

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	<u>Arun</u> District Council <u>FAO:</u> Simon Davis
FROM:	<u>WSCC</u> - Highways Authority: Tim Townsend
DATE:	26 September 2019
LOCATION:	Bridge Cottage <u>Lidsey</u> Road <u>Bognor</u> Regis <u>PO22 9PH</u>
SUBJECT:	AL/75/19/PL Construction of 8 no. dwellings, alterations to access and associated works - This is a Departure from the Development Plan.
DATE OF SITE VISIT:	30 th May and 4 th June 2018 (for previous planning application AL/20/18/OUT)
RECOMMENDATION:	<u>Objection</u>
S106 CONTRIBUTION TOTAL:	£ (comments to be sent separately other than where specified)

This is the WSCC County Highway Authority (CHA) response to the above planning application for construction of 8 no. dwellings, alterations to access and associated works.

A previous planning application – AL/20/18/OUT - (currently the subject of a Planning Appeal) was considered by the CHA and responded to by the CHA in reports sent to the LPA dated 12th June 2018, 20th August 2018 and 1st October 2018.

Summary position of County Highway Authority (CHA).

The application seeks to obtain planning permission for 8 No. new dwellings which, if permitted, would result in a net increase of 8 dwellings on the site when including the two existing properties shown remaining (so 10 properties would be using the access). The proposed access appears to be similar to that proposed for previous planning application AL/20/18/OUT. However, the design is not accompanied by a Stage 1 Road Safety Audit nor is a Design Check supplied setting-out what has informed dimensions of details such as road widths, visibility splays etc. In the absence of this information, the CHA cannot consider the access proposals further. The applicant is welcome to provide this additional information, at which time the CHA will consider the proposal further. However, in the absence of this, the CHA objects to the proposal on grounds that it is not demonstrated that the access design and associated road safety implications are acceptable. Furthermore, there appears to be little or no consideration of safe and suitable access for non-motorised users. Therefore, a further objection is raised on this point too. Both are set-out at the foot of this report.

Response to information provided so far.

Highways Technical Note reference DD0ldCottage.1 produced by Mayer Brown Traffic Consultants (undated) makes reference to one of the previous highways objections raised by the CHA in response to AL/20/18/OUT, namely:

"Adequate information has not been submitted to satisfy the Highway Authority that the proposal is acceptable in terms of road/junction layout, carriageway (and lane) width/s and visibility splays (including forward visibility/stopping sight distance splays) and would therefore give rise to increased hazards to highway users contrary to Policy T SP1 and the National Planning Policy Framework."

Further to this, it references WSCC parking guidance, site access arrangements, development impact, site access visibility splays (including forward visibility) and then sets-out conclusions.

Taking each of these in turn, the CHA responds as follows:

Parking.

It is not clear from the parking assessment whether the latest guidance has been used. WSCC published new guidance in August 2019. The applicant should either demonstrate that this has been used and if not, re-submit calculations using the new document.

Site access arrangements.

As-per the previous planning application AL/20/18/OUT, access to the site is shown directly off the A29 Lidsey Road on the northern side (outside apex) of a bend in the road located off the eastern side of the road, which in this location is subject to a 50 mph speed limit. At this location there are several access points leading to some existing residential and commercial properties, a caravan park (south of the site on the opposite side of the road) and further south, a public house and hotel and further residential properties served either directly or indirectly off the A29.

The access proposed appears to show a 4.5m wide carriageway with un-dimensioned bellmouth radii and short sections of footway constructed either-side. However, externally to the site, neither footway leads to anywhere and terminate quickly. Internally, the northern one terminates approximately 20m into the site whereas the southern one terminates approximately 10m into the site. Close to the junction with Lidsey Road, two access points are shown – one to Bridge Cottage (approximately 6m away from the junction) and on the southern-side, a 4.5m wide access road that is located at its closest point approximately 7-8m away from the Lidsey Road junction. Both (alongside the new road junction to A29 Lidsey Road) should be considered in a Stage 1 Road Safety Audit.

Previously, detailed matters regarding the internal layout were to follow at any Discharge of Condition and/or Reserved Matters (RES) stage. However, if this current application is submitted in full, then all details would need to be considered at this current planning stage.

Proposed Site Plan 1042/SK03 Revision 01 produced by Ben Smith and Partners shows the layout. Both access 'roads' appear to measure 4.5m wide. Visitor parking bays are shown opposite plots 2 and 8 (two outside the latter). However, to aid using these a small strip of hardstanding should be placed to the rear of all three to provide an area where drivers and passengers can board/alight without stepping onto grassed or landscaped areas. One further observation is that the location of the access to Bridge Cottage might make the existing garage difficult to access. The applicant should provide more detail of the on-site turning area for this property to see if any parking/turning

arrangements are workable. Finally, pram ramps should be provided where the footways terminate within the site.

The internal layout is shown indicatively on the site plan referenced above. 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.

Development (traffic) impact.

The Technical Note does not provide details of traffic impact – rather it states that two accesses would be consolidated into one alongside the road widening on the A29. Specifically with regard to traffic impact in terms of vehicle trips, based on the previous trip rates provided for AL/20/18/OUT, for 8 No. houses in the AM peak there would be approximately 1 arrival and 4 departures. In the PM peak period, there would be approximately 4 arrivals and 3 departures. Adding the traffic associated with the existing dwellings, this increases to approximately 2 and 5 in the AM peak and 5 and 4 in the PM peak (arrivals and departures respectively).

Site access visibility splays (and forward visibility).

The Technical Note documents that visibility splays taken from a 2.4m 'x' (centreline) distance would provide 68m in the leading traffic direction (so looking west from the access) and 67m in the trailing traffic direction (looking south). Forward visibility (so visibility to/from waiting vehicles and drivers coming-across those vehicles (and vice-versa) is shown to measure 68m in the leading direction (for southbound vehicles) and 67m for northbound vehicles.

From observation of the submitted drawings, the forward visibility (particularly for northbound vehicles) appears to be reliant on land that is outside of the highway boundary. If this is the case, third party land would be required to deliver the splay for northbound vehicles. Furthermore, drivers turning-in would have to be positioned close to the centreline (as shown on the Figure 1-10) whereas if they were slightly south and/or west, the visibility would be reduced. It is also dependent on regular maintenance of the vegetation on the bend and either-side of it to ensure visibility is maintained – likewise for site access visibility splays although being on the 'outside' of the bend and under the control of the applicant, this would be easier to maintain. The applicant is invited to respond to these points. However, in the absence of conclusive evidence to show the land required can be secured, then the splays shown on Figure 1.10 cannot be fully achieved.

Swept-path diagrams (tracking) for other vehicles – A29 and internally to the site.

These are provided in Figures (drawings) 1.3, 1.4, 1.7 and 1.8. Figure 1.8 shows the track of two 16.5m articulated vehicles passing one-another on the apex of the bend on the A29 post-road widening as proposed as part of the planning application. Figures 1.3 and 1.4 show the tracking of a 9.860m refuse vehicles within the site and entering the site from the A29. However, neither plan shows the same vehicle emerging. Also, the drawings are based on a specific length vehicle. The applicant should check with Arun DC what length of vehicle would use the site. Current information on Arun DC website suggests 10.22m but further information obtained through discussion with officers about a nearby site suggests it might be a longer vehicle required to use it. Any change to that already shown should be 'tracked' and revised drawings provided to the LPA and CHA (including exit back to A29).

Other matters.

Contribution towards Barnham-Eastergate-Westergate (BEW) Strategic Location infrastructure.

A financial contribution of £9,043 per-dwelling is required which will be used towards delivery of highways-related infrastructure to deliver the BEW Strategic Location. This must be secured by S106 Agreement.

Access for non-car modes (walking, cycling, bus and train access etc.).

In its response to AL/20/18/OUT, the CHA put forward the following highway objection:

"The proposal does not provide safe nor convenient infrastructure for non-car access to-and-from goods, services, local facilities, schools and employment, nor does it encourage or enable an increase in environmentally sustainable means of travel such as walking, cycling and public transport contrary to the NPPF and adopted Local Plan policies."

The current proposal also does not appear to consider access for non-car modes. With regard to the site's connectivity with footpaths, the applicant previously stated that the existing footway connections would enable those residents that wish to access facilities on foot to be able to do so. They also said that prospective purchasers of the houses would be aware of the accessibility options available to them at or close to the site and such considerations would be factored-into their travel choices.

As documented in its previous responses, the CHA considers that the Public Footpaths predominantly serve only as leisure routes given their location, construction, width, indirectness to main facilities/services etc. and lack of lighting, thereby giving only very limited potential for non-motorised and sustainable access to employment, shopping and school-based trips. The CHA is of the firm view that prospective purchasers should be provided with a range of high-quality accessibility options. On this occasion they are not.

With regard to what the NPPF says about this matter, the applicant has previously stated that the NPPF notes that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in decision-making. They say that this stems from the Matthew Taylor review and subsequent Government responses which have held and confirmed that rural areas should not be penalised from accommodating new development purely because of travel considerations when there may be other broader 'sustainability' benefits to such more rural locations. They concluded that for the previous site proposals under AL/20/18/OUT that the walking and cycling offer will only improve once the full package of transport infrastructure is provided as part of the wider BEW site.

The CHA recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural sites. However, the ability to travel by such means and safely is not demonstrated for this site for the reasons already given. Yes, a fuller package of transport infrastructure and associated mitigation will follow in due course as part of the wider BEW site. However, that is something that is not available yet, nor is it offered by the current planning application. As such, prospective residents will remain disadvantaged with the current poor offer and for an unknown period of time.

Although not appearing to be offered as part of the current proposals, the applicants previously said that they would be agreeable to offering a package of measures to residents of the scheme to promote the use of alternative methods of transport. Such a package could include:

- Electric charging points for every house

- Electric charging points in the street for delivery drivers and visitors
- Cycle vouchers
- Promotional literature on walking routes

The CHA considers that all the above would be welcomed and indeed, in the case of points 3 and 4, would be expected as part of any Travel Plan Statement. However, it does not change the fact that the site still provides only limited opportunities for sustainable travel to-and-from it – particularly walking and access to services, facilities and public transport etc. and as such, does not alter the CHA's view of the proposal from a sustainability viewpoint.

Lighting.

Street lighting must be considered for the development, the new access point and associated revisions on/to the A29 Lidsey Road and possibly on the approaches to the junction in accordance with plans and details to be submitted at S278 Agreement stage if the development is approved.

Surface water drainage.

Surface water drainage comments will be sent separately from the drainage team.

Conclusion.

As submitted, satisfactory design of the access **and** provision of safe and sustainable access by non-car modes is not demonstrated. As such, the CHA objects to the proposal for the following reasons:

1. Adequate information has not been submitted to satisfy the Highway Authority that the proposal is acceptable in terms of design and safety of proposed road/junction layout, carriageway (and lane) width/s and visibility splays (including forward visibility/stopping sight distance splays) and would therefore give rise to increased hazards to highway users contrary to the NPPF and adopted Local Plan policies.
2. The proposal does not provide safe nor convenient infrastructure for non-car access to-and-from goods, services, local facilities, schools and employment, nor does it encourage or enable an increase in environmentally sustainable means of travel such as walking, cycling and public transport contrary to to the NPPF and adopted Local Plan policies.

Tim Townsend
West Sussex County Council – Planning Services