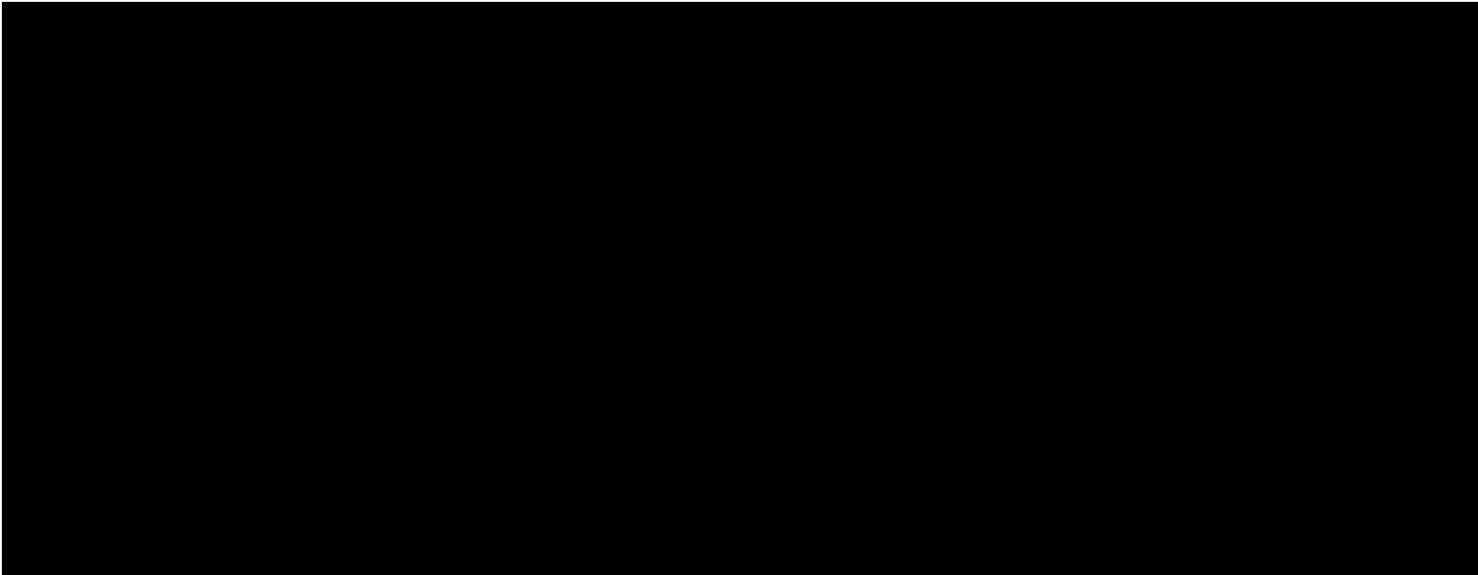




From: Franklin, Richard [REDACTED]
Sent: 12 January 2021 10:24
To: Planning.Responses <Planning.Responses@arun.gov.uk>; James Cross <James.Cross@arun.gov.uk>
[REDACTED]
Subject: Highways England Response (HE ref. #12217) re. BN/155/20/EIS - Land North of Barnham Road

For the attention of: James Cross

Site: Land North of Barnham Road, Eastergate

Development: Scoping opinion for up to 600 residential dwellings and care home.

Planning Application No: BN/155/20/EIS

Highways England Ref: #12217

Dear Mr Cross,

Thank you for your consultation of 22nd December 2020 regarding the above scoping opinion.

Highways England has 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 Highways England works 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. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN. In the case of this proposal, our interest relates to potential impacts upon the A27.

EIA Scoping

As attached, we have previously responded to a similar scoping opinion on the Barnham Road, Eastergate Environmental Impact Assessment Scoping Report (November 2019), as well as a Scoping Opinion on the whole Barnham Eastergate Westergate strategic development, which this site forms part of. Therefore, having reviewed the updated version of the Barnham Road, Eastergate Environmental Impact Assessment Scoping Report (December 2020), we have the following comments:

- It is not part of Highways England's role to comment on the need for or contents of an EIA Scoping Request, although we note that Traffic and Transport has now been scoped in and a Transport Assessment will be prepared to support the planning application for the site and appended to the ES. We also note that a Technical Transport Scoping Note for the Transport Assessment will be agreed separately. Therefore, it is expected that the relevant parts of the ES will reflect the Transport Assessment. This includes any requirement to assess the air quality and noise/vibration related issues associated with traffic generation/the Strategic Road Network.
- Any TA and EIA assessment should be undertaken in accordance with the DfT Circular 02/2013 "*The Strategic Road Network and the Delivery of Sustainable Development*". The TA should include a robust assessment of the vehicular impacts "with" and "without" development for the horizon year (full occupation) and the end of the Local Plan period to examine the net impact of non-consented development. The EIA should also demonstrate how it accords with the Design Manual for Roads and Bridges (DMRB) LA104 Environmental Assessment and Monitoring.
- We also note that a Construction Traffic Management Plan will be prepared to mitigate the construction impacts of the development.

As such, Highways England is content that a Transport Assessment and Construction Traffic Management Plan are to be prepared in support of the planning application, and request that we are consulted on these. Otherwise, we have no further comments on the Environmental Impact Assessment Scoping Report. As per our response to the EIA Scoping Opinion for the whole of BEW, we have provided some further advice on the Transport Assessment below:

TA Scoping

We are pleased to see that a Transportation Assessment Scoping note will be produced and we will be happy to provide advice and comments on this. The Scoping note should be agreed prior to commencement of the main transport study by both Highways England and West Sussex County

Council as Strategic and Local Highway Authorities. To this end, please note that we responded to the transport consultant for the whole BEW site (Stephen Moody at Pell Frischmann) with regard to the strategic modelling scenarios in July 2020, while we also responded to Arun District Council regarding the BEW Framework Masterplan in October 2020.

TA Considerations

Through work already undertaken with colleagues at West Sussex County Council and Arun District Council with consultants Systra as part of the Transport Assessment for the Arun Local Plan, we know that impacts from the strategic development site at BEW will affect the safe and efficient operation of both the local and strategic road networks.

As Strategic Highway Authority, we have concerns about the implications of development traffic on the A27 Chichester Bypass. Of particular concern is the impact of the development site on the A27 Bognor Road Roundabout, and A27 Whyke Roundabout. Both junctions will need detailed consideration as part of the Transportation Assessment.

The assessment of these junctions will also need to take into account Chichester District Council's Local Plan proposals (plus committed development) and the agreed necessary junction mitigations on the A27 coupled with the cumulative impacts of Arun's committed development and that from its adopted Local Plan. It will be necessary to undertake the assessment at the end of both Local Plan periods which is currently 2031 as well as year of opening at full occupancy.

As the Chichester Local Plan mitigation schemes on the A27 Chichester Bypass only account for the impacts of Chichester's own strategic development and deliver a 'no worse' than existing scenario on the highway network, it is highly unlikely that additional impacts from strategic development at BEW can be accommodated without increasing the severity of congestion already encountered at these junctions. Accordingly, the Transport Assessment will need to consider appropriate highways mitigations at the A27 Bognor Road and Whyke junctions as well as measures targeted at reducing travel demand by car in favour of more sustainable transport modes.

Similarly, consideration will also need to be given to the development's impact at the other SRN junctions identified in the latest Arun Local Plan strategic modelling report (Systra's Enterprise Bognor Regis Transport Review of November 2017).

Highways England are happy to continue working with the transport consultants for the development as well as colleagues from West Sussex County, Arun District and Chichester District councils and look forward to our continued involvement as the BEW strategic site is brought forward.

If you have any queries regarding this response, please contact us at



Regards,

Sent on behalf of Kevin Bown, Spatial Planning Manager Area 4

Richard Franklin

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

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

Please note that for the foreseeable future we are all working from home. All meetings will be via telephone, Skype or similar. We will continue to seek to work to our statutory and other deadlines. In case of IT or other issues, as a precaution, please copy all emails to

██████████ Thank you.

From: planning.responses@arun.gov.uk [<mailto:planning.responses@arun.gov.uk>]

Sent: 22 December 2020 15:19

To: Planning SE ██████████

Subject: #12217 Planning Consultation on: BN/155/20/EIS

To: **Highways England**
NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: BN/155/20/EIS

Registered: 21st December 2020

Site Address: Land North of Barnham Road Eastergate

Grid Reference: 495054 105616

Category:

Description of Works: Scoping opinion for up to 600 residential dwellings and care home.

Town & Country Planning Act 1990 (as amended)

Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

Consultation on Request for a Scoping Opinion

An application has been lodged for a scoping opinion. The Council has to respond in writing stating what information needs to be provided as part of an Environmental Statement that might be required in connection with the proposed development.

The development is described in the attached plans and written material:

[Click here to view documents available on our website](#)

[Click here to view the status of the application.](#)

I would be grateful for your electronic comments made on the website or by emailing to planning.responses@arun.gov.uk by **12th January 2021**.

Please be aware that any comments you may make will be available to view on our website

Please note the importance of the scoping opinion to any subsequent Environmental appraisal process. If you are in any doubt as to what is being requested please see the above regulations.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

James Cross

Planning Case Officer- Arun District Council

Telephone: 01903 737784

Email: james_cross@arun.gov.uk

PLCONEIS (ODE) 2020

<http://www.arun.gov.uk>

DX 57406 Littlehampton

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Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |

<https://www.gov.uk/government/organisations/highways-england> | info@highwaysengland.co.uk

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.

From: Franklin, Richard [REDACTED]
Sent: 18 December 2019 11:53
To: Planning.Responses
Cc: Planning SE; Cleaver, Elizabeth; Bowie, David; Bown, Kevin
Subject: Highways England response (HE ref. 6313) re. BN/122/19/EIS - Scoping opinion for Land North of Barnham Road

Follow Up Flag: Follow up
Flag Status: Flagged

For the attention of: Raymond Cole

Site: Land North of Barnham Road, Eastergate

Development: Scoping opinion under Regulation 15 of Town & Country Planning Act 1990 (as amended) Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and any subsequent amendments. The development is described in the attached plans and written material. The Council has to respond in writing stating what information needs to be provided as part of an Environmental Statement that might be required in connection with the proposed development.

Planning Application No: BN/122/19/EIS

Highways England Ref: 6313

Dear Mr Cole,

Thank you for your consultation of 11th December 2019 regarding the above scoping opinion.

Highways England has 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 Highways England works 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. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN. In the case of this proposal, our interest relates to potential impacts upon the A27.

Having reviewed the Barnham Road Eastergate Environmental Impact Assessment Scoping Report (November 2019), we have the following comments:

- It is not part of Highways England's role to comment on the need for or contents of an EIA Scoping Request, although we note that Traffic and Transport has been scoped out and a Transport Assessment will be prepared to support the planning application for the site and appended to the ES. We also note that a Technical Transport Scoping Note for the Transport Assessment will be agreed separately. Therefore, it is expected that the relevant parts of the ES will reflect the Transport Assessment. This includes any requirement to assess the air quality and noise/vibration related issues associated with traffic generation/the Strategic Road Network.

- We also note that a Construction Traffic Management Plan will be prepared to mitigate the construction impacts of the development.

If you have any queries regarding this response, please contact us at

Regards,

Sent on behalf of Elizabeth Cleaver, Assistant Spatial Planning Manager Area 4

Richard Franklin

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

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

From: planning.responses@arun.gov.uk [<mailto:planning.responses@arun.gov.uk>]

Sent: 11 December 2019 17:19

To: Planning SE

Subject: #9255 Scoping opinion Land North of Barnham Road Eastergate

To **Highways England**

:

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

APPLICATION NO: BN/122/19/EIS

Registered: 28-NOV-19

Site Address: Land North of Barnham Road Eastergate

Grid Reference:

Category: Scoping Opinion

Description of Works: Scoping opinion

Town & Country Planning Act 1990 (as amended)

Town & Country Planning (Environmental Impact Assessment) Regulations 2017(as amended)

Consultation on Request for a Scoping Opinion

Scoping opinion

Land North of Barnham Road Eastergate

An application has been lodged for a scoping opinion under Regulation 15 of Town & Country Planning Act 1990 (as amended)

Town & Country Planning (Environmental Impact Assessment) Regulations 2017(as amended) and any subsequent amendments. The development is described in the attached plans and written material. The Council has to respond in writing stating what information needs to be provided as part of an Environmental Statement that might be required in connection with the proposed development.

If you are in any doubt as to what is being requested please see the above regulations.

Please note the importance of the scoping opinion to any subsequent Environmental appraisal process.

Any comments you wish to make have to be with me by **1st January 2020**.

[Click here to view the application documents and plans](#)
[Click here to view the status of the application](#)

Please be aware that any comments you may make will be available on our website.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

The officer dealing with this application is Raymond Cole who can be contacted on telephone number 01903 737598.

Thanking you in anticipation

Planning Case Officer
Arun District Council

poisoon_email

<http://www.arun.gov.uk>

DX 57406 Littlehampton

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From: Bown, Kevin [REDACTED]
Sent: 22 October 2020 18:48
To: Planning.Responses
Cc: Planning SE; Spatial Planning
Subject: FAO Case Officer James Cross: Highways England response (our ref 6624#11494) re BN/112/20/EIS Environmental scoping opinion for up 1500 dwellings, community facilities, local centre (shops and services), a primary school and associated playing fields etc
Attachments: Highways England response: Barnham, Eastergate and Westergate Framework Masterplan Consultation; ATT00001.txt

For the attention of: James Cross

Your reference: BN/112/20/EIS

Site: Land at Barnham, Eastergate and Westergate

Proposal: Environmental scoping opinion for up 1500 dwellings, community facilities, local centre (shops and services), a primary school and associated playing fields and early years provision (nursery).

Highways England Ref: 6624#11494

Dear Mr Cross,

Thank you for your email of 3 October regarding the planning proposal referenced above, requesting a response no later than 24 October.

Highways England has 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 Highways England works 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.

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly the A27.

Highways England have no comment on whether an EIA is required; but if it is, it should be compatible and consistent with the required Transport Assessment for the application site. In this respect we note that the ES Transport chapter will be based upon the Transport Assessment, which is welcomed.

TA/EIA General Guidance

Any TA and EIA assessment should be undertaken in accordance with the DfT Circular 02/2013 *“The Strategic Road Network and the Delivery of Sustainable Development”*.

The TA should include a robust assessment of the vehicular impacts “with” and “without” development for the horizon year (full occupation) and the end of the Local Plan period to examine the net impact of non-consented development.

The EIA should demonstrate how it accords with the Design Manual for Roads and Bridges (DMRB) LA104 Environmental Assessment and Monitoring, and we note that the latter document is referenced in paragraphs 5.43 and 5.44 but not in paragraph 5.5 (Legislative and policy context).

TA Scoping Note

We are pleased to see that a Transportation Assessment Scoping note will be produced and we will be happy to provide advice and comments on this.

The Scoping note should be agreed prior to commencement of the main transport study by both Highways England and West Sussex County Council as Strategic and Local Highway Authorities.

To this end, we have already responded to the transport consultant (Stephen Moody at Pell Frischmann) with regard to the strategic modelling scenarios on 7 July 2020, while we have also responded to Arun District Council regarding the Framework Masterplan on 9 October 2020 as attached. With regard to the latter, we note that the Framework Masterplan included was up to 4,300 dwellings (a 1,300 dwelling increase on the previous proposal for 3,000 dwellings), where the EIA scoping report refers to 4,180, while the consultation refers to 1500 dwellings and thus clarification is required as such.

TA Considerations

Through work already undertaken taken with colleagues at West Sussex County Council and Arun District Council with consultants Systra as part of the Transport Assessment for the Arun Local Plan, we know that impacts from this strategic development site at BEW will affect the safe and efficient operation of both the local and strategic road networks.

As Strategic Highway Authority, we have concerns about the implications of development traffic on the A27 Chichester Bypass. Of particular concern is the impact of the development site on the A27 Bognor Road Roundabout, and A27 Whyke Roundabout. Both junctions will need detailed consideration as part of the Transportation Assessment.

The assessment of these junctions will also need to take into account Chichester District Council's Local Plan proposals (plus committed development) and the agreed necessary junction mitigations on the A27 coupled with the cumulative impacts of Arun's committed development and that from its adopted Local Plan. It will be necessary to undertake the assessment at the end of both Local Plan periods which is currently 2031 as well as year of opening at full occupancy.

As the Chichester Local Plan mitigation schemes on the A27 Chichester Bypass only account for the impacts of Chichester's own strategic development and deliver a 'no worse' than existing scenario on the highway network, it is highly unlikely that additional impacts from strategic

development at BEW can be accommodated without increasing the severity of congestion already encountered at these junctions. Accordingly, the Transport Assessment will need to consider appropriate highways mitigations at the A27 Bognor Road and Whyke junctions as well as measures targeted at reducing travel demand by car in favour of more sustainable transport modes.

Similarly, consideration will also need to be given to the development's impact at the other SRN junctions identified in Table 5.1, all of which were identified in the latest Arun Local Plan strategic modelling report (Systra's Enterprise Bognor Regis Transport Review of November 2017). This is considered key as the Systra Review was based upon 3,000 dwellings at BEW, where the Masterplan is now proposing 4,300 dwellings.

Highways England are happy to continue working with the transport consultants for the development as well as colleagues from West Sussex County, Arun District and Chichester District councils and look forward to our continued involvement as the BEW strategic site is brought forward.

If you have any queries regarding this response, please contact us at

[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, Skype or similar. We will continue to seek to work to our statutory and other deadlines. In case of IT or other issues, as a precaution, please copy all emails to [REDACTED] Thank you.

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- People are not 'working from home', they are 'at their home during a crisis trying to work'
- People's physical, mental and emotional health are far more important than anything else at present
- If people are currently less productive they should not try to compensate by working longer hours
- People should be gentle on themselves and others, not judging based on how they/ others are coping
- Individual and team success is not to be based on 'normal times' expectations

Safe roads, reliable journeys, informed travellers

Highways England: operating, maintaining and improving the strategic road network in England.

From: Cleaver, Elizabeth [REDACTED]
Sent: 09 October 2020 12:23
To: Strategic
Cc: Planning SE; Nicki Faulkner; Bowie, David
Subject: Highways England response: Barnham, Eastergate and Westergate Framework Masterplan Consultation

For attention of: Planning Policy & Conservation Team

Consultation: Barnham, Eastergate and Westergate Framework Masterplan Consultation

Highways England's Reference: #11185

Dear Sir/Madam,

Thank you for your email of 7 September 2020 regarding the Barnham, Eastergate and Westergate Framework Masterplan Consultation.

Highways England has 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 Highways England works 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. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly the A27.

We have reviewed the consultation comments and have the following comments:

- **General** – Highways England has been working with Arun District Council on the Arun Local Plan and associated transport impact. The latest version of this work (Enterprise Bognor Regis Transport Review 2017) includes 3,000 homes for the Barnham, Eastergate and Westergate strategic development. As such, mitigation for the SRN has been based on this and includes the following SRN junctions:
 - A27 / B2145 (Whyke Roundabout)
 - A27 / A259 (Bognor Road Roundabout)
 - A27 / B2233 Nyton Road
 - A27 / A29 (Fontwell Western Roundabout)
 - A27 / A29 (Fontwell Eastern Roundabout)
 - A27 / A284 Ford Road, Arundel
 - A27 / The Causeway (Arundel)

We note that the Barnham, Eastergate and Westergate Framework Masterplan increases the allocation up to 4,300 new homes. Whilst it is recognised that 2,300 dwellings would be delivered in the Local Plan period to 2031, which is below the original tested amount of 3000 dwellings, this Master Plan represents an increase of 1,300 over that previously tested. Accordingly, the above junctions and associated agreed mitigations are highly unlikely to be suitable for the traffic demands placed upon them as a result of this significant increase in housing numbers. Therefore, in order for Highways England to be able to robustly comment on this Master Plan there will need to be a thorough review of the

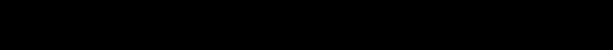
existing strategic modelling as well as detailed modelling of the above junctions. There will also be impacts on the Local Road Network and WSCC should be advised accordingly.

It now appears that, in all probability, the build out of the 2300 dwellings along with the other Strategic Allocations by the end of the Local Plan period 2031 will necessitate the construction of the already agreed mitigations. Therefore to avoid potentially abortive and disruptive roads works necessary to support the current adopted Local Plan urgent review will be required of any likely increase in housing numbers to determine what extra capacity might be necessary.

- **Chapter 8 (Phasing and Delivery)** – we note that page 65 states “*Infrastructure should be provided in a timely way to mitigate the impact of the development*”, with the development due to be built out between 2021 and 2037/2038. Please note that Highways England will need to have further separate discussions with Arun and Chichester District Councils in light of Chichester District Council’s revised A27 Chichester bypass mitigation proposals in terms of when the mitigation is delivered.

Accordingly, with the above matters taken into consideration Highways England recommends that this Master Plan for 4300 dwellings should not be adopted until such time as we have received and considered the relevant supporting information regarding the potential impacts to the highway network.

If you have any queries regarding this response please contact us at



Kind regards,

Elizabeth Cleaver, Assistant Spatial Planning Manager

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

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

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