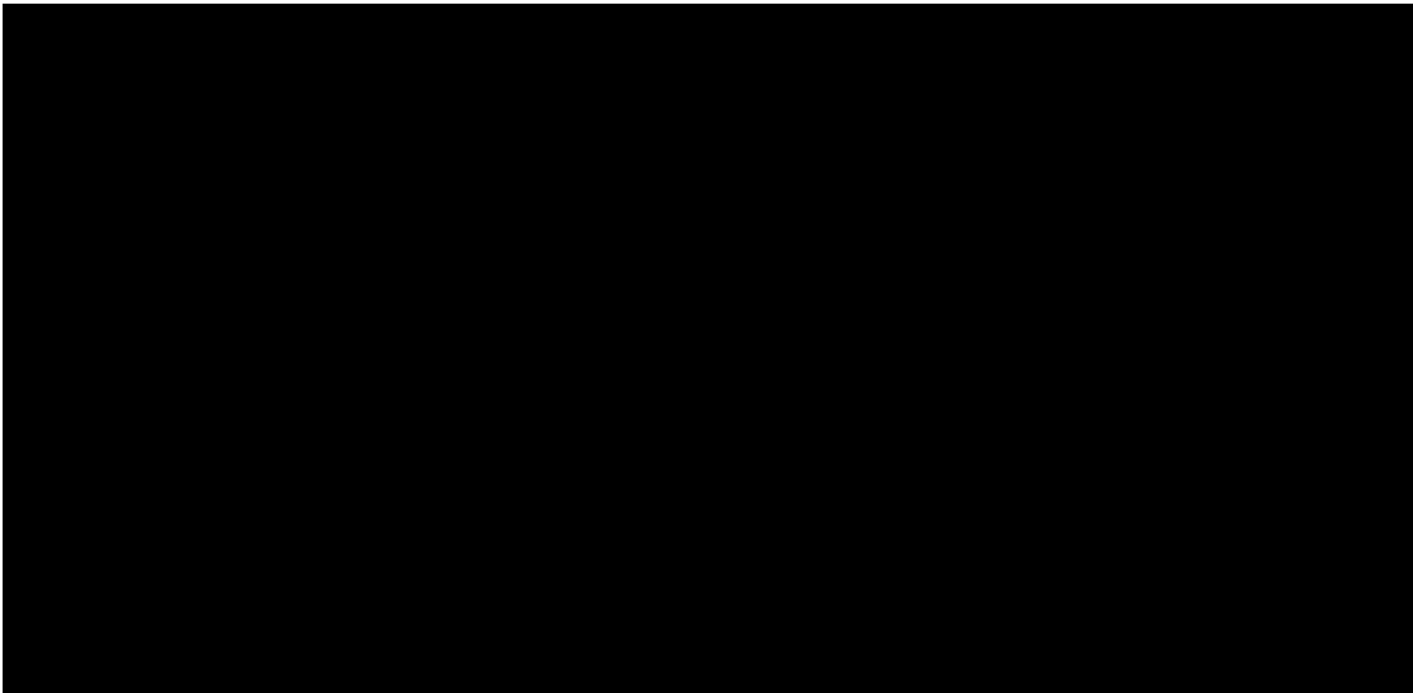
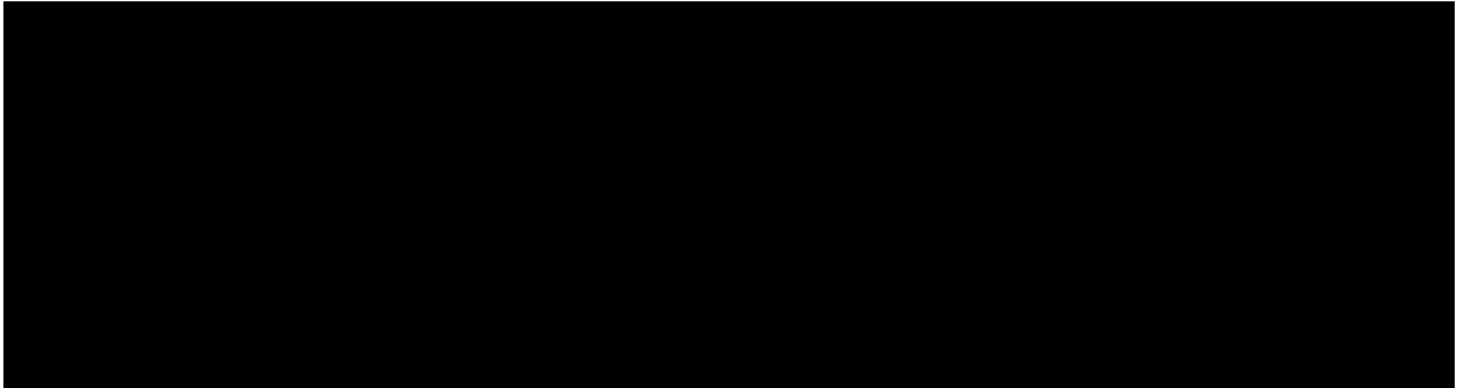




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From: Bown, Kevin [redacted]

Sent: 04 August 2021 15:47

To: Brenda Louisy-Johnson [redacted]

Cc: Planning SE [redacted]

Subject: FAO Case Officer Brenda Louisy-Johnson: Highways England HOLDING RECOMMENDATION (our ref 91812#13712 re application AL/87/21/PL Oldlands Farm Newlands Road Bognor Regis PO22 9FJ)

CAUTION: This email originated from outside of the organisation. You should take extra care when clicking links or opening attachments - if you are unsure the content is safe contact the IT Helpdesk before clicking or opening.

For attention of:	Brenda Louisy-Johnson
Site:	Oldlands Farm Newlands Road Bognor Regis PO22 9FJ
Proposal:	Erection of a warehouse (Use Class B8) with ancillary office, associated vehicle parking, van storage, plant, ancillary structures, lighting landscaping and infrastructure works including earthworks to facilitate flood compensation area. This site may affect listed buildings, may affect the character & appearance of the Shripney Conservation Area, is a Departure from the Development Plan, affects a Right of way & is in CIL Zone SP3 (Zero Rated) as other development
Your Reference:	AL/87/21/PL
Highways England's Reference:	91812#13712

Dear Ms Louisy-Johnson,

Thank you for your e-mail of 1 July 2021 inviting Highways England to comment on the above consultation; seeking a response no later than 5 August 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.

We have copied this email to the applicant's agent, (Alex Cole at DWD LLP) and await their response in due course.

Should you or others have any queries regarding our response, please contact us via:

[REDACTED]

Regards

Kevin Bown BSc(Hons) MPhil CMS MRTPI Spatial (Town) Planning Manager
Spatial Planning Team, South East Region Operations Directorate

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

[REDACTED] (all calls to this number will also patch through to my mobile)

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

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

[REDACTED]

Safe roads, reliable journeys, informed travellers
Highways England: operating, maintaining and improving the strategic road network in England.

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

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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 Brenda Louisy-Johnson)
planning.responses@arun.gov.uk

CC: [REDACTED]

Council's Reference: AL/87/21/PL

Location: Oldlands Farm Newlands Road Bognor Regis PO22 9FJ

Proposal: Erection of a warehouse (Use Class B8) with ancillary office, associated vehicle parking, van storage, plant, ancillary structures, lighting landscaping and infrastructure works including earthworks to facilitate flood compensation area. This site may affect listed buildings, may affect the character & appearance of the Shripney Conservation Area, is a Departure from the Development Plan, affects a Right of way & is in CIL Zone SP3 (Zero Rated) as other development.

Highways England Reference: 91812#13712

Referring to the planning application referenced above received 1 July 2021 in the vicinity of the A27(T) between Chichester and Fontwell 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: 4 August 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 this assessment of application AL/87/21/PL. Our assessments are copied to the Local Planning Authority to place on the application file; and to the applicant or their agent for their attention and 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.

Planning History

The TA states that a hybrid planning consent (reference AL/58/15/OUT) was granted in April 2016, which encompassed full planning consent for earthworks required to facilitate construction of a flood compensation area, and outline planning consent for up to 20,453 sqm of B2/B8 floorspace. This was followed in December 2018 (reference AL/44/18/RES) by the granting of consent for a 4-unit industrial scheme, comprising 3 units of B2 floorspace (7,032sqm) and 1 unit of B8 floorspace (10,610sqm).

The TA states that both of these consents have subsequently lapsed (April 2019 for the outline consent and December 2020 for the reserved matters consent).

Given that the permissions are lapsed, our view is that while the impacts of these previous schemes have been tested, all person and vehicle trips associated with the proposed development under consideration must be treated as “new” trips on the network for the purposes of Highways England’s comments.

Baseline Information

The baseline section of the TA demonstrates the accessibility of the site to different modes of transport. However, our view is that while some alternatives to car-based travel do exist for employees, the nature of the site, its location and it’s intended use and shift system use mean that a majority of employee trips would be expected to be made by car/van. (Comments on the site travel plan are provided subsequently within this response).

Site Layout and Parking

It is noted that a total of 193 car parking spaces are proposed to be provided at the site for employees and visitors, including 9 disabled parking spaces. This is significantly more than the 114 spaces which would typically be provided in line with West Sussex County Council and Arun District Council's adopted parking standards. The amount of car parking is considered to be necessary by the applicant in order to enable shift changeovers to happen at the site and is stated to be based around the requirements known to be associated with a similar site in use by a potential operator of the proposed development; information from this potential operator has also been supplied to inform the trip generation exercises.

In addition, the applicant is proposing 512 van spaces and 6 HGV spaces.

It is noted that the specific details of shift times and working patterns (and corresponding staff numbers) on which these requirements are based has not been included in the TA. Given that the parking spaces far exceed any normal B8 type usage, it is therefore requested that this information should be provided to Highways England in order that the actual number of proposed car parking spaces can be tested against this requirement.

Action: Applicant to provide details of expected shift patterns and corresponding staff requirements to Highways England.

Trip Generation

The initial trip generation exercises are based around the trip rates which were previously discussed and agreed for use in assessing the previous hybrid and reserved matters applications in 2016 and 2018. These exercises were conducted at the time using the TRICS database. No updated assessment of the current proposals using TRICS is presented and it is stated within the TA that the previously agreed trip rates are still considered appropriate to use for the purposes of assessing the current application; however, no evidence to support this assertion is provided.

Notwithstanding the use of bespoke data from a potential occupier (which is discussed below), it is considered that an up-to-date TRICS assessment of the specific proposals contained within the present application should be undertaken, for the purposes of establishing a "typical" current set of trip rates for the proposed development which the occupier-specific information can then be compared against.

The TA also presents a "sensitivity test" of a bespoke trip rate and trip generation calculation exercise which is based on operational data provided by a potential occupier of the site. This data indicates that, whilst the total amount of expected person and vehicle trips would be less than those predicted by the presented TRICS assessment, there would be substantially more trips expected to take place in the weekday network peak hours (8am to 9am and 5pm to 6pm). It is accepted in principle that the trip distribution and highway capacity exercises should be based around this data (subject to provision of the requested information relating to shift times and employee numbers previously requested). However, as the previous consents have both lapsed, it is also considered that the presentation of "net change" information based on the previous agreed trip rates is not directly relevant to Highways England's

assessment of the application and our assessment is therefore based solely on the expected number of trips arising from the first principles assessment.

Action: Applicant to provide details of a TRICS assessment (including full outputs) for a B8 warehouse / parcel delivery facility, using the latest version of the TRICS software package. The assessment should clearly state the assumptions made in screening for sites to be used in the TRICS assessment, and justification should be provided for any sites screened in or out manually to determine the final data set for use in the assessment. If the applicant wishes to suggest that no TRICS data is suitable/ available, they need to explain how they will provide comparator data/assessment.

Trip Distribution

The results of the trip distribution exercises are presented in Table 5.7 of the TA report. It is noted that the employee trip distribution is based on Census Journey to Work data, whilst the delivery activities are distributed based on a gravity model based on the population of nearby delivery locations. This approach is acceptable in principle, however no specific details are included of either the Census data used or the gravity model itself and it is therefore requested that this should be supplied to Highways England so that these assumptions can be checked and verified.

Action: Applicant to provide details of the Census Journey to Work calculations and gravity modelling exercise used to assign employee and delivery trips to the highway network. TA para 4.4 suggests the deliveries will be made to the “local area”. Information regarding what constitutes the “local area” should be provided to assist in assessing SRN impacts

Subject to the above being verified, the distributions identify two broad directions of travel where trips could feasibly connect to the SRN. These are via the A259 West (i.e. towards the A27 Bognor Road roundabout) or the A29 north (i.e. towards the junctions of the A27 at Fontwell and Crockerhill).

The current trip distributions are presented only in table form rather than as diagrams and do not extend to show how many of these trips would be expected to reach the SRN. In the case of the A27 Bognor Road roundabout, this could be up to 62 two-way trips in the AM peak and 64 two-way trips in the PM peak. Depending on both the exact number of trips expected to travel through this junction and the distribution of trips around the arms of the junction itself, there remains a significant possibility of there being a material impact to this junction which would require further appraisal. Highways England will be in a position to comment further on this once the requested information is supplied.

With regard to the trips on the A29 north, notwithstanding the requirement to verify the traffic distribution methodology and exercises, there would be expected to be a total of 45 two-way trips in the AM peak and 53 two-way trips in the PM peak which would use or cross over the A27 at Fontwell or Crockerhill. Trip distribution diagrams should therefore be provided to show how these trips will be distributed at these specific locations. (It is anticipated that the impacts at each location will be smaller than those

expected at the A27 Bognor Road junction, but this should be verified as set out above to demonstrate that further assessment will not be required).

It is recommended that WebTRIS is used to obtain data on traffic flows on the SRN at the locations in question, so that the expected traffic flow distributions can be examined in context. (It is recommended that data is obtained for both recent movements and representative pre-Covid dates for completeness).

Until this information relating to trip generation and trip distribution is supplied, Highways England is not in a position to confirm the impacts of the proposed development on the SRN.

Travel Plan

The supplied draft Travel Plan seeks to increase use of sustainable travel modes by staff by 5% from the surveyed baseline on occupation. While this is not converted directly into a reduction of car trips, it is estimated that, if successful, this would result in between 5 and 10 fewer vehicle trips per day by employees. Any reduction in the use of cars (and particularly single occupancy vehicles) is welcomed, although it is not anticipated that this level of change would alter any of Highways England's wider comments or conclusions with regard to this site. The general structure, aims, objectives, measures, monitoring regime and action plan are all considered appropriate.

It is recommended that implementation of the Travel Plan, either as set out in the draft or in accordance with a final version to be approved by the LPA, is made a condition of any consent to be granted. If required, Highways England will provide suggested wording for such a condition as part of a further or updated response when the actions set out in this email are undertaken by the applicant.

Conclusion

In conclusion, having assessed the submitted material, we are currently unable to conclude that the proposed development would not have an unacceptable impact upon the safety, reliability and operation of the SRN (the tests set out in MHCLG NPPF 201 Paras 110 to 113 & DfT C2/13 Paras 8 -11) in this location and its vicinity.

Therefore, our current recommendation to the local planning authority is that the application should not be determined (other than a refusal if the LPA so wishes) unless or until the matters raised above (and any others that are identified in the future) have been addressed.

Should the LPA wish to permit the application ahead of this time, it must inform us so that we may provide our up to date position at that point.

This HEHR is copied to the applicant and we await their response in due course.