AM/PM – derived from CATM, **noted to be marginally different from figures contained within the BEW Parcel SC1 TA, please advise on the reason**
- 2031 Do Something Traffic Flows + Barnham Eastergate Westergate Strategic Development AM/PM – reflecting Cala Homes and Parcel SC1
- 2038 Do Something Traffic Flows + Barnham Eastergate Westergate Strategic Development AM/PM – reflecting Cala Homes and Parcel SC1
- 2026 Baseline Traffic Flows AM/PM – TEMPro factor applied to 2019 baseline traffic flows
- 2026 Baseline Traffic Flows + Development Traffic Flows AM/PM – reflecting 200 units occupied on Cala Homes development
- 2028 Baseline Traffic Flows AM/PM – TEMPro factor applied to 2019 baseline traffic flows
- 2028 Baseline Traffic Flows + Development Traffic Flows AM/PM – reflecting 300 units occupied on Cala Homes development

We have undertaken a cross-check against the traffic data contained within BEW Parcel SC1 TA (Pell Frischmann, January 2022) and we note that:

- 2031 Do Minimum Traffic Flows AM / PM are consistent with those contained within the SC1 TA
- 2031 Do Something Traffic Flows AM / PM are marginally different on some movements from those contained within the SC1 TA
- 2038 Do Something Traffic Flows AM / PM are marginally different on some movements from those contained within the SC1 TA
- There is strong consistency between the CATM data presented within this report and the CATM data contained within the SC1 TA

We note that paragraphs 6.6.2 and 6.6.3 provide information on how the Scenario 3 (including BEW Parcel SC1 without East-West Link Road) traffic flows were produced. **Could you please provide further explanation with regard to these two paragraphs, as this is not clear.**

Framework Travel Plan Review

The Framework Travel Plan (FTP) includes a number of stated objectives and aims to achieve a 15% reduction in car driver trips generated by the site.

The measures and initiatives include marketing of the TP, specific measures to reduce single occupancy car travel and measures to encourage travel by walking, cycling, lift sharing and public transport. The proposed measures are noted to be focused on 'marketing' and 'promotion', together with physical measures located within the red line boundary. **The proposed measures are not deemed to be sufficient, additional measures should be developed associated with physical infrastructure/services, in alignment with the development vision.**

The TP includes for monitoring to be undertaken annually, together with setting targets. **However, there is also a need for the TP to include identifying the requirement for additional measures to be considered.**

There is a need for firm financial commitments to support the objectives of the TP. This needs to be provided within the TP document.

Construction Traffic Management Plan

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.

Wording below:

'Condition: 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 A27. The plan shall include as a minimum:

- *Construction phasing*
- *Construction routing plans*
- *Permitted construction traffic arrival and departure times*

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 A27 in accordance with DfT Circular 01/2022.'

The above represents our *initial* requirements. As the analysis progresses, it is possible that further requirements may emerge.

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 three months from the date of this response 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.

Davina Bowley

From: Nicola Oktay on behalf of Planning.Responses
Sent: 17 June 2024 11:13
To: Planning Scanning
Subject: FW: Holding Response - NH/24/05130 - AL/11/24/OUT - Land East of Westergate, Westergate
Attachments: Holding NHPR (Jun 24) - NH-24-05130 - AL-11-24-OUT - Land East of Westergate, Westergate.pdf

National Highways response

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From: Matthew Lewis [REDACTED]
Sent: Monday, June 17, 2024 7:36 AM
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Planning SE [REDACTED] Spatial Planning [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 25 June 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 3 months (until 17 September 2024) 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
[REDACTED]
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