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From: Angela Broughton [REDACTED]
Sent: 29 October 2020 14:06
To: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: Y/98/20/PL : Bonhams Field: Transport Assessment

Dear Mr. Davis,

In recent correspondence you kindly referred me to the Council's list of planning application validation requirements.

One of the items listed as being a requirement of a full planning application (major development of over 20 units) is a Transport Assessment (TA). This means the applicant MUST provide such a TA for the application to be validated and considered.

The current TA submitted with the planning application does not meet the requirement of the Council's own validation guidance or national government guidance. I set this out below.

The Council's validation requirement clearly states that a TA should address the following issues in relation to the proposed development:

"reducing the need to travel, especially by car – ensure, at the outset, that thought is given to reducing the need to travel; consider the types of uses (or mix of uses) and the scale of development in order to promote multipurpose or linked trips; promote accessibility by all modes of travel, in particular public transport, cycling and walking;

assess the likely travel behaviour or travel pattern to and from the proposed site; and develop appropriate measures to influence travel behaviour;

provide accurate quantitative and qualitative analyses of the predicted impacts of residual trips from the proposed development and ensure that suitable measures are proposed to manage these impacts;

and ensure as much as possible that the proposed mitigation measures avoid unnecessary physical improvements to highways and promote innovative and sustainable transport solutions. However, where innovative and sustainable transport solutions do not fully mitigate the adverse impact of personal travel from a development, there may be a necessity to provide highway infrastructure improvements to deal with the residual development impacts."

The applicant is then referred to a linked website setting out what a Transport Assessment should include in more detail.

This Guidance states: "*Transport Assessments are thorough assessments of the transport implications of development,*" and then provides the following detail:

"Key issues to consider at the start of preparing a Transport Assessment or Statement may include:

- the planning context of the development proposal;*
- appropriate study parameters (ie area, scope and duration of study);*
- assessment of public transport capacity, walking/cycling capacity and road network capacity;*
- road trip generation and trip distribution methodologies and/ or assumptions about the development proposal;*
- measures to promote sustainable travel;*
- safety implications of development; and*
- mitigation measures (where applicable) – including scope and implementation strategy."*

"The scope and level of detail in a Transport Assessment or Statement will vary from site to site but the following should be considered when settling the scope of the proposed assessment:

- information about the proposed development, site layout, (particularly proposed transport access and layout across all modes of transport)*
- information about neighbouring uses, amenity and character, existing functional classification of the nearby road network;*
- data about existing public transport provision, including provision/ frequency of services and proposed public transport changes;*
- a qualitative and quantitative description of the travel characteristics of the proposed development, including movements across all modes of transport that would result from the development and in the vicinity of the site;*
- an assessment of trips from all directly relevant committed development in the area (ie development that there is a reasonable degree of certainty will proceed within the next 3 years);*
- data about current traffic flows on links and at junctions (including by different modes of transport and the volume and type of vehicles) within the study area and identification of critical links and junctions on the highways network;*
- an analysis of the injury accident records on the public highway in the vicinity of the site access for the most recent 3-year period, or 5-year period if the proposed site has been identified as within a high accident area;*
- an assessment of the likely associated environmental impacts of transport related to the development, particularly in relation to proximity to environmentally sensitive areas (such as air quality management areas or noise sensitive areas);*
- measures to improve the accessibility of the location (such as provision/enhancement of nearby footpath and cycle path linkages) where these are necessary to make the development acceptable in planning terms;*
- a description of parking facilities in the area and the parking strategy of the development;*
- ways of encouraging environmental sustainability by reducing the need to travel; and*
- measures to mitigate the residual impacts of development (such as improvements to the public transport network, introducing walking and cycling facilities, physical improvements to existing roads.*

In general, assessments should be based on normal traffic flow and usage conditions (eg non-school holiday periods, typical weather conditions) but it may be necessary to consider the implications for any regular peak traffic and usage periods (such as rush hours). Projections should use local traffic forecasts such as TEMPRO drawing where necessary on National Road Traffic Forecasts for traffic data."

The Government Guidance concludes by re-stating: *"It is important to give appropriate consideration to the cumulative impacts arising from other committed development (ie development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next 3 years)."*

What is very clear in all this guidance on Transport Assessments is that an applicant (and a Council) cannot rely on a previous and out of date TA, prepared in 2016 for a different planning application, and not even submitted with this application.

The submitted TA for this planning application for 75 houses only deals with the impacts of the additional 19 housing units proposed (well actually only 15 because the previous TA in December 2016 was based on 60 properties), and there is absolutely no assessment of the cumulative impact on Main Road and the rest of the local and strategic traffic network of the 700 plus additional homes approved in the area since December 2016.

The submitted TA for this application also incorrectly states that the previous TA was prepared by Iceni Projects in December 2018, and not the actual year of 2016 (para 5.2). Is this just a typo or a deliberate misdirection?

The submitted TA clearly fails to meet the requirements of a proper Transport Assessment as set out above.

I would be very grateful of your confirmation that the applicant's will be required to submit a full and up-to-date Transport Assessment, as is required, before this application can be properly considered and determined.

Please can you also place this as another objection to the planning application as again I think it is too large for me to do it.

Regards

Angela Broughton