

[REDACTED]

From: Cleaver, Elizabeth [REDACTED]
Sent: 17 May 2022 18:51
To: Planning.Responses <Planning.Responses@arun.gov.uk>; katy.sharp@arun.gov.uk
Cc: Planning SE [REDACTED] Spatial Planning [REDACTED]
Subject: National Highways response: A/270/21/OUT, Land off Arundel Road, Angmering

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For attention of:	Ms Katie Sharp
Site:	Land off Arundel Road, Angmering
Proposal:	Demolition of existing buildings; b) Full planning application for the development of 160 No. dwellings with open space, landscaping and sustainable drainage systems (SuDS), and two vehicular access points from Arundel Road; c) Outline application with all matters reserved except for up to 1,393 square metres of Class E floor-space with associated parking provision and 2.1 hectares of sports pitch land. This site is a Departure from the Development Plan.
Your Reference:	A/270/21/OUT
National Highways Reference:	HAMIS 93660; Tracker #16531 & #16590 (JSJV SB371)

Dear Ms Sharp,

Thank you for your emails of 6 April 2022 and 11 April 2022 re-consulting National Highways on the application referenced above. The email dated 6 April 2022 related to revised plans and documents, while the email of 11 April 2022 concerned an amended development description which is reflected in the 'proposal' description above. This email and attached NHPR form are in response to both emails.

Our consultants contacted you on 28 April noting that the revised Transport Statement available on the planning portal was illegible, and advising that National Highways' 21-day consultation period would start from the date a legible version of the document was received. Thank you for sending a

legible copy of the Transport Statement on 5 May 2022; our deadline for response is now 26 May 2022.

We previously responded to A/270/21/OUT on 17 February 2022 noting that several matters required further clarification or information for us to be able to assess the implications of the proposal on the strategic road network. We recommended that planning permission not be granted for a period of 3 months and included a NHPR response which expires on 17 May 2022.

We have reviewed the Transport Statement dated March 2022 and observe that our previous comments have not been addressed. We are actively engaged with the applicant seeking to resolve these outstanding matters.

Also, the Transport Statement and Travel Plan will need updating accordingly to align with the amended development description.

We remain unable to assess the implications of the proposal on our network. Until such time as sufficient information has been provided to enable us to obtain a clear view of the impact of this proposed development on the SRN, our formal recommendation is that your council should not determine this application (other than a refusal) because of the potential for harm to the strategic road network.

Accordingly, I attach an updated NHPR response recommending that planning permission should not be granted for a further period of 3 months, expiring on **17 August 2022**. This is to allow time for the applicant to provide the further information set out in the attached NHPR dated 17 May 2022. This recommendation can be replaced or renewed during the three-month period, or at its end, dependent on progress made with regard to the required further assessments.

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

Kind regards,

Elizabeth Cleaver, Assistant Spatial Planning Manager

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

Web: <http://nationalhighways.co.uk/>

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National Highways Planning Response (NHPR 21-09)
Formal Recommendation to an Application for Planning Permission

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

To: Arun District Council - FAO Katie Sharp
planning.responses@arun.gov.uk

CC: [REDACTED]

Council's Reference: A/270/21/OUT

Location: Land off Arundel Road Angmering

Proposal: Demolition of existing buildings; b) Full planning application for the development of 160 No. dwellings with open space, landscaping and sustainable drainage systems (SuDS), and two vehicular access points from Arundel Road; c) Outline application with all matters reserved except for up to 1,393 square metres of Class E floor-space with associated parking provision and 2.1 hectares of sports pitch land. This site is a Departure from the Development Plan

National Highways Ref: HAMIS 93660

Referring to the consultation on a planning application dated 13 January 2022 referenced above, in the vicinity of the A27 that forms 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 21-09) September 2021

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

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

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.

Signature:

[REDACTED]

Date: 17 May 2022

Name: Elizabeth Cleaver

Position: Assistant Spatial Planning
Manager

National Highways, Bridge House 1 Walnut Tree Close Guildford 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.

Recommend that planning permission not be granted for a specified period

We previously responded to the application on 17 February 2021, recommending that planning permission should not be granted for a period of 3 months, expiring on 17 May 2022. This was due to a number of matters that required further clarification in order to assess the implications of the proposal on the strategic road network.

An updated Transport Statement, dated March 2022, is available on the Arun planning portal. We have reviewed the revised Transport Statement of March 2022 and note that none of our comments have been addressed.

Accordingly, we still 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. The following comments should be reiterated to the applicant.

Personal Injury Accident (PIA) Data

Insufficient detail is provided to allow for a review of the safety impacts of the proposed development on the operation of nearby junctions with the SRN. Full STATS19 accident analysis is required for A27/ Arundel Road priority junction, the A27 westbound carriageway in vicinity of the junction with Arundel Road, A27 Poling Corner U-turn and the A27/A280 dumbbell roundabouts.

The quality of the image in Figure 3.2 in the TS is not sufficiently legible and therefore a clearer copy of the TS is required. The commentary of the PIA data does not include any casual factors of the accidents and therefore we are unable to conclude whether the development proposals would have a detrimental impact on safety.

ACTION: The applicant needs to provide full STATS19 accident analysis including causation factor, severity and full PIA data for the A27/Arundel Road junction, the A27 westbound carriageway within 100m of the junction with Arundel Road, A27 Poling Corner U-turn and the A27/A280 dumbbell roundabouts. This needs to be carried out for the latest 5-year period for which accident data is available.

Highway Impact Assessment

It is not clear whether the traffic flow diagrams presented in Appendix H of the TS include the full proposed development trips including 1,393sqm of commercial use. The traffic flow diagrams in Appendix H are illegible and therefore we cannot ascertain whether the volume of arrival and departure trips for the proposed development concur with the trip generation presented in Table 5.2 and 5.4 (utilising the forecast for 1,393sqm commercial floor space). These traffic flow diagrams are subsequently used to inform the highway capacity assessments, including junction models, and we currently cannot determine whether this assessment is underrepresenting the proposed development trips.

ACTION: The applicant to clarify whether the traffic flow diagrams presented in Appendix H and the traffic impact analysis and junction models presented at Section 6 include the full quantum of proposed residential and commercial development.

Traffic Distribution and Assignment

The TS outlines that the distribution of proposed development trips and their assignment onto the highway network is in line with Travel to work Census Data (2011) and refers to Appendix H. However, the flow diagrams presented in Appendix H are illegible and therefore a legible copy of the TS and Appendices is required for review.

ACTION: The applicant to provide a fully legible copy of the Transport Statement and Appendices in order for us to assess the acceptability of the traffic distribution/assignment applied in the junction model assessments.

Committed Development

The junction assessments from the TA supporting the outline approval A/122/19/OUT dated August 2019 are presented in the submitted TS for this current application with no updates to the included committed developments. It must be confirmed with the LPA that the committed developments remain appropriate and complete.

ACTION: The applicant to liaise with the LPA to confirm any additional committed developments in Angmering over the period 2019 to present, which should be factored into the junction capacity assessments. Evidence of the agreed position with the LHA should be supplied to us.

Junction Assessments

Assessment years of 2021 (baseline and with development flow scenarios) and 2031 future year assessment (baseline and with development flow scenarios) are

presented. The future assessment year complies with DfT Circular 02/2013. However, DfT Circular 02/2013 also requires development opening year assessments in order to ascertain the need for, and form of, any mitigation on the SRN. The Opening Year is the date at which the development first becomes available for occupation but assuming full occupancy at that date.

Appropriate base model validation is also required

The junction assessments at Section 6 of the TS are replicated from Section 6 of the Outline (A/122/19/OUT) TA. The junction assessments have not been updated and the model results are exactly replicated in the submitted TS. Given the uplift in commercial floor area since the publication of the Outline (A/122/19/OUT) TA, we need to assess whether these models are fit for purpose.

Paragraph 6.5.6 of the submitted TS highlights that in response to the Outline application (A/122/19/OUT) TA, we requested that assessments be undertaken for the A27/Arundel Road priority junction. This position remains the case and no junction capacity modelling has been provided for this junction within the submitted TS.

Accordingly, the impact of development traffic impact on the closest junction with the SRN to the site cannot be ascertained. We also require an assessment of the impact of U turns at A27 Poling Corner.

We require an assessment of the A27 / Arundel Road priority junction in terms of compliance with DMRB CD123 especially paragraph 5.24 regarding a merge taper onto the A27 dual carriageway.

ACTION: The applicant to provide the model files for all junction assessments with the SRN including A27/Arundel Road priority junction, A280/Titnore Lane/A27 (southern A27 dumbbell roundabout) and A280 Long Furlong/A27 (northern A27 dumbbell roundabout) including both existing and proposed layouts where relevant.

ACTION: The applicant to provide an assessment of the impact of U turns at A27 Poling Corner.

ACTION: The applicant to provide details of base year model validation.

ACTION: The applicant to provide suitable opening year assessments in accordance with DfT Circular 02/2013.

ACTION: The applicant to provide an assessment of the A27 / Arundel Road priority junction in terms of compliance with DMRB CD123 especially paragraph 5.24.

Development Description

We were advised on 11 April 2022 that the application description had been amended. The transport evidence needs to be updated to reflect this.

ACTION: The applicant should update the Transport Statement and Travel Plan to reflect the changes to the development description.

Conclusion

Currently the proposed development impact on the SRN is not agreed. This response details the steps that need to be taken in order to resolve this issue.

The applicant should also be aware that, as this proposal is a Departure from the Development Plan, the development will be required to contribute to the agreed Arun Local Plan A27 junction mitigations as this site will impact the SRN proportionately in the same way as strategic sites within the Plan. The contribution would be in addition to any direct mitigation required for this development in isolation.

For the reasons set out above, National Highways recommends that planning permission not be granted for a period of three months expiring on **17 August 2022** to allow the applicant to resolve the outstanding matters.