

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Arun District Council FAO: Michael Eastham
FROM:	Highways, WSCC – Tim Townsend
DATE:	12 th June 2018
LOCATION:	Land at Bridge Cottage and The Old Cottage, Lidsey Road, Lidsey, PO22 9PH
SUBJECT:	AL/20/18/OUT Outline application with all matters reserved for the demolition of 2 No. dwellings & associated outbuildings & the erection of up to 27 No. dwellings, of which 30% will be affordable, with associated open space & access. This application is a Departure from the Development Plan.
DATE OF SITE VISIT:	30 th May and 4th June 2018
RECOMMENDATION:	☒ Advice ☒ Objection ☐ Modification ☐ No Objection ☒ More Information ☐ Refusal
S106 CONTRIBUTION TOTAL:	£TBA

This is the WSCC highways and transport response to the above outline planning application with all matters reserved for the demolition of 2 No. dwellings & associated outbuildings & the erection of up to 27 No. dwellings, of which 30% will be affordable, with associated open space & access.

Summary position of County Highway Authority (CHA).

Based on the information submitted, the CHA objects to the proposal on grounds of road safety, given the limited information (and associated lack of clarity of the details shown) not demonstrating suitable access design and lack of sustainable access (i.e. non-motorised access by those on foot, bicycle etc.) to local bus services, employment, schools and goods/services.

Site location.

The site is located adjacent to the A29 Lidsey Road north of Bognor Regis. The applicant seeks to demolish two properties and outbuildings, replacing them with up to 27 dwellings, internal access roads and parking. Access to the site is shown directly off the A29 Lidsey Road on the northern side (outside apex) of a bend in the road. Alongside the first section of the access road (on the southern side), a footway is shown for part of the road's length. To the south-east of the entrance point on Lidsey Road a footpath is shown emerging to the A29 to the south of the site with the applicant stating that this would provide access towards a south-bound bus stop.

Further comments about access and suitability thereof are made elsewhere in this report.

Access.

As mentioned above, vehicular access is shown directly off the A29 on the apex of a bend in the road. The access measures 4.8m wide with what appears to be 5.0-6.0m bellmouth radii (this should be clarified and marked-on a plan). Visibility splays are taken from a 2.4m 'x' distance with major road ('y'), with the applicant's Transport Consultant stating that splays of 106m in the leading traffic direction can be provided - looking west from the access - (98m scales on the plan) and 150m in the trailing direction - looking south - (79m scales on the plan). Forward visibility (i.e. that required for drivers of vehicles turning right and left into the site and corresponding visibility for drivers already on Lidsey Road coming-across them - from both north and south) is stated as being 81m (although approximately 60m scales from the drawing between a right turning vehicle and driver of a vehicle travelling southbound). No northbound forward visibility splay is shown for vehicles driving northwards coming across a vehicle turning right into the site.

Given the lack of clarity including lack of marked-on dimensions and visibility splays - it is not known what can actually be provided - both on and off-site. For the CHA to consider the matter further, the above matters should be attended to - a summary of which is provided below (other requirements are summarised elsewhere in this report under relevant sections):

- The dimensions of bellmouth radii of new junction
- The achievable visibility splays taken from 2.4m 'x' distance with dimensions marked-on
- The forward visibility both for vehicles travelling north AND south encountering a vehicle waiting to turn into the site with dimensions
- Dimensions of carriageway at and on the approach to the site entrance (and site entrance itself)

(All the above to be shown on a revised plan).

With regard to design documentation used to inform the road and access design, the applicant's Transport Consultant has used advice in Manual for Streets 2 (MfS2) to inform parameters (visibility, access widths etc.), whereas Design Manual for Roads and Bridges (DMRB) is generally used where the speed limit exceeds MfS2 criteria of 37mph. The A29 at this location is 50mph. However, in support of using MfS2, the applicant's Transport Consultant has provided speed and traffic count data recorded over the period 15th March - 26th March 2016. The data is just over 2 years old but with regard to solely the speed data, no material changes have taken place since this time to suggest speeds might have increased or decreased. What is not clear however, are the precise locations where the readings were taken. It is also not stated what weather conditions were during that time. Therefore, it is not known whether any wet weather adjustment would be appropriate nor whether one has been made.

For the CHA to consider this part of the proposal further, it would need the following:

- Plan showing precise locations of where the speed surveys were taken/recorded
- Details of weather conditions during entire extent of surveys

The data shows the following (85%tile speeds are quoted):

Northbound.

AM peak - 37mph

PM peak - 35mph

Southbound.

AM peak - 38mph

PM peak - 36mph

With regard to what design guidance and/or standard should be used, based on the speed survey data alone, this suggests that it is appropriate to use MfS2 given the closeness of the recorded speeds in relation to the criteria in that document. What is not clear, however, is the interpretation of the visibility splays and how they are plotted on the application site access drawing (as already mentioned above). Also, the position of the right-turning vehicle (car) could – in practice – vary. As such, the applicant should re-draw the splays, ensuring they are properly plotted with dimensions marked on them and also provide two plots of the right-turning vehicle - one where it is at present and the other with it slightly further forward. As already mentioned above, forward visibility and Stopping Sight Distance (SSD) splays should also be marked-on (for users of the access and for those encountering the turning vehicle from both directions) as should the dimensions and details of the proposed changes to the road and its markings in this location. Areas where vegetation is prevalent should also be marked on more clearly.

Although detailed surface water drainage (SWD) comments will be made separately by the SWD team, at any detailed design/S278 stage careful attention should be given by the applicant to SWD on the bend in the road adjacent to the access, particularly as water occasionally ponds at this location. As the applicant is proposing road widening here, the amount of hard area (i.e. road surface) will be increasing, thereby increasing surface water run-off. As such, any highway works here should include appropriate mitigation to address this.

Finally, the applicant should provide detail of the proposed road markings at the new access and on the road itself, documenting how these comply with the Traffic Signs Manual.

A design commentary should also be submitted alongside any plan.

For the CHA to consider this part of the proposal further, it would need the following:

- Visibility information and SSD to right turning vehicles as required as above
- Vegetation areas required for visibility purposes shown more clearly
- Road markings that are proposed at and on the approaches to the new access point and how these comply with the Traffic Signs Manual
- A Design Commentary setting-out how the design complies with guidance and/or design standards

If the above is provided on a revised plan and in an associated report, the CHA will consider the access proposals further. However, based on that provided so far, a highway objection is raised.

Road Safety.

A Stage 1 Road Safety Audit (RSA) has been provided within the Transport Statement (TS) that accompanies the application. A Designer's Response (DR) is also provided.

The audit team makes three recommendations based on correspondence from Reeves Transport Planning and specifically Drawing No. LID/SR/101 - all to do with the access position and visibility available to and from it. The designer accepts these although in the absence of revised plans showing specific visibility splays (see comments above), it is not possible to comment further at this stage. All that will be said is that the applicant should look at the highest 85th %tile speeds recorded and – subject to confirmation of weather conditions and as a consequence any wet-weather adjustment (if deemed appropriate) - and base visibility splays on those. Also, the RSA was based on a previous proposal for 6-7 units – not the 27 now proposed.

The footpath towards the bus stop should also be safety audited. Furthermore, if any additional highways mitigation is proposed, this too should be safety audited.

For the CHA to consider this part of the proposal further, it would need the following:

- Any revised plan/s (when produced) - including description of development as submitted under AL/20/18/OUT - to be submitted to the audit team for further comments. Following that, both the plan and any further comments from the Audit Team to be provided to the CHA to consider.
- The footpath leading towards the bus stop should be safety audited.
- Any additional highways mitigation - if proposed and/or identified to be safety audited.

Personal Injury Accident (PIA) reports have been provided for the period 01/03/2011 – 29/02/2016. Plan dated 08/04/2016 provided by the Sussex Safer Roads Partnership shows that during this time 6 PIAs were recorded. 4 of these resulted in slight injury; 1 in serious injury and 1 fatal. Of these, 1 slight and 1 serious were recorded close to the location of the proposed site access. However, further records up-to the current date (or as records permit) should be provided.

For the CHA to consider this part of the proposal further, it would need the following:

- Up-to-date PIA records for the most-recent 5 years. The records provided by the applicant's Transport Consultant only provide data up-to 2016. All the information will be reviewed by the CHA when that information is made available.

Traffic generation.

The site, as existing, has two residential properties on it (including outbuildings). The proposal seeks to demolish these and construct up to 27 homes. The TS includes TRICS data provided by the applicant's Transport Consultant suggesting that the site – in redeveloped guise - would generate the following trips, showing AM and PM* peak periods and daily traffic:

Table 5.1
TRICS Data and Development Trip Generation Analysis

Time Range	TRICS Data		Development Trip Generation	
	Arrivals	Departures	Arrivals	Departures
AM Peak Hr (08:00 to 09:00)	0.126	0.411	3.4	11.1
PM Peak Hr (08:00 to 09:00)	0.398	0.254	10.7	6.9
12Hour (07:00 to 19:00)	2.809	2.881	75.8	77.8

(*Note that the table erroneously mis-quotes the AM hours for the PM peak period – these should read 17:00-18:00).

Sustainable access.

Walking – The proposed indicative layout shows a combination of footways and shared-surface arrangements. A single footway emerges on the southern side of the vehicular access, terminating just beyond the cessation of the bellmouth and not linking to any other paths/footways close-by. The plan also shows a footpath link emerging from the south-eastern corner of the site intended to provide access to local bus stops. However, the plan doesn't fully show this with the path appearing to terminate at the southern boundary of the site and not at the bus stop itself. No other footways are close-by. There are Public Rights of

Way nearby, in the form of Public Footpath's No. 200_1 running E-W and utilising the course of the disused canal; 296_1 that runs N-S from 200_1 to Sack Lane (found south of the site); 151 found south of Sack Lane and 152 that can be found at the eastern end of Sack Lane. However, these paths are generally indirect and predominantly serve as leisure routes given their location, construction, width and lack of lighting, thereby giving only very limited potential for commuter/access to employment, shopping and school-based trips.

Cycling – No bespoke off-road routes are available for cyclists, requiring them to use the A29 providing access for those likely to be confident and/or experienced riders only.

Buses – The current bus service is documented in the TS. Bus stops are located within verges approximately at and opposite the entrance to Lidsey Caravan Park. However, there are currently no footways or footpaths providing access to them (nor hardstandings by them either) requiring users to either walk in the carriageway of the A29 or be dropped-off adjacent to them.

Train – The nearest railway stations are Bognor Regis and Barnham. Public Footpath 200_1 does provide an indirect link to the latter on-foot only. However, given the suitability of the route and distance of both stations from the site and lack of other walking and cycling routes, access to both would likely be by car.

Internal layout.

The internal layout is shown indicatively on drawing 1749-02B. As submitted, it would not be suitable for adoption under S38 given lack of suitable service margins. Also, it is not known what form of surface water drainage is proposed for the site which might itself dictate whether the layout can or can't be adopted.

With regard to access by refuse and fire appliances, the access drive shown to plots 22-27 might need widening as in places it looks slightly restrictive (particularly adjacent to plots 25-27). As such, this would have to be considered further at any RES/DOC stage.

As part of any permission, a suitable S106 Agreement would be required to secure any off-site highways works and additionally, must also include non-adoption and management plan clauses in the event the internal layout is not adopted.

Parking.

Parking should follow WSCC parking guidance. The TS does provide a copy of the WSCC Parking Calculator suggesting that 61 spaces are required for the 27 homes proposed. This and the layout of car parking (including visitor car parking) will be looked at in detail at any reserved matters/discharge of conditions stage. Parking space dimensions shall follow advice in MfS – so car parking spaces to be 2.4m wide x 4.8m long (3.0m wide if located alongside walls/barriers etc. and 6.0m long if located in front of garages). Garage dimensions (internal) to be 3.0m wide x 6.0m long.

Street lighting.

Street lighting should be considered for the layout. However, this is a matter to be considered at any discharge of condition (DOC) and/or reserved matters (RES) application stage. Careful consideration should also be given to the junction with the A29 given that the location is unlit. Also and depending on any off-site mitigation offered, this too should be considered for lighting.

Strategic Location (Emerging Arun Local Plan).

Reference is made within the TS about the Barnham-Eastergate-Westergate (BEW) Strategic Allocation site for housing found north and east of the application site. Based on the current indicative alignment of the proposed southern connection of the new A29, the site appears to be encompassed - at least in-part - within the BEW area. However, it is not clear from the plans provided whether this current planning application potentially prejudices the alignment

of the southern end of the proposed A29. This should be clarified prior to determination of the application. If it does prejudice it, the development should not be permitted. If it isn't found to prejudice it, in advance of appropriate highways infrastructure which might include that which the new road might bring, the submission of the site now for development might still be considered premature at this stage. While the subject of prematurity is a matter for the LPA to consider, the aforementioned lack of suitable vehicular access and sustainable access is still relevant at this stage given the shortcomings as documented above and does still contribute to the prematurity statement.

S106.

The county council is currently engaged in internal consultations and a detailed S106 consultation response will be provided in due course. However, WSCC can advise that discussions will need to be undertaken with County Council services in order to ensure any proposed development would be appropriately mitigated in terms of infrastructure provision and/or contributions. These services include highways, education (Early Years, Primary, Secondary, Sixth Form and Special Education Needs), libraries, waste and Fire Service and delivery solutions for these projects need to be agreed. In addition, the installation of and connection to mains water fire hydrants are required at the developer's expense - these will be conditioned as necessary.

Conclusion.

As submitted, both the design of the access and provision of access by non-car modes are not adequately demonstrated. As such, the CHA objects to the proposal on the following grounds:

1. Adequate information has not been submitted to satisfy the Highway Authority that the proposal is acceptable in terms of road/junction layout and visibility splays (including forward visibility splays) and would therefore give rise to increased hazards to highway users.
2. The proposal does not provide safe and convenient access to goods, services, schools and employment by a choice of means of travel nor does it encourage and enable an increase in environmentally sustainable means of travel such as walking, cycling and public transport.

Tim Townsend
West Sussex County Council – Planning Services