

Arun District Council, Civic Centre, Maltravers Rd

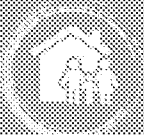
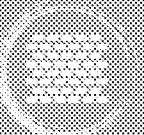
Littlehampton, West Sussex, BN17 5LF

www.arun.gov.uk

To register to receive notification of planning applications in your area please go to
<https://www1.arun.gov.uk/planning-application-finder>



Our priorities...

 Improving the wellbeing of Arun	 Delivering the right homes in the right places	 Supporting our environment to support us	 Fulfilling Arun's economic potential	  ARUN DISTRICT COUNCIL
--	---	---	---	--

From: Kevin Bown [REDACTED]
Sent: 06 April 2023 16:06
To: David Easton <David.Easton@arun.gov.uk>; Planning.Responses
<Planning.Responses@arun.gov.uk>
Cc: [REDACTED] Planning SE [REDACTED] Spatial
Planning [REDACTED] Elizabeth
Cleaver [REDACTED] Diana Ngobi
[REDACTED]
Subject: National Highways Response: BN/11/22/OUT Barnham, Eastergate, Westergate BEW Parcel
SC1 Barnham

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:	Mr David Easton
Site:	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 Aidingbourne, 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.
Your Ref:	BN/11/22/OUT
National Highways Ref:	94046 #19335

Dear Mr Easton,

We last wrote to you on 16 December 2022, providing an update on discussions with the applicant on the application referenced above.

We continue to engage with all parties and progress is being made. However, there are still various outstanding matters that require evidence before we are able to fully assess and agree the assessment of this application and any implications of the proposals 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 C1/22 and MHCLG NPPF2021 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 6 July 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

Kevin Bown BSc(Hons) MPhil CMS MRTPI Spatial (Town) Planning Manager

Spatial Planning Team, South East Region Operations Directorate

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

[REDACTED]

Web: www.nationalhighways.co.uk

This email may contain information which is confidential and is intended only for use of the recipient/s named above. If you are not an intended recipient, you are hereby notified that any copying, distribution, disclosure, reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please notify the sender and destroy it.

National Highways Limited | [REDACTED] | **National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF** | <https://nationalhighways.co.uk> | [REDACTED]

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

Consider the environment. Please don't print this e-mail unless you really need to.



National Highways Planning Response (NHPR 22-12)

Formal Recommendation to an Application for Planning Permission

From: Operations Directorate
South East Region
National Highways

[REDACTED]

To: Arun District Council - FAO Mr D Easton & Mr P Arthurs
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: HAMIS: 94046

Referring to the consultation on a planning application dated 16 February 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);~~

National Highways Planning Response (NHPR 22-12) December 2022

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: 6 April 2023
Name: Kevin Bown	Position: Spatial Planning Manager
National Highways Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ	

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.

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

Recommendation: that planning permission not be granted for a specified period

While we have been and continue to engage with all parties, it is recommended that the application should not be approved until after 6 July 2023, unless we write formally otherwise.

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 SRN A27 near Barnham.

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. As a result of this review, we have identified further actions in relation to the submitted modelling; these are described below.

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

A27 / B2145 (Whyke Roundabout)

The summary results table for the A27 / B2145 Whyke Roundabout junction is reproduced below.

	AM				PM			
	Queue (PCU)	Delay (s)	RFC	LOS	Queue (PCU)	Delay (s)	RFC	LOS
2019 Base								
1 - B2145 (N)	0.5	7.20	0.30	A	17.5	135.18	0.88	F
2 - A27 Chichester bypass (E)	2.6	4.83	0.70	A	2.5	5.35	0.78	A
3 - B2145 (S)	0.8	2.77	0.45	A	0.3	2.16	0.24	A
4 - A27 Chichester bypass (W)	3.2	7.02	0.74	A	4.9	6.76	0.83	A
2031 DM No Calx								
1 - B2145 (N)	0.9	9.81	0.45	A	22.1	152.55	1.00	F
2 - A27 Chichester bypass (E)	2.1	4.33	0.85	A	2.0	5.17	0.84	A
3 - B2145 (S)	3.8	12.18	0.79	B	0.6	3.61	0.36	A
4 - A27 Chichester bypass (W)	3.2	6.86	0.74	A	5.6	9.97	0.84	A
2031 DM								
1 - B2145 (N)	0.9	9.58	0.44	A	24.5	167.73	1.01	F
2 - A27 Chichester bypass (E)	2.1	4.32	0.85	A	2.0	5.17	0.84	A
3 - B2145 (S)	3.9	12.45	0.79	B	0.6	3.57	0.36	A
4 - A27 Chichester bypass (W)	3.1	6.82	0.74	A	5.8	10.31	0.84	B
2031 DS No Calx								
1 - B2145 (N)	0.9	9.84	0.45	A	33.7	225.44	1.04	F
2 - A27 Chichester bypass (E)	2.1	4.37	0.85	A	2.0	5.19	0.84	A
3 - B2145 (S)	4.3	13.52	0.81	B	0.6	3.59	0.36	A
4 - A27 Chichester bypass (W)	3.3	7.10	0.74	A	6.2	10.86	0.85	B
2031 DS								
1 - B2145 (N)	0.9	9.86	0.45	A	36.1	249.80	1.05	F
2 - A27 Chichester bypass (E)	2.1	4.38	0.85	A	2.1	5.20	0.84	A
3 - B2145 (S)	4.4	13.94	0.81	B	0.6	3.60	0.37	A
4 - A27 Chichester bypass (W)	3.3	7.09	0.74	A	6.3	11.03	0.85	B
2038 DM								
1 - B2145 (N)	1.0	10.69	0.48	B	61.6	406.18	1.11	F
2 - A27 Chichester bypass (E)	2.2	4.53	0.86	A	2.1	5.27	0.85	A
3 - B2145 (S)	5.1	15.74	0.83	C	0.7	3.85	0.41	A
4 - A27 Chichester bypass (W)	3.9	8.13	0.78	A	7.7	13.36	0.88	B
2038 DS								
1 - B2145 (N)	0.9	10.59	0.47	B	63.6	407.86	1.21	F
2 - A27 Chichester bypass (E)	2.3	4.68	0.87	A	2.3	5.54	0.87	A
3 - B2145 (S)	6.8	20.66	0.87	C	0.8	4.04	0.42	A
4 - A27 Chichester bypass (W)	4.1	8.57	0.78	A	10.9	18.35	0.91	C

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

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 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. (It is noted 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.

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)

The summary results table for the A27 / A259 Bognor Road Roundabout junction is reproduced below.

	AM			
	Queue (PCU)	Delay (s)	RFC	LOS
2019 Base				
1 - A27 Chichester Bypass N	5.2	13.67	0.83	B
2 - A259 Bognor Rd E	13.0	42.68	0.95	E
3 - Vinnetrow Rd	6.5	104.31	0.93	F
4 - A27 Chichester Bypass S	5.4	12.48	0.84	B
5 - A259 Bognor Road W	4.0	21.78	0.81	C
2031 DM No Cala				
1 - A27 Chichester Bypass N	50.3	112.35	1.04	F
2 - A259 Bognor Rd E	6.0	23.02	0.97	C
3 - Vinnetrow Rd	28.1	577.62	1.28	F
4 - A27 Chichester Bypass S	14.6	27.41	0.97	D
5 - A259 Bognor Road W	10.9	41.65	0.97	E
2031 DM				
1 - A27 Chichester Bypass N	52.5	118.56	1.04	F
2 - A259 Bognor Rd E	6.1	23.35	0.97	C
3 - Vinnetrow Rd	29.8	598.03	1.30	F
4 - A27 Chichester Bypass S	15.0	27.95	0.97	D
5 - A259 Bognor Road W	11.3	43.76	0.97	E
2031 DS No Cala				
1 - A27 Chichester Bypass N	67.9	145.00	1.06	F
2 - A259 Bognor Rd E	6.2	23.89	0.97	C
3 - Vinnetrow Rd	29.2	598.44	1.30	F
4 - A27 Chichester Bypass S	15.7	28.79	0.98	D
5 - A259 Bognor Road W	11.5	44.31	0.97	E

	2031 DS			
1 - A27 Chichester Bypass N	71.4	151.99	1.06	F
2 - A259 Bognor Rd E	6.3	24.21	0.87	C
3 - Vinnetrow Rd	30.6	420.67	1.31	F
4 - A27 Chichester Bypass S	15.5	28.73	0.98	D
5 - A259 Bognor Road W	10.8	43.65	0.97	E
	2038 DM			
1 - A27 Chichester Bypass N	103.2	215.10	1.09	F
2 - A259 Bognor Rd E	6.4	24.32	0.88	C
3 - Vinnetrow Rd	32.1	422.50	1.34	F
4 - A27 Chichester Bypass S	19.4	35.15	1.00	E
5 - A259 Bognor Road W	13.9	59.31	1.00	F
	2038 DS			
1 - A27 Chichester Bypass N	139.6	288.77	1.11	F
2 - A259 Bognor Rd E	7.4	27.79	0.90	D
3 - Vinnetrow Rd	38.0	526.13	1.39	F
4 - A27 Chichester Bypass S	19.9	37.41	1.00	E
5 - A259 Bognor Road W	14.4	64.75	1.01	F

	PM			
	Queue (PCU)	Delay (s)	RFC	LOS
2019 Base				
1 - A27 Chichester Bypass N	5.8	18.03	0.86	C
2 - A259 Bognor Rd E	12.3	44.31	0.96	E
3 - Vinnetrow Rd	3.8	89.67	0.84	F
4 - A27 Chichester Bypass S	5.7	13.97	0.86	B
5 - A259 Bognor Road W	8.8	38.06	0.92	E
2031 DM No Cala				
1 - A27 Chichester Bypass N	65.9	120.23	1.13	F
2 - A259 Bognor Rd E	42.7	106.88	1.11	F
3 - Vinnetrow Rd	136.9	3434.66	2.27	F
4 - A27 Chichester Bypass S	26.8	67.38	1.00	F
5 - A259 Bognor Road W	7.0	33.39	0.90	D
2031 DM				
1 - A27 Chichester Bypass N	70.6	129.40	1.13	F
2 - A259 Bognor Rd E	42.9	108.12	1.11	F
3 - Vinnetrow Rd	136.1	3407.58	2.22	F
4 - A27 Chichester Bypass S	29.2	71.83	1.01	F
5 - A259 Bognor Road W	7.0	33.54	0.90	D
2031 DS No Cala				
1 - A27 Chichester Bypass N	65.8	120.43	1.12	F
2 - A259 Bognor Rd E	44.0	113.85	1.11	F
3 - Vinnetrow Rd	139.7	3741.72	2.33	F
4 - A27 Chichester Bypass S	34.4	62.82	1.02	F
5 - A259 Bognor Road W	8.0	37.73	0.92	E

	2031 DS			
1 - A27 Chichester Bypass N	77.5	144.18	1.14	F
2 - A259 Bognor Rd E	43.7	111.23	1.11	F
3 - Vinnetrow Rd	139.9	3616.27	2.33	F
4 - A27 Chichester Bypass S	36.2	86.83	1.02	F
5 - A259 Bognor Road W	7.9	37.21	0.91	E
	2038 DM			
1 - A27 Chichester Bypass N	121.4	235.35	1.18	F
2 - A259 Bognor Rd E	47.9	131.81	1.13	F
3 - Vinnetrow Rd	158.1	4390.20	2.58	F
4 - A27 Chichester Bypass S	54.7	125.41	1.05	F
5 - A259 Bognor Road W	12.6	54.32	0.96	F
	2038 DS			
1 - A27 Chichester Bypass N	165.5	345.51	1.21	F
2 - A259 Bognor Rd E	48.5	134.49	1.13	F
3 - Vinnetrow Rd	165.0	5014.37	2.76	F
4 - A27 Chichester Bypass S	86.8	189.79	1.08	F
5 - A259 Bognor Road W	16.7	69.18	0.99	F

It is stated within the additional information submission of 22 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.

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 technical note and supporting drawings, and it is considered 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 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.

The expected physical extent of the queues as represented in the model output results included with the 25 October 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.

It is also noted that 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. We are currently preparing a model for use by the applicant to carry out the required sensitivity test and this will be provided accordingly.

The required sensitivity test of the mitigation measures proposed in the Enterprise Bognor Regis review for the A27 Bognor Road roundabout should be conducted using the model to be provided by us.

A27 / The Causeway (Arundel)

The summary results tables for the A27 / The Causeway, Arundel junction are reproduced below.

	AM				PM			
	Queue (PCU)	Delay (s)	RFC	LOS	Queue (PCU)	Delay (s)	RFC	LOS
2031 DM No Calt								
1 - The Causeway (N)	0.2	4.65	0.16	A	1.0	8.20	0.50	A
2 - A27 (The Causeway) South/East	2.9	6.35	0.74	A	1.6	4.31	0.51	A
3 - A27 West (Arundel Bypass)	2.9	7.74	0.74	A	3.5	6.46	0.76	A
2031 DM								
1 - The Causeway (N)	0.2	4.66	0.16	A	1.0	8.20	0.50	A
2 - A27 (The Causeway) South/East	2.9	6.31	0.74	A	1.6	4.33	0.51	A
3 - A27 West (Arundel Bypass)	2.9	7.80	0.75	A	3.5	6.46	0.76	A
2031 DS No Calt								
1 - The Causeway (N)	0.2	4.73	0.16	A	1.0	6.46	0.51	A
2 - A27 (The Causeway) South/East	3.0	6.39	0.75	A	1.7	4.34	0.53	A
3 - A27 West (Arundel Bypass)	3.2	6.21	0.76	A	3.6	6.72	0.79	A
2031 DS								
1 - The Causeway (N)	0.2	4.75	0.16	A	1.0	6.56	0.51	A
2 - A27 (The Causeway) South/East	3.0	6.39	0.75	A	1.7	4.35	0.53	A
3 - A27 West (Arundel Bypass)	3.2	6.21	0.76	A	3.6	6.72	0.79	A
2038 DM								
1 - The Causeway (N)	0.2	4.84	0.17	A	0.9	6.07	0.48	A
2 - A27 (The Causeway) South/East	3.7	7.58	0.79	A	1.7	4.28	0.52	A
3 - A27 West (Arundel Bypass)	3.5	8.14	0.78	A	3.5	6.57	0.78	A
2038 DS								
1 - The Causeway (N)	0.2	5.12	0.19	A	1.2	6.46	0.55	A
2 - A27 (The Causeway) South/East	3.6	7.75	0.79	A	2.1	4.90	0.67	A
3 - A27 West (Arundel Bypass)	4.4	10.82	0.82	B	4.2	6.73	0.82	A

It is stated within the additional information submission of 22 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.

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

The summary results tables for the A27 / The Causeway, Arundel junction are reproduced below. (It is noted that the AM files are labelled as revision C, with the PM files labelled as revision D).

	AM				
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS
2019 Base					
1 - A27 North	D1	7.2	11.49	0.88	B
2 - Arundel Road		1.9	26.85	0.68	D
3 - A29 Fontwell Ave		12.3	81.49	0.98	F
4 - A27 Arundel Road West		1.4	3.24	0.55	A
2031 DM No Cata					
1 - A27 North	D2	37.1	58.45	1.02	F
2 - Arundel Road		2.0	50.54	0.70	F
3 - A29 Fontwell Ave		362.8	2481.43	1.86	F
4 - A27 Arundel Road West		1.3	2.95	0.57	A
2031 DM					
1 - A27 North	D3	38.5	57.47	1.02	F
2 - Arundel Road		2.5	56.84	0.76	F
3 - A29 Fontwell Ave		367.8	2537.62	2.00	F
4 - A27 Arundel Road West		1.3	2.93	0.56	A
2031 DS No Cata					
1 - A27 North	D4	43.3	64.78	1.02	F
2 - Arundel Road		4.0	76.82	0.88	F
3 - A29 Fontwell Ave		407.2	2555.00	2.05	F
4 - A27 Arundel Road West		1.3	2.87	0.56	A
2036 DM					
1 - A27 North	D6	75.9	116.94	1.05	F
2 - Arundel Road		5.9	102.48	0.88	F
3 - A29 Fontwell Ave		361.7	2421.35	2.00	F
4 - A27 Arundel Road West		1.6	3.21	0.60	A
2036 DS					
1 - A27 North	D7	174.6	254.31	1.11	F
2 - Arundel Road		7.4	161.85	1.06	F
3 - A29 Fontwell Ave		334.9	2062.54	1.90	F
4 - A27 Arundel Road West		1.7	3.47	0.63	A
2031 DS					
1 - A27 North	D8	36.8	59.29	1.02	F
2 - Arundel Road		4.1	76.56	0.88	F
3 - A29 Fontwell Ave		406.9	2589.30	2.05	F
4 - A27 Arundel Road West		1.3	2.89	0.56	A

	PM				
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS
2019 Base					
1 - A27 North	D1	7.8	18.41	0.66	C
2 - Arundel Road		0.4	9.35	0.29	A
3 - A29 Fontwell Ave		1.0	7.21	0.48	A
4 - A27 Arundel Road West		1.4	2.86	0.57	A
2031 DM No Cala					
1 - A27 North	D2	178.1	286.87	1.14	F
2 - Arundel Road		0.5	14.85	0.35	B
3 - A29 Fontwell Ave		2.3	13.60	0.71	B
4 - A27 Arundel Road West		14.2	17.25	0.86	C
2031 DM					
1 - A27 North	D3	177.5	288.77	1.15	F
2 - Arundel Road		0.5	15.66	0.36	C
3 - A29 Fontwell Ave		2.6	15.15	0.74	C
4 - A27 Arundel Road West		15.2	18.25	0.86	C
2031 DS No Cala					
1 - A27 North	D4	258.5	486.45	1.22	F
2 - Arundel Road		0.4	13.88	0.29	B
3 - A29 Fontwell Ave		3.3	17.00	0.78	C
4 - A27 Arundel Road West		31.4	32.13	1.01	D
2031 DS					
1 - A27 North	D5	237.0	435.73	1.20	F
2 - Arundel Road		0.4	13.65	0.29	B
3 - A29 Fontwell Ave		2.3	13.37	0.71	B
4 - A27 Arundel Road West		28.8	28.59	0.89	D
2038 DM					
1 - A27 North	D6	312.8	588.86	1.25	F
2 - Arundel Road		0.5	14.07	0.34	B
3 - A29 Fontwell Ave		5.0	23.31	0.86	C
4 - A27 Arundel Road West		28.7	28.59	0.89	D
2038 DS					
1 - A27 North	D7	458.0	887.87	1.36	F
2 - Arundel Road		0.4	13.15	0.30	B
3 - A29 Fontwell Ave		4.6	20.71	0.84	C
4 - A27 Arundel Road West		78.8	69.21	1.07	F

It is stated within the additional information submission of 22 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.

The assessment of the queues within the 22 November 2022 technical note acknowledges 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 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 response

states a highest queue value of 131 PCUs, whereas the model output files state a figure of 458 PCUs.

Further explanation is required in relation to the discrepancies between the analysis within the 22 November 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

It is expected that a full Construction Management Plan will be required for the development; this will need to be conditioned, with the CMP reviewed and approved prior to commencement of any works associated with the development. The standard text is provided below for reference:

'No works shall commence on the site hereby permitted (including site clearance or preparation) until the details of a Construction Management Plan have been submitted to and approved in writing by the local planning authority (who shall consult with National Highways). Thereafter the construction of the development shall proceed in strict accordance with the approved Construction Management Plan unless otherwise agreed in writing by the local planning authority (who shall consult National Highways).'

Reason: To ensure that the A27 Trunk Road continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

Informative: The CMP shall include details (text, maps and drawings as appropriate) of the scale, timing and mitigation of all construction related aspects of the development. It will include but is not limited to: site hours of operation; numbers, frequency, routing and type of vehicles visiting the site; measures to ensure that HGV loads are adequately secured, travel plan and guided access/egress and parking arrangements for site workers, visitors and deliveries; and wheel washing and other facilities to prevent dust, dirt, detritus etc from entering the public highway (and means to remove if it occurs).'

It is noted that a draft Framework Travel Plan (TP) has been submitted as Appendix D2 of the Environmental Statement. It is further noted that the applicant has not sought any discount to the trip rates applied to the development to account for TP measures, therefore we will be minded to condition approval of the full TP. Approval will need to be in place before first occupation of any part of the development.

The above represents our *current* 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 MHCLG NPPF2021 [particularly paras 110 to 113]). 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 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.