

Technical Note 3 – 2nd Response to National Highways

Project Name:	Fryatts Way, Bexhill	Office:	Manchester
Project No.:	784-A115791	Prepared by:	M Thompson
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1.0 Introduction

- 1.1 This Technical Note (TN3) has been produced to respond to the National Highways (NH) comments dated 21 March 2022 on Rother District Council (RDC) planning application reference RR/2021/1656/P.
- 1.2 The planning application package submitted included a Transport Assessment (TA) produced by Tetra Tech (Tt). A previous Technical Note (TN1) was submitted in response to NH comments dated 18 October 2021. Further comments were then received in March 2022, which are responded to within this Technical Note (TN3).
- 1.3 The planning application is for up to 210-dwellings on Land off Fryatts Way in Bexhill.
- 1.4 The NH comments are attached at **Appendix A**. Their comments cover:
- 1) Personal Injury Accident Review
 - 2) Committed Developments
 - 3) Trip rates
 - 4) Assessment Years
 - 5) Traffic Impact Assessment
- 1.5 Each of those matters are dealt with in sub-sections of this TN3.

2.0 Personal Injury Accident Review

2.1 The TA and TN1 included a review of Personal Injury Accidents (PIA). Those reviews used CrashMap data. In response to this, NH have stated:

“The applicant has provided screenshots of the Crashmap online database for the A259 corridor between Little Common Roundabout and A259/A269 signalised junction. The applicant needs to compare the basic Crashmap accident data with the likely average accident rates for trunk roads and junctions as given in Road Casualties Great Britain. Should the accident rates be higher than would reasonably be expected nationally, then STATS19 analysis should be undertaken to determine whether or not there are any particular common factors within the accident data that could be impacted by the proposed development.”

2.2 Our TN1 identified that:

“Across the study area which comprises a 2.5km stretch of the A259 between the Little Common roundabout and its junction with the A269, 57 PIAs have occurred in the last 5 years. Of those 57 PIAs, 44 have been classified as slight accidents and 13 have been classified as serious accidents. It is not unusual for a network of this large size and with such a high traffic flow to have a relatively large number accidents recorded. It is also evident that none of the accidents resulted in a fatality.”

2.3 A review of the Road Casualties Great Britain suggests that there is no specific accident rates for trunk roads included therein. Instead, it presents a rate which relates to all road types. Clearly this does not directly relate to the characteristics of this section of the A259 (i.e. The Study Area). Notwithstanding this, a comparison against the Road Casualties Great Britain 2019 rate has been included for completeness.

Table 2.1: Accidents per Billion Miles Calculations

Calculation Input	Result
Length of the A259 between Little Common Rbt and the A259/A269 Junction (meters)	2500
Length of road at Little Common Rbt (meters)	120
Total length of road (meters)	2620
Meter to Mile conversion	0.000062
Length of road in miles	1.628
2019 AADT on A259: Eastbound	6143
2019 AADT on A259: Westbound	6524
2019 AADT on A259: Two-way	12667
Total Vehicle Miles per Average Day	20622
Number of days in a year	365
Total Vehicle Miles in 2019	7526950
Total Casualties in 2019	18
Casualty Rate per vehicle 1 mile 1 billion factor	0.0000024 1,000,000,000
Casualty Rate per billion miles: A259 within the Study Area	2391
Casualty Rate per billion vehicle miles in 2019 across Great Britain (Page 8 of the 2019 annual report)	425.5

2.4 The calculations set out in **Table 2.1** indicate that the study area has a higher accident rate when compared to an average rate for all roads in the Great Britain. As previously stated, this does not directly relate to the characteristics of this section of the A259. For example, it must follow that accidents on other types of road e.g. busy urban settings etc. would have different / higher accident occurrences.

2.5 In order to provide a more appropriate comparison, the National Highways Network Management Map has been reviewed to identify stretches of trunk road with similar characteristics to the A259 in the Study Area (i.e. suburban road with a number of

junctions and frontage development). That review identified the following section of roads:

- A21 Worthing between Sompting Road and Grove Lodge Roundabout
- A36 Salisbury between Church Lane and the A360
- A49 Hereford between Barton Road and Newtown Road

2.6 A review of the PIAs on each of the above roads is presented in **Table 2.2**, along with a comparison to the Study Area.

Table 2.2: Comparison of the average number of road traffic accidents on Trunk Roads with similar characteristics and on the A259 within the study area

Link	Length of link	Slight	Serious	Fatal	Total	Frequency per 100m
A21 Worthing between Sompting Road and Grove Lodge Roundabout	1km	21	9	0	30	3
A36 Salisbury between Church Lane and the A360	1.4km	20	4	1	25	1.8
A49 Hereford between Barton Road and Newtown Road	1.2km	26	4	0	30	2.5
Study Area on A259	2.5km	44	13	0	57	2.3

2.7 The results in **Table 2.2** show that the number of road traffic accidents on the A259 and within the study area is similar to the average accident rates for trunk roads with similar characteristics.

2.8 Notwithstanding the above, to ensure that National Highways are fully satisfied the review of accident statistics, the causation factor review using detailed STATS19 data has been undertaken. The STATS19 data has been purchased from Sussex Safer Road Partnership (Sussex Police) and the front page of that data is shown in **Excerpt 2.1**.

Excerpt 2.1: Accident Data

Little Common Road – Bexhill – Tetra Tech

Collision report 01/01/2018 – 30/04/2022

Date produced
30 May 2022

This report is marked as **Official – Sensitive**

- The information included in this report is provided for analysis purposes and is for the exclusive use of the applicant; the information must only be used for the purposes for which it has been obtained.
- The data has been provided by Sussex Police and should not be transmitted to any other person without their consent, including reports for the general public.
- Be aware that any improper disclosure, copying, distribution or use of the contents of this information is prohibited and criminal proceedings may follow.

Sussex Safer Roads
P A R T N E R S H I P
Safer Roads
Safer Communities
Sharing the Responsibility

Produced by Sussex Safer Roads Partnership on behalf of Sussex Police

- 2.9 Clearly the above report cannot be Appended to this report due to the sensitivity of the data. However, the report has been reviewed in detail and the causation factors for each of the accidents are summarised in **Table 2.2**.
- 2.10 Across the network of interest, i.e. the A259 between the Little Common Roundabout and the A259 / A269 junction, the Sussex Safer Road Partnership report identifies 15 serious and 28 slight accidents. The causation factors of the accidents are summarised in **Table 2.2**.

Table 2.2: Accident Causation Factors across the Study Area

Primary Causation Factor	No. Accidents
Driver Error	
Failed to look properly	19
Failed to judge other persons speed or path	5
Reckless	5
Swerved	2
Distracted by friend outside vehicle	1
Following too close	1
Foot stuck	1
Impaired by alcohol	1
Lost control	1
No lights in dark	1
Poor turn or manoeuvre	1
Speed	1
Pedestrian Error	
Crossing on red	1
Weather	
Slippery Road	2
Dazzling sun	1

2.11 Table 2.2 shows that the primary causation factor of 39 of the 43 accidents was driver error, 1 of the 43 was pedestrian error and 3 out of 43 was weather.

2.12 It is also relevant to consider the quantum of development traffic that would use that road. As shown in Figures v2: Fig. 18 and Fig. 19. (attached), the development is predicted to add approximately 38 vehicles in the AM and PM peak hours. That equates to a 1 additional vehicle every 1 minute on a corridor which currently accommodates c. 1,200 weekday peak hour vehicles. This increase (c.3%) would be



entirely imperceivable and there is no reason to expect that it would materially alter the road safety performance of the road.

- 2.13 The above review finds that there are no un-typical accidents and no evidence of a common accident causation factor which suggests a specific highway safety issue caused by the highway layout on the A259 within the Study Area.



3.0 Committed Developments

3.1 The NH response stated:

“The Bexhill Highways Capacity Assessment Report, November 2018, is provided as an Appendix to Technical Note 1. The report includes details of the committed developments accounted for in the modelling, but these are only up to 1 April 2018. All committed developments since 1 April 2018 need to be included in the baseline traffic, for example, Land at Clavering Walk (RR/2018/3127/P) permitted February 2020.”

3.2 It goes on to say:

“Rother District Council, as the local planning authority, should be advising on committed developments in Rother”

3.3 Following those comments, Gladman Developments Limited (GDL) approached the local planning authority for an up to date list of windfall planning applications to be included in the committed development assessment. That correspondence is included in **Appendix B**. The list of planning applications for consideration is set out in **Table 3.1**.

Table 3.1: Planning Approvals for Consideration

Application Ref:	Proposals	Included in Assessment?
RR/2018/3127/P	85 dwellings	Yes
RR/2018/2453/P	10 apartments	No
RR/2018/273/P	11 apartments	No
RR/2019/2289/P	10 apartments	No
RR/2019/2302/P	12 apartments	No
RR/2020/1170/P	8 apartments	No
RR/2020/1410/P	29 dwellings	Yes
RR/2020/155/P	6 apartments	No

RR/2020/468/P	7 apartments	No
RR/2020/577/P	8 apartments	No

- 3.4 As shown in **Table 3.1**, two planning approvals have been identified to be included as committed developments within the updated assessments set out in Section 7 of this TN. For the two included approvals, the submitted Transport Statements / Transport Assessments have been reviewed and the relevant traffic flow information has been extracted and is attached to this report as **Appendix C**.
- 3.5 Notwithstanding the above, National Highways have confirmed in their consultation response for the 29-dwelling scheme (RR/2020/1410) that even that level of development “would not materially affect the safety, reliability and / or the operation of the SRN”. Nonetheless, that 29-dwelling scheme has been included as a committed development in the assessments in Section 7 of this TN.
- 3.6 With respect to the 9 other planning approvals, they resulted in small apartment developments which will generate a negligible number of vehicle trips and their impact will be imperceptible on the local highway network.

4.0 Trip Rates

4.1 In relation to trip rates, NH have stated:

“We continue to wish to see a sensitivity test using a trip rate of 0.7 per dwelling in the AM and PM peaks.”

- 4.2 It is considered that there is no justification or policy requirement to support this request. It clearly presents impacts which are greater than can reasonably be expected.
- 4.3 There is evidence of a trend in trip rates reducing as described in TRICS Guidance Note on Changes in Travel Behaviour, August 2019 (see **Appendix D**) and that there are numerous cases of sites in similar settings where the Planning Inspectorate have accepted trip rates in the region of 0.5 to be appropriate.
- 4.4 However, as requested the sensitivity test has been undertaken in the traffic impact assessments set out in Section 7 of this TN.



5.0 Assessment Years

5.1 NH have stated:

“The TN proposes to assess future years of 2028 and 2031. For SRN assessments the opening of a development is defined as the date at which the development first becomes available for occupation, but assuming a full occupancy level at that time. The TN anticipates the development could be complete by 2028, so 2028 is not the opening year as defined in Circular 02/2013.”

5.2 GDL has confirmed that the expected opening year is 2025.

5.3 The updated traffic impact assessments included in Section 7 of this TN include:

- Base Year: 2022
- Opening Year: 2025
- Review Year: 2031

5.4 To align with the assessment years set out in Paragraphs 25 to 27 of the DfT circular, a traffic reduction factor to 2025 has been applied to the 2028 baseline traffic flows from the Bexhill and Hastings model.

5.5 The 2025 to 2028 growth factors for Super Output Areas which cover Bexhill (Rother 007, 008, 009, 010 and 11) have been extracted from TEMPro and are set out in

Table 5.1.

Table 5.1: 2025 to 2028 Growth Factors

Scenario	AM Peak	PM Peak
Rother 007	1.0273	1.0281
Rother 008	1.0282	1.0287
Rother 009	1.0279	1.0293
Rother 010	1.0295	1.0315
Rother 011	1.0291	1.0290
Bexhill Average	1.0284	1.0293



6.0 Previously Submitted Traffic Impact Assessment

6.1 In response to TN1, NH have stated:

The Technical Note uses traffic survey data recorded on 20 January 2022 to provide base year validated traffic models. However, as January is not a neutral month, as provided in WebTAG guidance, the applicant will need to undertake a sensitivity test.

6.2 The 2022 surveyed traffic flows have primarily been used for the validation of the base models. Model validation is a review of whether a model is reporting similar conditions to those which occurred on the same day. The traffic counts and the queue surveys were undertaken across the same time periods on the same day and therefore even though the traffic flows are not from a neutral month, they are entirely adequate for model validation.

6.3 The only other inclusion of the January 2022 traffic flow data was with respect to the minor arms of the A259 / A269 junction (London Road, Beeching Road, and Down Road).

6.4 To address the comment that “January is not a neutral month, as provided in WebTAG guidance, the applicant will need to undertake a sensitivity test.”, 2019 traffic data for the A259 (i.e. pre-covid) has been obtained from Webtris and a January to ‘busiest month’ (i.e. May) uplift has been applied to the 2022 flows to create 2022 Neutral month flows. The Webtris Traffic Data is shown in **Table 6.1**.

Table 6.1: Traffic Flows on the A259

Month	Two-way flow	uplift from Jan
Jan	11127	
Feb	12878	16%
Mar	12237	10%
Apr	13443	21%
May	13919	25%

Jun	13831	24%
Jul	13819	24%
Aug	13612	22%
Sep	13335	20%
Oct	12706	14%
Nov	8445	-24%

6.5 On the basis of **Table 6.1**, a factor of +25% has been applied to the January survey data. It should be noted that this factor results in derivation of maximum annual traffic flows, not typical and adds an extra level of robustness.

6.6 NH have provided further comments on the junction assessments that have been undertaken at the A259 / A257 signalised junction. The response states:

We note that the LinSig model at the A259/A269 signalised junction has now been modified to include the Down Road, London Road, and Beeching Road arms. However, no information has been provided regarding the slope and intercept co-efficients used to inform the non-signalised arms of the LinSig model. The applicant will need to provide raw slope and intercept figures from the PICADY models that were used to determine the Opposing Lane Coefficients within the non-signalised arms of the A259/A269 LinSig model.

6.7 The LinSig model of this junction has been created replicating a LinSig model which National Highways have recently discussed at length and subsequently accepted in the context of the recommendation for planning approval for the Bexhill Leisure Centre redevelopment. Nonetheless, PICADY models of the minor arms have been produced (see **Appendix E**) and the slope and intercept co-efficients have been extracted and input into the revised LinSig included in the updated traffic impact assessment contained within Section 7 of this TN. It should be noted that neither the PICADY nor the LinSig model include the operational benefits of “keep clear” and ‘yellow box’ markings which are present on all three of the side road approaches.

This means that the local adjacent side road junctions will operate significantly better than indicated within the modelling assessments.

The A259/A269 signalised junction LinSig model is based on the existing layout rather than the mitigation scheme for the redevelopment of Bexhill Leisure Centre (RR/2019/430/P). Although the planning application is undecided, the development is an allocation in the adopted Rother Local Plan (BEX4) and the mitigation at A259/A269 is required to deliver Local Plan development, not just BEX4. Therefore, the development and associated mitigation should be assumed in 2031 future year assessments. However, we recognise that the Bexhill Leisure Centre redevelopment proposal is currently suspended and so an assessment based on the existing layout could be undertaken as an additional test.

- 6.8 An assessment of the Bexhill Leisure Centre mitigation scheme including the Bexhill Leisure Centre traffic flows (see **Appendix C**) has been included in the updated traffic impact assessment included in Section 7 of this TN.

7.0 Updated Traffic Impact Assessment

Traffic Flows

- 7.1 The 2028 SATURN Baseline Flow (Extracted from the East Sussex County Council SATURN model for Bexhill and Hastings) are shown in Figures v2: **Fig. 1** and **Fig. 2** for the AM and PM peak hours respectively.
- 7.2 The following Figures present AM and PM peak hour flows as listed below.
- The 2028 to 2025 reduction factor has been applied to the 2028 Baseline Flows to create the 2025 Baseline Flows and those are shown in Figures v2: **Fig. 3** and **Fig. 4**.
 - The 2028 to 2031 growth factor has been applied to the 2028 Baseline Flows to create the 2031 Baseline Flows and those are shown in Figures v2: **Fig. 5** and **Fig. 6**.
 - The Clavering Walk traffic flows are shown in Figures v2: **Fig. 7** and **Fig. 8**.
 - The South of Barnhorn Road & West of Ashridge Court, traffic flows are shown in Figures v2: **Fig. 9** and **Fig. 10**.
 - The Total Committed Development flows are shown in Figures v2: **Fig. 11** and **Fig. 12**.
 - The 2025 Baseline + Committed Development Flows are shown in Figures v2: **Fig. 13** and **Fig. 14**.
 - The 2031 Baseline + Committed Development Flows are shown in Figures v2: **Fig. 15** and **Fig. 16**.
 - The traffic distribution of the proposed development is shown in Figures v2: **Fig. 17**.
 - The traffic generation of the proposed development is shown in Figures v2: **Fig. 18** and **Fig. 19**.
 - The 2025 Assessment Flows (Baseline + Committed Development + Development) are shown in Figures v2: **Fig. 20** and **Fig. 21**.
 - The 2031 Assessment Flows (Baseline + Committed Development + Development) are shown in Figures v2: **Fig. 22** and **Fig. 23**.

- The sensitivity test of traffic generation of the proposed development is shown in Figures v2: **Fig. 24** and **Fig. 25**.
- The 2025 Sensitivity Assessment Flows (Baseline + Committed Development + Development using Sensitivity Test trip rate) are shown in Figures v2: **Fig. 26** and **Fig. 27**.
- The 2031 Sensitivity Assessment Flows (Baseline + Committed Development + Development using Sensitivity Test trip rate) are shown in Figures v2: **Fig. 28** and **Fig. 29**.
- The Bexhill Leisure Centre (RR/2019/430/P) traffic flows are shown in Figures v2: **Fig. 30** and **Fig. 31**.
- The 2025 Sensitivity Test (0.7 trip rate) Assessment + Bexhill Leisure Centre Flows at Junction 7 are shown in Figures v2: **Fig. 32** and **Fig. 33**.
- The 2031 Sensitivity Test (0.7 trip rate) Assessment + Bexhill Leisure Centre Flows at Junction 7 are shown in Figures v2: **Fig. 34** and **Fig. 35**.

Junction 5: Little Common Roundabout

- 7.3 The validated ARCADY model of Junction 5 has been updated to include the traffic flows requested by NH, in particular the inclusion of a revised opening year (2025) and the inclusion of committed development flows. The results of the updated assessments are shown in **Table 7.1** and the full Junctions 9 output is attached as **Appendix F**.

Table 7.1 – Junction 5: Validated Traffic Model, Updated Assessment Results

Link	AM Peak			PM Peak		
	Max RFC	Av. Delay (s/pcu)	Max Queue (PCU)	Max RFC	Av. Delay (s/pcu)	Max Queue (PCU)
2025 Opening Year: Baseline Flows (inc committed developments)						
Pear Tree Lane	0.91	70	5	0.61	32	1
Little Common Road (A259)	0.79	18	4	0.73	13	3
Cooden Sea Road	0.78	28	3	0.90	45	6
Barnhorn Road (A259)	0.86	20	5	0.97	41	13
Chestnut Walk	0.62	69	1	0.50	64	1
2025 Opening Year: Assessment Flows (inc committed developments)						
Pear Tree Lane	0.92	73	6	0.63	34	2
Little Common Road (A259)	0.82	21	4	0.74	14	3
Cooden Sea Road	0.80	31	4	0.92	49	7
Barnhorn Road (A259)	0.86	20	6	0.98	48	15
Chestnut Walk	0.65	74	2	0.54	72	1
2031 Future Year: Baseline Flows (inc committed developments)						
Pear Tree Lane	1.04	138	11	0.68	41	2
Little Common Road (A259)	0.85	24	5	0.78	16	3
Cooden Sea Road	0.85	39	5	1.00	79	11
Barnhorn Road (A259)	0.91	27	8	1.03	79	25
Chestnut Walk	0.83	125	3	0.62	93	1
2031 Future Year: Assessment Flows (inc committed developments)						
Pear Tree Lane	1.05	146	11	0.70	43	2
Little Common Road (A259)	0.87	27	6	0.79	17	4
Cooden Sea Road	0.87	44	5	1.01	88	13
Barnhorn Road (A259)	0.92	28	8	1.04	93	30
Chestnut Walk	0.87	135	3	0.65	106	2

- 7.4 The results in **Table 7.1** show that the validated junction model forecasts that in the 2025 with development scenario the junction will operate within capacity AM peak and at capacity in the PM peak. The conclusion of the TA remains in that there are no material impacts at this junction associated with the development proposals.
- 7.5 The development would only give rise to entirely imperceptible increases in delay of no more than 8 seconds per vehicle in 2025. Traffic conditions at the roundabout would therefore not be materially different to the baseline scenario.



7.6 NH have also requested a sensitivity test using 0.7 trip rates. The sensitivity test results are shown in **Table 7.2**.

Table 7.2 – Junction 5: Validated Traffic Model, Sensitivity Test Results

Link	AM Peak			PM Peak		
	Max RFC	Av. Delay (s/pcu)	Max Queue (PCU)	Max RFC	Av. Delay (s/pcu)	Max Queue (PCU)
2025 Opening Year: Assessment Flows (inc committed developments)						
Pear Tree Lane	0.93	75	6	0.63	35	2
Little Common Road (A259)	0.82	21	4	0.74	14	3
Cooden Sea Road	0.80	32	4	0.92	49	7
Barnhorn Road (A259)	0.87	21	6	0.99	51	16
Chestnut Walk	0.65	75	2	0.55	73	1
2031 Future Year: Assessment Flows (inc committed developments)						
Pear Tree Lane	1.05	149	12	0.7	43	2
Little Common Road (A259)	0.88	27	6	0.79	17	4
Cooden Sea Road	0.88	44	5	1.01	89	13
Barnhorn Road (A259)	0.92	29	9	1.05	97	32
Chestnut Walk	0.88	138	3	0.66	110	2

7.7 The results in **Table 7.2** show that with the sensitivity assessment trip rates, the junction is forecast to operate with one arm at 99% of its capacity in 2025.

Junction 6: Little Common Road / Broadoak Lane Priority Junction

7.8 The validated PICADY model of Junction 6 has been updated to include the traffic flows requested by NH, in particular the inclusion of a revised opening year (2025) and the inclusion of committed development flows. The results of the updated assessments are shown in **Table 7.3** and the full Junctions 9 output is attached as **Appendix G**.



Table 7.3 – Junction 6: Validated Traffic Model, Updated Assessment Results

	AM Peak			PM Peak		
	Max RFC	Average Delay (s/pcu)	Max Queue (PCU)	Max RFC	Average Delay (s/pcu)	Max Queue (PCU)
2025 Opening Year: Baseline Flows (inc committed developments)						
Broadoak Lane	0.82	80	4	0.64	46	2
Little Common Road - Right Turn	0.14	10	0	0.33	14	1
2025 Opening Year: Assessment Flows (inc committed developments)						
Broadoak Lane	0.97	151	9	0.74	67	3
Little Common Road - Right Turn	0.14	10	0	0.34	14	1
2031 Future Year: Baseline Flows (inc committed developments)						
Broadoak Lane	0.96	147	8	0.79	82	3
Little Common Road - Right Turn	0.15	10	0	0.37	15	1
2031 Future Year: Assessment Flows (inc committed developments)						
Broadoak Lane	1.12	276	18	0.93	143	6
Little Common Road - Right Turn	0.15	10	0	0.37	16	1

7.9 The results in **Table 7.3** show that the validated junction model forecasts the junction to operate within capacity in the 2025 with development scenario.

7.10 A review of the Broadoak Lane arm has found that there is opportunity for minor arm capacity improvements if deemed necessary in the future.

7.11 NH have also requested a sensitivity test using 0.7 trip rates. The sensitivity test results are shown in **Table 7.4**.

Table 7.4 – Junction 6: Validated Traffic Model, Sensitivity Test Results

	AM Peak			PM Peak		
	Max RFC	Average Delay (s/pcu)	Max Queue (PCU)	Max RFC	Average Delay (s/pcu)	Max Queue (PCU)
2025 Opening Year: Assessment Flows (inc committed developments)						
Broadoak Lane	1.00	172	10	0.76	71	3
Little Common Road - Right Turn	0.14	10	0	0.34	15	1
2031 Future Year: Assessment Flows (inc committed developments)						
Broadoak Lane	1.15	309	21	0.94	152	7
Little Common Road - Right Turn	0.15	10	0	0.38	16	1

7.12 The results in **Table 7.3** show that with the sensitivity assessment trip rates, the junction is forecast to operate with one arm at 100% of its capacity in 2025.

Junction 7: Little Common Road / London Road Signalised Junction

7.13 The validated LinSig model of Junction 7 has been updated to include the traffic flows requested by NH, in particular the inclusion of a revised opening year (2025), the inclusion of committed development flows and the use of slope and intercept values extracted from PICADY for the 2 nearby priority junctions. The results of the updated assessments are shown in **Table 7.5** and the full LinSig output is attached as **Appendix H**.

Table 7.5 – Junction 7: Validated Traffic Model, Updated Assessment Results

Approach	AM Peak			PM Peak		
	DoS (%)	Av. Delay (s/pcu)	MMQ (pcu)	DoS (%)	Av. Delay (s/pcu)	MMQ (pcu)
2025 Opening Year: Baseline Flows (inc committed developments)						
A259 Little Common Road (W) Left	57.2%	36	18	63.0%	40	17
A259 Little Common Road (W) Ahead Right	97.5%	103	39	90.2%	81	25
A259 Belle Hill (E) Ahead Left	42.2%	53	8	56.0%	64	10
A259 Belle Hill (E) Ahead Right	37.4%	51	8	51.1%	62	10
A269 Combe Valley Way Left Ahead	85.9%	49	34	62.2%	33	23
A269 Combe Valley Way Right	89.8%	109	23	91.2%	106	18
A269 London Road Left Right Ahead	84.8%	66	27	90.7%	65	34
PRC (%)		-8.3			-1.3	
2025 Opening Year: Assessment Flows (inc committed developments)						
A259 Little Common Road (W) Left	57.3%	36	19	63.8%	41	18
A259 Little Common Road (W) Ahead Right	98.3%	108	43	92.0%	86	27
A259 Belle Hill (E) Ahead Left	43.1%	54	8	55.2%	62	10
A259 Belle Hill (E) Ahead Right	38.6%	52	8	51.4%	61	10
A269 Combe Valley Way Left Ahead	86.5%	54	36	61.9%	33	23
A269 Combe Valley Way Right	93.0%	126	26	92.0%	109	18
A269 London Road Left Right Ahead	85.9%	68	29	91.6%	67	35
PRC (%)		-9.2			-2.3	
2031 Future Year: Baseline Flows (inc committed developments)						
A259 Little Common Road (W) Left	53.9%	29	17	67.4%	43	19
A259 Little Common Road (W) Ahead Right	99.2%	119	43	95.4%	101	31
A259 Belle Hill (E) Ahead Left	44.2%	55	9	56.7%	63	10
A259 Belle Hill (E) Ahead Right	41.8%	54	10	52.1%	61	10

A269 Combe Valley Way Left Ahead	102.9%	156	63	65.6%	34	25
A269 Combe Valley Way Right	97.7%	152	28	96.2%	131	22
A269 London Road Left Right Ahead	91.4%	82	33	96.1%	85	40
PRC (%)		-14.3			-6.9	
2031 Future Year: Assessment Flows (inc committed developments)						
A259 Little Common Road (W) Left	54.1%	28	16	66.7%	42	21
A259 Little Common Road (W) Ahead Right	103.7%	179	57	97.2%	109	33
A259 Belle Hill (E) Ahead Left	44.0%	52	9	58.0%	63	10
A259 Belle Hill (E) Ahead Right	38.5%	50	8	54.2%	61	10
A269 Combe Valley Way Left Ahead	103.7%	166	67	66.5%	34	24
A269 Combe Valley Way Right	92.2%	108	23	97.3%	136	22
A269 London Road Left Right Ahead	94.2%	89	32	97.1%	88	41
PRC (%)		-15.2			-8.1	

7.14 The results in **Table 7.5** show that the validated junction model forecasts the junction to operate within capacity in the 2028 with development scenario. The conclusion of the TA remains in that there are no material traffic impacts at this junction.

7.15 NH have also requested a sensitivity test using 0.7 trip rates. The sensitivity test results are shown in **Table 7.6**.

Table 7.6 – Junction 7: Validated Traffic Model, Sensitivity Test Results

Approach	AM Peak			PM Peak		
	DoS (%)	Av. Delay (s/pcu)	MMQ (pcu)	DoS (%)	Av. Delay (s/pcu)	MMQ (pcu)
2025 Opening Year: Assessment Flows (inc committed developments)						
A259 Little Common Road (W) Left	52.5%	29	16	63.8%	41	18
A259 Little Common Road (W) Ahead Right	96.3%	92	36	92.0%	86	26
A259 Belle Hill (E) Ahead Left	40.7%	50	8	55.6%	63	10
A259 Belle Hill (E) Ahead Right	35.0%	49	8	52.1%	61	10
A269 Combe Valley Way Left Ahead	95.2%	75	42	61.9%	33	23
A269 Combe Valley Way Right	97.6%	165	30	92.3%	110	18
A269 London Road Left Right Ahead	86.2%	69	29	91.8%	67	35
PRC (%)		-8.5			-2.6	
2031 Future Year: Assessment Flows (inc committed developments)						
A259 Little Common Road (W) Left	54.1%	28	16	66.7%	42	20
A259 Little Common Road (W) Ahead Right	103.4%	174	56	97.5%	112	32
A259 Belle Hill (E) Ahead Left	43.7%	51	9	58.7%	63	10
A259 Belle Hill (E) Ahead Right	38.2%	50	8	54.9%	61	11

A269 Combe Valley Way Left Ahead	103.7%	166	68	66.5%	34	25
A269 Combe Valley Way Right	93.8%	111	23	97.6%	138	22
A269 London Road Left Right Ahead	94.6%	90	32	97.4%	90	42
PRC (%)		-15.3				-8.4

7.16 The results in **Table 7.6** show that the validated junction model forecasts the junction to operate within capacity in the 2025 with development scenario even when using the sensitivity test 0.7 trip rate.

7.17 NH have also requested that a potential mitigation scenario at this junction is modelled. A planning application for the redevelopment of Bexhill Leisure Centre (RR/2019/430/P) identifies a mitigation layout and although the planning application is undecided, the development is an allocation in the adopted Rother Local Plan (BEX4) and the mitigation at A259/A269 is required to deliver Local Plan development. Therefore, an assessment of the 2031 future year assessment flows including the Bexhill Leisure Centre flows on the mitigation layout has been undertaken and the results are shown in **Table 7.7**. For robustness, the Development flows included in the Mitigation assessment are the Sensitivity Test 0.7 trip rate flows. The LinSig model output for the Mitigation layout is attached as **Appendix I**.

Table 7.7 – Junction 7: Mitigation Layout Traffic Model, Assessment Results

Approach	AM Peak			PM Peak		
	DoS (%)	Av. Delay (s/pcu)	MMQ (pcu)	DoS (%)	Av. Delay (s/pcu)	MMQ (pcu)
2025 Opening Year: Assessment Flows (sensitivity test development flows + committed developments + Bexhill Leisure Centre)						
A259 Little Common Road (W) Left	74.6%	39	20	86.6%	58	22
A259 Little Common Road (W) Ahead	89.2%	83	28	70.7%	61	17
A259 Little Common Road (W) Ahead Right	89.8%	125	16	95.6%	159	15
A259 Belle Hill (E) Ahead Left	62.4%	73	10	57.9%	63	10
A259 Belle Hill (E) Ahead Right	62.8%	72	11	54.2%	61	11
A269 Combe Valley Way Left Ahead	79.8%	44	34	62.7%	33	23
A269 Combe Valley Way Right	78.4%	70	18	94.5%	120	20
A269 London Road Left Right Ahead	85.1%	71	28	94.6%	76	37
PRC (%)		0.2				-6.2

2031 Future Year: Assessment Flows (sensitivity test development flows + committed developments + Bexhill Leisure Centre)

A259 Little Common Road (W) Left	78.7%	42	23	91.6%	69	26
A259 Little Common Road (W) Ahead	94.1%	98	32	74.8%	64	18
A259 Little Common Road (W) Ahead Right	96.8%	166	21	105.1%	278	23
A259 Belle Hill (E) Ahead Left	65.8%	75	10	60.8%	64	11
A259 Belle Hill (E) Ahead Right	66.4%	73	12	57.0%	62	11
A269 Combe Valley Way Left Ahead	84.1%	50	40	66.6%	34	25
A269 Combe Valley Way Right	82.7%	76	20	99.8%	155	25
A269 London Road Left Right Ahead	89.7%	82	31	99.9%	109	48
PRC (%)		-7.5			-16.8	

7.18 **Table 7.7** shows that the proposed mitigation layout is forecast to operate with spare capacity in the 2025 opening year scenario, with the Bexhill Leisure Centre re-development flows and the Sensitivity test 0.7 trip rate for the development traffic.

Traffic Impact Assessment Summary

7.19 As confirmed alongside the summary tables presented in this section. It is clear that the development would not have a material impact on the operation of the junctions assessed in the 2025 assessment year. In all instances in 2025, the junctions continue to operate within capacity. The 2025 assessment year corresponds with the ‘the opening year, assuming full build out and occupation’, as set out in Para 101 of Highways England document “The strategic road network: Planning for the future”. Para 101 of that document continues ‘The assessment at opening will be used for the determination of impact mitigation’. On the basis of the 2025 Opening Year modelling results set out in this TN, it is considered that no mitigations are required as there are no significant impacts as a result of the development in accordance with the NPPF.



8.0 Summary and Conclusions

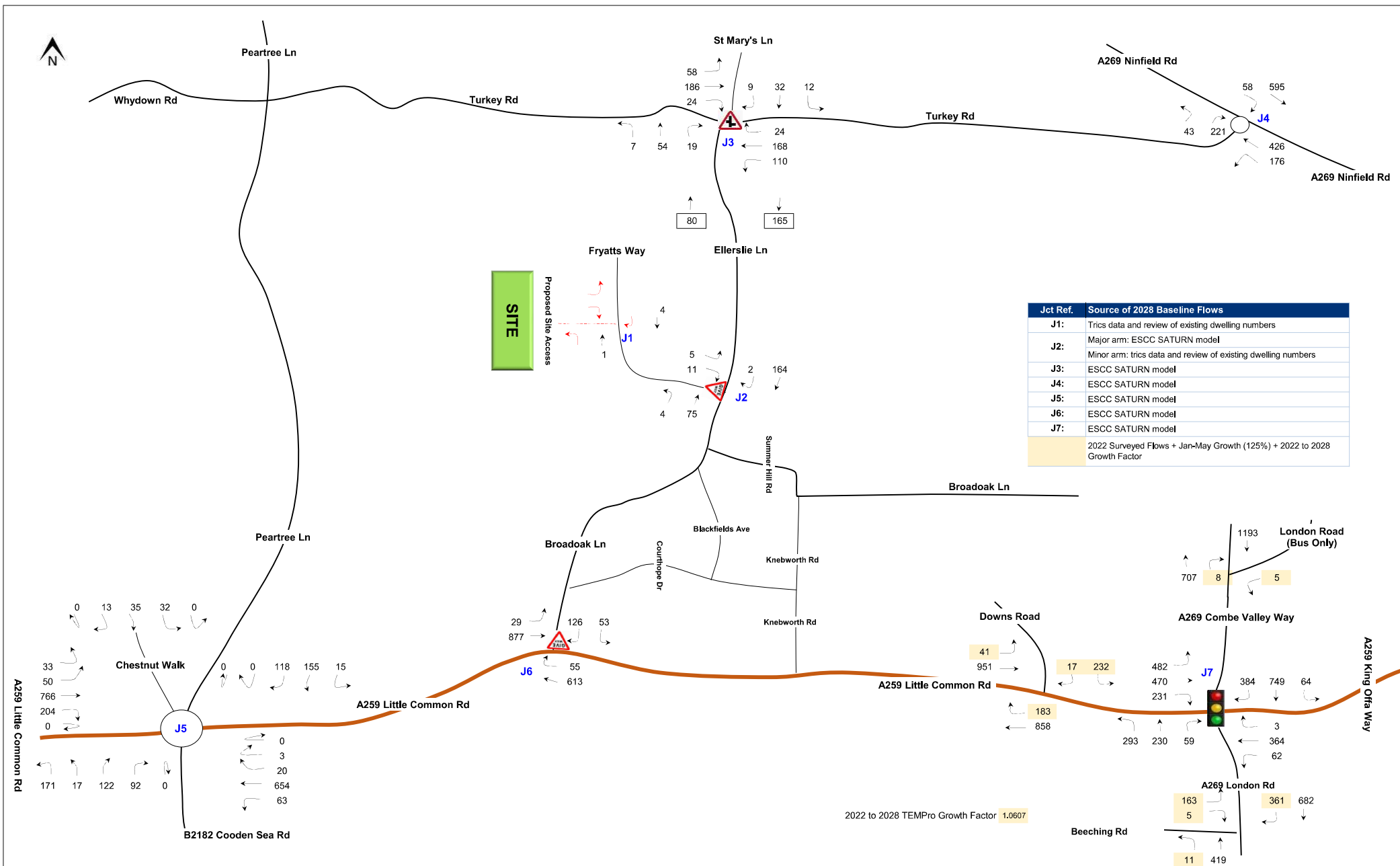
- 8.1 This Technical Note has been produced to respond to all of the issues raised within the National Highways (NH) comments on Rother District Council (RDC) planning application reference RR/2021/1656/P.
- 8.2 The technical work presented herein continues to indicate that there is no transport or highway policy justification which should stand against the development proposals.

Fryatts Way, Bexhill
Technical Note 3



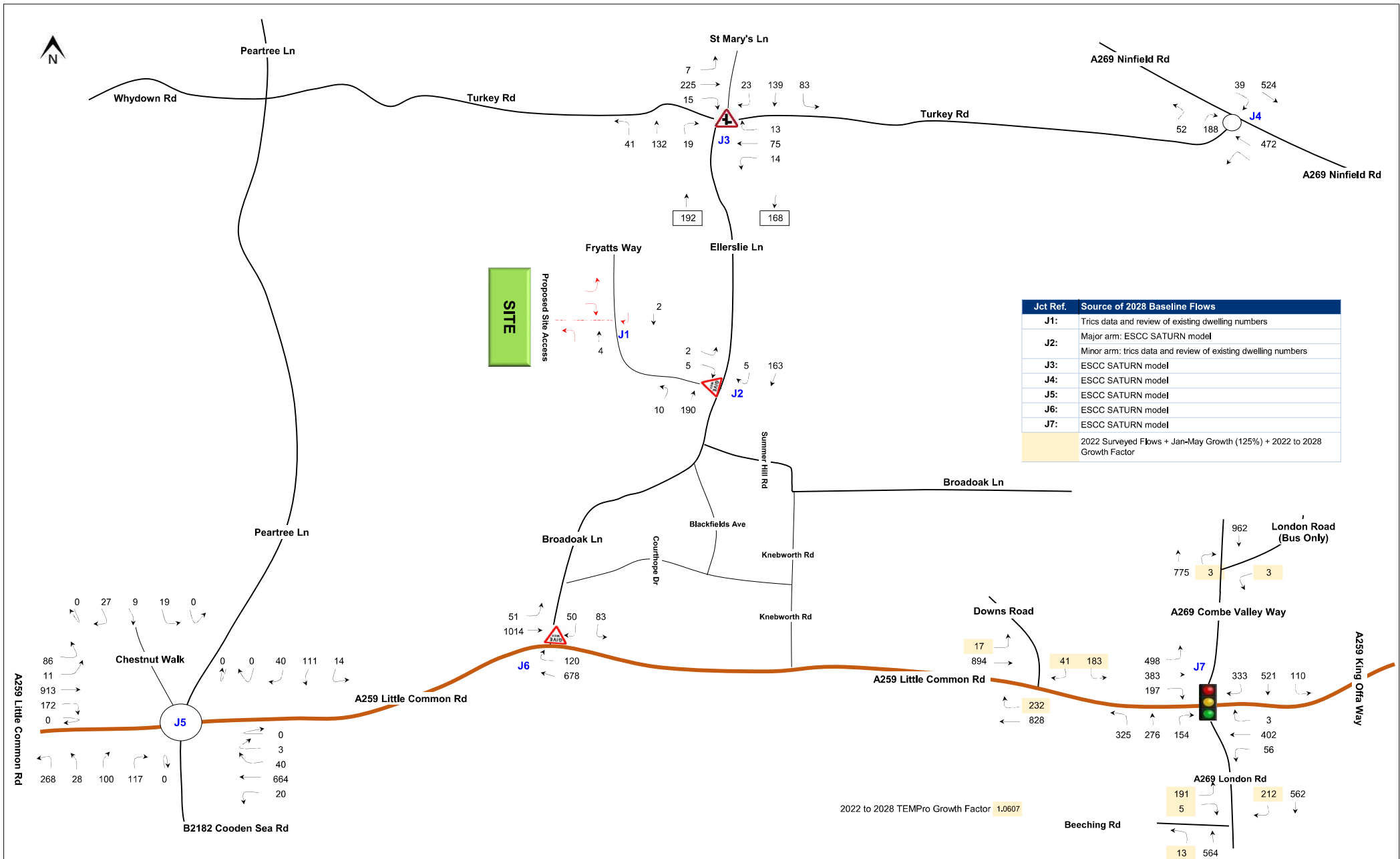
TETRA TECH

Traffic Flow Diagrams

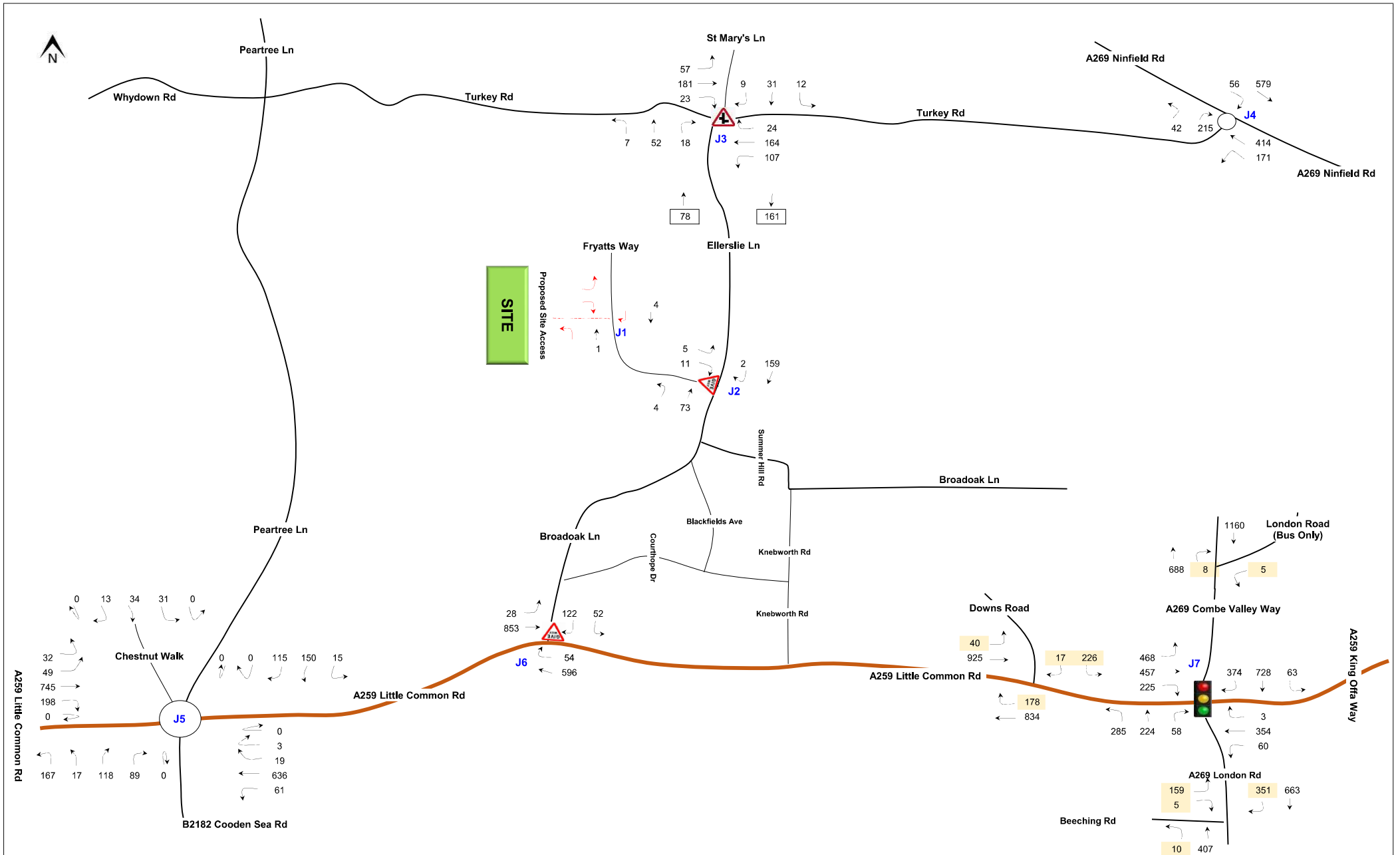


Figures v2: Fig 1: 2028 Baseline Flows (Extracted from the East Sussex County Council SATURN model for Bexhill and Hastings) - AM Peak Hour

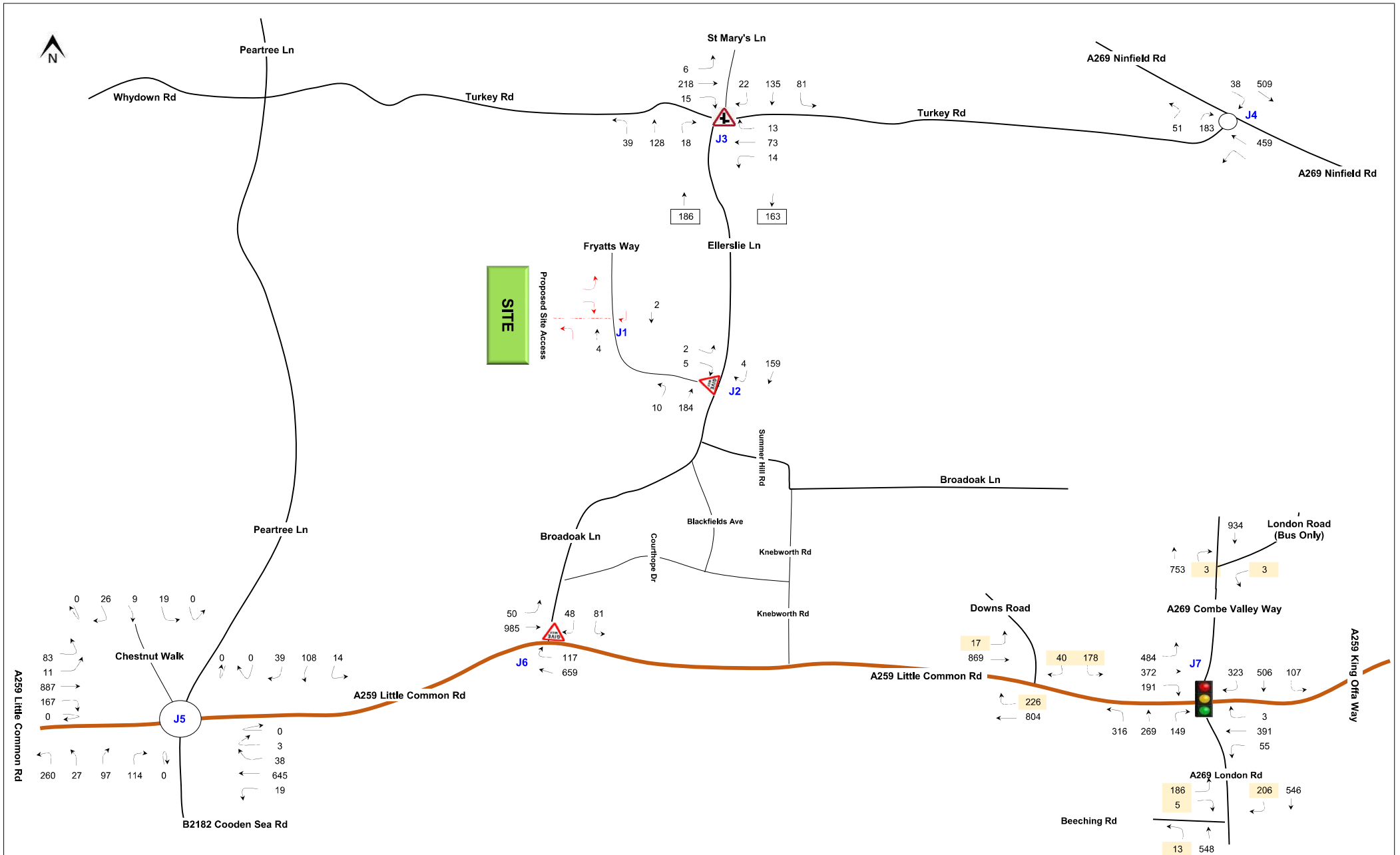




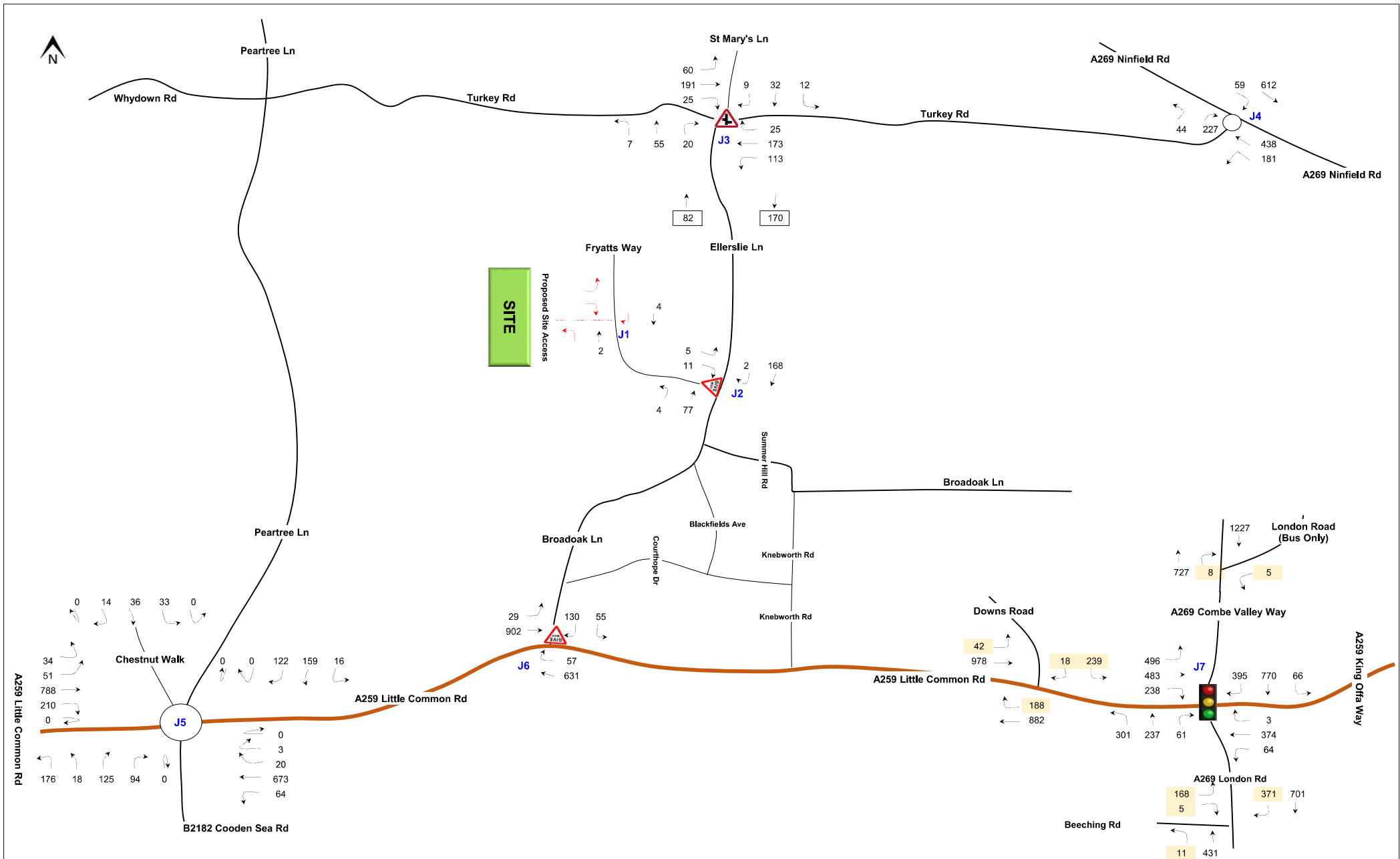
Figures v2: Fig 2: 2028 Baseline Flows (Extracted from the East Sussex County Council SATURN model for Bexhill and Hastings) - PM Peak Hour



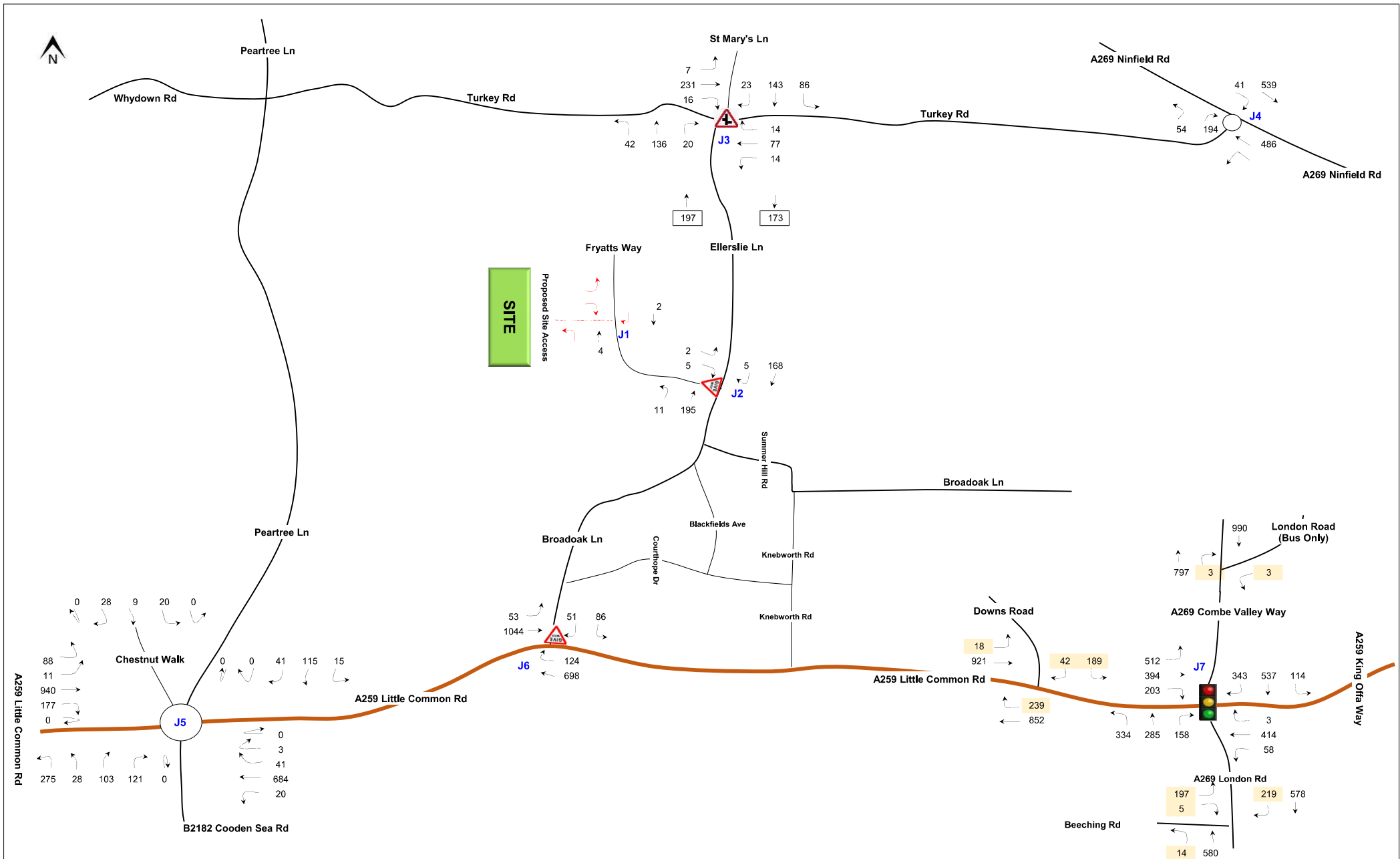
Figures v2: Fig 3: 2025 Baseline Flows - AM Peak Hour



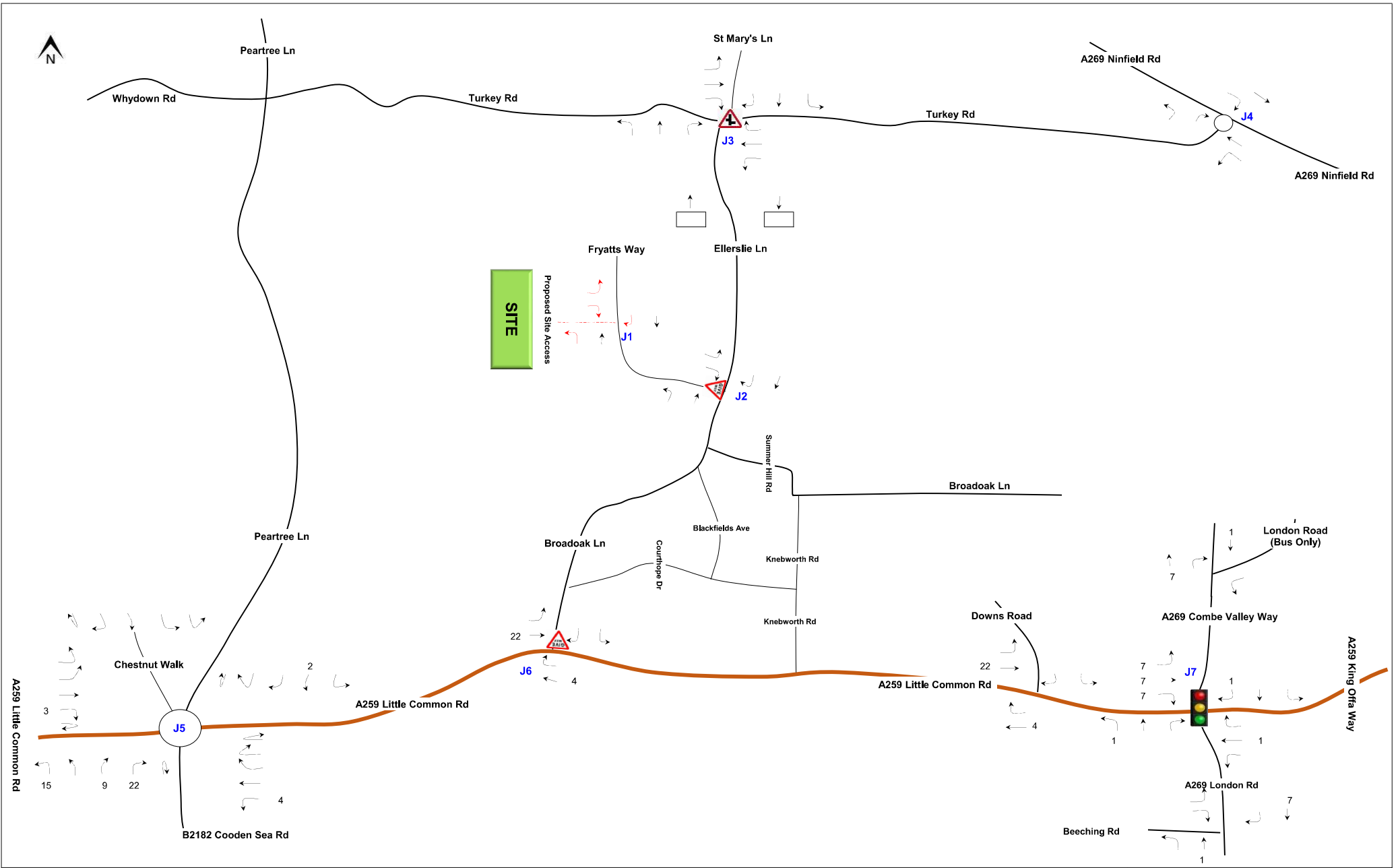
Figures v2: Fig 4: 2025 Baseline Flows - PM Peak Hour



Figures v2: Fig 5: 2031 Baseline Flows - AM Peak Hour



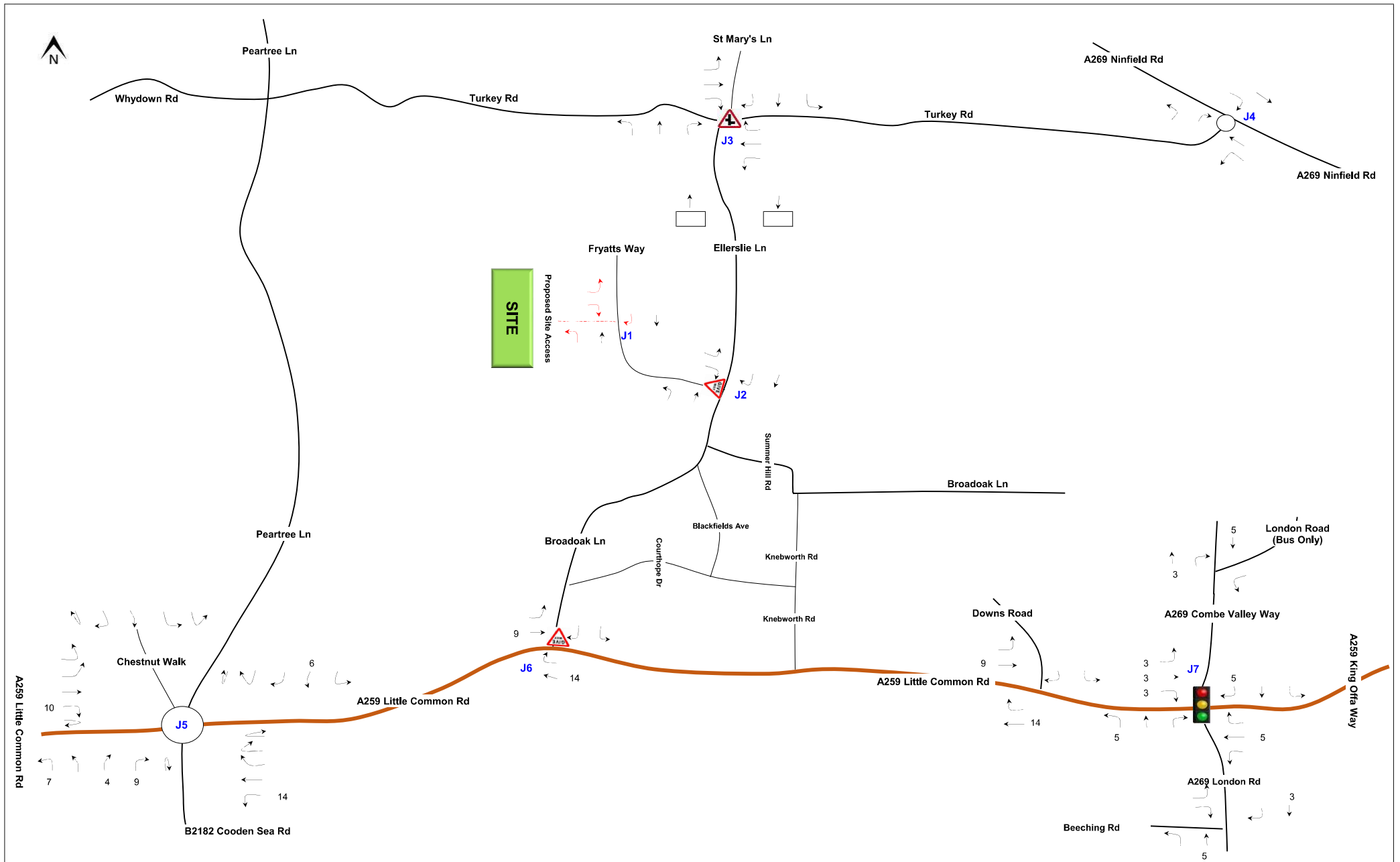
Figures v2: Fig 6: 2031 Baseline Flows - PM Peak Hour



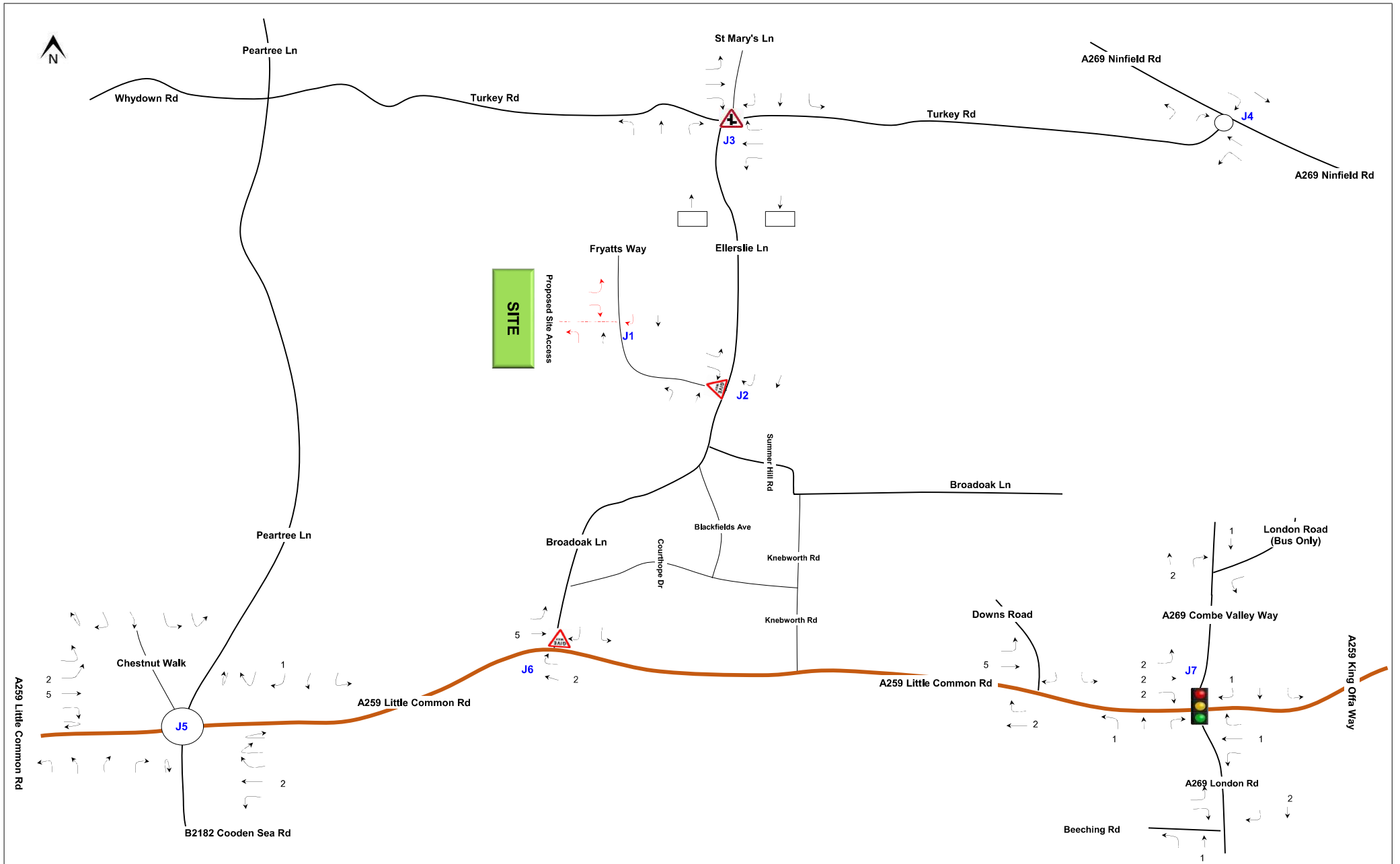
Figures v2: Fig 7: Clavering Walk Committed Development Flows - AM Peak Hour

Job no. A115791 Bexhill, Fryatts Way

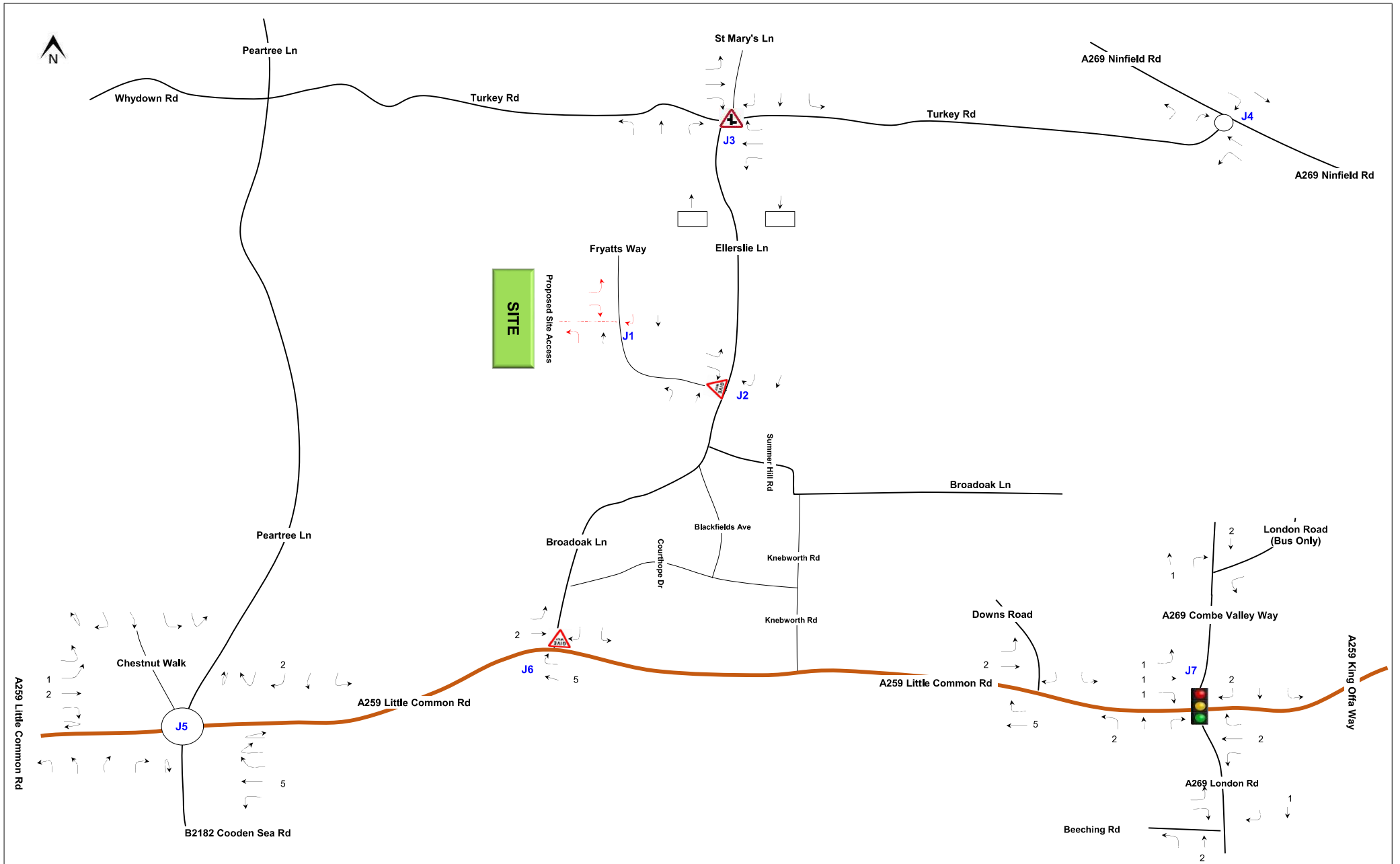




Figures v2: Fig 8: Clavering Walk Committed Development Flows - PM Peak Hour



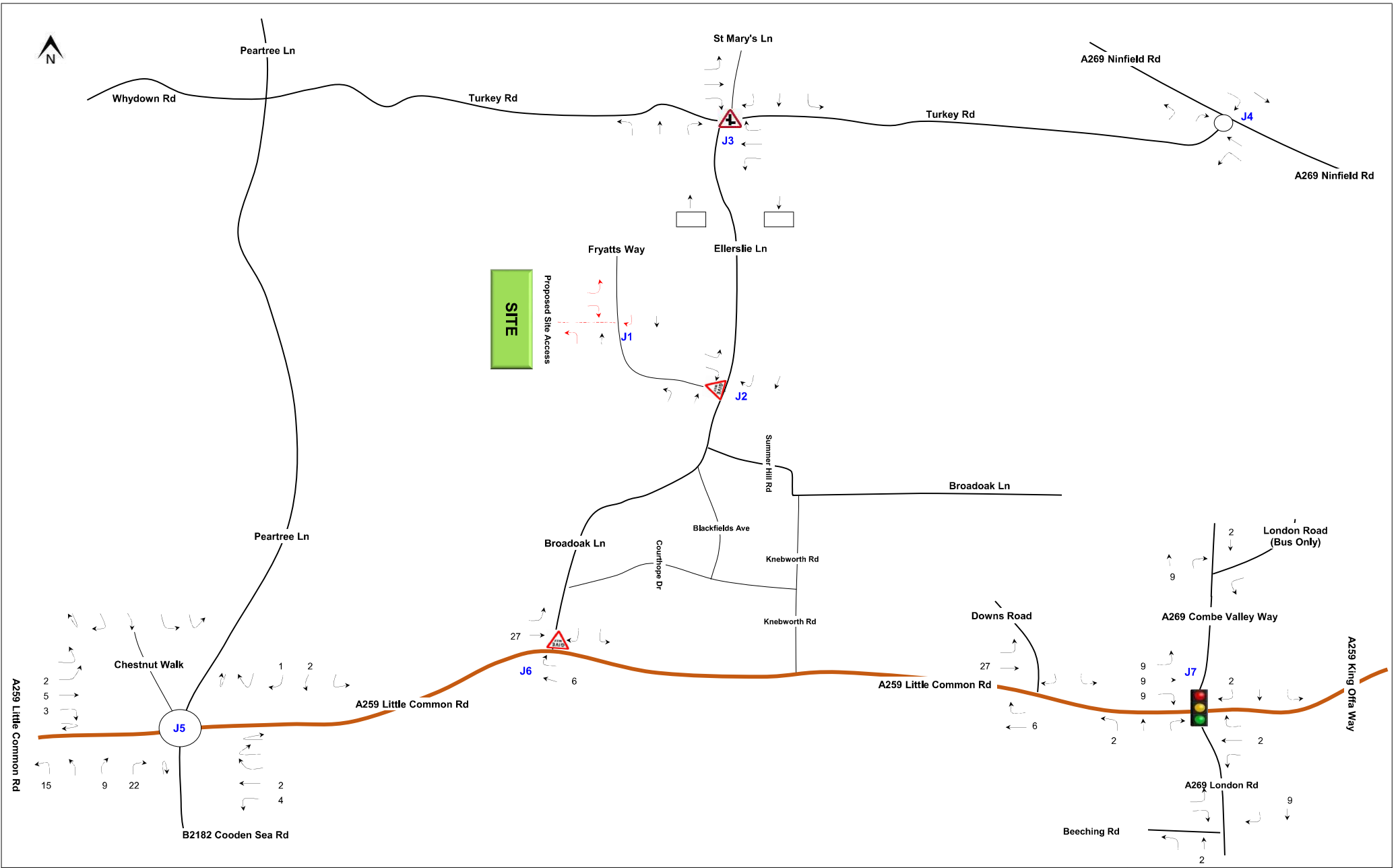
Figures v2: Fig 9: South of Barnhorn Road & West of Ashridge Court Committed Development Flows - AM Peak Hour



Figures v2: Fig 10: South of Barnhorn Road & West of Ashridge Court Committed Development Flows - PM Peak Hour

Job no. A115791 Bexhill, Fryatts Way

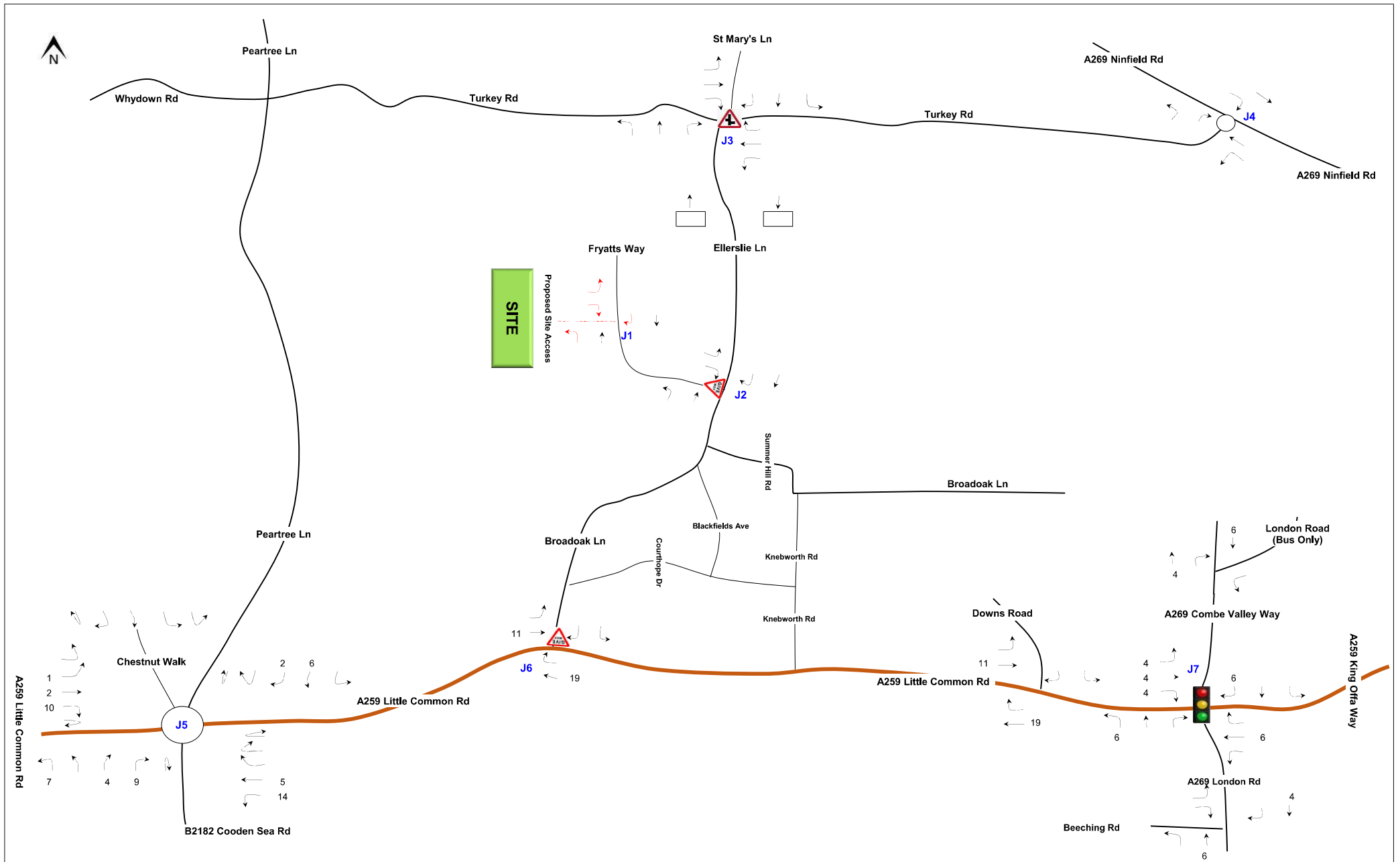




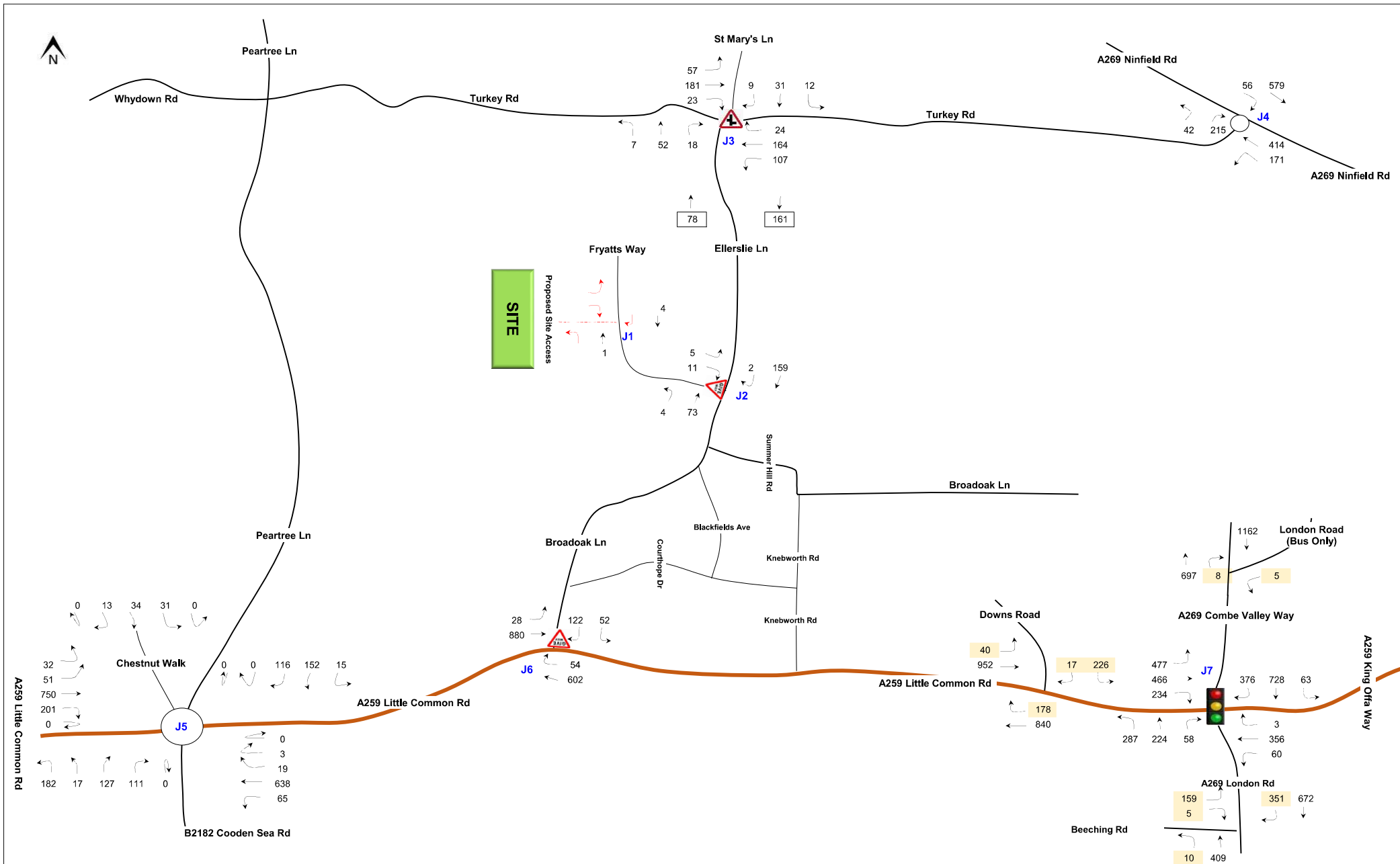
Figures v2: Fig 11: Total Committed Development Flows - AM Peak Hour

Job no. A115791 Bexhill, Fryatts Way

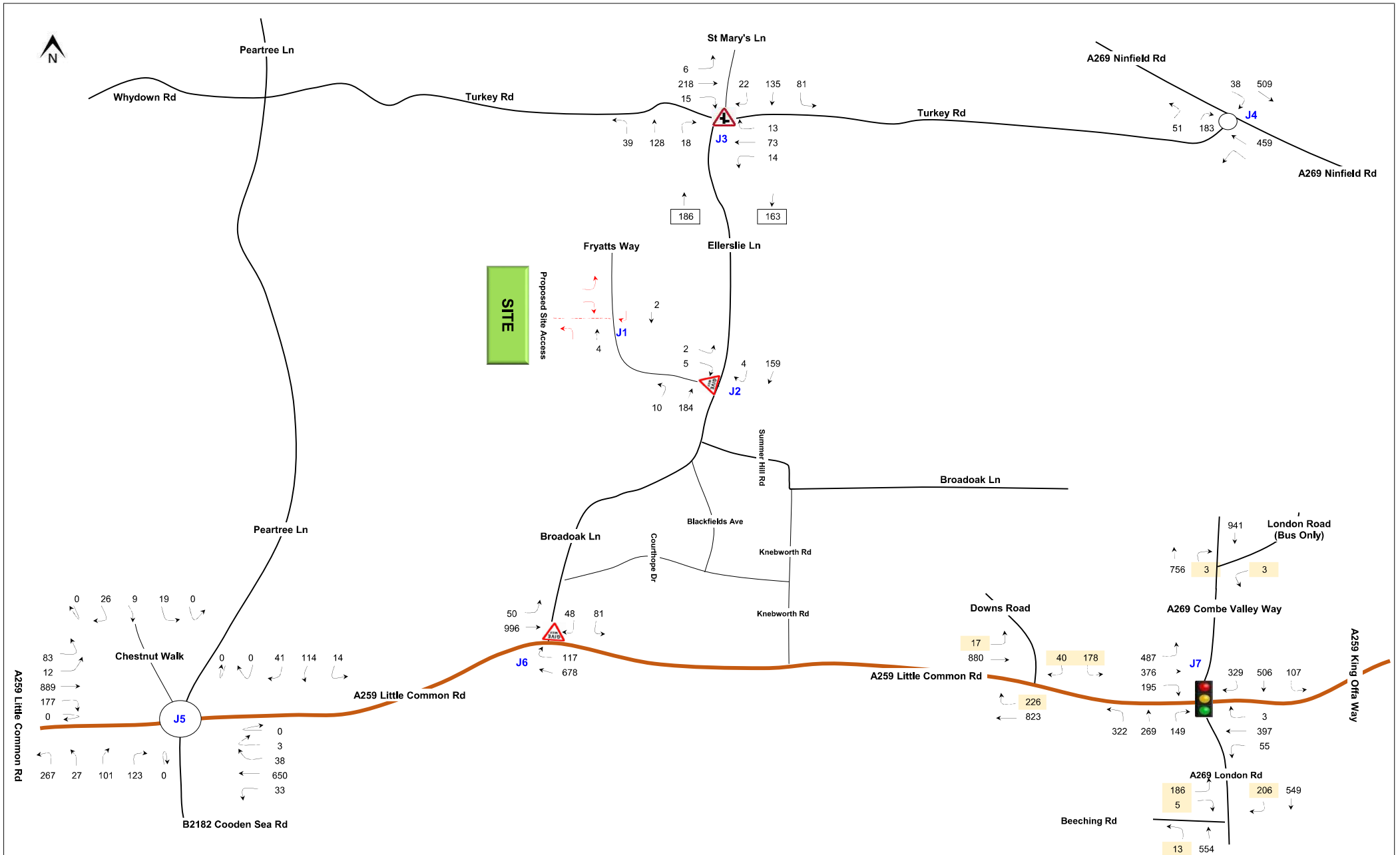




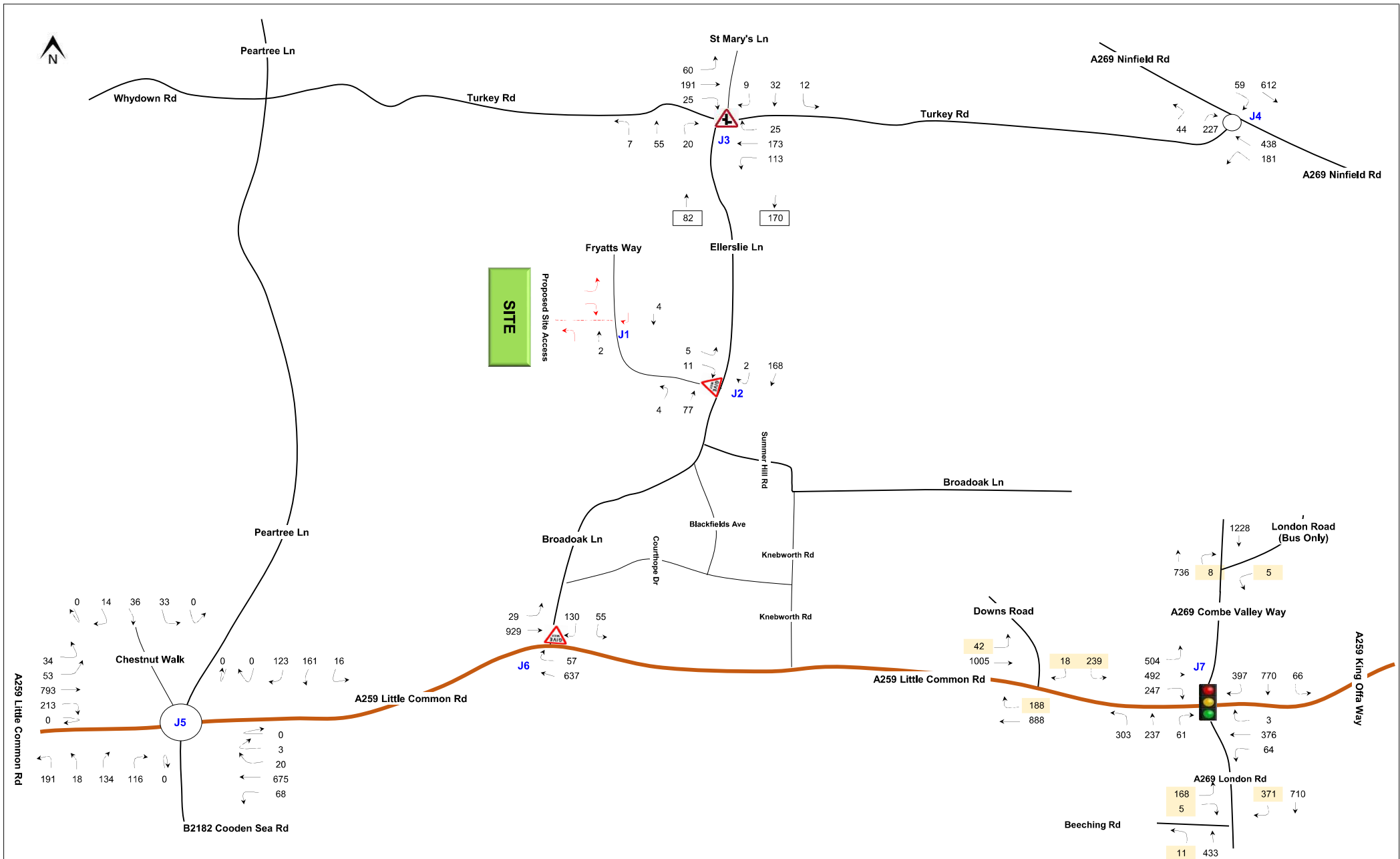
Figures v2: Fig 12: Total Committed Development Flows - PM Peak Hour



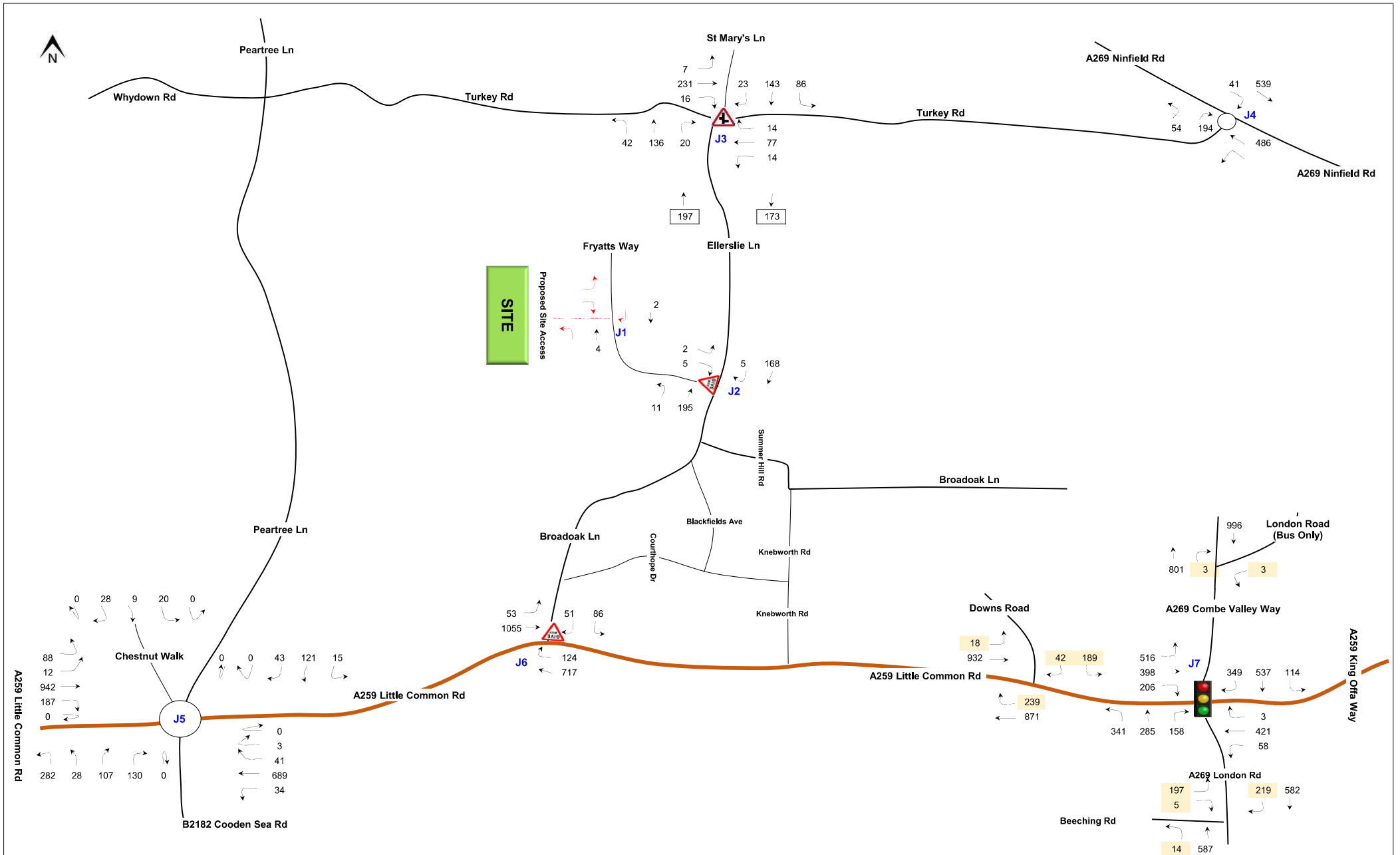
Figures v2: Fig 13: 2025 Baseline Flows + Committed Flows - AM Peak Hour



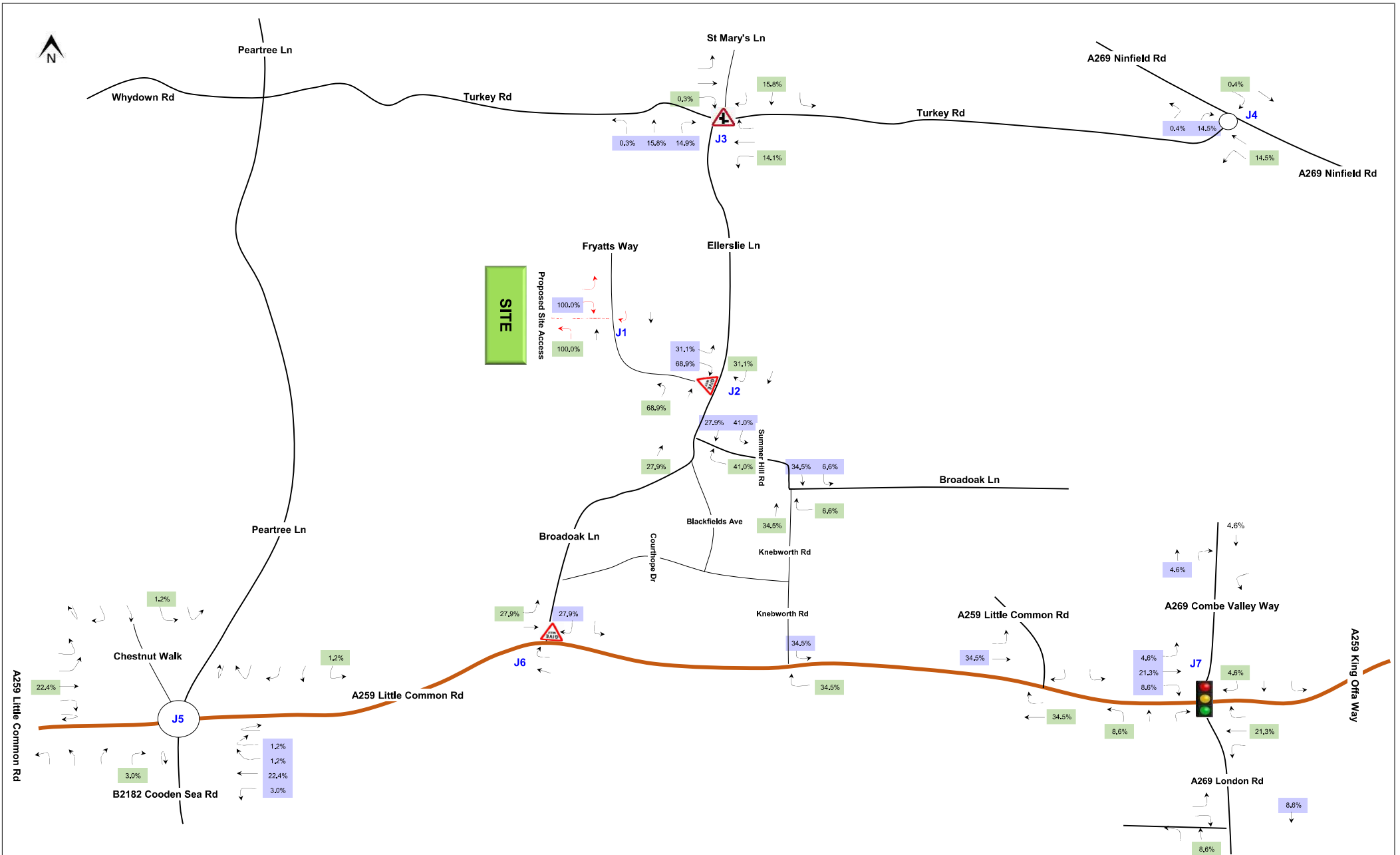
Figures v2: Fig 14: 2025 Baseline Flows + Committed Flows - PM Peak Hour



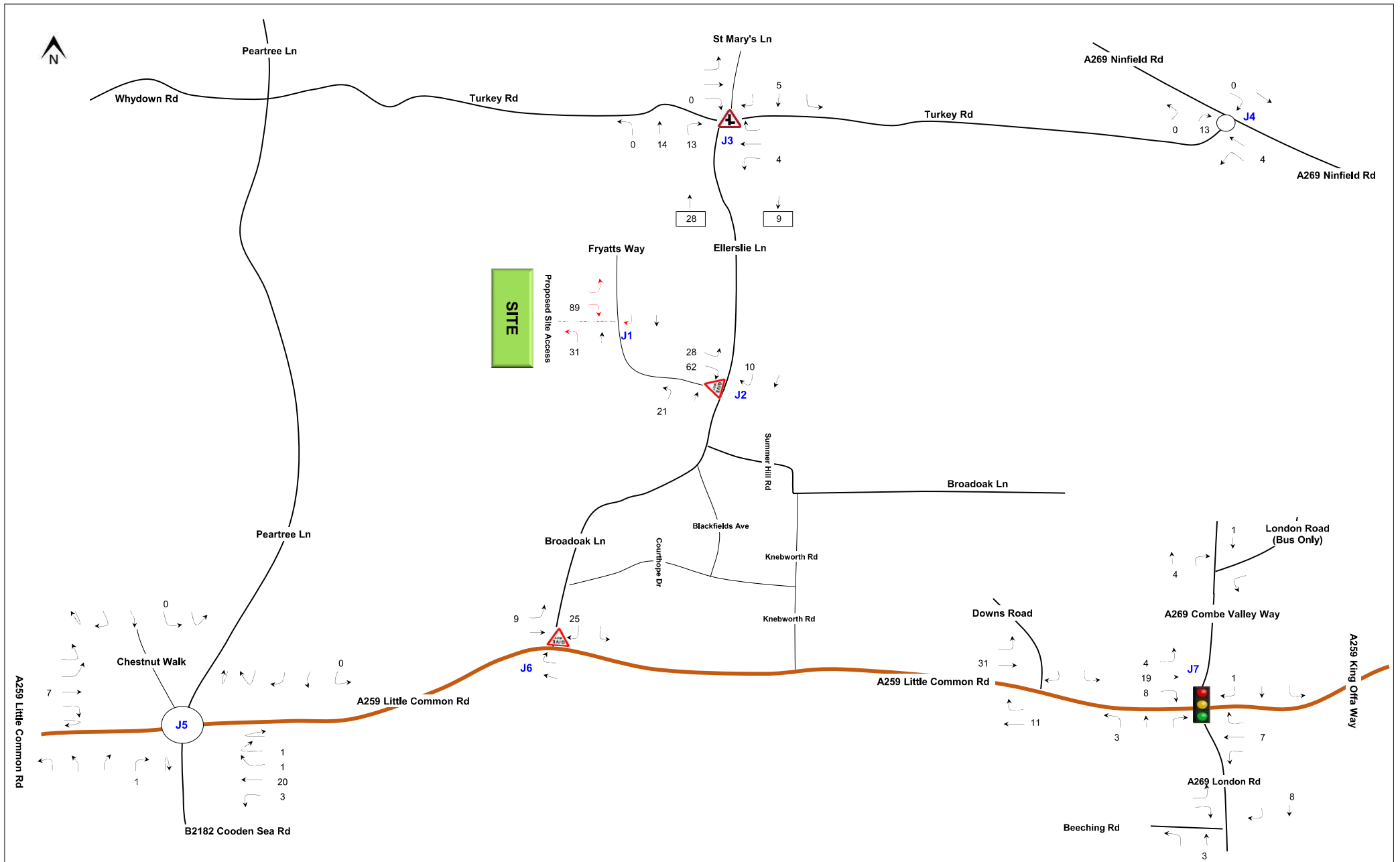
Figures v2: Fig 15: 2031 Baseline Flows + Committed Flows - AM Peak Hour



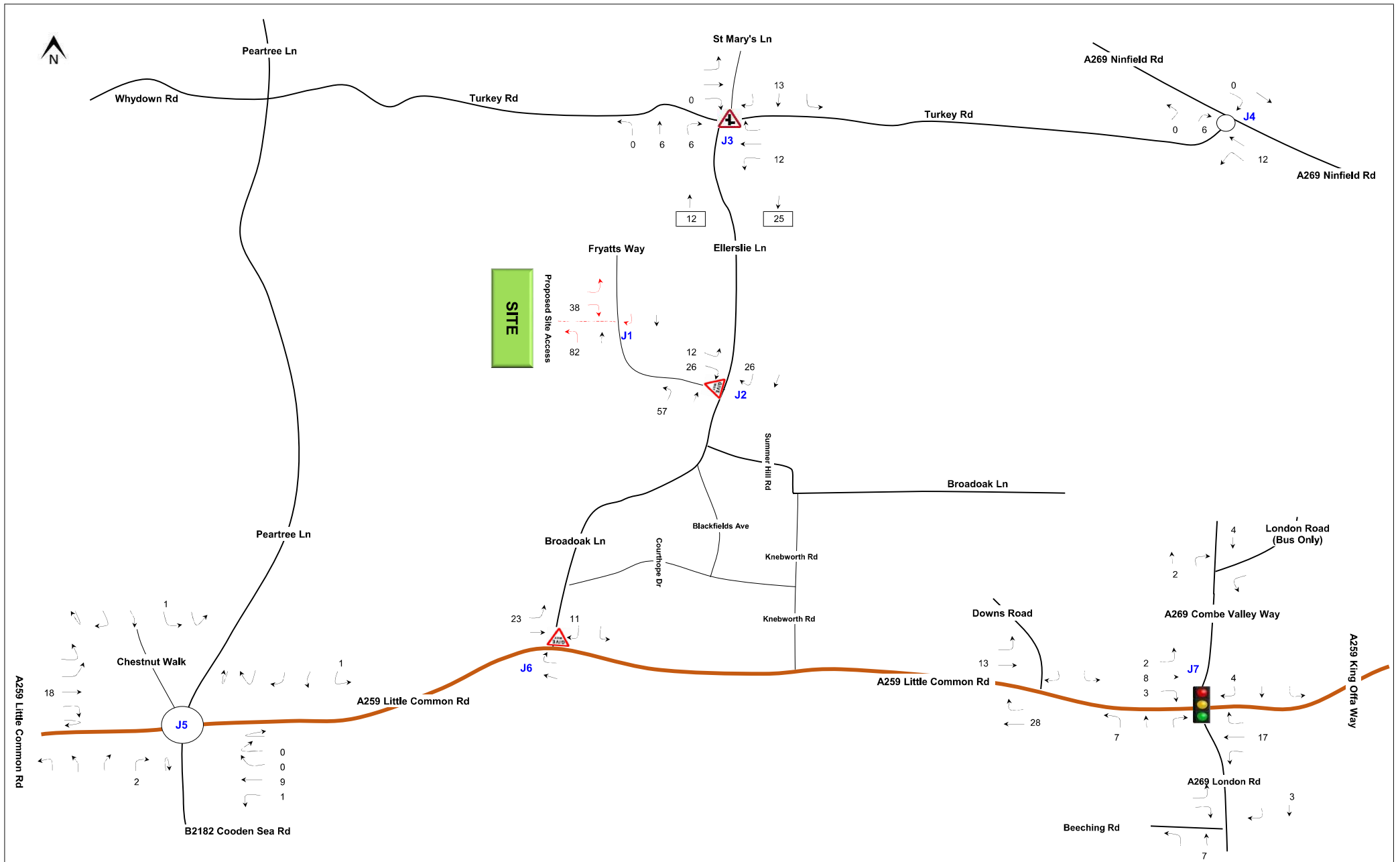
Figures v2: Fig 16: 2031 Baseline Flows + Committed Flows - PM Peak Hour



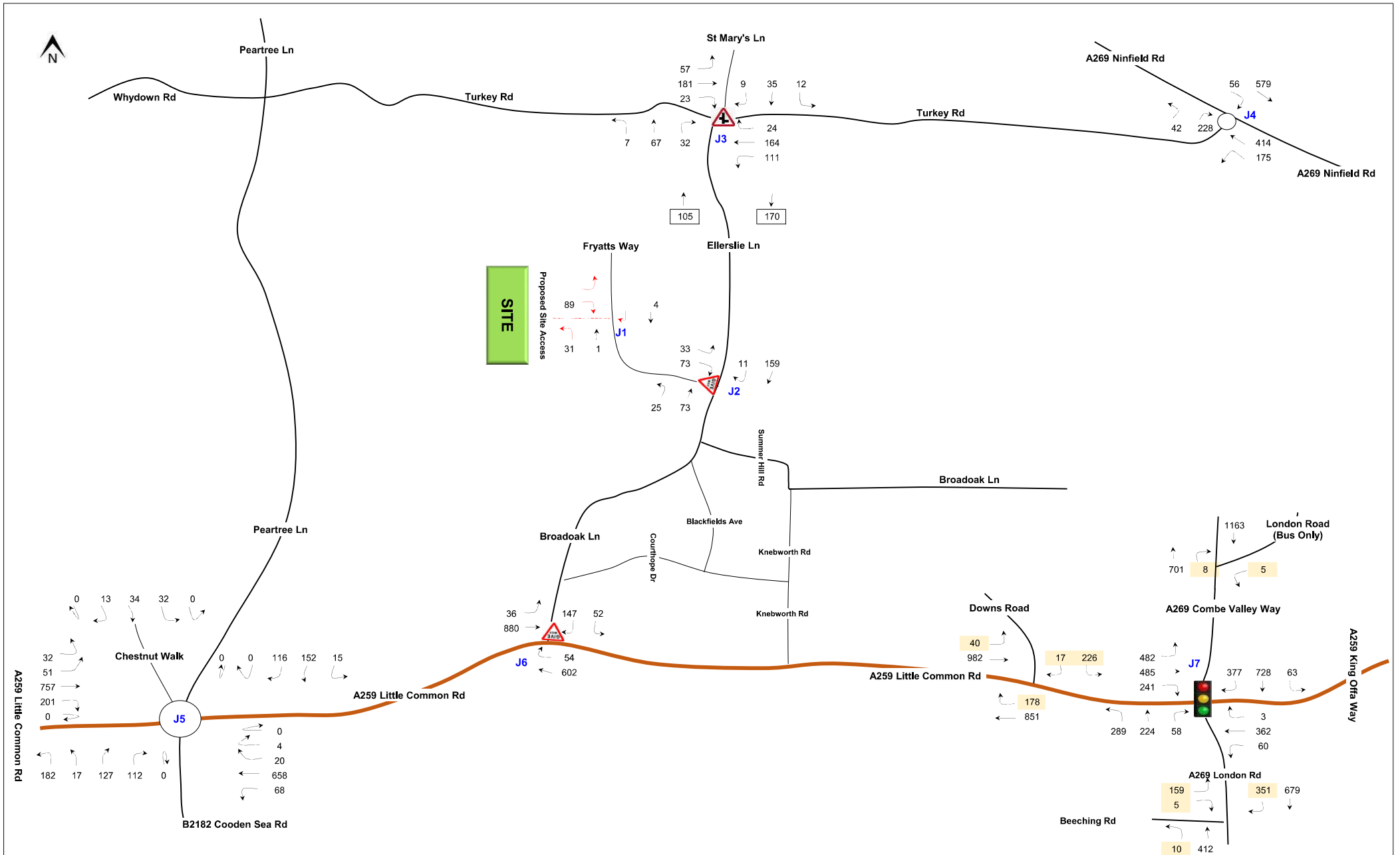
Figures v2: Fig 17: Trip Distribution based on 2011 Census- Proposed Residential Development



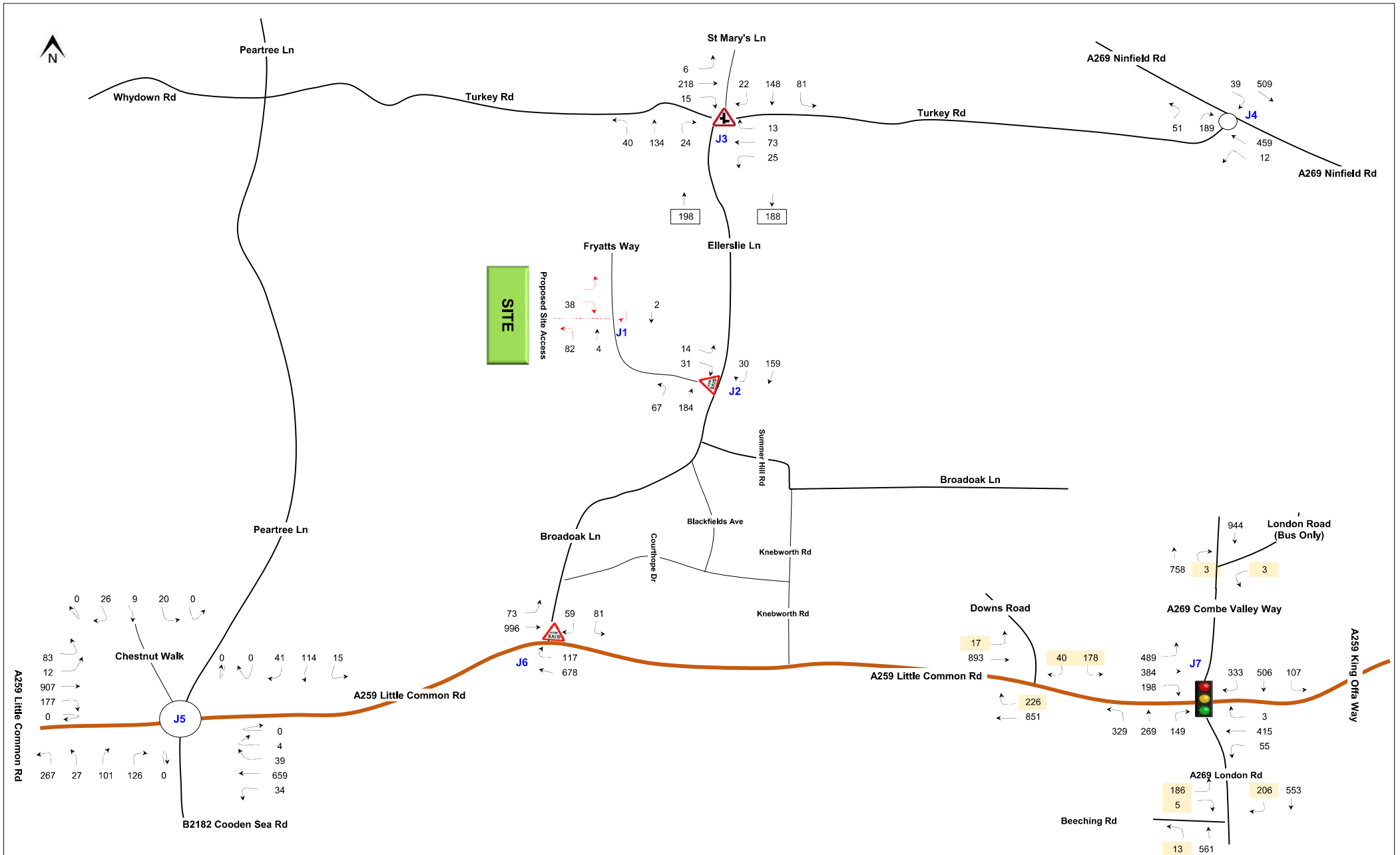
Figures v2: Fig 18: Trip Generation - Proposed Residential Development - AM Peak Hour



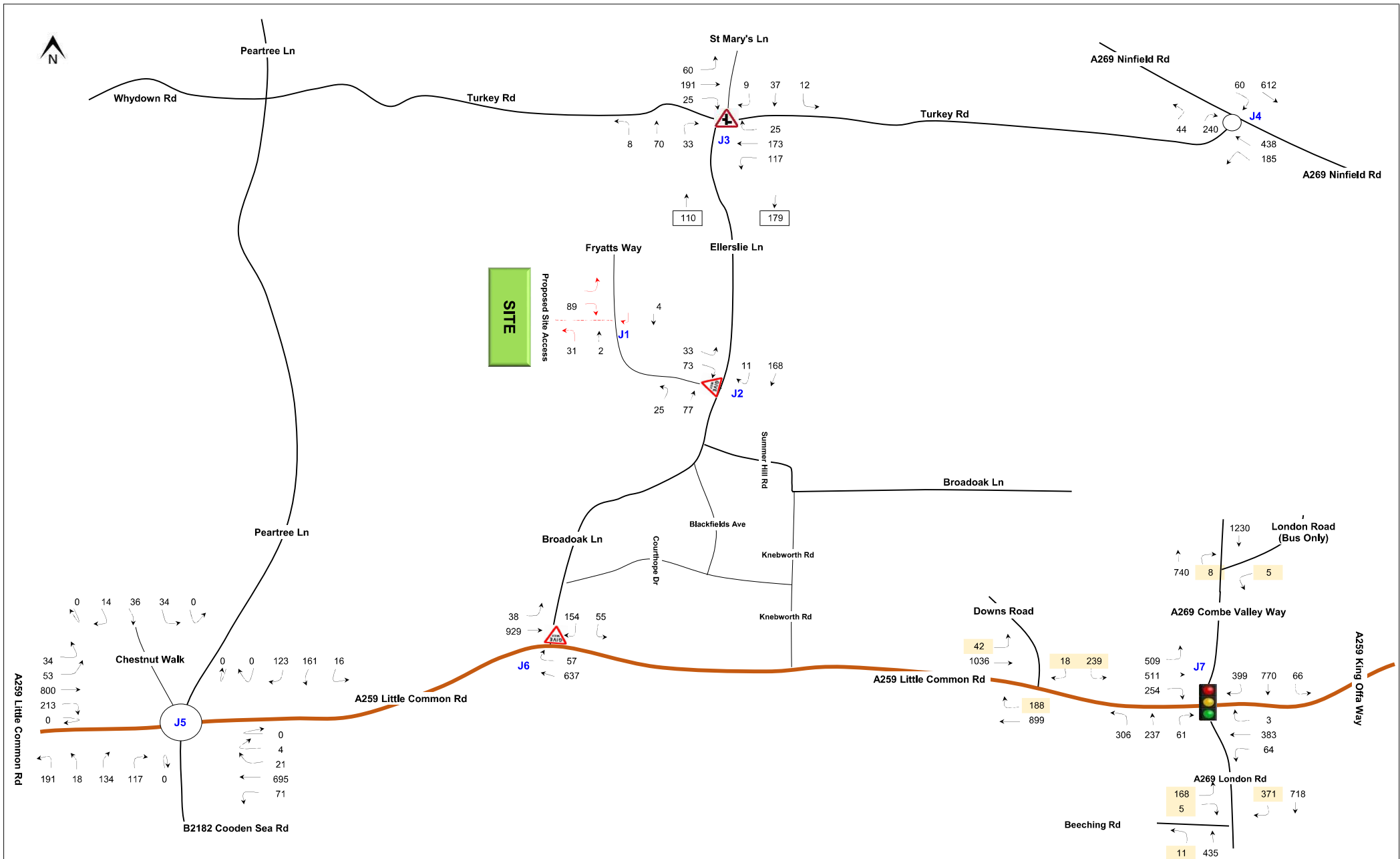
Figures v2: Fig 19: Trip Generation - Proposed Residential Development - PM Peak Hour



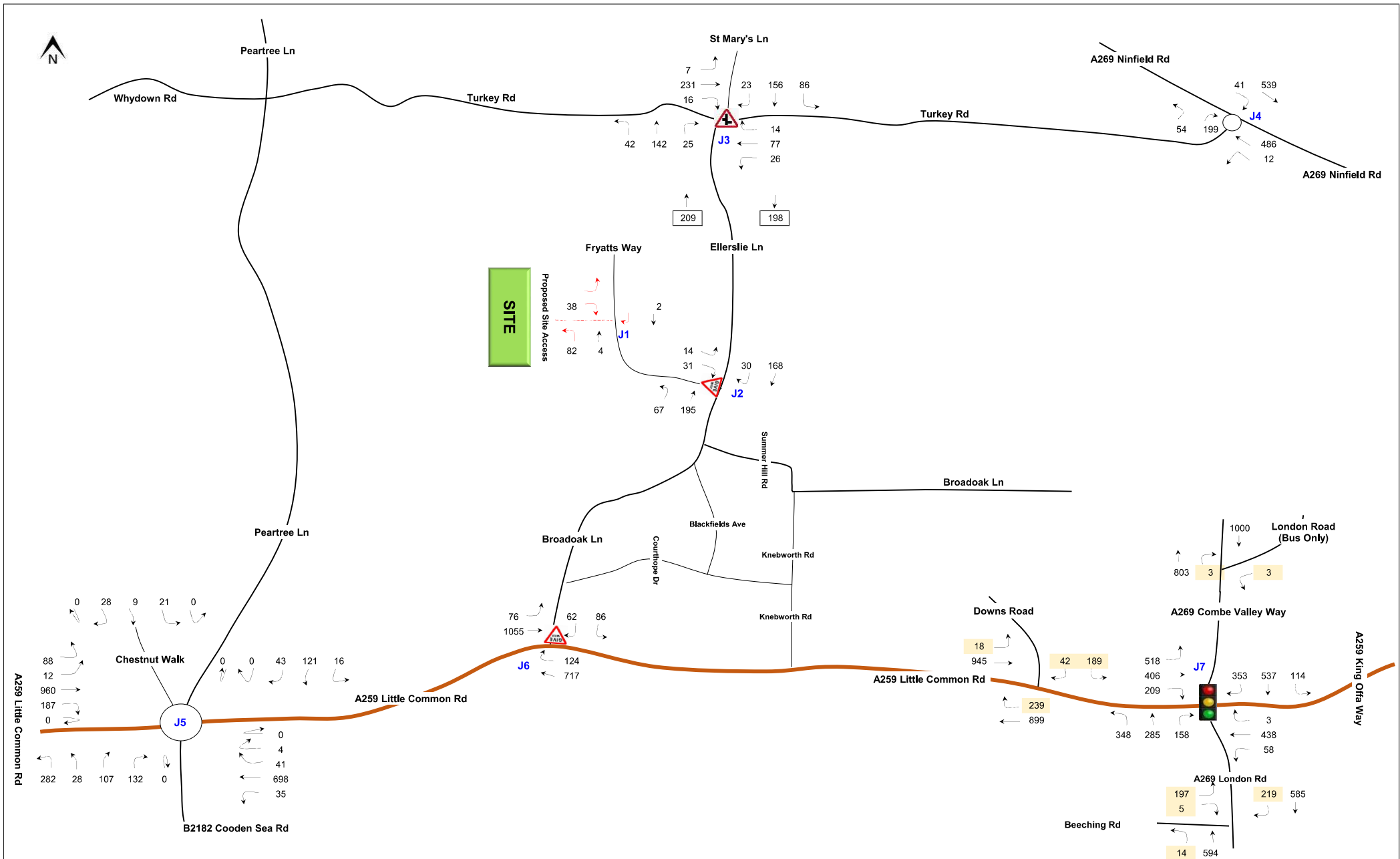
Figures v2: Fig 20: 2025 Assessment Flows (Baseline + Committed Development + Development) - AM Peak Hour



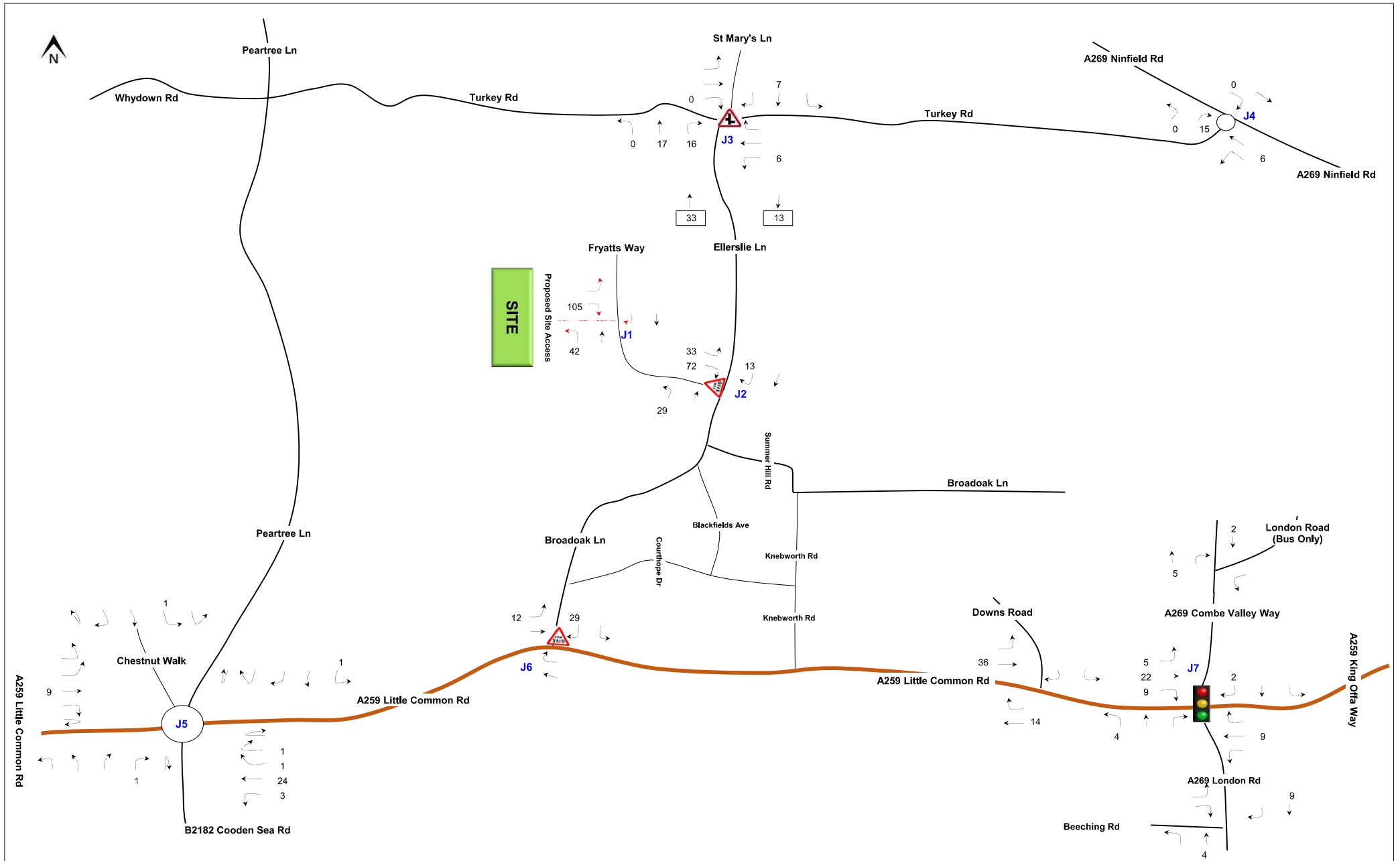
Figures v2: Fig 21: 2025 Assessment Flows (Baseline + Committed Development + Development) - PM Peak Hour



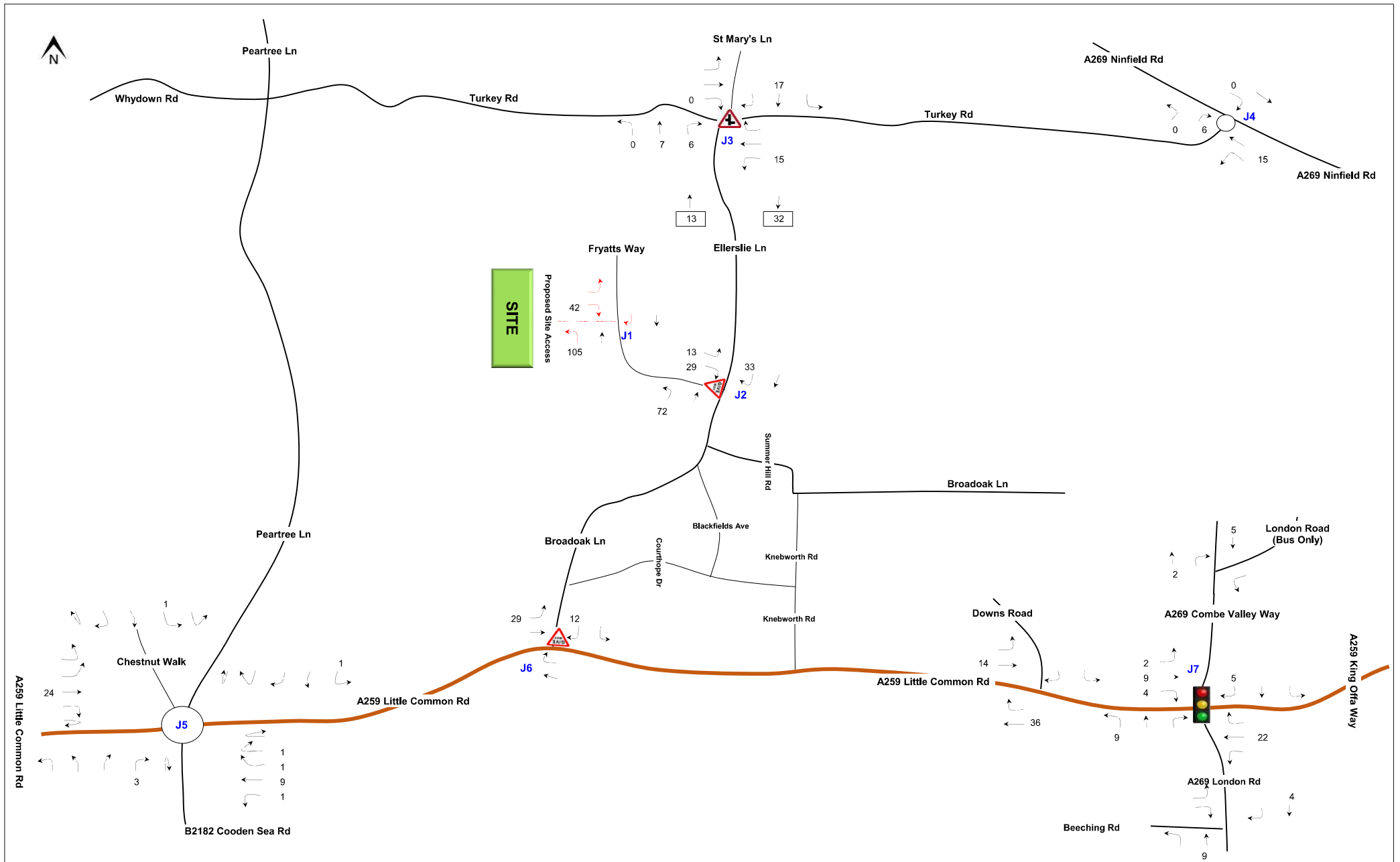
Figures v2: Fig 22: 2031 Assessment Flows (Baseline + Committed Development + Development) - AM Peak Hour



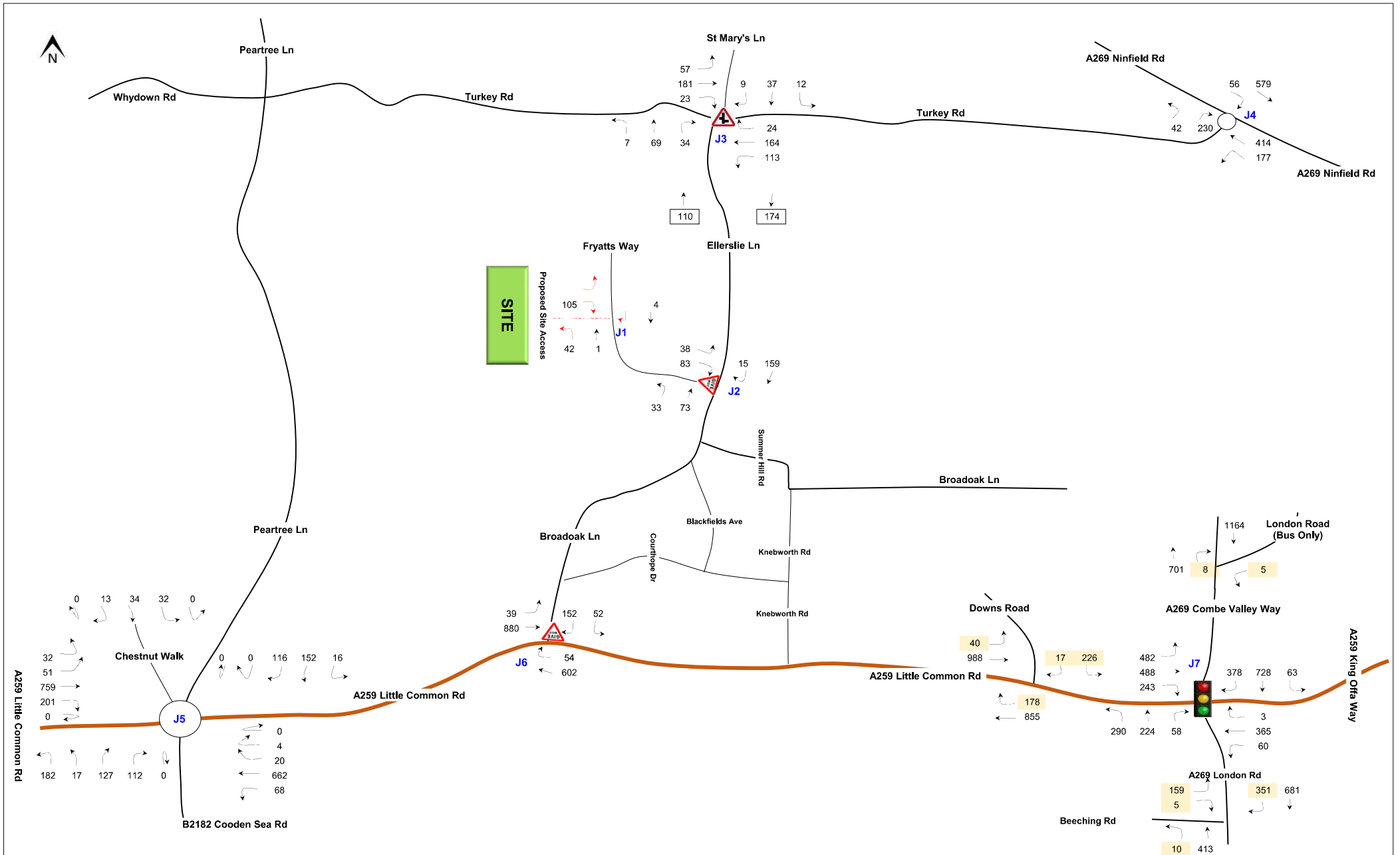
Figures v2: Fig 23: 2031 Assessment Flows (Baseline + Committed Development + Development) - PM Peak Hour



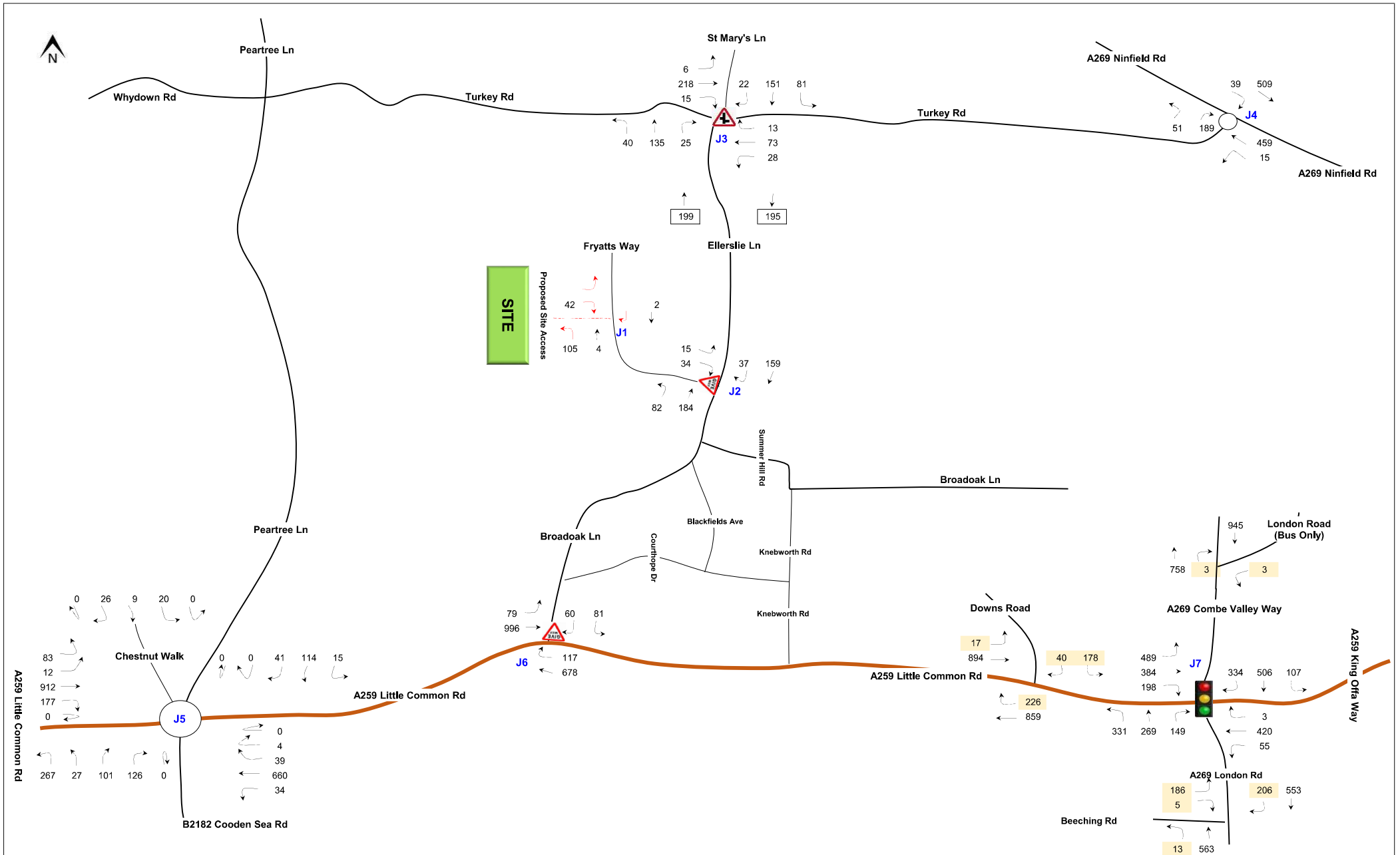
Figures v2: Fig 24: Trip Generation (Sensitivity Test) - Proposed Residential Development - AM Peak Hour



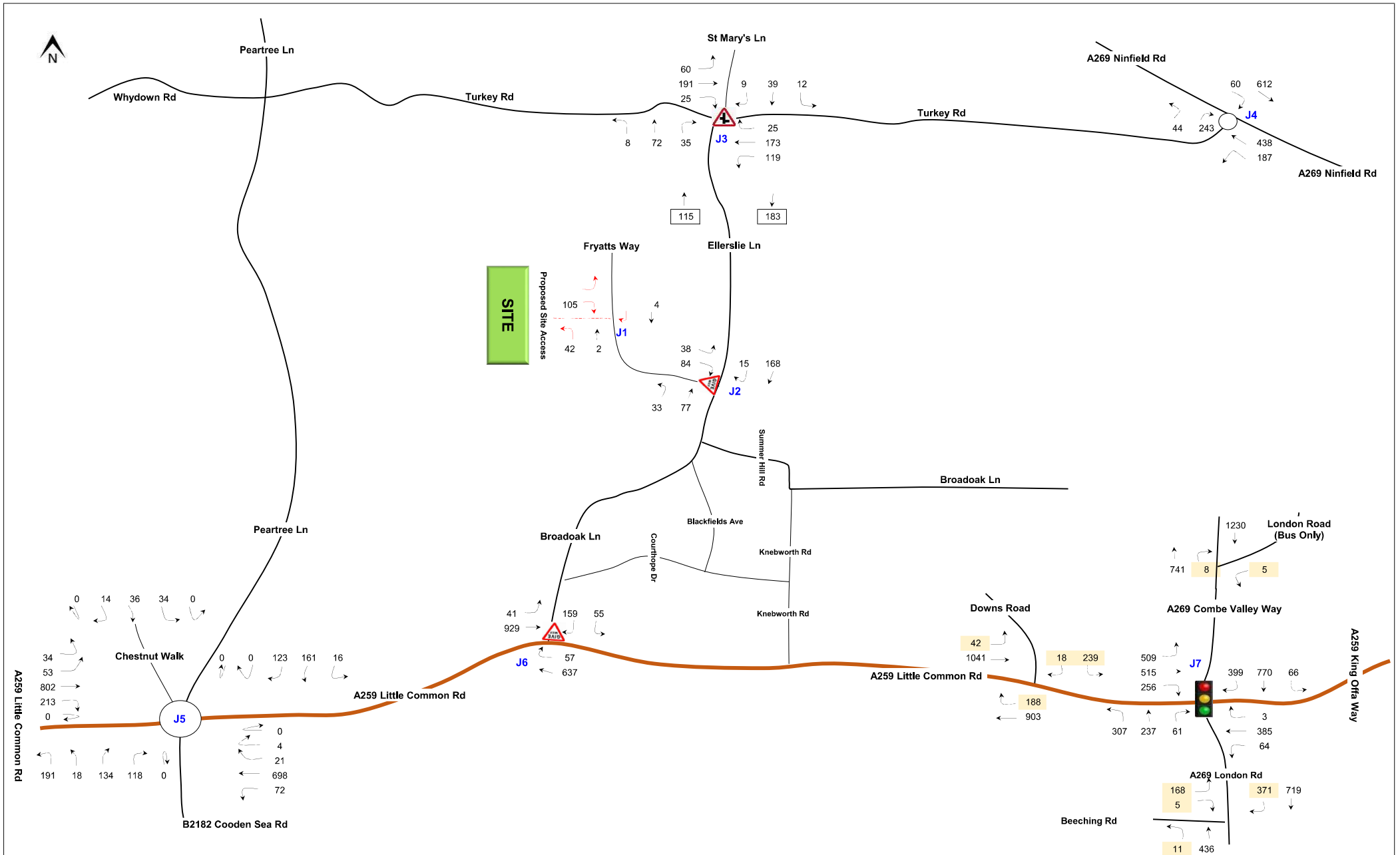
Figures v2: Fig 25: Trip Generation (Sensitivity Test) - Proposed Residential Development - PM Peak Hour



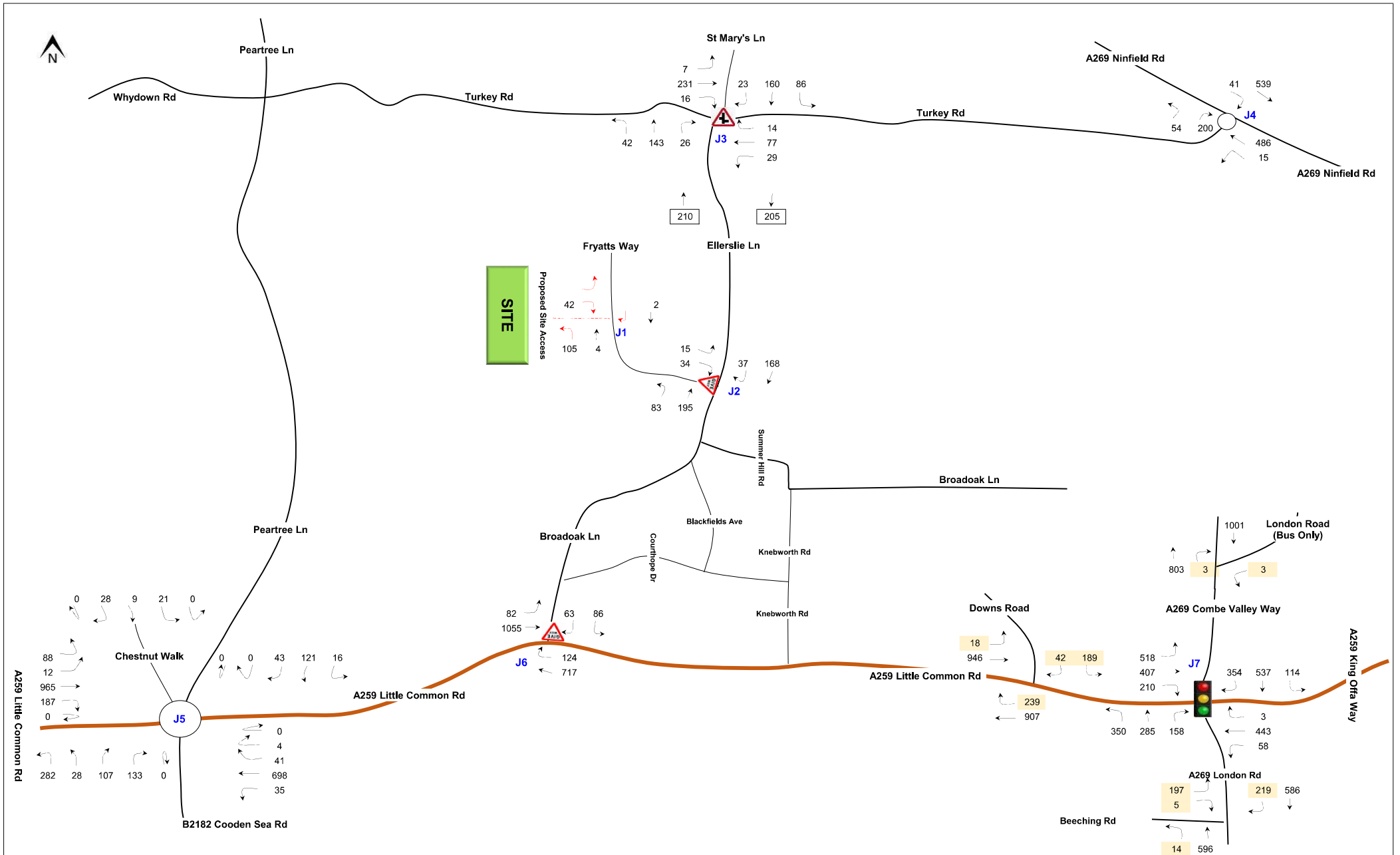
Figures v2: Fig 26: 2025 Sensitivity Assessment Flows (Baseline + Committed Development + Development) - AM Peak Hour



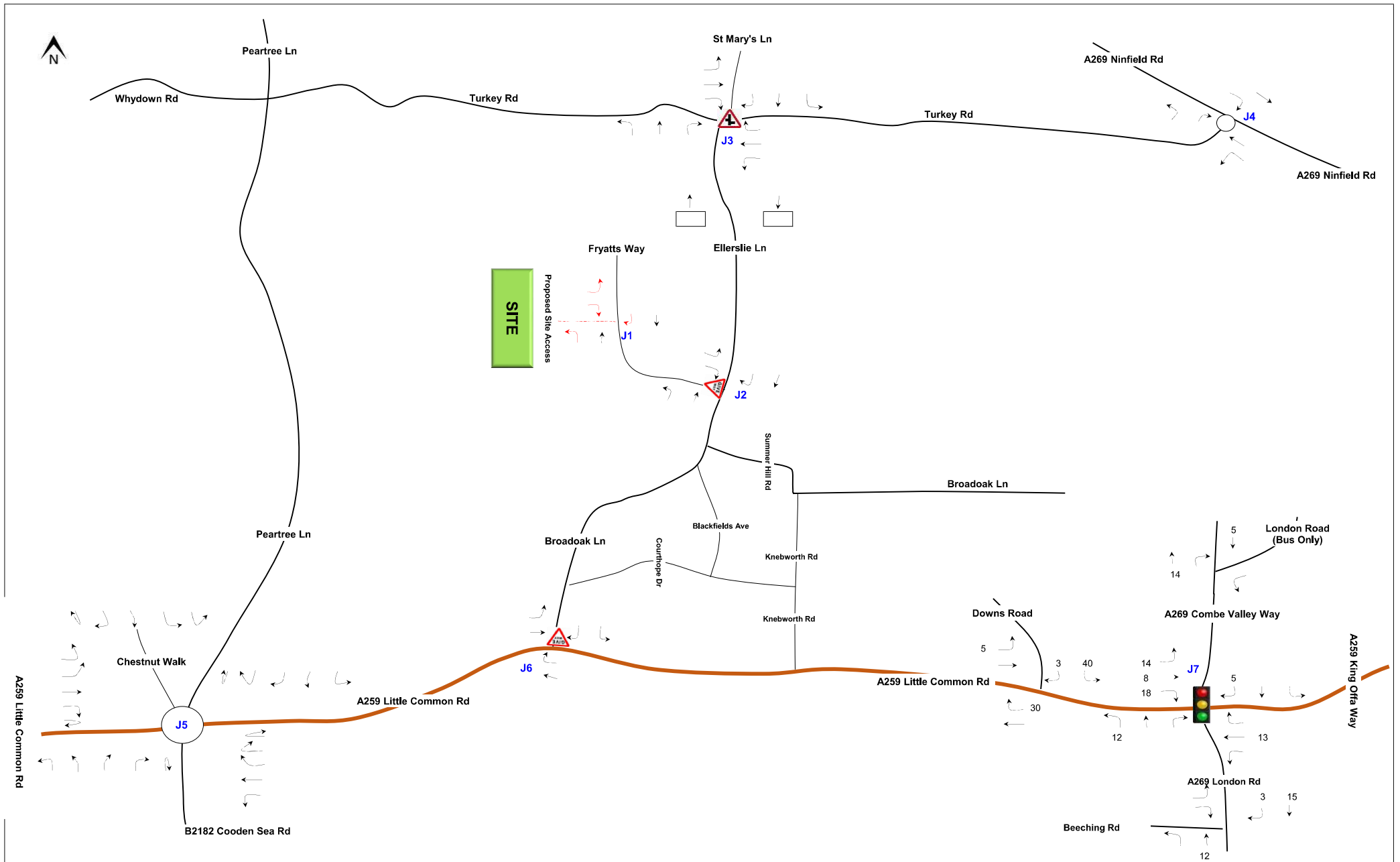
Figures v2: Fig 27: 2025 Sensitivity Assessment Flows (Baseline + Committed Development + Development) - PM Peak Hour



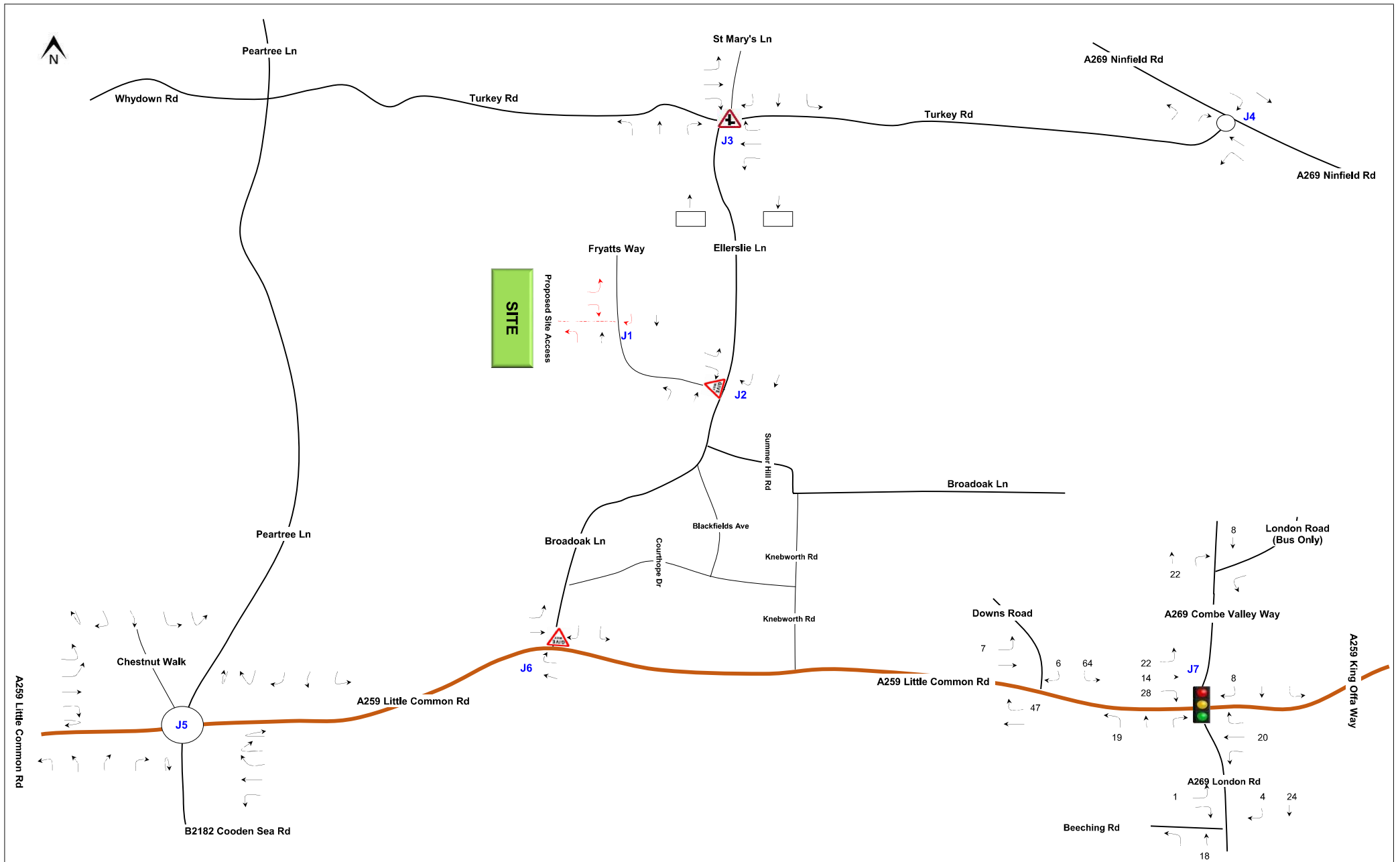
Figures v2: Fig 28: 2031 Sensitivity Assessment Flows (Baseline + Committed Development + Development) - AM Peak Hour



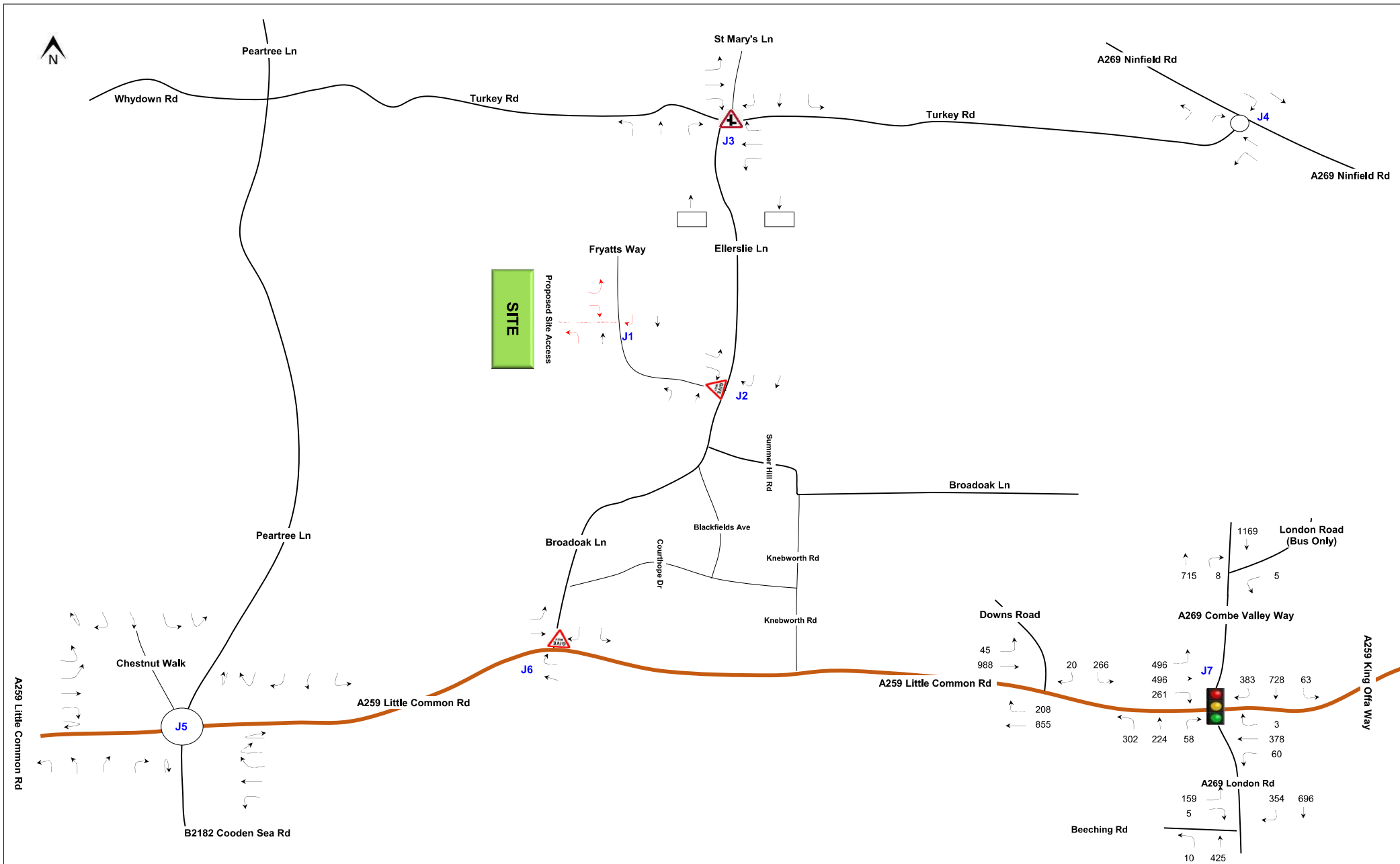
Figures v2: Fig 29: 2031 Sensitivity Assessment Flows (Baseline + Committed Development + Development) - PM Peak Hour



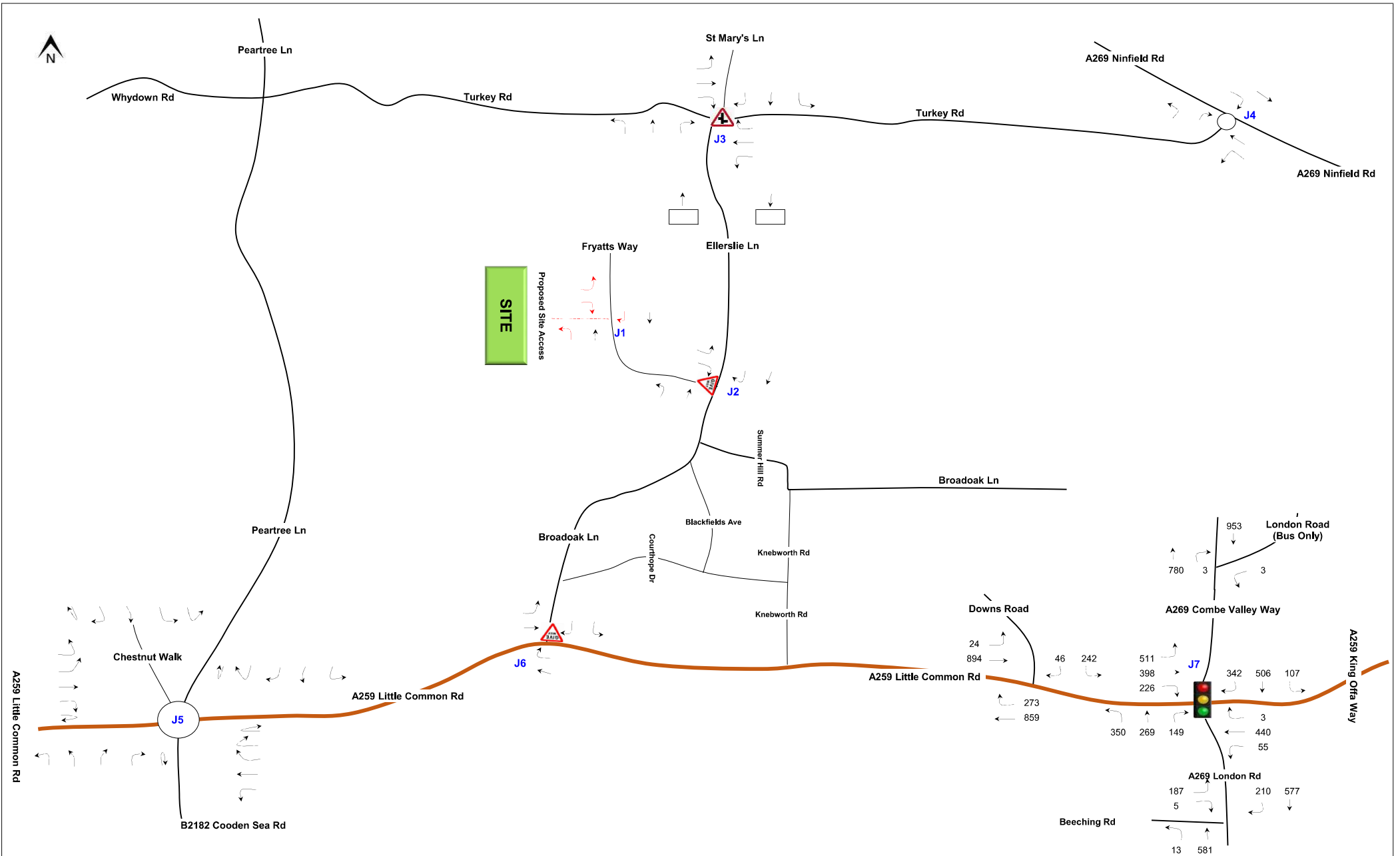
Figures v2: Fig 30: Bexhill Lesuire Centre Re-development Traffic Generation - AM Peak Hour



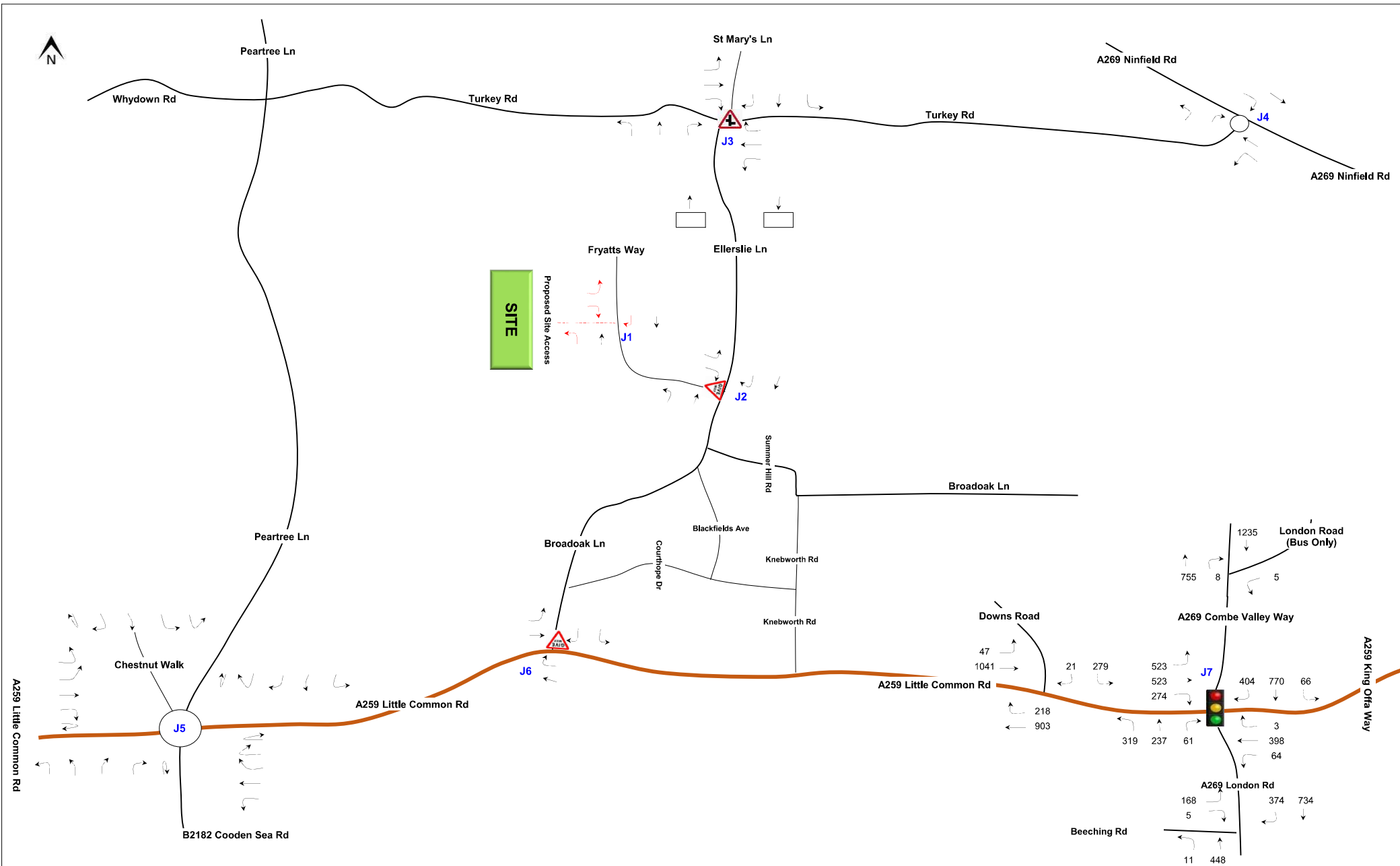
Figures v2: Fig 31: Bexhill Lesuire Centre Re-development Traffic Generation - PM Peak Hour



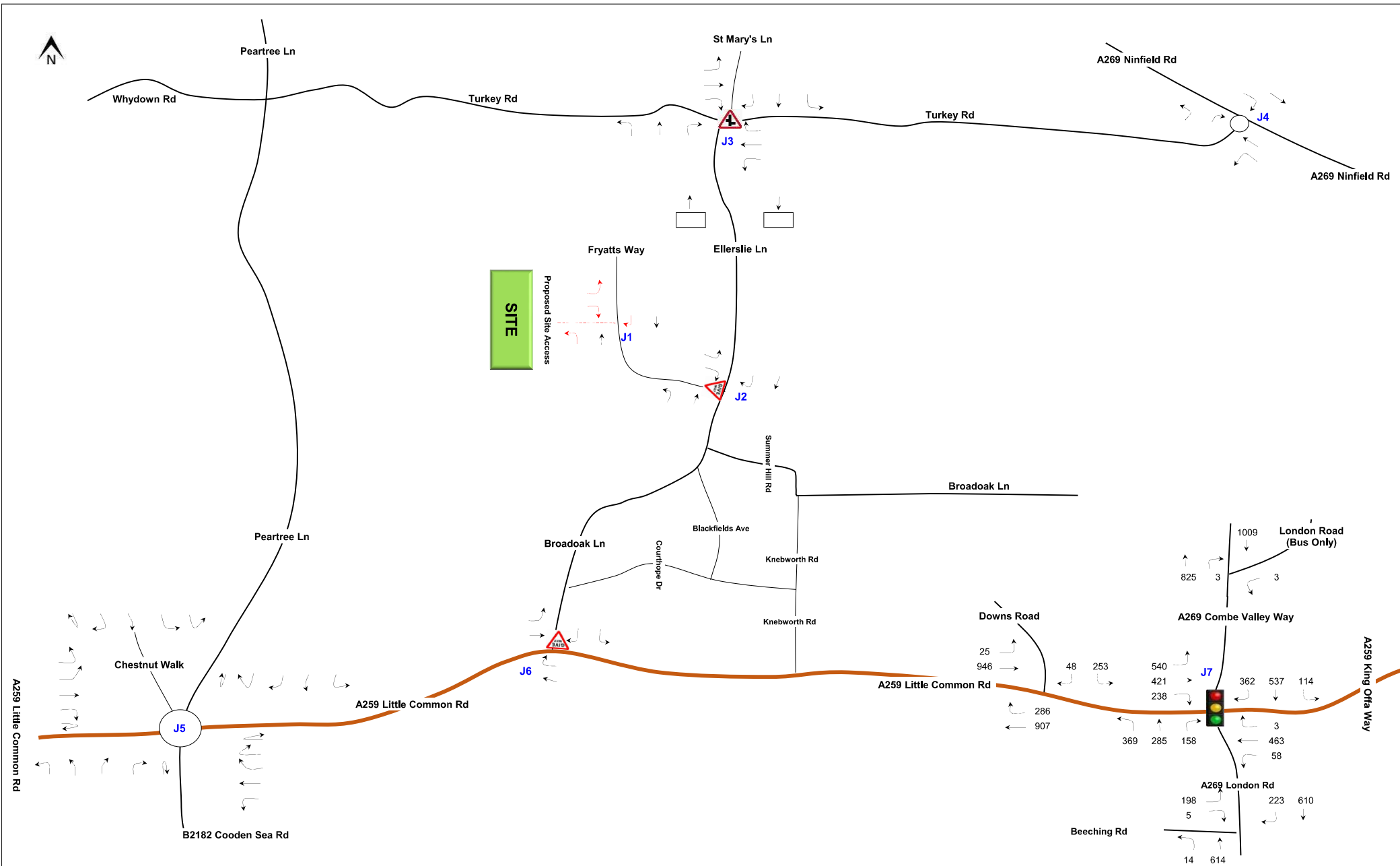
Figures v2: Fig 32: 2025 Assessment Flows for Mitigation at J7 (Baseline + Committed Development + Development (Sensitivity) + Bexhill Lesuire Re-dev) - AM Peak Hour



Figures v2: Fig 33: 2025 Assessment Flows for Mitigation at J7 (Baseline + Committed Development + Development (Sensitivity) + Bexhill Lesuire Re-dev) - PM Peak Hour



Figures v2: Fig 34: 2031 Assessment Flows for Mitigation at J7 (Baseline + Committed Development + Development (Sensitivity) + Bexhill Lesuire Re-dev) - AM Peak Hour



Figures v2: Fig 35: 2031 Assessment Flows for Mitigation at J7 (Baseline + Committed Development + Development (Sensitivity) + Bexhill Lesuire Re-dev) - PM Peak Hour



Appendices



Appendix A – Comments from National Highways



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

From: Nicola Bell (Regional Director)
Operations Directorate
South East Region
National Highways
planningse@nationalhighways.co.uk

To: Rother District Council - FAO Ms C Gibbons
planning@rother.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.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: HAMIS 92759

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 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@df.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@nationalhighways.co.uk.

Signature:	Date: 21 March 2022
Name: Elizabeth Cleaver	Position: Assistant Spatial Planning Manager
National Highways: Bridge House, 1 Walnut Tree Close, Guildford, GU1 4LZ PlanningSE@nationalhighways.co.uk	

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

Annex A National Highways' 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.

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

National Highways initially responded to this planning application consultation on 18 October 2021 setting out further information required in order to form a view on the potential impacts upon the strategic road network. The applicant's response, *Technical Note 1: Response to National Highways Comments*, was sent to us on 28 February 2022. We have reviewed the Technical Note and have the following comments:

Personal Injury Accident Review

The applicant has provided screenshots of the Crashmap online database for the A259 corridor between Little Common Roundabout and A259/A269 signalised junction. The applicant needs to compare the basic Crashmap accident data with the likely average accident rates for trunk roads and junctions as given in *Road Casualties Great Britain*. Should the accident rates be higher than would reasonably be expected nationally, then STATS19 analysis should be undertaken to determine whether or not there are any particular common factors within the accident data that could be impacted by the proposed development.

Baseline Traffic Data

The Bexhill Highways Capacity Assessment Report, November 2018, is provided as an Appendix to Technical Note 1. The report includes details of the committed developments accounted for in the modelling but these are only up to 1 April 2018. All committed developments since 1 April 2018 need to be included in the baseline traffic, for example, Land at Clavering Walk (RR/2018/3127/P) permitted February 2020.

The Technical Note refers to pre-application correspondence with East Sussex County Council regarding committed developments not included in the Development and Site Allocations. However, Rother District Council, as the local planning authority, should be advising on committed developments in Rother, rather than East Sussex County Council.

Trip Rates and Trip Generation

We continue to wish to see a sensitivity test using a trip rate of 0.7 per dwelling in the AM and PM peaks. We do not accept the applicant's statement regarding post Covid19 travel changes because there has been insufficient time post the onset of Covid19 to determine whether there is a long term change in travel patterns. Other planning proposals in the area have been required to undertake sensitivity assessment with a 0.7 trip rate to represent a worst case scenario so that we can understand the implications if national trip rates derived from TRICS are not representative of the local area. It would assist the applicant's position in allaying the considerable level of local opposition and concerns over the volume of traffic generated by development and whether or not the highway network will cope with that traffic.

Assessment Years

The TN proposes to assess future years of 2028 and 2031. For SRN assessments the opening of a development is defined as the date at which the development first becomes available for occupation, but assuming a full occupancy level at that time. The TN anticipates the development could be complete by 2028, so 2028 is not the opening year as defined in Circular 02/2013.

SRN Junction Capacity Assessments

The Technical Note uses traffic survey data recorded on 20 January 2022 to provide base year validated traffic models. However, as January is not a neutral month, as provided in WebTAG guidance, the applicant will need to undertake a sensitivity test.

We note that the LinSig model at the A259/A269 signalised junction has now been modified to include the Down Road, London Road and Beeching Road arms. However, no information has been provided regarding the slope and intercept co-efficients used to inform the non-signalised arms of the LinSig model. The applicant will need to provide raw slope and intercept figures from the PICADY models that were used to determine the Opposing Lane Coefficients within the non-signalised arms of the A259/A269 LinSig model.

The A259/A269 signalised junction LinSig model is based on the existing layout rather than the mitigation scheme for the redevelopment of Bexhill Leisure Centre (RR/2019/430/P). Although the planning application is undecided, the development is an allocation in the adopted Rother Local Plan (BEX4) and the mitigation at A259/A269 is required to deliver Local Plan development, not just BEX4. Therefore, the development and associated mitigation should be assumed in 2031 future year assessments. However, we recognise that the Bexhill Leisure Centre redevelopment proposal is currently suspended and so an assessment based on the existing layout could be undertaken as an additional test.

Conclusion

Our current position is that the proposed development's impact on the SRN is not agreed. This response details the steps that need to be taken in order to resolve this issue.

National Highways recommends that planning permission not be granted for a period of three months expiring **21 June 2022** to allow the applicant time to resolve the outstanding matters. This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regard to the required assessments.

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.



Appendix B – Correspondence with LPA regarding Committed Developments
