

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Arun District Council FAO: Claire Potts
FROM:	WSCC - Highway Authority
DATE:	10 th May 2022
LOCATION:	Barnham, Eastergate, Westergate BEW Parcel SC1 Barnham
SUBJECT:	BN/11/22/OUT Outline application with all matters reserved (except for the A29 Realignment) for the demolition of existing structures and mixed use development to provide residential dwellings (Use Class C3), Care Home/Senior Living Accommodation (Use Class E/F2/Sui Generis), a Primary School plus open space, landscaping, drainage and all other associated ancillary works; and realignment of the A29 and early connection to existing A29 including construction of a new road carriageway, junctions and associated infrastructure. This application also lies within the parish of Aldingbourne, affects the setting of listed buildings, affects the character & appearance of the Eastergate Church Lane Conservation Area and affects a Public Right of Way. This application is the subject of an Environmental Statement.
DATE OF SITE VISIT:	31 st March 2022
RECOMMENDATION:	More Information Required
S106 CONTRIBUTION TOTAL:	Amount TBC

This is the second WSCC County Highways (CHA) response to the outline planning application with all matters reserved (except for the A29 Realignment) for the demolition of existing structures and mixed use development to provide residential dwellings (Use Class C3), Care Home/Senior Living Accommodation (Use Class E/F2/Sui Generis), a Primary School plus open space, landscaping, drainage and all other associated ancillary works; and realignment of the A29 and early connection to existing A29 including construction of a new road carriageway, junctions and associated infrastructure. The application also lies within the parish of Aldingbourne, affects the setting of listed buildings, affects the character & appearance of the Eastergate Church Lane Conservation Area and affects a Public Right of Way. This application is the subject of an Environmental Statement.

This response follows the previous WSCC Highways response dated 7th April 2022 and should be read alongside it. As previously, given the size and complexity of the proposal, the additional comments contained in this response continue to only refer to some of the component parts of the scheme. Although the CHA will continue to review the application and information supplied to-date, further comments will be made following review of the responses to the comments made in the previous response and those responding to those points raised in this response.

For ease-of-reading, comments found in the previous CHA response have been repeated in this response in order to make sure that all comments can be read in one document.

Site location.

The application site comprises land south of Barnham Road and north of the south coast mainline railway as well as part of the route of the A29 realignment including the early connection referred to as the Hanbury Link (the 'Site'). The development is referred to as BEW Parcel SC1.

The principal highway routes into Chichester and Bognor Regis are the B2233 to the southeast and northwest, and the A29 which currently runs along the western edge of the Site. Both of these main routes provide linkage to the A27 as the main strategic inter-urban east/west road along the south coast.

Latest WSCC response and questions.

1. Cycle track width to be widened to provide for two-way flows on both sides of the new road.
2. A 'step' shown to differentiate foot and cycle components of the paths referred to in point 1 above should be shown.
3. No continuation of cycle routes is shown into the side roads.
4. Alignment of foot and cycle paths towards side roads at roundabouts – alignment on approaches should be sweetened, if possible, to avoid sharp turns.
5. Central islands preventing right hand turns. These appear to be very narrow and may lead to signs being hit by vehicles on either-end and may, in practice, lead to higher traffic speeds past them. And, no rationale is provided as to why they are proposed. Applicant to look to provide right hand turning lanes instead for the locations where the central 'barriers' are shown.
6. The access to the industrial/commercial facility north of roundabout (Lidsey Farm) is not clearly shown, nor does it appear to have been considered in the Road Safety Audit, nor tracked for the size and type of vehicles that use it. As the kerb line is being altered and given its proximity to the new roundabout on Lidsey Road, this information must be provided, please.
7. No detail is shown of the transition of the roundabout on existing A29 and the existing right hand turning lane, also on existing A29 (the latter serving the waste site). This point has also been picked up in the submitted Road Safety Audit.
8. Roundabout referred to in point 7 above should be tracked for a selection of vehicles including HGVs.
9. Crossing points – There are a large number of crossing points shown – some controlled and some uncontrolled. Applicant to explain rationale behind them including type of crossing proposed, locations chosen and whether any informal ones are included?
10. Applicant to explain the same (i.e. that set-out in point 9 above) for the proposed crossing points around the roundabouts.
11. Speed limit reduction on approaches to new road and associated links (on existing A29) – what evidence of data collection and information consultation has been carried out?
12. Applicant to explain rationale for 'no kerbed' new A29, road width of the same and what effect these might have on traffic speeds.

Previous WSCC response and questions.

1. **Design speed** – This is still quoted as 30mph. However, no reference to the WSCC Speed Limit Policy is provided. As such, the applicants should set-out whether-or-not the new A29 road accords with that Policy.

2. **Departures from Standard** – None appear to be identified by the applicant’s consultants but this is not stated either-way. Applicant to reply to this, please. If some are identified, then there is a formal process for considering them.
3. **Crossings** - As an initial comment, there appear to be too many controlled crossing points, and where they do occur, they are not spaced sufficiently apart. There could be the situation where drivers are stopped by each set of signals due to the gaps created by them, increasing journey time & air pollution. The applicant should state their reasons why so many are proposed.

With regard to the Zebras, having these so close to roundabouts has the potential to impact traffic flow depending on pedestrian flows, and could subsequently generate queues back on to the roundabouts, impacting their operation. Additionally given the recent changes to the highway code, the parallel crossings may result in conflict between vehicles and cyclists, as cyclists/pedestrians have priority and drivers may not be looking to the side for a fast-moving cyclist, as they exit a roundabout. That’s not to say that some form of ped/cycle priority-style crossing won’t be accepted in some locations, it’s just that the form and design of crossing chosen for each location might need to be looked at again. At the very least, the applicant needs to present their rationale for them and how they meet design standards and/or guidance. As a final point regarding the Zebras, they cannot be installed if the 85th percentile speed is greater than 35 mph, therefore evidence of this will be required before that type of crossing can be considered.

4. **Structures** - As a foreword to the comments for both structures, it’s very unclear what type of NMU facilities are proposed. The drawn detail, text and dimensions are inconsistent e.g. the GA for the Lidsey Rife Viaduct shows a 4.0m wide ‘cycleway/footway’ (plus 0.5m extra allowances for fixed objects to each side). It was also understood that the routes are to be segregated facilities. However, the text leads us to think that un-segregated facilities are proposed because there is no drawn detail to the route to define which side is footway, and which side is the cycleway. Also, the dimension of 4.0m wide is in excess of the 3.0m minimum for a shared facility but inadequate for say a two-way segregated facility.

On Section A-A of the GA for the Rail Bridge it defines a similar 4.0m wide ‘cycleway/footway’ (plus 0.5m extra allowances for fixed objects to each side), and defines that the width is in accordance with LTN 1/20 Table 6-3, which is for un-segregated facilities. As noted above, a shared facility only needs to be 3.0m wide. NB: the 4.0m wide dimension given doesn’t match any of the dimensions in the referenced table. For the rail bridge there are also NMU facilities under the structure. The Options Report states ‘pedestrian’ routes under (in the text and in the figures), whereas the West Elevation on the GA defines them as ‘shared’ facilities (in the dimension for the overall span). However, also on the West Elevation the dimensions for the route widths then defines them as ‘segregated’ facilities... NB: at 4.0m wide they are only suitable for being an un-segregated facility (i.e. 3.0m minimum width plus 2x0.5m for allowances for fixed objects to each side = 4.0m). This needs to be clarified.

The drawings and reports need to be unambiguous on the proposed NMU route type(s) as they fundamentally effect the width of the structures and the overall span of the railway

structure. WSCC has identified several of the inconsistencies associated to the NMU routes in the comments below, but the list is not exhaustive.

A29 BEW Rail Bridge (WSCC structure ref: 1779).

Options Report.

1. The WSCC naming convention for the bridge needs to appear on all doc' headers and drg. title blocks. The name should be as clear/specific as possible but more importantly, the 'WSCC structure ref: 1779' must appear.
2. Refer to general comment above regarding NMU route type. The cross section in Figure 4 needs to be consistent with that in the GA.
3. 2.1, 2nd bullet point – the text refers to 3m pedestrian access routes under the structure (between the abutments and fence), refer to general comment above regarding NMU route type.
4. Either in section 2.1 or 2.2 there should be a few words on the need for the NMU approaches to be compliant with designing for disabilities (gradients, rest points etc.) as this impacts on the length of the approaches.
5. 2.2 (span), Figure 6 shows a min. 5.8m headroom envelope with a further headroom allowance taking it up to 6.2m, but the GA only show's 5.8m to the soffit(?). As well as ensuring consistency between the Figure and the GA please also define what the red line envelope is, and why you have opted for a further 0.4m clearance(?).
6. 2.2 (utilities) the response given touches upon the need for further enquiries during the preliminary design stage. WSCC concurs with the statement but would stress the importance of these early enquiries given the potential for abortive design work to accommodate larger diameter ducts, (and therefore potential breaches of planning). NB: given the CDM/H&S issues associated to utilities perhaps there should also be a recommendation in section 6(?).
7. 3.1 immediately above Figure 7-3, refer to general comment above regarding NMU route type (& overall span).
8. 3.2.2, the title refers to an in-situ box but the text below refers to a voided deck slab(?).
9. 3.3, overall span dimension, refer to general comment above regarding NMU route type.
10. Figure 9 showing 6.2m headroom but text above defines 5.8m.
11. Option 1 – Beams ctrs, spans etc – possible changes(?). Do need to be specific with the dimensions. NB: Figure 10 defines 5No. beams at 3.287m ctrs but the text above define 6No. at 3.0m ctrs. Please clarify.

General Arrangement

- a. Refer to general comment above regarding NMU route type, and changes associated to items above (i.e. consistency between text and drawing).

- b. Refer commentary above regarding utilities. WSCC require to see something on the drawing that is indicative and calls up that the utilities are TBC.
- c. Please show the NMU routes under the structure on the plan ensuring that they don't clash with the maintenance access routes/parking/turning heads.
- d. On the elevation please show the boundary fences to be 2.4m high palisade (as this is most likely what NR will want, as also indicated by the call-up).
- e. On the elevation please show the 'verges' to the left and right of the NMU's routes (if they are indeed shared facility routes?)
- f. On Section A-A please show the NR boundary fence.
- g. The clear span is noted as being based on the boundary fence location plus the NMU route widths. To ensure accuracy/consistency please also show the 20.1m dimension as per Figure 6.

A29 BEW Lidsey Rife Viaduct (WSCC structure ref: 1780).

Options Report/Technical Note.

The Technical Note (TN) is geared towards either a) a 200m long multi-span viaduct, or b) a 30m single span structure. The reason for the massive variance is as stated in the front of the report, see screen grab below.

However, recent discussions with the Environment Agency have reduced to the flood level to 2.2m AOD at point of crossing. As a result, the structure clearance can be reduced and therefore the multi span bridge is no longer a viable option. For information purposes, the multi span structure proposal is included within this report.

Given as much, the vast majority of the content of the TN is of limited use as it only discusses 1 No. viable option. The TN should have addressed various single span options (e.g. weathering steel, U or W beams similar to the Options Report for the rail bridge). As a result, the drawing is certainly of interest but also of limited value (in the context of 'options'). Perhaps the rife bridge could basically be a repeat of the rail bridge (the widths should be identical and the spans are very similar)?

General Arrangement

- a. Refer to general comment above regarding NMU route type.
- b. The WSCC naming convention for the bridge needs to appear on all doc' headers and drg title blocks. Again, the name should be clear/specific but the 'WSCC structure ref: 1780' must appear.
- c. It is appreciated that deeper beams result in more fill on the approaches, but with Y6 beams at 1.0m centres there is not enough space between the beams to inspect the inside faces (gap is currently approx. 250mm). Deeper beams at larger centres are necessary.

- d. The cantilevers look too wide given how thin the deck slab is(?).
 - e. Typically with a Y beam deck there are YE beams.
 - f. Ideally, WSCC would require inspection & maintenance access points to the underside (steps down the embankments at diagonally opposite corners?).
 - g. The report touches on the lack of clashing with existing services, but what about new services? There is not a lot of fill to accommodate larger diameter mains. It is appreciated that this is the first submission but WSCC would like to see something on the drawing that is indicative and calls up that the utilities are TBC.
5. **Public transport strategy (from developer)** - still awaited. The strategy should include proposed bus services and routes (E-W and N-S), more information about the area shown to the east of the site, such as how it is intended to use it, how it feeds into the public transport strategy for the site and how connectivity to Barnham Station is provided, how 'active travel' is to be incorporated into overall strategy etc. (list is not exhaustive).
 6. **Left-in/left-out junctions still proposed at certain locations** – These do not look right and may encourage higher speeds. How do these meet any specific design criteria and why are they proposed?
 7. **TRO strategy for entire road scheme** – Nothing supplied. In one area, the applicants propose a speed limit reduction from 50mph to 30mph at the southern tie-in with the existing A29. Applicant to provide evidence of speed surveys, consultation with Local Member and whether or not the resultant speed surveys would comply with WSCC policy considerations for speed limit reductions. Applicants to also state the reasons why the speed limit is proposed to be reduced at this point.
 8. **Cycle infrastructure** – The alignments towards the side roads would benefit from being made smoother. And no continuation of routes from new A29 alongside access roads nor transitions shown. Please also provide evidence of what design documents the crossings comply with/follow, please.
 9. **Access to commercial buildings at southern tie-in with existing A29** – No detail shown.
 10. **Travel Plan** – The applicants should review the WSCC Development Travel Plans Policy as the Travel Plan doesn't appear to follow it. The submitted Framework Travel Plan does not seem to reference promotion of lift sharing (e.g. through www.westsussexcarshare.com) or the provision of car club vehicles. The latter will be particularly important given that car clubs have the potential to 'unlock' use of non-car modes. Copies of all the relevant WSCC TP documents can be sent to the developer separately to this response upon request.
 11. **Modelling** - The information is not presented clearly. WSCC would expect the applicants to quantify the uses in the application itself at the start of section 4 and to fully set-out the quantum of development modelled for each scenario in section six. However, the

information provided at 6.1.4 is non-specific with a general description which is not enumerated/quantified. However, it does strongly suggest that the applicant has only included the application itself, other committed sites and the other sites within the BEW Local Plan allocations. There is no mention of development within the BEW area beyond the Local Plan period or quantum. This should be clarified.

In particular there would be the opportunity to set out at the 4th bullet under 6.1.4 the quantum associated with each developer included in the modelling. Looking at the model scenarios seems to show that all the strategic modelling provided is that which the CHA saw previously (2 years?). As such, it appears that no new runs have been undertaken. Further runs could be undertaken given that the applicants paid for three years continuous access to the A29 model. Therefore, the option has been available to the applicants to amend the previous work without needing to renew their access fee. So, any comments the CHA made previously to do with the then assessed 2031 and 2038 scenarios may still apply if no new work has been undertaken, unless the applicants can tell us what they have done differently. It would be helpful to the CHA to see again see what information was provided previously showing the quantum assessed and it's split between the various land parcels. And building on this, what would also be very helpful is an account of any differences between the pre-application scenarios and also whether numbers proposed now for individual plots are now higher than originally planned and/or modelled and whether that impacts on an overall number of dwellings within BEW overall, higher than the Local Plan allocation.

The years which they have modelled are those which exist in the strategic forecast model for the A29. However, given that if approved this part of the development (at least the houses and part of the new A29 and associated access roads off it) would be constructed prior to 2031 and 2038, WSCC will require forecast years for opening year and interim/intermediate years when certain infrastructure is not yet in place. This may need to be on the basis of manual adjustments or failing that, the applicants would need to agree methodology with the CHA for development of a new model forecast year. The manual method seems simpler. The applicants do need to provide details of opening year and scenarios where they are reliant on a single point of access (and until when)?

- 12. Noise attenuation** – What is required and what is proposed? WSCC would want confirmation that the type selected has a long design-life (so steel – not wood) and that its location would be such that it didn't present any highway safety issues and could be easily accessed for maintenance purposes.

Conclusion.

Additional information is required to enable the CHA to continue to review the submitted planning application. This is set-out above. Please re-consult when available.

Thank you.

Tim Townsend
West Sussex County Council – Planning Services