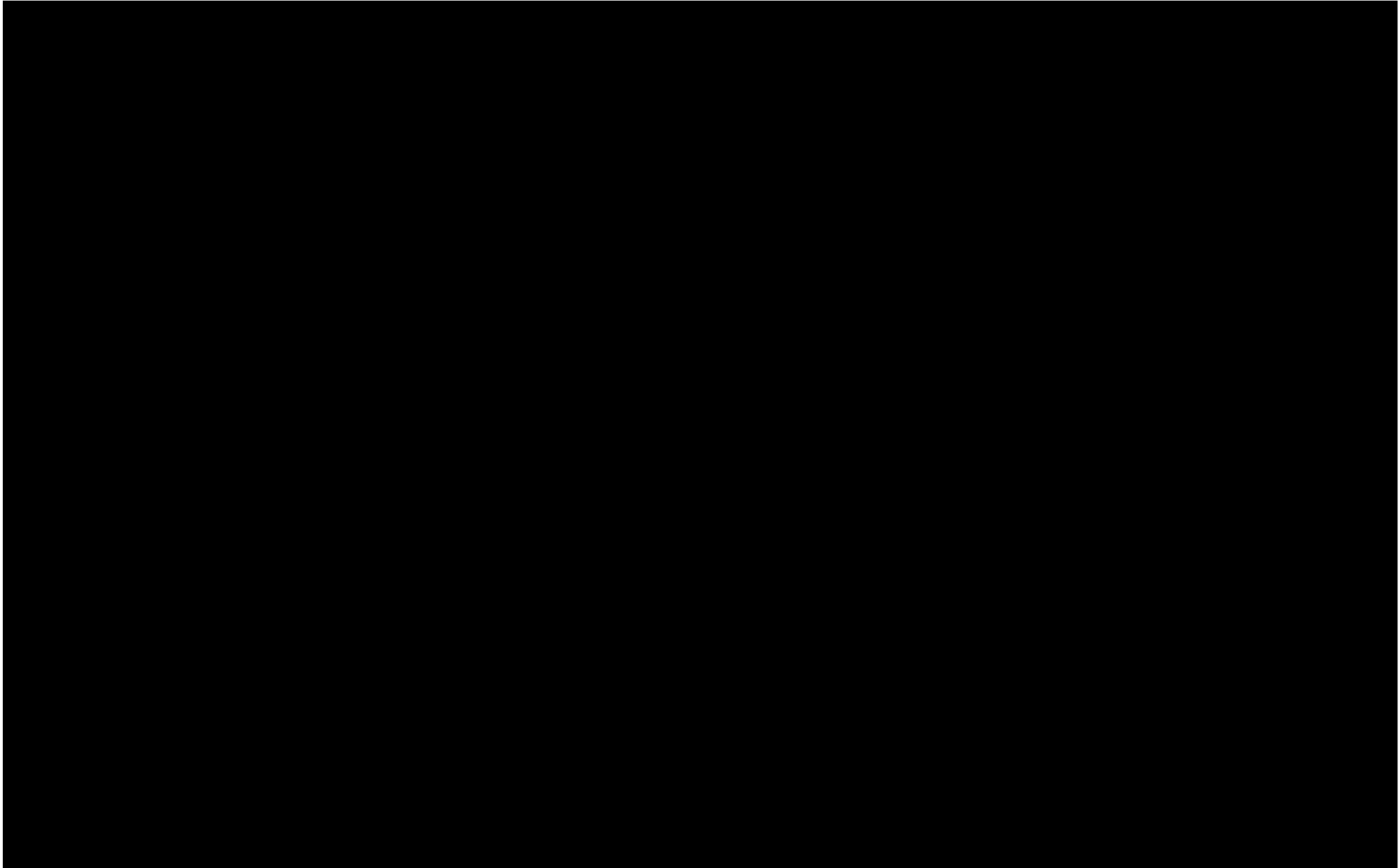




From: Diana Ngobi [REDACTED]
Sent: 16 December 2022 22:09
To: David Easton <David.Easton@arun.gov.uk>; Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: [REDACTED]
Subject: National Highways Response: BN/11/22/OUT Barnham, Eastergate, Westergate BEW Parcel SC1 Barnham

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For attention of:	Mr David Easton
Site:	Barnham, Eastergate, Westergate BEW Parcel SC1 Barnham
Proposal:	Outline application with all matters reserved (except for the A29 Realignment, Home/Senior Living Accommodation (Use Class E/F2/Sui Generis), a Primary

	connection to existing A29 including construction of a new road carriageway, buildings, affects the character & appearance of the Eastergate Church Lane
Your Ref:	BN/11/22/OUT
National Highways Ref:	94046 #18115 (SB398)

Dear Mr Easton,

We previously wrote to you on 27 September 2022, providing an update on discussions with the applicant on the application referenced above. As was indicated in that email and the associated NHPR form, significant further discussions have taken place with the applicant and several additional technical exercises have been undertaken in response to the outstanding matters which were identified. We have now undertaken our review of this additional information provided in relation to this application. Whilst progress has been made, there remain 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, we 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 until 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 our updated NHPR response recommending that planning permission should not be granted for a period of 3 months, expiring on 16 March 2023. This is to allow time for the applicant to provide the further information set out in the attached NHPR dated 16 December 2022. This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regard to the required further assessments. If you have any questions regarding our response, please contact us at

[REDACTED]

Kind regards
Diana

Diana Ngobi

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

[REDACTED]

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

From: Regional Director
Operations Directorate
South East Region
National Highways

[REDACTED]

To: Arun District Council - FAO David Easton
planning.responses@arun.gov.uk

CC:

[REDACTED]

Council's Reference: BN/11/22/OUT

Location: Barnham, Eastergate, Westergate BEW Parcel SC1 Barnham

Proposal: 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.

National Highways Ref: 94046 #18115 (SB398)

Referring to the consultation on a planning application dated 16 February 2022 referenced above, in the vicinity of the A27 at Barnham 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);

~~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: 16 December 2022
Name: Diana Ngobi	Position: Assistant Spatial Planning Manager
National Highways Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ	

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

Annex A National Highway's 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

That planning permission not be granted for a specified period

Reasons:

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:

Some of the actions identified through previous discussions with the applicant (and recorded in previous versions of the NHPR form) have now been satisfactorily addressed, which has enabled a technical review of the submitted highway capacity modelling to be undertaken by us. As a result of this review, we have identified further actions in relation to the submitted modelling; these are set out below.

A27 / B2145 (Whyke Roundabout)

It is stated within the additional information submission of 22 November 2022 that the 2031 and 2038 DM and DS modelling is based upon the mitigation scheme proposed in the Enterprise Bognor Regis Transport Review 2017.

We observe that the model results show that the B2145 (north) arm of the junction is operating very close to capacity in the 2019 base case, and over capacity by increasing degrees in all of the future year scenarios. It is additionally stated in the response note of 22 November 2022 that the queue length on the A27 West left turn lane would reach a maximum of 59 PCUs (339m); the current mitigation scheme would provide a lane length of 158m, which would be insufficient to accommodate such a queue (we note that this queue length is not evident from the tables provided within the corresponding model output files). It is stated that the design of this mitigation is therefore proposed to be amended, however no details of such an amendment are presented in the latest submissions.

ACTION: The differences between the submitted model output files and the model results (including queue lengths) referenced in the November 2022 technical response note should be clarified. Appropriate General Arrangement (GA) drawings which correspond to associated modelling files will need to be

provided for any revised mitigation scheme; these will need to be suitably assessed by us in order to be accepted for the purposes of the application.

A27 / A259 (Bognor Road Roundabout)

It is stated within the additional information submission of 22 November 2022 that the 2031 and 2038 DM and DS modelling is based upon the mitigation scheme proposed in the Arun Transport Study Stage 3 report.

We see that the model results show that there is expected to be extensive queuing on the A27 (north) and A27 (south) arms of the junction in all of the future year scenarios; the increase in queues on the A27 (south) arm is limited in the 2031 tests, but slightly more pronounced in the 2038 tests. The requested examination of the available queuing space identifies that there is space for 115 PCUs of traffic on the A27 (south) arm, across two lanes; this corresponds to modelled queue lengths of 36.2 PCUs in the 2031 DS PM peak models and 86.8 PCUs in the 2038 DSP PM peak models. These figures correspond correctly to the 22 November 2022 technical note and supporting drawings, and we consider that the impacts to the A27 (south) arm would not result in a material impact to safety.

For the A27 (north) arm, extensive queues are seen in both the AM and PM peaks in all future year scenarios. The maximum modelled queue length is seen in the 2038 PM Peak DS model, of 165.5 PCUs (the equivalent for the 2031 PM peak DS model is 77.5 PCUs). It is stated in the 22 November 2022 submission note that the maximum expected queue on this arm is 19.4 PCUs; this does not correspond with the data from the supplied model output files as reproduced above.

ACTION: The expected physical extent of the queues as represented in the model output results included with the 25 October 2022 submission package will need to be confirmed and shown visually via a suitable drawing, to demonstrate whether these queues will impact on any other part of the SRN or junctions with the local road network.

We have identified that the mitigation scheme presented in the Arun study Stage 3 has been superseded by the mitigation proposals associated with the Enterprise Bognor Regis review; as such, a further test will be required which appraises the proposed development impacts against this scheme. It is recommended that the applicant seeks further advice and dialogue with us prior to carrying out this test. It is understood that a CATM scenario test has previously been developed for these proposals and appropriate traffic flow and distribution data should be sought from the model holders, to ensure that the effects of the mitigation measures on the wider distribution of traffic in the vicinity of the junction is properly reflected.

ACTION: A sensitivity test of the mitigation measures proposed in the Enterprise Bognor Regis review for the A27 Bognor Road roundabout should be conducted.

A27 / The Causeway (Arundel)

It is stated within the additional information submission of 22 November 2022 that the 2031 and 2038 DM and DS modelling is based upon the mitigation scheme proposed in the Arun Transport Study Stage 3 report.

The results of the modelling exercise demonstrate that, with the proposed mitigation scheme in place, the junction will operate within capacity in all scenarios, with minimal changes between the do minimum and do something scenarios. Subject to the implementation of the identified mitigation scheme, it is considered that the impacts of the development at this location will be suitably addressed.

A27 / Fontwell Avenue

It is stated within the additional information submission of 22nd November that the 2031 and 2038 DM and DS modelling is based upon the mitigation scheme proposed in the Arun Transport Study Stage 3 report.

We see that the assessment of queues within the 22 November 2022 technical note acknowledge the substantial growth in queues on the A27 North and A27 Arundel Road West arms in the AM and PM peaks. It is noted that the summary table includes all queuing vehicles, which are in practice split across two lanes on each arm. Drawings have been provided in the 22 November 2022 response showing the physical measured extent of the queues during the busiest scenarios; for the Arundel Road West arm this is stated to be 223 PCUs, however in the model output files the highest recorded length is 79.8 PCUs. For the A27 North arm, the 22 November 2022 response states a highest queue value of 131 PCUs, whereas the model output files state a figure of 458 PCUs.

ACTION: Further explanation is required in relation to the discrepancies between the analysis within the 22 November 2022 technical note and the information within the supplied model output files. The queue length measurement drawings should be revised to correspond to the submitted model output data.

Other Matters

We previously set out that we are minded to recommend suitable planning conditions for the CEMP and Travel Plan at the appropriate stage of the planning process; this remains the case.

Conclusion

At the present time, 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.

For the reasons set out above, National Highways recommends that planning permission not be granted for a period of three months from the date of this response 16 March 2023 to allow the applicant to resolve 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 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 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.