

# Statement of Case



**PINS ref:** APP/U1430/W/22/3304805

**Planning Application Ref:** RR/2021/1656/P

**Location:** Land at Fryatts Way, Bexhill, TN39 4LW

**Description:** 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; Tracker #17919

**Appellant:** Gladman Developments Ltd

Dear Sir,

National Highways has 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 National Highways works 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. We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN, in the case of this proposal, particularly the A259.

The A259 is currently a highly stressed route where the development's impacts will be apparent. The appellant has not demonstrated that there will not be an adverse impact on the safe and efficient operation of the strategic road network in this case the A259 trunk road (the tests set out in DfT Circular 02/2013, particularly paragraphs 8 to 11 and MHCLG NPPF 2021 paragraphs 110-113)

We have had ongoing discussions with the appellant's consultant, during which additional information has been provided. This primarily relates to junction assessments along the A259 as reported in TN03 produced by Tetra Tech and dated 17 June 2022. Initial comments from us requested geometry and modelling files, some of which have subsequently been provided. On 6 and 10 October 2022 the appellant's consultant sent us information relating to junction geometries, electronic LinSig model files and a commentary as to why (in their view) assessment of the A259/Knebworth junction is not required. We have reviewed this information.



Whilst the matter of junction geometries is now satisfactorily resolved, the model of the A259/A269 junction is not currently agreed (owing to a number of technical inaccuracies).

This email therefore summarises the status of junctions to be considered for impact on the A259, including identifying matters that remain unanswered:

- . The junction modelling and geometry measurements for the A259 Little Common roundabout have now been provided. This means that the results as identified in Tetra Tech TN03 can be considered representative results of the impact on this roundabout. Please note all assessments assume the mitigation associated with the scheme as shown in 180300-003F, and therefore delivery of mitigation represented within this scheme should be delivered by this development.
- . The junction modelling file and geometry measurements for the A259 / Broadoak Lane have now been provided, and therefore the results as reported in TN03 can be considered appropriate in making a judgement on the impact of the development on the A259 / Broadoak Lane junction.
- . A259/A269 Bexhill Leisure Centre signals have had a technical review which has identified issues associated with the model to be resolved before impact can be considered. Note that this includes the consideration of the interaction of Down Rd, Beeching Rd and London Rd with the A259.
- . The A259/West Down Road priority junction has yet to be considered. We note that this route could be used as an alternative to Down Road, given the proximity of Down Road to the A259 / A269 junction, and therefore should be considered. Therefore we do not currently accept the appellant's findings.
- . The A259 / Knebworth junction has not been assessed to date. The distribution and assignment of vehicle trips generated to and from the proposed development shows there would be a substantial increase in trips using the A259 / Knebworth priority junction. We are unable to make an informed view on potential impacts upon the safe and efficient operation of this junction or whether or not there is a need for mitigation measures.

Once we have received and reviewed the outstanding information related to Knebworth Road junction, along with our other concerns being satisfactorily addressed our position in relation to this application may change and we will advise you of any change of position as soon as it becomes apparent. Our objective is to work with the applicant to ensure that all highway matters are amicably resolved.

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Accordingly, given above concerns it is not possible to determine the impacts on the SRN at this time.

David Albert Bowie BSc (Hons) MCIHT  
Associate Director Systs Ltd – For and on behalf of National Highways

26 October 2022