PROPOSED NEW DEVELOPMENT OF UP TO 475 RESIDENTIAL DWELLINGS AND ASSOCIATED OPEN SPACE, ON LAND NORTH WEST OF GORING RAILWAY STATION, GORING BY SEA WORTHING, WEST SUSSEX

HIGHWAYS AND TRANSPORTATION

REBUTTAL PROOF OF EVIDENCE OF

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Principal Transport Planner

West Sussex County Council

Worthing Borough Council ref: AWDM/1264/20.
Planning Inspectorate ref: Appeal Reference: APP/M3835/W/21/3281813

January 2022

1. INTRODUCTION

1.1. This rebuttal addresses points raised in evidence in relation to highways and transportation by Mr Wares of Milestone Transport Planning on behalf of Persimmon Homes Thames Valley, with reference to the proposed development at Land North West of Goring Railway Station.

1.2. I will also use this rebuttal to correct errors in my own evidence, whereby I notice that I had utilised incorrect VISSIM model run results. I will make it clear which paragraphs/tables of my initial evidence I no longer rely on and the necessary amendments.

1.3. In this rebuttal I do not respond to each and every point on which I disagree, but rather I have sought to respond to those issues where I consider the Inspector would be assisted by a specific response. The fact that I have not responded to every point raised by Mr Wares is not an indication that I agree with those points.

2. CORRECTION TO MY OWN EVIDENCE

2.1. In preparing my original Proof of Evidence I, in error, utilised an earlier VISSIM model run provided by the Appellant on the 25/11/2021 rather than the latest and correct run provided on the 14/12/2021. The correct model runs were however included within my original Proof at appendix 3.

2.2. The model run provided on the 14/12/2021 includes the amendments suggested by the Stage 1 Road Safety Auditor and is the correct '*with development + mitigation scenario'* to be utilised when assessing the appeal. By using the 14/12/2021 data, Table 6 and para 5.3.10 of my Proof of Evidence were affected and I set out below the changes. Within para 5.3.11 of my original proof I also incorrectly referenced the figures provided in Table 4 of my original proof, and I set out the correct figures below.

~~Table 6 within Proof of Evidence~~

2033 AM PEAK QUEUE COMPARISON					
NO.	ARM	BASE		WITH MITIGATION	
		N AVG [veh]	N MAX [veh]	N AVG [veh]	N MAX [veh]
8	Goring Way (W)	33	67	54	100
9	Aldsworth Avenue	7	22	6	23
10	A259 Goring Way (E)	12	50	9	45
11	A259 Goring Street N	57	75	47	66
12	Ardingly Drive	1	9	1	11

2033 PM PEAK QUEUE COMPARISON					
NO.	ARM	BASE		WITH MITIGATION	
		N AVG [veh]	N MAX [veh]	N AVG [veh]	N MAX [veh]
8	Goring Way (W)	35	79	7	28
9	Aldsworth Avenue	15	33	14	30
10	A259 Goring Way (E)	82	172	84	171
11	A259 Goring Street N	1	26	3	37
12	Ardingly Drive	0	4	0	4

Correct Table 6

2033 AM PEAK QUEUE COMPARISON					
NO.	ARM	BASE		WITH MITIGATION	
		N AVG [veh]	N MAX [veh]	N AVG [veh]	N MAX [veh]
8	Goring Way (W)	33	67	56	100
9	Aldsworth Avenue	7	22	6	26
10	A259 Goring Way (E)	12	50	9	49
11	A259 Goring Street N	57	75	49	66
12	Ardingly Drive	1	9	3	21

2033 PM PEAK QUEUE COMPARISON					
NO.	ARM	BASE		WITH MITIGATION	
		N AVG [veh]	N MAX [veh]	N AVG [veh]	N MAX [veh]
8	Goring Way (W)	35	79	7	26
9	Aldsworth Avenue	15	33	12	31
10	A259 Goring Way (E)	82	172	70	161
11	A259 Goring Street N	1	26	2	36
12	Ardingly Drive	0	4	1	4

~~5.3.10 Utilising the VISSIM base year average, journey times between the A259 Littlehampton and the A259 Goring Way (East) would increase in the AM peak from 933 seconds to 1087 seconds an increase of 154 seconds and in the PM peak from 348 seconds to 612 seconds an increase of 264 seconds~~.

5.3.10 Utilising the VISSIM base year average, journey times between the A259 Littlehampton and the A259 Goring Way (East) would increase in the AM peak from 933 seconds to 1142 seconds, an increase of 209 seconds, and in the PM peak from 348 seconds to 580 seconds, an increase of 233 seconds.

~~5.3.11 It is the view of the local highway authority that the increase in average queues on an arm that is already predicted to show a high level of queuing vehicles, of 107 vehicles in the AM peak and 64 in the PM peak and the anticipated additional delays for journeys utilising the A259 Littlehampton Road would constitute a severe impact in line with NPPF para 111. The delays in combination with approaches to the A259/ Goring Way / Aldsworth Avenue would significantly affect journeys on the key West to East corridors in the peak periods and would not be sufficiently offset by the benefit of the additional sustainable transport offered by the applicant linking the site to Northbrook College.~~

5.3.11"It is the view of the local highway authority that the increase in average queues on an arm that is already predicted to show a high level of queuing vehicles, of 102 vehicles in the AM peak and 58 in the PM peak and the anticipated additional delays for journeys utilising the A259 Littlehampton Road would constitute a severe impact in line with NPPF para 111. The delays in combination with approaches to the A259/ Goring Way / Aldsworth Avenue would significantly affect journeys on the key West to East corridors in the peak periods and would not be sufficiently offset by the benefit of the additional sustainable transport offered by the applicant linking the site to Northbrook College."

2.3. The amended queue length information shown within table 6 does not alter the conclusions drawn in paras 5.42-5.4.4 of my original proof. The updated AM figures show a small increase in average and maximum queues on all arms (average queues increase on Goring Way (West) A259 Goring Street and Ardingly Drive and maximum queues increase on Aldsworth Avenue, A259 Goring Way (East) and Ardingly Drive). Within the PM peak the A259 Goring Way (East) approach average queue would be reduced by 12 vehicles and the maximum queue by 11 vehicles. This would result in 17% and 6% reductions, but significant queues would remain in both the AM and PM peak. The reduced queue length means that rather than the queue for A259 Goring Way (East) extending for 1km (as stated in para 5.4.3 of my original proof), the queue would extend for 966m. The junctions affected by the queues would remain unchanged. The queue length for Goring Way (West) would remain the same at 600m.

2.4. The utilisation of the 14/12/2021 journey time data does not alter the conclusions set out in my original proof at para 5.3.10, and if anything shows a worsening of journey times in the AM peak between the A259 Littlehampton and the A259 Goring Way (East).

2.5. The changes to the figures utilised in 5.3.11 of my original proof would not alter the conclusions set out in 5.3.11. The correct figures result in a reduction of 5 vehicles in the AM peak and 6 in the PM peak compared to the figures in my original proof, and an increase of 102 (AM) and 58 vehicles (PM) when compared to the Local Plan TA baseline would still be considered severe.

3. MR WARES' PROOF

3.1. In tables 3.3-3.6 of his Proof, Mr Wares provides detail of the impact of the development against a base scenario that includes the draft local plan sites but without the highway improvements at Goring Crossroads identified within the Worthing Local Plan Transport Study 2018. As identified at paragraph 5.3.2 of my Proof of Evidence, the Appellant's approach assumes that highway improvements at Goring Crossroads will only be delivered through the appeal scheme. I do not consider that assumption to be robust.

3.2. The 2018 Transport Assessment for the emerging Local Plan identifies a number of road improvements that are proposed to mitigate the impact of the Local Plan allocations. Section 7.2 of the Local Plan TA notes that the Goring Crossways roundabout (A259/A2032) would operate over capacity in the forecast year scenario with the inclusion of the Local Plan allocations. As such, it proposes a re-design of the roundabout to accommodate the additional flow associated with the Local Plan and explains, in section 7.3 that the improvements identified in the TA will primarily be funded through section 106 obligations and CIL. The Council's Infrastructure Delivery Plan (IDP) 2021 recognises that future residential growth will place increased demands on infrastructure and explains that the purpose of the IDP is to ensure that the emerging Local Plan can be supported by necessary infrastructure provision. The IDP informs the Infrastructure Investment Plan which identifies projects on a three-year rolling programme that should be prioritised to receive CIL funding. The IDP identifies improvements to the Goring Crossways roundabout as 'critical'. Policy DM9 of the IDP provides that (a) development will be required to take into account existing infrastructure and to provide or contribute to the provision of infrastructure made necessary by development and (b) the Council will work with partners, including infrastructure providers, to ensure that the necessary physical,

economic, social and environmental infrastructure is provided. The current Infrastructure Investment Plan covers the period 2020 – 2023. It notes that a number of emerging plans, including the Worthing Local Plan, are identifying new infrastructure projects that may be prioritised in the next funding period (2023 – 2026). Given that improvements to the Goring Crossways roundabout are identified as necessary in the Local Plan TA and identified as critical in the IDP, I consider that there is every prospect that those works will be prioritised for delivery in the next Infrastructure Investment Plan. I consider that those improvements are likely to come forward regardless of whether the appeal scheme is allowed.

3.3. I attach at Appendix A plans for the Goring Crossroads that show the average and maximum queue lengths of the VISSIM modelling (for both the appellant's base scenario and the development + mitigation scenario) along with the queue lengths for sensitivity test 2. These show that in the AM peak the appeal scheme would reduce average and maximum queue lengths on the Titnore Lane, A2032 Littlehampton Road and A259 Goring Way approaches when compared to the submitted base scenario. The appeal scheme would also reduce average and maximum queue lengths in the PM peak on the Titnore Lane and A2032 Littlehampton Road approaches. However, as can be seen from the comparison with sensitivity test 2, the benefits relied upon by the Appellant would be achieved regardless of the appeal scheme because of the improvements proposed to the Goring Crossroads roundabout in the Local Plan TA. The benefits from the Local Plan TA mitigation would be achieved without the level of increased queues on the A259 Littlehampton Road associated with the appeal.

3.4. Within paragraph 3.17 Mr Wares identifies that the "*potential for increased congestion arising as a consequence of the planned development only arises during the weekday AM peak hour period and is therefore of a very limited duration*". Tables 3.5 and 3.6 of Mr Wares' Proof identify an adverse impact on the A259 Littlehampton Road approach to the Goring Crossroads in the PM peak and this impact is acknowledged at paragraph 4.3 of Mr Wares' proof. In accordance with 5.3.10 and 5.3.11 of my Proof of Evidence (as revised at paragraph 2.2 above), in the PM peak the average queues would increase by 58 vehicles and journey times would increase by 233 seconds between the A259 Littlehampton Road and A259 Goring Way (East). This increase is considered to result in a severe impact.

3.5. At Paragraph 2.24 Mr Wares correctly identifies that National Highways have withdrawn their objection (subject to conditions) on the application and its impacts on the A27. However, Mr Wares also identifies in para 3.20 that traffic could reroute away from the study area. However, he has not provided any assessment of the likely impacts of traffic re-routing away from the A259 to avoid congestion.

3.6. At appendix B I have provided Google route mapping information that shows there are limited alternative routes that avoid the A259 and the study area modelled by the appellant. When travelling from Littlehampton to Worthing, the only alternative route avoiding the study area is via the A27. Ferring has limited access onto the A259, and no junctions allowing right hand turns across the A259 to gain through access for all users. When travelling from Worthing to Littlehampton the alternatives to the study area are via the A27 or via Marine Drive/Sea Lane. The Appellant has provided no assessment of the likely impacts of traffic re-routing to use the A27 or Marine Drive/Sea Lane.

3.7. The West Sussex Transport Plan, 2011-2026 (CDH1, page 66) identifies that congestion affects many parts of the Borough, with particular problems along the A27. Since its publication, no schemes to address these concerns have been delivered. National Highways are reviewing potential schemes as part of the Route Investment Strategy 2 programme but as yet there are no committed schemes. Therefore, the potential for trips to redistribute without adverse consequences is limited and un-tested.

3.8. In paragraph 4.3 of his Proof, Mr Wares identifies that the potential for increased congestion arises on just 3 of the approaches (A259 Littlehampton Road, The Strand and A259 Goring Way (West)) in the AM peak and on one approach in the PM peak (A259 Littlehampton Road). As per revised paragraph 5.3.11 and paragraph 5.4.4 of my original Proof, I am of the opinion that the increase in average queues on the A259 Littlehampton Road of 102 vehicles (AM peak) and 58 vehicles (PM peak) when compared to the Local Plan sensitivity 2 baseline or of 36 vehicles (AM) and 55 vehicles (PM) when compared to the appellant's own base would constitute a severe impact on this arm and the Goring Crossways junction.

3.9. When assessing the junctions as a whole, I consider that the adverse impacts on the approaches identified by Mr Wares outweigh the benefits on the Titnore Lane approach in the AM and PM peak, the benefits on the A2032 Littlehampton Road and

Goring Way (West) approaches in the PM peak and minor benefits on other approaches. Overall, despite these benefits, the impact of the appeal scheme is severe.

3.10. The Appellant's position appears to be that while some junctions are currently operating at or close to capacity, the additional traffic generated by the appeal scheme is relatively modest and not, of itself, severe. However, I note that paragraph 111 of the NPPF provides that scheme may be refused on highway grounds where "*the residual cumulative impacts on the road network would be severe".* This does not require a decision-maker to consider the traffic associated with the appeal scheme in isolation, but rather to consider the residual cumulative impacts of the appeal scheme's traffic in the context of the operation of the existing highway network.

3.11. Relevant to this point is the appeal decision (Appeal Ref: APP/J2210/W/18/3216104) in respect of Land off Popes Lane, Sturry, Kent CT2 0JZ (Appendix C). In that case, the proposed development was forecast to generate 79 traffic movements in the AM peak hour and 72 in the PM peak. The Inspector recognised that "*These are not large numbers. But in a situation where some junctions are already under pressure, a relatively small increase may be significant, especially where the effect would be to push some junctions closer to their capacity, or beyond. And in any event, the NPPF makes it clear that traffic impacts should be considered on a cumulative basis, and that a severe cumulative impact may amount to grounds for refusal of permission."* The Inspector found that a junction with queues of 30 vehicles in the PM peak and an RFC of 1.13 was significantly beyond its capacity, supporting the conclusion that the development would result in a severe impact arising from '*significantly increase[d] pressure on the junction'*. The queue levels presented by the appellant are significantly in excess of the figures in the Popes Lane appeal decision.

3.12. Within appendix D I have included screenshots of the VISSIM model which show the unbalanced impacts of the proposals. The appeal scheme provides sufficient mitigation on some approaches to the Goring Crossroads and the A259/ Goring Way / Aldsworth Avenue junction, with the resultant effect of no queuing vehicles, but on other approaches such as the A259 Littlehampton Road in the AM and PM peak (where the queues are so long that they extend off the visuals provided) and Goring Way (West) in the AM peak, the level of mitigation provided is insufficient and results in a severe impact on the approaches and the junctions as a whole. The Appellant

produced full videos of the VISSIM outputs showing the development + mitigation models. I consider that these short (circa 3minute) videos would be useful for the Inspector to see and will seek to add them to the Core Document library.

3.13. In paragraph 4.3, Mr Wares identifies that the VISSIM results should be examined within the context of the site's location and substantial enhancements to the pedestrian and cycle infrastructure. Apart from the extension of the cycle route from The Strand to north of Northbrook College as shown on drawing ref 18122/006 all measures would be expected to be delivered should the development not have resulted in a severe impact and as such the impacts were included within the trip rates generated and resultant vehicular impact presented within the Transport Assessment and VISSIM modelling. The range of mitigation proposed by the appellant would be beneficial but not to the extent to reduce the traffic impacts identified. This point is supported by the approach of the Inspector on the Pope's Lane appeal, where he found that:

"Various other transport related mitigation measures are proposed by the appellants, including the toucan crossing, improvements to pedestrian routes and cycleways, and a travel plan which would include a travel voucher scheme. But although these measures would be potentially beneficial in their own ways, there is no evidence to suggest they would reduce traffic impacts that have been identified. Indeed the TA makes it clear that measures of these kind were taken into account when the trip generation and distribution rates for the development were decided".

3.14. Paragraph 4.3 of Mr Wares' proof also states that there is no evidence to suggest that the development will not have an impact on highway safety. As identified at paras 5.3.12 and 5.4.3 of my Proof of Evidence, no evidence has been submitted to assess the impact of the additional queueing on a number of side roads and crossing points.

3.15. It remains my view that there remains a clear reason for refusal in respect of reason for RfR 4. The cumulative impact of the development on increased queues and delays at the Goring Crossroads and A259/ Goring Way / Aldsworth Avenue junction would result in a severe impact. For these reasons it remains my view that granting planning permission for the proposed development would be contrary to paragraph 111 of the NPPF.

4. Conclusion

4.1. I have reviewed the content of Mr Wares' Proof.

4.2. This Rebuttal acknowledges errors in my original evidence relating to the use of the incorrect VISSIM model run within the text of my Proof and provides the correct information, albeit the conclusions reached remain the same.

4.3. It remains my view that there continues to be a clear reason for refusal in respect of RfR 4 as a result of the severe impact of the development in increased queues and delays at the Goring Crossroads and A259/ Goring Way / Aldsworth Avenue junction.

APPENDICES

A VISSIM QUEUE LENGTHS AND COMPARISION AGAINST SCENARIO 2 OF THE LOCAL PLAN TRANSPORT ASSESSMENT

B ROUTE OPTION SCREENTSHOTS

C APPEAL DECISION ref Appeal Ref: APP/J2210/W/18/3216104) in respect of Land off Popes Lane, Sturry, Kent CT2 0JZ

D VISSIM MODEL SCREENSHOTS