



From: Bowie, David [REDACTED]
Sent: 23 May 2022 12:47
To: Simon Davis <Simon.Davis@arun.gov.uk>

Subject: Y/3/22/OUT - Land West of Bilsham Road Yapton - FAO Simon Davis

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For the Attention of:	Simon Davis
Site:	Land West of Bilsham Road Yapton
Application	Y/3/22/OUT
Development:	Hybrid Application comprising of Full application for Phase 1 for 30 No residential dwellings, new access from Bilsham Road, public open space, landscaping, sustainable urban drainage and associated works; and Outline planning application for further phases of up to 110 No dwellings and associated infrastructure (with all matters reserved). This application is a Departure from the Development Plan and is in CIL Zone 3 and is CIL Liable as new dwellings.
National Highways Ref No:	93768 / #16847

Dear Simon,

Thank you for contacting National Highways (formerly Highways England) on the 13 May 2022 regarding the proposed development at the Land West of Bilsham Road, Yapton (Ref: Y/3/22/OUT).

We received further information from the applicant on the 21 March 2022 following our earlier questions regarding the detail of the Transport Assessment.

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.

As such, we will be concerned with plans or proposals that have the potential to impact on the safe, reliable and efficient operation of the SRN, in this case, particularly the A27/Yapton Lane junction.

We have reviewed the further information supplied in the Technical Note prepared in response to the actions raised within our NHPR dated 18 February 2022 and have set out below where information remains outstanding in order for us to fully assess the impacts on the Strategic Road Network (SRN).

Personal Injury Collision Analysis

Our current holding recommendation cites the following required action in relation to Personal Injury Collision Analysis data:

“ACTION: Personal Injury Collision analysis is required for the A27 Yapton Lane junction”.

The holding recommendation also states that this is to be undertaken for a five-year period.

We observe that you have provided a *summary* of accident data for a five-year period, citing data protection concerns as the reason for not providing the full details.

We request that you supply detail on the causation of the five identified accidents to validate the stated conclusion that the accidents were attributable to driver error rather than any concern regarding the highway layout of the junction contributing to safety issues. No personal data records need to be supplied alongside the causation factor. So you are aware 95% of all Road Traffic Accidents are as a result of driver error with the remaining 5% being shared equally to highway and vehicle defects. The purpose of supplying the data is to determine whether or not there are any common factors between each of the recorded accidents, be this causation factor, time, weather, lighting conditions, month, year, vehicle type, movement etc etc. Without a detailed analysis you are in no way able to determine whether or not an intensification of movements at the junction will give rise to an increase risk of accident occurrence.

ACTION: The applicant to provide the exact wording of the causation factor of accidents specified in the collision report identified at the A27 Yapton Lane junction.

A27/Yapton Lane Junction Modelling

As noted in our previous response detailed modelling of the A27/Yapton Lane junction is required to support the planning application to determine the potential impact of the proposed development on the junction operation. Our previous response identified the following action:

“ACTION: Calibrated and Validated base model to be provided for review to ensure that it is a fair representation of typical junction operating conditions during morning and evening peak hours.”

No detail on how the model has been validated to ensure that the model is a fair representation of typical peak junction operating conditions has been provided. This is required. Until such time you demonstrate that the model has been validated to observed conditions, we are unable to comment on the junction modelling results. To validate the base model, it is suggested that a comparison is made between the queue length data on the relevant approach arms of the junction and the right turn pocket with the baseline modelling results and if the base model is not accurately reflecting observed conditions, then the model should be calibrated and re-run. Use of queue length data from the Ford Airfield application (if available), as per the baseline traffic flows would be acceptable to serve this purpose.

ACTION: The applicant to detail the method taken to validate and if necessary, calibrate the base local junction model to reflect observed baseline conditions.

The A27/Yapton Lane junction model uses baseline traffic flows from the Ford Airfield planning application (Ref: F/4/20/OUT) and it is understood that 2018 baseline traffic surveys are upscaled to a 2021 baseline. The approach of using these traffic surveys is accepted in principle.

Committed Developments

We observe that you have provided a list of committed developments included within the assessment, together with trip distribution/assignment information for the A27/Yapton Lane junction.

We have examined your comments in relation to trip assignment for the Chichester area. As the alternative route you cite that avoids the A27/Yapton junction has a longer journey time by 2-3 minutes, we are unable to accept this point.

Additionally, the distribution/assignment of trips has been approved as part of the process of granting planning permission for the committed development sites and should therefore be assessed as per the outcome of Table 4.1 identified in your Technical Note, with the total traffic assigned to the North End Road/ Yapton Lane being 203 vehicles in the AM and 180 vehicles in the PM peak periods

ACTION: The applicant to align the volume of committed development trips routing via the A27/Yapton Lane junction to the distribution presented in Table 4.1 of the Technical Note.

Furthermore, we have undertaken a planning search which has identified a series of applications that have *not* been included in the committed development list factored within your junction modelling. These applications are detailed in the table below, alongside the number of dwellings or commercial floor area. These additional sites equate to a total of 177 dwellings and 3,785sqm of light industrial use.

Planning Application	No of dwellings/ sqm commercial	Location
Y/121/19/PL	11	The Steddles North End Road Yapton BN18 0DT
Y/74/17/RES	18	Land At Kings Close Yapton BN18 0EX
Y/32/17/OUT	19	Land at Southern end of Cinders Lane Yapton BN18 0JJ
BN/51/16/RES	107	Land at former Pollards Nursery Lake Lane Barnham
BN/57/19/RES	3,785sqm light industrial	Land East of Fontwell Avenue Fontwell Avenue Fontwell BN18 0SB
WA/23/17/OUT	22	Barnfield House Arundel Road Fontwell BN18 0SD

ACTION: For relevant scenarios, applicant to include the additional committed developments identified by us.

Sensitivity Test

As per previous correspondence from us on 30 March 2022, we request that a sensitivity test is run for junction model A27/Yapton Lane which includes current planning applications lodged before Y/3/22/OUT (including those going to Appeal) so we can understand the potential impacts of Y/3/22/OUT in the event that these are consented before the application currently under consideration.

ACTION: A sensitivity test of junction model A27/Yapton Lane needs to be run which includes current planning applications lodged before Y/3/22/OUT (including those going to Appeal) so we can understand the potential impacts of Y/3/22/OUT in the event that these are consented before the application currently under consideration.

Traffic Impact Assessment – Model Year Scenarios

In previous correspondence we requested the assessment scenarios are to include the following as a minimum in line with the requirements of DfT Circular 02/2013.

- Opening Year + Permitted development
- Opening Year + Permitted + Proposed development
- Review Period + Permitted + Local Plan development
- Review Period + Permitted + Local Plan + Proposed development

The opening year is the date at which the development first becomes available for occupation, unless agreed otherwise, but assuming the full development quantum.

The identified action was as follows:

“ACTION: Detailed junction assessments of A27/Yapton Lane junction, in line with guidance set out in DfT Circular 02/2013 to be provided for review”.

Regrettably, you have not presented an opening year assessment, and this therefore must be provided to align with the requirements of DfT Circular 02/2013. You will need to use an appropriate growth factor to scale up baseline traffic survey flows.

It is observed that you content that as the committed development includes all likely development to come forward by the time of the opening year of the development (suggested to be 2026), the 2021 scenario is effectively the opening year. However, TEMPRO or a similar method should be used to assess the background traffic growth and the committed developments can be subtracted from the growth assessment to avoid double counting whilst still accounting for development further afield.

ACTION: The applicant to present an opening year assessment of the A27/Yapton Lane junction in accordance with the required assessment years of DfT Circular 02/2013.

Growth Factors

TEMPRO growth factor calculations are required for the opening assessment year.

ACTION: The applicant to provide growth factor calculations for the opening assessment year.

Mitigation Scheme

As per previous correspondence, it must be noted that there is already a committed mitigation scheme for the A27/Yapton Lane junction, as shown on drawing number ITB11324-GA-014 Revision C. Once the detailed junction modelling has been updated considering the above actions, the results will inform our decision on whether any further mitigation is required as per our previous stance.

Conclusion

At this time given the outstanding information required, I attach our NHPR response recommending that planning permission should not be granted for a period of 3 months, expiring on **23 August 2022**. This is to allow time for the applicant to provide the further information set out in the attached NHPR. 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.

Please note I have copied this response to the applicants consultants for their consideration. If you have any questions regarding our response, please contact us at [REDACTED]

Kind regards,

David

David Bowie
Area 4 Spatial Planning Manager (Acting)

[REDACTED]
National Highways | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ
Web: <http://www.nationalhighways.co.uk>

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National Highways Limited | General enquiries: [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

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

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

To: Arun District Council FAO Simon Davis
planning.responses@arun.gov.uk

CC: [REDACTED]

Council's Reference: Y/3/22/OUT

Location: Land West of Bilsham Road, Yapton

Proposal: Hybrid Application comprising of: Outline planning application for further phases of up to 110 No dwellings and associated infrastructure (with all matters reserved) and Full application for Phase 1 for 30 No residential dwellings, new access from Bilsham Road, public open space, landscaping, sustainable urban drainage and associated works. This application is a Departure from the Development Plan and is in CIL Zone and is CIL Liable as new dwellings.

National Highways Ref: HAMIS 93768

Referring to the consultation on a planning application dated 24 January 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);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**

National Highways Planning Response (NHPR 21-09) September 2021

~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is/is not relevant to this application.¹

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: 23 May 2022
Name: Kevin Bown	Position: Area 4 Spatial Planning Manager
National Highways: Bridge House, 1 Walnut Tree Close, Guildford, GU1 4LZ	
[REDACTED]	

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

Annex A National Highways' 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.

Recommend that planning permission not be granted for a specified period: Reasons

National Highways recommends that planning permission is not granted for a period of three months expiring **23 August 2022**.

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 proposed development on the strategic road network. In particular, we have the following comments and actions for the applicant:

Personal Injury Collision Analysis

Our current holding recommendation cites the following required action in relation to Personal Injury Collision Analysis data:

"ACTION: Personal Injury Collision analysis is required for the A27 Yapton Lane junction".

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Conclusion

Our current position is that the impact of the proposed development 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, we recommend that planning permission not be granted for a period of three months from the date of this response to allow the applicant to resolve the outstanding matters.

This application has been assessed by the National Highways South East Region Spatial Planning Team. This NHPR form represents National Highways' formal recommendation regarding the application. It is copied to the Department for Transport as per the terms of our Licence.