



Our ref: NZ 304 653
Your ref: ST/0228/21/FUL

Development Management
South Tyneside Council
Town Hall & Civic Offices
Westoe Road
South Shields
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National Highways
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Tel: 0300 470 6163

8 March 2022

FAO: Geoff Horsman

Dear Geoff,

Demolition of Existing Structures and Redevelopment to Provide 448 New Studio, 1, 2, 3, 4 & 5 Bedroom Homes, Flexible Community/Commercial Floorspace (Class E / F2) With the Provision of Vehicular Access from Ellison Street at Vacant Former Hawthorn Leslie Shipyard and Rathbone Community Industry, Ellison Street, Hebburn NE31 1YN.

Thank you for your consultation request, dated 15 February 2022, regarding the above application. I provided here National Highways' comments responding to the Note in Response to NH Comments on TA Addendum (the Note), dated February 2022, prepared by Tetra Tech submitted in response to our previous review and offer the following comments.

Committed and Emerging Developments

Overall, the committed development included in the proposed assessments is acceptable, based on previous agreements for this development proposal. However, we would note that we are aware of other committed developments and relevant active planning applications which add traffic to the Strategic Road Network (SRN) junctions that have been assessed. We would request that this context should be considered when interpreting any assessment results.

A194 (M) / A184 (Whitemare Pool) and A194 / B1306 Mill Lane Junction Capacity Assessment

Upon review of the revised model, we would accept that the proposed TRANSYT15 model is robust. Consequently, it is now appropriate to consider the results of this assessment. In the 2023 with and without development scenarios, the following arms are over capacity, in either the AM or PM peak:

- **A194 (M) / A184 (Whitemare Pool)**
 - **A184 WB (100% or over)**
 - **A194(M) NB (100% or over)**
 - **A184 EB (between 90% and 100%)**

- A194 SB (between 90% and 100%)
- A194 / B1306 Mill Lane Junction
 - A194 NB (100% or over)
 - B1036 (100% or over)
 - A194 SB (between 90% and 100%)

We would reiterate that the Department for Transport 'Circular 02/2013' states:

"Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe".

The A194 (M) / A184 (Whitemare Pool) junction is shown to be operating over-capacity. We would conclude that the residual cumulative impacts of development are severe, and a discussion is required with South Tyneside Council (the Council) to discuss the approach towards mitigating these cumulative impacts.

A19 / A185 (Jarrow) Junction Capacity Assessment

National Highways has material concerns regarding the validity and reliability of the queue length validation undertaken by the applicant's transport consultants:

- The on-site traffic survey reviewer was not independent from the applicant's transport consultants and video footage validating the survey results has not been provided;
- The survey was undertaken on a single day in a single peak hour;
- The survey was undertaken in a non-neutral month; and
- An average was not provided over several network peak hours so could not accurately capture the typical MMQ queue lengths to facilitate calibration.

It is also considered an irregular approach to undertake queue length validation on a single arm within capacity assessment. Considering that the ARCADY 9 model reports significant RFCs and queue lengths, with multiple arms reported to exceed practical capacity and the A185 northbound arm estimated to surpass theoretical capacity. We would request that robust, accurate and reliable queue length validation exercises are undertaken on all arms to ensure the validity of the whole model presented and not just calibration undertaken on a single arm. The survey should be:

- Undertaken by an independent professional traffic survey organisation and not a conflicted party, or video footage provided for review;

- Where possible, cross-checks against historic count data should be undertaken to identify any changes in patterns. Where a clear discrepancy and explanation can be identified it may be appropriate to make manual adjustments to the count data. This is particularly relevant given the proposal to use 2022 survey to validate 2018 base traffic flows. Upon request, National Highways can provide relevant queue length survey data collected pre-covid19.
- Undertaken in a neutral month which is unaffected by covid-19 restrictions (in accordance with TAG guidance) and for a worst case weekday as informed by several weekday peak period surveys.

Given our concerns with the proposed junction capacity assessment, we would withhold final comment on the proposed assessment results. However, we note that a discussion may be required with the Council to discuss the approach towards mitigating the identified cumulative impacts to ensure the safe and efficient operation of the SRN.

Collision Data Analysis

The applicant's transport consultants state that they have demonstrated that the proposed development's impacts are not significant and should be deemed acceptable and, on that basis, further safety assessment is not needed. Based on the above, we would reiterate that the applicant should present a clear analysis of the collision data, causation trends, and cluster analysis for the A194 (M) / A184 (Whitemare Pool) Junction or the A19 / A185 (Jarrow) Junction.

Construction Traffic Management Plan

It is noted that a Construction Traffic Management Plan is to be secured via a planning condition. We support this approach and would comment that subject to the above issues being resolved, the following wording would be appropriate for a planning condition:

Construction should not commence until written details of a construction phase traffic management plan ("CTMP") for the management of construction traffic incorporating the number of construction trips, routing, timing, access details, wheel wash facilities and vehicle parking for contractors has been submitted to and approved in writing by the Local Planning Authority in consultation with National Highways. Thereafter the construction of the development shall proceed in strict accordance with the approved CTMP unless otherwise agreed in writing by the local planning authority in consultation with National Highways.

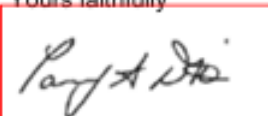
Conclusion

The cumulative impact at the A184 / A194 (M) (Whitemare Pool) Junction are severe. The impacts at the A19 / A185 (Jarrow) Junction is unconfirmed at this stage due to the need for further evidence.

On the basis of the above, our current recommendation of non-determination, dated 2 November 2021, is withstanding or until all requested information is assessed and any issues of concern have been resolved, whichever is the earlier.

I trust that the above appropriately sets out National Highways' position regarding the planning application. Please do not hesitate to contact me should you have any queries.

Yours faithfully



Paul Dixon
Planning & Development
Yorkshire & North East