



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
PlanningSE@highwaysengland.co.uk

To: Adur & Worthing Councils (FAO: Gary Peck)
planning@adur-worthing.gov.uk
gary.peck@adur-worthing.gov.uk

CC: spatialplanning@highwaysengland.co.uk

Council's Reference: AWDM/1264/20

Location: Land North West Of Goring Railway Station, Goring Street, Worthing, BN12 5BT

Proposal: Mixed use development comprising up to 475 dwellings along with associated access, internal roads and footpaths, car parking, public open space, landscaping, local centre (uses including A1, A2, A3, A4, A5, D1, D2, as proposed to be amended to use classes E, F and Sui Generis) with associated car parking, car parking for the adjacent railway station, undergrounding of overhead HV cables and other supporting infrastructure and utilities (Outline with all matters reserved).

Highways England Reference: 90124

Referring to the planning application referenced above received by Highways England on 22 December 2020, notice is hereby given that Highways England's formal recommendation is that we:

- ~~a) offer no objection~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);

~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~


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 5 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 transportplanning@dft.gov.uk.

Signature: 	Date: 10 March 2021
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

Annex A - Further Assessment Required

We were originally consulted on 22 December 2020 and provided a response on 12 January 2021 setting out various requirements. To date, we have not received any further information and therefore our concerns are and remain as follows (the headings in bold relate to the relevant chapters within the Transport Assessment. Text underlined represents required actions):

4. Baseline Highway Conditions

- The PIA analysis should be extended to cover the A27/A280 junction

6. Multimodal Trip Generation

- Paragraph 6.9 references 'Method of Travel to Work' data from the 2011 Census for the Worthing 013 Middle Layer Super Output Area (MSOA). However, the site is located in Worthing 006 Middle Layer Super Output Area (MSOA) as outlined in paragraph 7.13. Therefore, please can clarification be provided?

7. Highway and Transport Impact Assessment

- Paragraph 7.2 states that 505 units has been assessed – please can clarification be provided regarding the level of units assessed as chapter 6 was based on 475? (if 505 units has been assessed, a further table showing the total development trips based on 505 units is required)
- Table 7.3 – Highways England requests that a 'Trunk' road TEMPro growth rate is used for the A27/A280 junction flows
- Table 7.13 – the "2031 Future Year + Committed Development + Development + Sensitivity scenario" in Table 7.20 of the Land North of Water Lane Transport Assessment is considered to be the base scenario in 2031. However, the 2033 base scenario in Table 7.13 shows that the performance of the A280 North arm in the AM is better in 2033 compared to the 2031 Land north of Water Lane scenario – please can this be explained?
- Table 7.14 – the "2031 Future Year + Committed Development + Development + Sensitivity scenario" in Table 7.21 of the Land North of Water Lane Transport Assessment is considered to be the base scenario in 2031. However, the 2033 base scenario in Table 7.14 shows that the performance of the following arms are better in 2033 compared to the 2031 Land north of Water Lane scenario – please can this be explained?:
 - A280 Long Furlong (AM)
 - A280 south (AM and PM)
 - A27 offslip (AM)
 - Arundel Road (AM)
- Table 7.14 – comparison of the 2033 Base with 2033 Base + Development scenarios shows the A27 offslip performs better in the AM with the development – please can clarification be provided as this is not logical?
- Paragraph 7.57 references mitigation at the A280 / A27 / Titnore Lane roundabout in relation to Table 7.15, yet Table 7.15 is labelled "A280 - A27 - Arundel Road – mitigation", therefore please can clarification be provided?

Appendix 14

- Highways England disagrees with some of the route assignment as follows:
 - all Chichester trips should use Titnore Lane / A27 (W)

- all Horsham trips should use Titnore Lane / A280 (N)
- The final page appears to show trips based on a development of 600 units, which differs from the 475 in chapter 6 and 505 referred to in chapter 7 and therefore further clarification is requested

Appendix 16

- Figure 11 (2033 Base + Committed Development Flows AM Peak (08:00 - 09:00)) has been compared to the 2031 flows in TF23 in the Land North of Water Lane Transport Assessment. The tables below show the Land North of Water Lane Transport Assessment flows that are higher than the base flows in this TA, which requires clarification as the 2033 flows should be higher:

Southern Roundabout AM		
From/To	A280 North	A280 South West
A27 Off-slip		323
A280 South West	823	

Northern Roundabout AM		
From/To	A280 North	A27 On-slip
A280 South	817	387

- Figure 12 (2033 Base + Committed Development Flows PM Peak (17:00 - 18:00)) has been compared to the 2031 flows in TF24 in the Land North of Water Lane Transport Assessment. The tables below show the Land North of Water Lane Transport Assessment flows that are higher than the base flows in this TA, which requires clarification as the 2033 flows should be higher:

Southern Roundabout PM		
From/To	A280 North	A280 South West
A280 North		663
A27 Off-slip		340
A280 South West	511	

Northern Roundabout PM		
From/To	A27 On-slip	
A280 South	247	

- The development distribution flow diagram (Figure 13) does not reflect the distribution in Appendix 14 at the A27/A280 junction. Therefore, please can the flow diagrams be updated or clarification be provided?
- The total development flows in Figure 20 and Figure 21 do not appear to match those in Table 6.9 and therefore clarification is required.

Based on the above comments, Highways England has concerns regarding the accuracy of the modelling at the A27/A280 junction and therefore it is requested that the trip generation, distribution, traffic flow diagrams and junction modelling are updated in line with the above comments and resubmitted.

Conclusions

At present, the application has not demonstrated that it will not have a detrimental impact on the safe and efficient operation of the Strategic Road Network (the tests set out in DfT Circular 2/2013, particularly paragraphs 8 to 11, and MHCLG NPPF2019, particularly paragraphs 108 to 111).

As such, the application is currently contrary to national policy.

Therefore, our recommendation to the Council is that you refrain from determining the application (other than a refusal if Members so wish) ahead of these matters being addressed and resolved.

We note that the Officer's Report to the 10 March 2021 Planning Committee, having acknowledged our and the County highway authority's concerns has recommended refusal, including on the ground that

03 The Local Planning Authority is not satisfied that adequate information has been submitted to demonstrate that the proposal is acceptable in terms of access and would not therefore give rise to increased hazards to highway users. The proposal therefore fails to comply with the relevant guidance of the National Planning Policy Framework which requires that the potential impacts of development on transport networks can be addressed in development proposals

04 The Local Planning Authority does not consider that adequate information has been submitted to demonstrate that the mitigation proposed is acceptable in terms of its impact on the local highway network including (but not limited to) the Goring Crossroads and A259/ Goring Way/ Aldsworth Avenue junctions. As such it has not been demonstrated that the development would not have a severe impact on the local highway network and therefore the proposal fails to comply with paragraph 109 of the National Planning Policy Framework 2019.

We concur with the sentiments expressed but would suggest the inclusion of specific reference to the Strategic Road Network.

Should the Council wish to ignore our recommendation, then in accordance with the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, the Council must inform us and consult the Secretary of State and await his decision prior to the issuing of any permission.

In the meantime, we stand ready to work with all parties regarding the production, assessment and agreement regarding the required evidence and any required mitigation.