



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

From: Nicola Bell (Regional Director)
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To: Rother District Council FAO Ms C Gibbons
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CC: transportplanning@dft.gov.uk
spatialplanning@highwaysengland.co.uk

Council's Reference: RR/2021/1656/P

Location: Fryatts Way - land at, Bexhill

Proposal: Outline: Erection of up to 210 residential dwellings (including up to 30% affordable housing), introduction of structural planting and landscaping, informal public open space and children's play area, surface water flood mitigation, vehicular access point and associated ancillary works. All matters to be reserved with the exception of the main site access.

National Highways Ref: 92759 / #14944

Referring to the consultation on a planning application dated 28 September 2021 referenced above, in the vicinity of the A259 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);**
- ~~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

This represents National Highways formal recommendation (*prepared by the Area 4 Spatial Planning Team*) and is made available to the Department for Transport as per the terms of our Licence.

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 transportplanning@dft.gov.uk 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 planningse@highwaysengland.co.uk.

Signature: 	Date: 18 October 2021
Name: Elizabeth Cleaver	Position: Assistant Spatial Planning Manager
National Highways Bridge House 1 Walnut Tree Close Guildford GU1 4LZ	

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

² As announced on 19 August 2021 Highways England became National Highways; although our roles and responsibilities remain largely unchanged and our branding will transition over a period of time.

Annex A **National Highway's 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.

This response represents our formal recommendations with regard the above referenced planning application and has been prepared by the Area 4 South East Spatial Planning Team for National Highways.

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

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 development on the strategic road network. In particular, the following comments should be passed onto the applicant:

Pre-Application Discussions

Pre-application advice was provided to the applicant's agent regarding our assessment requirements in relation to the proposed development.

As part of these discussions, proposed residential trip rates and trip generation for a development quantum of 200 dwellings was agreed. The current application is for a slightly increased number of 210 dwellings and the trip generation has been revised accordingly.

We also advised that, regardless of mitigations work agreed with Rother District Council, East Sussex County Council and their consultants for several junctions on the A259, which have been designed to achieve a nil detriment (most notably the A259 Little Common roundabout and the A259 / A269 /A2690 King Offa Way signalised crossroads), these junctions are already considered to be severely congested. The proposal will add approximately 30 trips (two-way) at each junction and, given their already congested operation, this number of additional trips is not considered to be insignificant. Hence, there is a requirement to model both junctions and to provide appropriate mitigation.

In addition to this, we requested that the applicant also undertake a sensitivity test using a trip rate of 0.7 per dwelling for the AM and PM Peaks in order to ensure that the assessment is suitably robust.

Matters relating to the trip distribution methodology, utilising journey to work data derived from the 2011 UK Census, were also agreed. However further information was requested in relation to the trip assignment methodology.

Review of Current Planning Application

Transport Assessment

The Transport Assessment (TA), prepared by Tetra Tech Limited and dated 10 June 2021, as revision 02, has been reviewed and our comments are as follows:

National and Local Policy

It is noted that this section of the TA does not include any references to DfT Circular 02/2013.

ACTION: The Applicant will need to demonstrate that the development will not materially affect the safety, reliability and/or operation of the SRN (the tests set out in DfT Circular 02/2013).

Personal Injury Accident Review

Due to the proximity of the proposed development site to the A259 Little Common Roundabout and the A259/A269 signalised junction, both of which suffer from existing severe congestion, we require that the current PIA analysis should be extended to include the A259 from the A259/Broad oak Lane junction up to and including the A259 Little Common Roundabout, and the A259 from the A259/Broad oak Lane junction up to and including the A259/A269 signalised junction.

ACTION: In addition to the existing accident analysis submitted within the TA, the applicant is to provide accident analysis for the A259 from the A259/Broad oak Lane junction up to and including the A259 Little Common Roundabout, and the A259 from the A259/Broad oak Lane junction up to and including the A259/A269 signalised junction, for the latest 5 year period for which accident data is available.

2028 Baseline Traffic Data

The TA states that 2028 baseline traffic flows for the AM and PM peak hours have been obtained from the East Sussex Saturn Model. However, the use of any data from the East Sussex Saturn model is subject to the provision of evidence to show that the Saturn base model is sufficiently calibrated and validated at the relevant SRN junctions, which are to be assessed.

ACTION: Applicant to provide Local Model Validation Report (LMVR) for the East Sussex Saturn Model and any other supporting evidence to show that the Model is sufficiently calibrated and validated at the relevant SRN junctions, which are to be assessed.

The TA also states that the 2028 Saturn baseline traffic flows also includes the committed developments in the vicinity of the site. However, it is expected that these committed development flows will now be out of date, depending on when the 2028 Saturn scenarios were produced. The LPA will be able to provide an updated list of committed developments (developments with planning consent).

ACTION: Applicant to obtain an up to date list of committed developments from LPA, which should then be submitted to us for review and agreement.

Furthermore, the 2028 traffic data would not match any of the required assessment years as set out in Paragraphs 25 to 27 of DfT Circular 02/2013. The required assessments include an opening year and a review period.

The opening year is defined as the date at which the development first becomes available for occupation. The review period is either ten years after the date of registration of the planning application or the end of the relevant Local Plan, whichever is the greater.

ACTION: Applicant to provide assessment of proposed development impact (opening year and review period) in accordance with guidance set out in DfT Circular 02/2013.

Trip Rates and Trip Generation

The trip rates presented within the TA are agreed. However, as requested during pre-application discussions, we requested that the applicant undertake a sensitivity test utilising a trip rate of 0.7 per dwelling in the AM and PM peak hours – this is to ensure that the assessment is robust.

ACTION: A Sensitivity Test using a trip rate of 0.7 per dwelling in the AM and PM Peaks should be undertaken to ensure a fully representative assessment of the potential development trip impacts.

Trip Distribution and Assignment

While the methodology of using journey-to-work data derived from the 2011 UK Census for trip distribution is agreed, justification was required as to the routing and assignment of development trips due to discrepancies found in the route choices. The required information has not been included within the submitted TA and remains outstanding.

ACTION: Further justification is required regarding the assignment of development trips, with specific attention drawn to Lewes trips (60% via Route F (A259) and 40% via Route B (LRN)) and to Crawley trips (50% via Route B (LRN) and 50% via Route F (A259)) – this is to ensure that the number of trips distributed onto the A259 has not been underestimated.

Future Year Assessment Flows

For the reasons stated earlier in relation to the '2028 Baseline Traffic Data', the 2028 assessment scenarios presented in the TA are not in accordance with the guidance set out in DfT Circular 02/2013 and are not accepted.

For the avoidance of doubt, suitable flows will be required to be provided for the following scenarios:

- Base Year
- Opening Year + Committed development
- Opening Year + Committed + Proposed development
- Review Year + Committed + Local Plan development
- Review Year + Committed + Local Plan + Proposed development

ACTION: Applicant to provide suitable future year assessment flows in accordance with DfT Circular 02/2013. The review year shall be 10 years post application or end of Local Plan period whichever is longest.

SRN Junction Capacity Assessments

The TA presents junction capacity assessment results for the following SRN junctions:

- A259 Little Common Roundabout – Junctions 9 ARCADY model of mitigation scheme (drawing number 180300-003F) linked to consented application RR/2018/3127/P at Clavering Walk, Land at Bexhill for a residential development of up to 85 dwellings
- Broadoak Lane /A259 Little Common Road Priority Junction – Junctions 9 PICADY model of existing layout
- A269 / A259 Signal Junction – LinSig model of existing junction layout

The following scenarios have been assessed:

- 2028 without development – AM and PM peak hours
- 2028 with development – AM and PM peak hours

However, as previously noted, the assessed scenarios do not meet the requirements of DfT Circular 02/2013.

ACTION: Applicant to provide SRN Junction Capacity Assessments in accordance with DfT Circular 02/2013

Furthermore, all future year models should be derived from calibrated and validated base models, supported by independent observed data, to demonstrate that they are a fair representation of typical junction operations during the morning and evening peak hours.

ACTION: Calibrated and validated morning and evening peak base models to be provided for review together with the independent observed data utilised as part of the validation process.

Notwithstanding the above, we have undertaken a brief check of the models presented in the TA in relation to geometric inputs and model network structure and have the following comments:

A259 Little Common Roundabout

The model geometries accurately represent the proposed layout illustrated in scheme drawing 180300-003 Rev F.

Broadoak Lane /A259 Little Common Road Priority Junction model

We are unable to replicate the geometry used for this junction model based on the existing junction layout, specifically the lane width of the Broadoak Lane approach

ACTION: The applicant is required to submit any drawings or measurements used to calculate the geometries of this junction model.

A269 / A259 Signal Junction

Lane lengths specified for various lanes do not appear to correspond with the existing junction layout

ACTION: The applicant is required to submit any drawings or measurements used to calculate the geometries of this junction model.

It is also recommended that, given their proximity to the main junction, the junctions for Down Road, London Road and Beeching Road should also be included in order to accurately represent the input of traffic from these routes and the manner in which they affect the mainline flow of the A259 and A269.

For the non-signalised approaches of Down Road and Beeching Road, PICADY models should be created in order to derive the correct slope and intercept coefficients for the give-way parameters in the LINSIG model.

ACTION: Junctions for Downs Road, London Road and Beeching Road to be included within the LINSIG model.

Furthermore, we have noted a potential road safety concern with regard to the length of the cycle time within this model, which is 305 seconds in all scenarios for the 'Capture Double' LINSIG model – for the 'One Cycle' model the cycle time is 120 seconds.

Based on the Capture Double cycle time, several of the pedestrian movements – most notably Phase J – are not allowed a movement for up to 300 seconds. This could potentially present a concern for pedestrians who may opt to cross without the invitation of the pedestrian signal due to the extended waiting time. If the limited number of permitted movements for these pedestrian phases has been done due to low pedestrian demand, thereby giving more movements to busier pedestrian crossing routes, evidence of this pedestrian demand needs to be provided.

ACTION: Justification as to the length of the cycle times and the lack of available movements for certain pedestrian phases needs to be provided.

It is also noted that a LinSig model has not been provided of the potential mitigation scheme (drawing number P18063-004 - Proposed A259/A269 Signalised Junction Mitigation) put forward by the Bexhill Leisure Centre development (application reference RR/2019/430/P) , an application which has yet to be determined by the LPA. Presumably the applicant wishes to demonstrate that the proposed development can be accommodated within the existing junction layout. Evidence of this will need to be provided.

Due to the number of outstanding issues, the current results of the SRN junction capacity assessments, as presented in the TA, are not accepted. Furthermore, when the modelling is revised, a copy of the electronic modelling files should be provided to assist with our review.

ACTION: Electronic modelling files of all junction models to be provided for review.

Conclusion

At the present time, the proposed development impact 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, National Highways recommends 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.