

[REDACTED]

[REDACTED]

From: Bown, Kevin [REDACTED]
Sent: 26 October 2020 15:45
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Raymond Cole <Raymond.Cole@arun.gov.uk>
Cc: Planning SE [REDACTED]
Subject: FAO Case Officer Raymond Cole: Highways England response (our ref 89148#11492) re application LU/238/20/OUT Land west of Bridge Road Roundabout, Littlehampton, BN17 5DF

For attention of:	Raymond Cole
Site:	Land west of Bridge Road Roundabout, Littlehampton, BN17 5DF
Proposal:	Outline planning application with some reserved matters (Scale and Access to be reserved) for the demolition of existing treatment works & redevelopment of a former camp site to provide; up to 105 No. homes, 100sqm of A1 Shops use, 220sqm of A3 restaurant use & 420m of pontoons to provide approximately 32 leisure moorings along with associated landscaping, sluice gate, flood defence works & car parking highways works. This application also lies within the parish of Climping, may affect a Public Footpath & is a Departure from the Development Plan.
Your Reference:	LU/238/20/OUT
Highways England's Reference:	89148#11492

Dear Mr Cole,

Further to our email of 24 September, we have received and considered the email from the applicant's transport consultant below on 5 October.

While we do not fully agree with the trip distribution, having undertaken our own analysis, we consider that this development will have a small additional cumulative impact on the A27 junctions.

Therefore, our position is that as the Arun Local Plan is now adopted and contains agreed highway mitigations for the impacted A27 junctions resulting from the strategic development sites with funding to be provided from developer contributions, further housing development, even relatively small allocations, such as this, will have an additional cumulative impact on the A27 junctions, as well as the local highway network, and thus is likely to require further mitigation. Therefore, as this development is a Departure from the Development Plan, Arun District Council should request an appropriate proportional contribution from this particular site towards mitigation at the A27 junctions in Arun.

In view of its close proximity to the Littlehampton Economic Growth Area (LEGA) and Westbank strategic development site, a proportional contribution in line with this site is deemed appropriate.

Reference to the Enterprise Bognor Regis Transport Review 2017 report shows that the LEGA development is due to contribute £195,840 for the 1,000 houses there, equating to £195.84 per house.

Therefore, provided that Arun District Council collects a contribution of £20,563.20 (105 x £195.84) from this particular site towards further mitigation of the A27 junctions in Arun, Highways England is satisfied that the proposals would not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109) in this location and our formal HEPR response of No Objection is attached.

Please confirm that this is acceptable to the applicant/Council. If not, we will issue a revised HEPR to reflect any alternative equivalent mitigation that is agreed or our objection to the application.

If you or the applicant 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.

We are mindful that everyone is different and everyone's circumstances may be different. We are sharing the following NHS principles

- .. 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: Emily Scott-Holt [REDACTED]

Sent: 05 October 2020 12:35

To: Cleaver, Elizabeth [REDACTED]

Subject: RE: Highways England response: LU/238/20/OUT, Land west of Bridge Road Roundabout

Dear Elizabeth,

We are the transport consultants for the above listed site and have been forwarded on your comments (the email issued on the 24/09/2020).

We have confirmed that the Appendices to the Transport Assessment are available on the Arun planning portal, however it appears that the file names have altered as part of the uploading process which would explain their absence as part of the TA. For your ease and the avoidance of further confusion we have provided a copy the complete Transport Assessment (please download via the below link).

[REDACTED]

For ease of reference Appendix L of the Transport Assessment, the TRICS Output data, can be found at page 247. We are pleased to confirm that the TRICS data used complies with the listed requirements, being located outside of London but within England, in a comparable location to the development, of a similar size to the proposal, and with all datasets used being less than 10 years old.

The applied traffic distributions can be found in Appendix M (page 277) of the Transport Assessment. As detailed within the report traffic distribution to and from the site has been distributed as per the turning proportions for Broad Piece (also cul-de-sac off the Bridge Road Roundabout). As presented in Appendix M within any given 15 minute interval it has been forecast that a maximum of three vehicles would depart north onto the A259, and two vehicles would arrive from the A259 (north) to arrive at the site in the AM peak period. Similarly in the PM peak it has been forecast that up to five (but on average two) vehicles would arrive from, and two vehicles would depart to the northern arm of the A259. Vehicles routing to and from the A259 north would route via Wick Roundabout, where there is the potential to route via the A284 Lyminster Road to the A27 Crossbush Junction. Of course this traffic also has the choice of continuing on the A259 or some local traffic on Wick Street and therefore only a proportion will reach Crossbush.

If you still need this quantifying we can follow up with Guy Parfect and / or undertake further analysis ourselves. In the meantime if you have any questions or queries please do not hesitate to get in contact.

Kind regards,



Emily Scott-Holt | Principal Transport Planner

MOINT

Tuscany House | White Hart Lane | Basingstoke | RG21 4AF

[REDACTED]

From: Cleaver, Elizabeth [REDACTED]
Sent: 24 September 2020 18:30
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Raymond Cole <rj>
>
Cc: Planning SE [REDACTED]
Subject: Highways England response: LU/238/20/OUT, Land west of Bridge Road Roundabout

For the attention of: Raymond Cole

Planning Application No: LU/238/20/OUT

Site: Land west of Bridge Road Roundabout, Littlehampton, BN17 5DF

Proposal: Outline planning application with some reserved matters (Scale and Access to be reserved) for the demolition of existing treatment works & redevelopment of a former camp site to provide; up to 105 No. homes, 100sqm of A1 Shops use, 220sqm of A3 restaurant use & 420m of pontoons to provide approximately 32 leisure moorings along with associated landscaping, sluice gate, flood defence works & car parking highways works. This application also lies within the parish of Climping, may affect a Public Footpath & is a Departure from the Development Plan.

Highways England Ref: HAMIS 89148, #11207

Dear Mr Cole,

thank you for your notification of 10 September 2020 regarding the application referenced above.

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 strategic road network (SRN), in this case the A27.

We have reviewed the Transport Assessment submitted in support of the above development, and have the following queries and requests for further information:

- Appendix L TRICS outputs and all other Appendices do not appear to be in the document or with the application. We need to see the TRICS outputs to verify that the parameters selected are similar to the proposed site. In general we request sites in England only (excluding Greater London) with a similar size and location to the proposed site, that have been surveyed in the last 10 years.
- We would also like to understand the distribution of the 51 AM and 60 PM trips. We are particularly interested in the number that will travel north and impact at the A27 Crossbush Junction. Please can the applicant contact Guy Perfect at West Sussex County Council who has access to the strategic model supporting Arun's Local Plan which can be used to distribute the vehicle trips onto the network?

We require this further information in order to understand the potential impacts of the development. Currently there is insufficient information for us to be satisfied that the proposals will not materially affect the safety, reliability and/or operation of the SRN (the tests set out in DfT Circular 2/13 paragraphs 9 & 10 and MHCLG NPPF para 109). In any event, as this application is over and above the agreed Strategic Housing Allocations in the adopted Local Plan it would seem appropriate for the council to request a proportionate contribution towards the agreed Local Plan Highway mitigations.

I trust that the comment above are of assistance and would be grateful if you could pass the above comments to the applicant and their consultants for further consideration and reply. This email does not constitute a formal recommendation from Highways England.

Accordingly, we formally request that your authority refrains from determining this application (other than refusal) until such time as we have received and considered all the requested information. Once we are able to adequately assess the above and its potential impact on the SRN, we will provide you with our final formal response.

If, in the meantime, your authority wishes to determine the application, please let us know and we will provide you with a formal response based on the information available at that time.

We look forward to receiving the additional information in due course. If you have any queries regarding our response please contact us at [REDACTED]

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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Highways England Company Limited | General enquiries [REDACTED] National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |

<https://www.gov.uk/government/organisations/highways-england> [REDACTED]

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Developments Affecting Trunk Roads and Special Roads

Highways England Planning Response (HEPR 16-01)

Formal Recommendation to an Application for Planning Permission

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

To: Arun District Council (FAO Case Officer: Mr Raymond Cole)
planning.responses@arun.gov.uk

CC: [REDACTED]

Council's Reference: LU/238/20/OUT

Location: Land west of Bridge Road Roundabout, Littlehampton, BN17 5DF.

Proposal: Outline planning application with some reserved matters (Scale and Access to be reserved) for the demolition of existing treatment works & redevelopment of a former camp site to provide; up to 105 No. homes, 100sqm of A1 Shops use, 220sqm of A3 restaurant use & 420m of pontoons to provide approximately 32 leisure moorings along with associated landscaping, sluice gate, flood defence works & car parking highways works. This application also lies within the parish of Climping, may affect a Public Footpath & is a Departure from the Development Plan.

Highways England Reference: 89148#11492

Referring to the planning application referenced above received by Highways England on 10 September 2020, in the vicinity of the A27 near Littlehampton that forms part of the Strategic Road Network, notice is hereby given that Highways England's formal recommendation is that we:

a) offer no objection*

**on the basis that our position is that as the Arun Local Plan is now adopted and contains agreed highway mitigations for the impacted A27 junctions resulting from the strategic development sites with funding to be provided from developer contributions, further housing development, even relatively small allocations, such as this, will have an additional cumulative impact on the A27 junctions, as well as the local highway network, and thus is likely to require further mitigation. Therefore, as this development is a Departure from the Development Plan, Arun District Council should request an appropriate proportional contribution from this particular site towards mitigation at the A27 junctions in Arun.*

In view of its close proximity to the Littlehampton Economic Growth Area (LEGA) and Westbank strategic development site, a proportional contribution in line with this site is deemed appropriate.

Reference to the Enterprise Bognor Regis Transport Review 2017 report shows that the LEGA development is due to contribute £195,840 for the 1,000 houses there, equating to £195.84 per house.

Therefore, provided that Arun District Council collects a contribution of £20,563.20 (105 x £195.84) from this particular site towards further mitigation of the A27 junctions in Arun, Highways England is satisfied that the proposals would not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109) in this location.

Please confirm that this is acceptable to the applicant/Council. If not, we will issue a revised HEPR to reflect any alternative equivalent mitigation that is agreed or our objection to the application.

~~b/c/d not relevant to this application~~

Highways Act Section 175B (covering new access to the SRN) is not relevant to this application.¹

HIGHWAYS ENGLAND (“we”) have 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 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.

This represents Highways England’s formal recommendation (prepared by the Area 4 Spatial Planning Team) and is made available to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority disagree with any recommendation made under b), c) or d) above, the application must not be determined before they have:

- i) informed Highways England; and
- ii) consulted the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via

Signature:		Date: 26 October 2020
Name: Kevin Bown		
Position: Spatial Planning Manager		
		
Highways England: Bridge House, 1 Walnut Tree Close, Guildford, GU1 4LZ		

¹ Where relevant, further information will be provided within Annex