

From: Franklin, Richard [REDACTED]
Sent: 04 January 2018 17:43
To: Michael Eastham; Planning.Responses
Cc: 'ppcplanner@btinternet.com'; Planning SE; Bown, Kevin; Bowie, David; Cleaver, Elizabeth
Subject: Update to Highways England response re. Outline planning application Y/49/17/OUT - Land at Street Buildings, North End Road

Dear Mr Eastham,

Further to our email below, I note that you sent a letter on 31st October 2017 requesting that Mr Collins (copied for expediency) coordinates with fellow landowners/developers in order to prepare a Masterplan to cover proposed residential development on land between Bonhams Field and Land at Street Buildings. I am just emailing to see whether this has been progressed?

We also note that an *"Addendum to the Design and Access Statement dated 7 July 2017"* prepared by Mr Collins was uploaded to the application website in December 2017. We have reviewed the document and have the following comments:

- Paragraph 2 states *"In the absence of an up to date adopted Local Plan and/or Neighbourhood Plan the relevant transport issues associated with this proposal need to be considered in the context provided by Framework Paragraph 32."* As previously outlined, Highways England is concerned about the development's impact on safety as well as capacity at the A27 / Yapton Lane junction, and a Transport Statement or Assessment has not been provided to demonstrate that the impact on safety and capacity is not severe. As such, our advice is that such an assessment is provided prior to further consideration of this application. This advice is given in accordance with Planning Practice Guidance to the NPPF Paragraph: 013 Reference ID: 42-013-20140306. It should also be noted that in the document *"The strategic road network - Planning for the future – A guide to working with Highways England on planning matters"*, paragraphs 100-102 outline that emerging Local Plans should also be taken into account.
- Paragraph 5 states *"The lack of need for any off site improvements to the existing Transport Infrastructure to accommodate this scheme is based on the view that the development would not generate significant amounts of movement that would result in any material impact on existing Transport infrastructure requiring mitigation."* However, as previously outlined, a proper Transport Statement or Assessment has not been provided to back up this view and our advice is that this should be provided. This advice is given in accordance with Planning Practice Guidance to the NPPF Paragraph: 014 Reference ID: 42-013-20140306
- Paragraph 7 states *"This addendum therefore provides the Stage 1 Road Safety Audit (RSA) and the TRICS Output data requested by the LHA."* (i.e. West Sussex County

Council). However, the document does not address Highways England's concerns as outlined in the email below and attached.

- Paragraph 9 incorrectly applies a 30% reduction to the trips in Table 1. The trips in Table 1 are not person trips they are already vehicle trips.
- Paragraph 10 states *"In our submission increases of this magnitude will not lead to any material impact on the local transport network or junctions requiring mitigation..."*. However, a Transport Statement or Assessment has not been provided within the submitted information to back up this statement.

Therefore, our initial substantive response remains as outlined previously - i.e. a Transport Statement or Assessment has not been provided to demonstrate that the development will not result in a severe impact on the A27 / Yapton Lane junction (which should consider safety as well as capacity in accordance with the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32). As such, Highways England's advice is to recommend that the application should not be determined (other than a refusal) until such time as the required information is provided and Highways England given opportunity to consider and make its final substantive response.

Regards,

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

Richard Franklin

Highways England Company Limited | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ | Registered in England and Wales No. 9346363

From: Franklin, Richard

Sent: 11 September 2017 10:57

To: 'paul collins'

Cc: Planning SE; 'Neil Crowther'; 'David Innes'; 'Michael Eastham'; 'Simon.Davis@arun.gov.uk'; Bown, Kevin; Bowie, David; Cleaver, Elizabeth

Subject: FAO Mr Collins: Highways England response to emails of 23, 30 and 31 August 2017 re Outline planning application Y/49/17/OUT - Land at Street Buildings, North End Road

Dear Mr Collins,

Application: Arun District Council Y/49/17/OUT

Location: Land at Street Buildings, North End Road, Yapton, BN18 0DT

Proposals: Outline application with some matters reserved for the demolition of all existing structures & redevelopment of the site with up to 45 dwellings (30% affordable (up to 14) & 0.3 hectares of landscaped open space with vehicular access from Maypole Lane & pedestrian/cycle access only from North End Road. This application is a Departure from the Development Plan & may affect the setting of a listed building.

Highways England Ref: 78566

Thank you for your emails of 23, 30 and 31 August 2017, the contents of which are noted.

However, we also note that a Transport Statement or Assessment has still not been provided in support of the application that assesses the cumulative impact of the proposed development, in conjunction with all other allocated, permitted and/or relevant proposed development, on the A27 Trunk Road, as requested in our email of 9th August 2017 as attached.

As always, Highways England needs to be as certain as possible that any adverse impacts of development on the SRN can be identified and then, as appropriate, either be accommodated safely within the operational capacity of its road network; or, where not achievable, suitable deliverable highway improvements are provided as part of development. In this respect, we are aware that the A27 / Yapton Lane junction is a sensitive location from our knowledge and experience of the SRN, and thus we must make sure that the operation and safety of the junction is protected in response to both individual and cumulative impacts.

Therefore, I draw your attention again to DfT circular 2/2013 *'The Strategic Road Network and the Delivery of Sustainable Development'*, and in particular para 22, noting that this proposed development currently falls outside of the emerging Arun Local Plan (which will be subject to examination in public in later this month) and hence requires a full C2/13 compliant impact assessment to be conducted. Until such an assessment is provided and the impacts are known and mitigations determined, it is impossible to say for sure whether or not these are deliverable.

As such, as the required assessment has not been provided to date, Highways England has no option but to recommend that the application should continue not be determined (other than a refusal) until it is provided. This is consistent with other applications that we are considering within the area and elsewhere.

I trust that this is of assistance and if you require further information please contact us accordingly.

Regards,

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

Richard Franklin

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

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For the attention of: Mr S Davis

Planning Application No: Y/49/17/OUT

Site: Land at Street Buildings, North End Road, Yapton, BN18 0DT.

Development: Outline application with some matters reserved for the demolition of all existing structures & redevelopment of the site with up to 45 dwellings (30% affordable (up to 14) & 0.3 hectares of landscaped open space with vehicular access from Maypole Lane & pedestrian/cycle access only from North End Road. This application is a Departure from the Development Plan & may affect the setting of a listed building.

Highways England Ref: HAMIS 78566.

Dear Mr Davis,

Thank you for your consultation of 21 July 2017 regarding the above application.

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 the A27.

Having examined the above application, we note that a supporting Transport Statement or Transport Assessment has not been provided. This application proposes an additional 45 dwellings on top of nearby development (108 at the neighbouring Stakers Farm site with 38 approved with a further 70 proposed) that is a departure from the Development Plan. As such, Highways England is concerned about the potential cumulative impact of these developments as the proposed agreed improvements on the A27 as part of Arun's emerging Local Plan do not take account of these developments. Accordingly, we consider that there is currently insufficient information provided by the applicant on which to base an informed decision 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:

- As the proposal falls outside of the current Development Plan, it was not considered as part of the Transportation Assessment which supports the Strategic Sites being promoted in the emerging Local Plan. The Local Plan is now sufficiently progressed within the public domain such that the applicant needs to consider this proposed site in relation to the cumulative impacts of the emerging Local Plan proposals at the end of the emerging Local

Plan period. In addition, as there are other applications currently within the planning system which have yet to be determined or are already committed, these also need to be accounted for as they too fall outside of the Strategic Allocations in the emerging Local Plan. This accords with the policy set out in Department for Transport Circular 02/2013;

- Highways England require the provision of a supporting Transport Statement/Transport Assessment in support of the planning application to be able to assess the development's impact on the Strategic Road Network (SRN). In particular, the A27 / Yapton Lane junction and associated right turn lane is already stressed and therefore there is a need to demonstrate that the proposed development will have no detrimental impact on junction operation, or where this is not the case, provide appropriate mitigation. The cumulative impacts will require assessment at the end of the Local Plan period 2031 with a view to a 'no worsening' of the impacted junction (no worse in terms of delay, queue length, RFC's and safety) compared with the development proposals and mitigation proposed as part of the emerging Local Plan – it should be noted that TEMPRO is not considered representative for local traffic growth arising from residential development in this regard.

Until such time as sufficient information has been provided to enable Highways England to obtain a clear view of the cumulative traffic impacts of this proposed development on the SRN, our informal advice is that you should not approve this application because of the potential for severe harm to the Strategic Road Network.

I trust that the above is of assistance and would be grateful if you could pass the above comments to the applicant and his consultants for further consideration and reply. This email does not constitute a formal recommendation from Highways England. We will provide formal recommendation later when we can be confident that the application is in its final form. To assist us with this we would be grateful if you would advise when you expect to determine the application.

Regards,

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

Richard Franklin

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

Sent: 21 July 2017 09:18

To: Planning SE

Subject: #3293 Planning Consultation on: Y/49/17/OUT

To: **Highways England**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town & country Planning (Development Management Procedure) (England) Order 2015 -

Article 5 - Articles 16 & 18 Consultation before the grant of permission

Outline Consent

APPLICATION NO: Y/49/17/OUT

Registered: 21st July

2017
Site Address: Land at Street Buildings North End Road Yapton BN18 0DT
Grid Reference: 497641 103557
Description of Works: Outline application with some matters reserved for the demolition of all existing structures & redevelopment of the site with up to 45 dwellings (30% affordable (up to 14)) & 0.3 hectares of landscaped open space with vehicular access from Maypole Lane & pedestrian/cycle access only from North End Road. This application is a Departure from the Development Plan & may affect the setting of a listed building.

The Council have received the above application. I shall be pleased to receive any observations you may wish to make.

[Click here to view the application details](#)

Should you have any comments to make, these should be sent by replying to this email by 24-AUG-17.

You can also monitor the progress of this application through the Council web site:

www.arun.gov.uk/planning

Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.

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 Mr S Davis who can be contacted on telephone number 01903 737874.

Regards
Planning Officer

consultee_email

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