



Arun District Council Development Control Committee

Objection to Planning Application AW/237/19/PL

Prepared by the Friends of the Ship Inn Aldwick



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REVISION HISTORY	DATE	
D	05/03/20	Road Width amended App B added
C	21/02/2020	Proviso added
B	06/02/20	Final
A	25/01/20	Draft for Discussion



Introduction

This document is submitted to the Arun District Council, Development Committee, for consideration at their meeting on Wednesday 8th April 2020

This is an objection on behalf of the Friends of the Ship Inn and the Aldwick Community Society Ltd to the OneStop Application to vary deliveries to convenience store at the site of former Ship Inn, Aldwick Street, Bognor Regis. **Application N^o AW/237/19/PL.**

Executive Summary

This objection seeks to ask the members of the Arun District Council Development Control Committee to reject the application AW/237/19/PL by One Stop Stores Ltd of Apex Road, Brownhills WALSALL WS8 7HU to vary the conditions applied to application AW/211/14/PL concerning the number and times of delivery to their proposed convenience store at the former Ship Inn, Aldwick Street BOGNOR REGIS PO21 3AP.

The objection to the Application is based upon five premises:

1. The reason given for the Application is flawed;
2. The vehicle tracking (swept path) analysis submitted is flawed;
3. Road widths have not been fully considered;
4. The delivery process has not been fully considered and is unsafe;
5. The original delivery conditions were imposed for valid reasons.

Premise 1: Reason for the Application: The application to vary the conditions is based upon a false premise; i.e. that the original application AW/211/14/PL, was always beholden to the delivery service from a particular store and variations should now be permitted because that store has now closed. We can find no evidence of this in the original application.

Premise 2: Swept Path Analysis: Vehicle templates used in the design of the swept paths have not considered the true size of vehicles involved. The lorry template does not consider refrigerated vehicles and the private car template is based upon a 48 year old car, narrower than modern vehicles. The swept paths shown in the submitted drawings overlap, indicating that cars will not be able to pass a parked delivery vehicle in both directions.

Premise 3: Road Widths: In the design of the parking for deliveries the remaining carriageway width is considered dangerous for road users by the Department for Transport and would not be permitted under their guidance for temporary width restrictions at roadworks.

Premise 4: Safety During Delivery Loading and Unloading: The delivery process has not been fully considered by the senior management of the store and is likely to place their employees in a hazardous situation that cannot be resolved with the buildings in their current arrangement.

Premise 5: Conditions Applied to the Original Decision: The original Application was permitted with Conditions, viz: that deliveries were limited to three per day in the interests of, and to safeguard the amenities of the neighbouring properties. These reasons have not been addressed in this application to vary the Conditions.

The Friends of the Ship Inn and the Aldwick Community Society Ltd request the members of the Development Committee to reject the application outright.

Application Summary

Application Proposals:

Variation for removal or variation of a condition following grant of planning permission.

The application seeks permission to vary the existing conditions which specify the number of deliveries and the delivery hours.

Original Reference Number AW/211/14/PL. Council Decision Notice dated 17/12/2014

Conditions Applied to the Original Proposal:

Condition 8: There shall only be one delivery of newspapers/magazines between 06:00 and 08:00. The other two deliveries to the site shall be made between the hours of 07:00 and 21:30

Condition 10: There shall be no more than three deliveries to the site per day comprising of: (a) one newspaper/magazine delivery via a transit van or similar size vehicle of less than 7m in length; and (b) up to two deliveries by a larger vehicle (a rigid HGV up to 10.35m in length).

Condition(s) – Removal/ Variation in this Application:

“The conditions were applied on the basis that the convenience store would be serviced by another local larger supermarket. The property is presently vacant since the withdrawal of the supermarket serving the convenience store. In order for any future convenience store to trade from the premises a standard convenience store delivery programme would be required. Attached within the Supporting documents is the Delivery Management Scheme proposed for the convenience store.”

Condition 8: the delivery of newspapers/magazines between 0500 and 0700 via a small delivery vehicle to a holding box in readiness for store opening. Other deliveries (not restricted to 2 N^o) to be between 0700 and 2130.

Condition 10: Deliveries for goods serving the store to be in accordance with the attached Delivery Management Schedule.

Objection

The objection to the Application is based upon five premises:

1. The reason given for the Application is flawed;
2. The vehicle tracking (swept path) analysis submitted is flawed;
3. Road widths have not been fully considered;
4. The delivery process has not been fully considered and is unsafe;
5. The original delivery conditions were imposed for valid reasons.

1. Reason for the Application

The application has requested a change to the Delivery Management Schedule contained in the earlier application to permit the store to be serviced from a different depot, as the original depot had closed. That a different Delivery Management Schedule is required, is not in dispute, but what concerns us is that this application to vary the conditions is based upon a false premise; i.e. that the original application was always beholden to the delivery service from a particular store, and variations should now be permitted because that store has now closed.

This application is asking for a variation to the Conditions number 8 and 10 in the original decision notice AW/211/14/PL of 17th December 2014. In the original decision Conditions 8 and 10 are as follows:

- | | |
|--------------|---|
| Condition 8 | There shall only be one delivery of newspapers/magazines between 06:00 and 08:00. The other two deliveries to the site shall be made between the hours of 07:00 and 21:30. |
| Condition 10 | There shall be no more than three deliveries to the site per day comprising of: (a) one newspaper/magazine delivery via a transit van or similar size vehicle of less than 7m in length; and (b) up to two deliveries by a larger vehicle (a rigid HGV up to 10.35m in length). |

The reason for variation given in this application is as follows:

'The conditions were applied on the basis that the convenience store would be serviced by another local larger supermarket. The property is presently vacant since the withdrawal of the supermarket serving the convenience store. In order for any future convenience store to trade from the premises a standard convenience store delivery programme would be required'

In the application, in Section 7 Pre-application advice, Mr Langlois of Calford -Seaden contacted Mr Davis of Arun DC on 2nd July 2019. Details of the conversation are given in the Application submission:

'A telephone discussion was held with Mr Davis (the planner whom was involved in the original application) to discuss the requirements of deliver [sic] and advise of the future delivery programme. Mr Davis acknowledged that the basis of planning application was relative to the store being delivered from a nearby superstore and that the future occupation of the building by another organisation is likely to result in a differing delivery strategy, but an application for condition variation would be necessary before any agreement could be made.'

We can find no evidence of the original application mentioning that the Delivery Management Schedule was dependent upon the store being serviced from another nearby supermarket.

In the Peacock and Smith Planning Statement submitted with the original application(extract below), reference was made to consultation with local residents raising concerns with regard to highways and deliveries, and that these matters would be addressed in the Planning Statement and supporting documents.

Community Consultation	
1.09	The Parish Council has been consulted by way of meeting on 3 July 2014. The main issues discussed at the meeting include: • Impact on local businesses; • Licensing/impact on amenity of local residents; • Highways and deliveries; • Pedestrian linkages to the store and • Signage and external appearance.
1.10	The matters above are addressed within this Planning Statement and the documents submitted in support of this planning application.

The submissions made no reference to the servicing of the site from any particular location. The Transport Potential Ltd Transport Note, submitted as part of the original application, has:

	without the need to improve the layout.
4.32	Servicing is entirely carried out within the site boundary, a layout is proposed, where service vehicles utilise the car park aisles as currently accepted at this site.
4.33	The 'M' Local delivery vehicle is a 10.35m long 2 axle rigid HGV, the track illustrates the refuse vehicle which is 10.2m long 3 axle rigid HGV, which has a more onerous swept path than the delivery vehicle. This demonstrates that servicing can be carried out entirely within the site, in a similar manner to the existing.
4.34	The servicing arrangement can be carried out when the store is operating and when it is closed, this enables the vehicle to enter and exit the development in a forward gear.

OBJECTION: That a different Delivery Management Schedule is required, is not in dispute, but what concerns us is that this application to vary the conditions is based upon a false premise; i.e. that the original application was always beholden to the delivery service from a particular store, and variations should now be permitted because that store has now closed.

2. Swept Path Analysis

The swept path drawings were submitted to reassure councillors and residents that two cars could pass a parked delivery vehicle, hence implying that congestion would not occur due to the parking of those vehicles. What concerns us is that our investigation has demonstrated that the designs used to reach this conclusion are in error and congestion is likely to occur whenever a vehicle is parked in front of the former Ship Inn, at whatever time of day.

Calford Seaden Drawing B190031/B 104, submitted as part of this application, shows parked delivery vehicles with the tracking of cars (the swept path) superimposed; the implication given is that two cars can pass a parked delivery vehicle.

Vehicle swept path analysis is used by planners, architects, engineers, developers and site owners to provide a means to assess the turning implications of a variety of vehicle types on design layouts at an early stage in the design process without the need for physically driving or undertaking the manoeuvres. The process used to be done by hand but is now always computerised. The analysis should help to inform the design process and provide a fast method of assessing alternative layouts as well as providing evidence for planning permission applications.

Delivery Vehicle Template

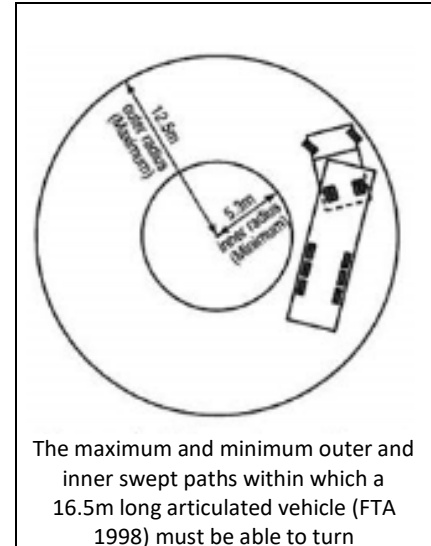
Vehicle swept path analysis requires that a vehicle template is introduced to the design program and overlaid on plans drawn up for the purpose or on to Ordnance Survey 1:1250 or 1:2500 scale plans. The swept path designer is at liberty to use a standard vehicle template or to develop their own. For consistency, ease of use and robustness of argument, many designers in the UK use the delivery vehicle templates provided by the Freight Transport Association (FTA), the trade body for the transport logistics industry. The templates are published in the FTA document Designing for Deliveries.

FTA templates have been developed over many years and modified and updated as legislation and technology has progressed. Currently the articulated vehicle template used by the majority of designers is known as the Freight Transport Association Design Articulated Vehicle 1998, abbreviated to FTA 1998.

FTA 1998 template vehicle length is 16.48m and width 2.55m (widths exclude driving mirrors). The older FTA 1983 template used by Calford Seaden has a vehicle length of 15.5m and width 2.5m, again excluding driving mirrors.

Use of the earlier FTA 1983 template can be justified, if the area within which the vehicle has to turn is restricted. The limitation on use of the larger template vehicles (FTA 1998) requires that the combination of tractor and trailer be able to turn within concentric radii of 5.3m and 12.5m respectively, otherwise smaller vehicles must be used.

We can find no evidence of a limitation in the turning area.



Vehicle Sizes

The vehicle template used by Calford Seaden is the FTA 1983 template. The dimensions are given on their drawing B190031 B102. The vehicle used in the analysis is given as 15.5m long. This conflicts with the statement given in the One Stop Delivery Management Scheme submitted as part of the application. In the schedule the articulated vehicle is stated as "38 feet in length". 38 feet converts to 11.58 metres, not the 15.5m used in the swept path drawings.

It could be argued that this size of vehicle would give a better result in the swept path analysis, but our concern is that if the designers have tried to make shortcuts by selecting a pre-prepared template rather than devising the correct one, what else has been cut?

Under the Road Vehicles (Construction and Use) Regulations 1986 as amended, refrigerated vehicles are permitted to be 2.6 metres wide to allow for the extra thickness of the insulation. It would be surprising if this type of vehicle were not used for delivery to a convenience store, having large stocks of chilled and frozen food, and in fact the response from Calford Seaden on 23rd September 2019 to queries from the Arun DC Environmental Health officer, submitted as part of this application, does imply that such vehicles would be used.

The Delivery Management Scheme submitted by One Stop specifically mentions refrigerated vehicles.

The FTA document Designing for Deliveries in Section 4.1.2 Widths of two-way access roads, has the following:

"Large refrigerated goods vehicles are allowed to operate at a width of 2.6m. ...designers...should take into account their added width over the standard vehicle."

This has not been done.

Private Car Template

The car vehicle template in drawing B190031/B 104 denominated DB32 Private Car, is a standard template within the suite of templates provided by a swept path computer program; it is derived from information given in the Department of the Environment document Design Bulletin 32 (hence DB32) Residential Roads and Footpaths - Layout Considerations, published in 1977 and revised in 1992. The car template has a width of 1.715m and is based upon the British Leyland Austin 1800 Mk2 of 1972, a car originally introduced in 1964.

DB32 vehicle is not included in the FTA design guide. Where vehicles are not covered by their guide, the FTA recommend undertaking full scale tests to determine the correct template. We do not have that facility and have derived our data from other means. Analysis of recent vehicle trends in the UK in Appendix A, give an average vehicle width of 1.790m and 2.012m if the door mirrors are taken into consideration.

For calculation purposes, we have taken the average car width of 2.01m, nearly one foot wider than the template used in the swept path analysis.

Road Widths

At the Committee meeting on 8th January Cllr Coster gave some measurements he had made of the road widths at the Ship Inn. He measured the road width as 8.2m. This is at its widest point on the corner of the existing building, adjacent to the car park. This is not where the delivery vehicle is shown in the plans submitted by OneStop. In order to avoid the proposed informal pedestrian crossing, proposed in the original application AW/211/14/PL of August 2014, the delivery lorry will need to park in front of the existing porch. Adjacent to the existing porch the carriageway width is measured at 7.81m.

Drawing B19001/B104 shows the delivery vehicle parking off the carriageway. We have allowed 0.5m width of delivery vehicle to be parked off the carriageway. Closer than this and the vehicle would impact the bollards along the front of the property.

With the road width of 7.81m blocked by 2.1m (2.6m less 0.5m) of the delivery vehicle and 2.01m of average car parked outside Tudor buildings, the remaining width for two cars to pass is 3.7m, an allowance of 1.85m per car passing, less than the width of car found by our research.

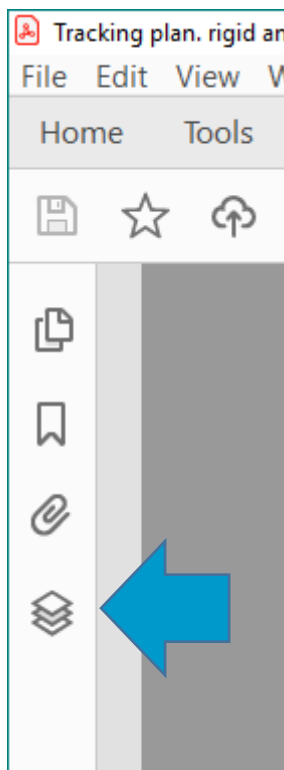
The implication given by drawing B190031/B 104 is that two cars could pass a parked delivery vehicle. This is not the case as all four options show the car tracking lines overlapping. Implying two cars may pass is optimistic in the extreme. The vehicle tracking plans are presented with thick lines drawn to the outline of the vehicle swept paths. This obscures the actual path as the lines are so thick that detail is hidden. However, there is a technical method to show the overlap:

The submitted electronic plans, as downloaded from the Arun DC planning portal, are in a form that can be easily enlarged to an infinite extent on any computer.

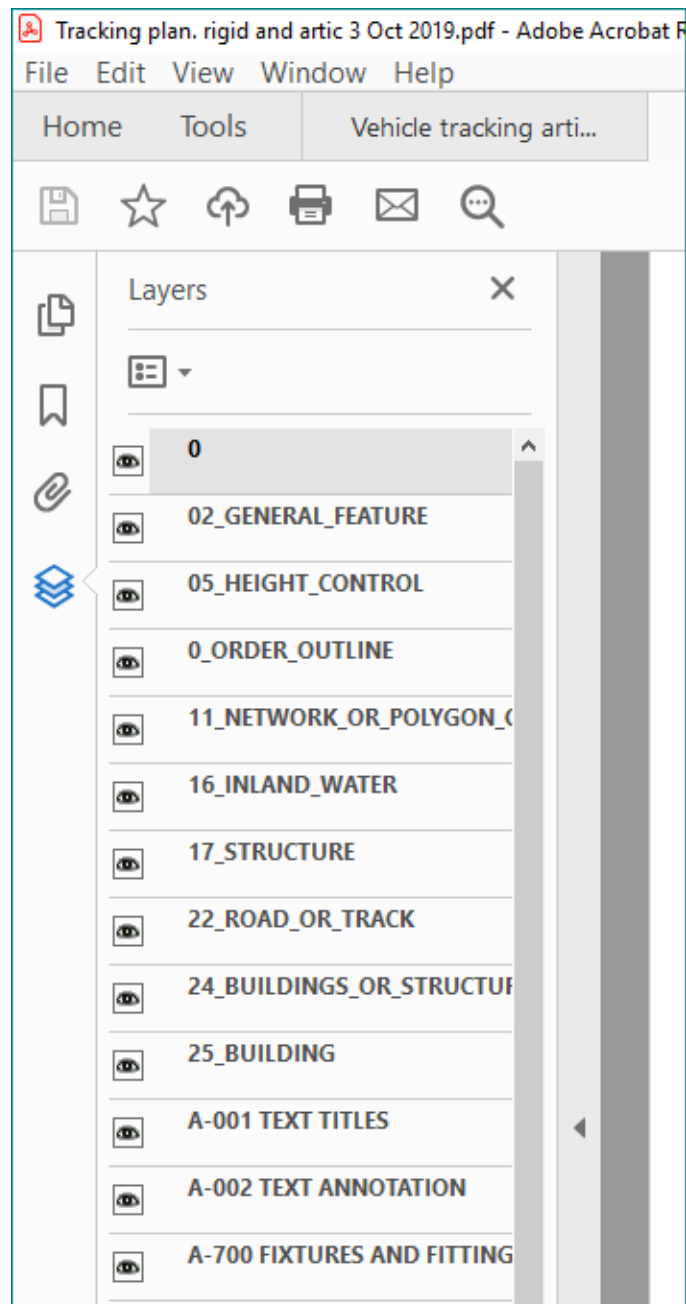
Calford Seaden Drawing B190031/B 104 (named as 'Site location plan with vehicle tracking: cars passing delivery vehicles B 104' in ADDITIONAL DOCS on the Arun DC planning portal) has been submitted with swept path design layers still visible. These can be viewed by clicking the small arrow symbol ► on the left frame as shown: (Note, you will need to download the drawing from the planning portal to view the design layers).



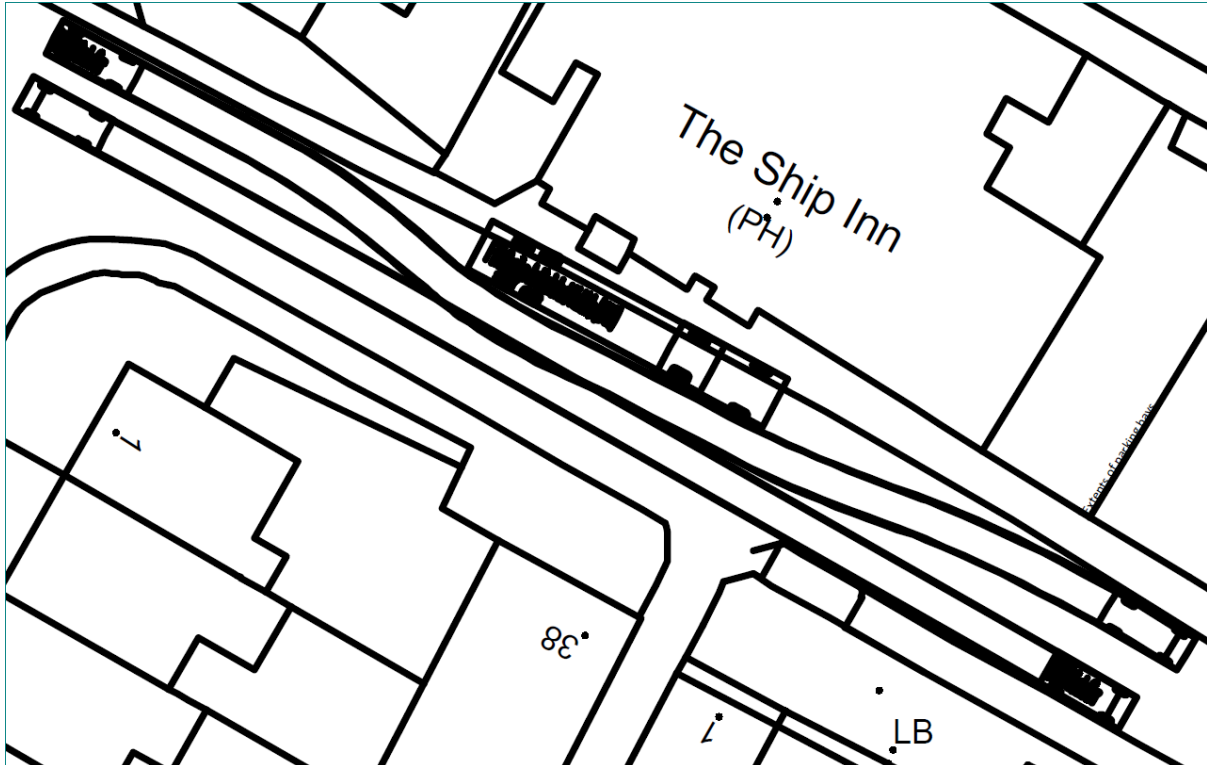
This brings out more symbols, one of which lists the design layers in the drawing:



Clicking on the symbol at the bottom will release the layers list:



I would ask you to now enlarge the drawing to show just one of the four options given; for preference, please enlarge Articulated Vehicle Tracking Plan: Option 3, so that the vehicle tracking paths fill the screen thus:



In the numbered layers panel, alternately switch off and on again, layer ATR14 (click on the 'eye' symbol ). This shows a car passing the parked articulated lorry, travelling East-bound (top left to bottom right).

Alternately switching off and on highlights the conflict between the cars travelling in opposite directions.

The car vehicle template width used in the drawing is 1.715m. The car vehicle developed by our research is 2.01m if the door mirrors are taken into consideration. This is significantly larger than the submitted template and leads to the conclusion that a greater overlap would result if two modern cars were to meet.

In the FTA Designing for Deliveries Introduction it has:

"...the variations between individual vehicles and drivers are such that the designs [produced from these templates] which are marginal by FTA standards are unlikely to be fully adequate under operational conditions."

In other words, if a swept path design appears to allow vehicles to just squeeze through a gap, the design is unlikely to operate effectively in the real world.

OBJECTION: The swept path drawings were submitted to reassure councillors and residents that two cars could pass a parked delivery vehicle, hence implying that congestion would not occur due to the parking of those vehicles. What concerns us is that our investigation has demonstrated that the designs used to reach this conclusion are in error and congestion is likely to occur whenever a vehicle is parked in front of the former Ship Inn, at whatever time of day.

3. Road Width

In the design of the parking for deliveries to the proposed store, the carriageway width that remains during delivery has not been fully considered. The remaining carriageway width is considered dangerous for road users by the Department for Transport and would not be permitted under their guidance for temporary width restrictions at roadworks.

Parking by delivery vehicles is, by definition, a temporary situation. For comparison only, it was therefore logical to compare parking by a delivery vehicle with parking by e.g. a road maintenance vehicle.

To this end, we looked at comparing the delivery situation with the Department for Transport (DfT) requirements for Temporary Traffic Management (road works management).

Design standard lane width for new roads is 3.65m in accordance with the DfT Design Manual for Roads and Bridges, Volume 6 Section 1 Part 1 CD127 Figure 2.1.1N1e. An existing road should have a minimum of the standard lane design width of 3.65m, hence for a single carriageway of one lane in each direction, the expected carriageway width would be 7.3m.

Lane widths at temporary traffic management sites are defined by the definitive DfT Traffic Signs Manual Chapter 8 Part 1, which has the following:

'D3.3.1 On all roads, in order to provide the required lateral clearance, the running lane width may be reduced according to the expected type of usage. Where heavy vehicles, including public service vehicles, caravans etc. are expected, the lane width may be reduced to 3.25 m (desirable minimum) or 3.0 m (absolute minimum).'

To summarise the design guidance, DfT guidance booklet Safety at Street Works and Road Works – A Code of Practice, produced as guidance for street works operatives at temporary traffic management has the following Table on Page 53:

	Standard: Normal traffic including buses and HGVs	Restricted: Cars and light vehicles only
Two-way working	6.75 m minimum	5.5 m minimum
Shuttle working	3.25–3.50 m desirable width range 3.0 m absolute minimum	3.25 m desirable minimum width 2.5 m absolute minimum

The Restricted situation is where the larger vehicles are restricted and the temporary works are passed only by cars and light vans; this is not the situation at the Ship Inn, served by the Stagecoach N° 62 bus.

Shuttle working is the situation where priority boards, Stop/ Go boards or temporary traffic signals are utilised.

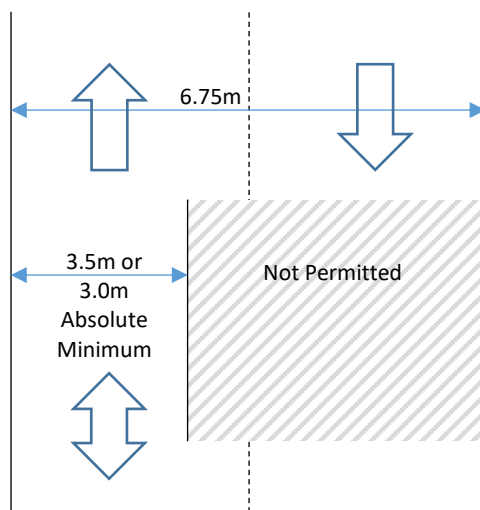
This indicates that in a temporary situation (as would be created when delivery vehicles are unloading), for two-way working with normal traffic including buses and HGV, a minimum width of 6.75m should be maintained.

Again, using Cllr Coster's measurements of the road width as 8.2m, wider than the standard 7.3m, with a parked delivery vehicle of potentially 2.6m, with 0.5m off the carriageway (as noted above) and a 2.01m car parked on the opposite side of the road outside Tudor buildings, the remaining carriageway width is 4.09m, considerably less than the 6.75m given in the DfT guidance. The road was measured at the widest point.

We have considered the situation whereby a bus on Route 62 and an HGV in the opposite direction are coincident during a delivery. From internet searches, we have obtained swept path templates for a Dennis Dart bus of the type used on Route 62 and a standard FTA Design Heavy Goods Rigid Vehicle (non-refrigerated). These templates are recorded in Appendix B.

The Bus width is given as 2.401m and the HGV width is given as 2.500m. Dimensions do not allow for exterior mirrors. Even excluding mirrors, the combined width of these two vehicles is 4.901m, more than the remaining 4.09m calculated above. One or other of the vehicles would have to give way, effectively creating single-way (shuttle) working, but without the controls afforded by traffic signals, Stop/ Go boards or priority boards.

Referring to the previous DfT guidance booklet Safety at Street Works and Road Works – A Code of Practice, with 2-way working, the permitted minimum width is 6.75m; if the carriageway is narrowed below this, then it must be reduced to 3.5m, or at absolute minimum 3.0m, and shuttle working implemented.



Most importantly, the Code of Practice does not permit two 3.0m absolute minimum lane widths, as this would produce a dangerous situation whereby with two vehicles approaching in opposite directions, drivers are tempted to make a dash for it and come to grief. If drivers are 'dashing', they are likely to be travelling at speed and the consequent collision can be made worse than if it were a slower accident.

In addition, to allow safe passage for cyclists overtaken by cars and HGV, the Code of Practice single lane width is given as between 3.25m and 3.5m, for two-way operation this means between 6.5m and 7.0m. That cyclists use this route is undeniable; Google Streetview shows a cyclist using the road between Barrack Lane and Fish Lane.



OBJECTION: In the design of the parking for deliveries to the proposed store, the carriageway width remaining during delivery has not been fully considered. The remaining carriageway width is considered dangerous for road users by the Department for Transport and would not be permitted under their guidance for temporary width restrictions at roadworks.

4. Safety During Delivery Loading and Unloading

The delivery process has not been fully considered by the senior management of the store and is likely to place their employees in a hazardous situation that cannot be resolved with the buildings in their current arrangement.

The Health and Safety Executive (HSE) is the government body charged with advising on safety at work. Guidance on loading and unloading vehicles is given on their website:

<https://www.hse.gov.uk/workplacetransport/factsheets/loading.htm>. The first statement of guidance is:

Loading and unloading areas should be:

- *Clear of other traffic, pedestrians and people not involved in loading or unloading.*

With traffic passing as close as given in the swept path drawings submitted, the unloading area will not be clear of other traffic.

From observations of similar premises and internet searches, supermarket deliveries are usually made by large box-type commercial vehicles with rigid sides and a tail lift mechanism at the rear. An example is given here for illustrative purposes only:

Unloading at the rear is usually safer for the delivery operative, but the usual situation is that the wheeled cages containing the goods are moved to a footway or other protected area.

There is insufficient space in front of the premises; the existing porch has a step around it and the existing bollards limit the size of wheeled cage that can be manoeuvred past. Wheeled cages used for deliveries are usually around 75cm wide. The space available (measured on 04/02/2020) is 52.5cm.



Example of a delivery vehicle tail lift
© Dhollandia

We have considered the situation whereby the bollards are removed, and a temporary ramp placed over the porch step. Access will still be hindered by the posts supporting the porch roof.

The goods would have to be unloaded and taken to the entrance in the existing car park and where the bin store is located. All three swept path plans submitted show rigid and articulated vehicles parked on the carriageway with rear access to the North West (ie the vehicle approaching from the Barrack Lane/ Aldwick Road junction with Aldwick Street. With the vehicle in this orientation, the delivery operatives would be obliged to push the loaded and empty trolleys past the parked vehicle on the carriageway side to the car park and from the bin store shown on the original submission plans.

As a comparison only, the DfT guidance booklet Safety at Street Works and Road Works – A Code of Practice mentioned above, has the following advice:

‘In no circumstances must the footway width be reduced below 1.0 metres’

A responsible employer would identify this hazard and after a properly undertaken risk assessment of the working operation in accordance with the Management of Health and Safety at Work Regulations 1992, would put mitigating measures in place to ensure their employee’s safety.

Mitigating measures may be temporary, e.g. a temporary traffic management scheme whilst the vehicle is being unloaded, or permanent, e.g. to remove the porch and bay windows on the building frontage. Neither measure is included in this application. Permanent measures would take time to complete and should the store be opened before they are complete, the delivery operative will be placed in a hazardous position every time a delivery is made.

It is likely that the store management would place temporary traffic management to allow the operative to safely deliver to the loading bays. This will reduce the width of carriageway available for passing vehicles and is unsatisfactory.

The store management may have to put in measures to ensure that deliveries are undertaken only when the vehicles approach from the South East. If the decision of the committee would be to make this a Condition of acceptance, does Arun DC have the resources to ensure the Condition is kept?

OBJECTION: The delivery process has not been fully considered by the senior management of the store and is likely to place their employees in a hazardous situation that cannot be resolved with the buildings in their current arrangement.

5. Conditions Applied to the Original Decision

In the original Application, permitted by the Members with Conditions, deliveries were limited to three per day in the interests of, and to safeguard the amenities of the neighbouring properties. These Reasons have not been addressed in this application to vary the Conditions.

In the original decision to Application AW/211/14/PL, the reasons for the conditions was given by Arun DC:

Condition 8	There shall only be one delivery of newspapers/magazines between 06:00 and 08:00. The other two deliveries to the site shall be made between the hours of 07:00 and 21:30.
	Reason: In the interests of the residential amenities of neighbouring properties in accordance with policies GEN7 and GEN32 of the Arun District Local Plan.
Condition 10	There shall be no more than three deliveries to the site per day comprising of: (a) one newspaper/magazine delivery via a transit van or similar size vehicle of less than 7m in length; and (b) up to two deliveries by a larger vehicle (a rigid HGV up to 10.35m in length).
	Reason: To safeguard the amenities of the neighbouring properties in accordance with Arun District Local Plan policies GEN7 and GEN32.

With regard to the Reasons given for the conditions in the original decision; The planning Policies GEN7 and GEN 32 of the Arun District Local Plan, extant at the time of the decision are as follows:

POLICY GEN7 The Form of New Development

Planning permission will only be granted for schemes displaying high quality design and layout.

Development proposals involving new buildings or significant extensions or alterations must be accompanied by an illustrated written analysis of the site and its immediate setting, together with its relationship with the relevant townscape, landscape, wildlife and movement characteristics of the wider area.

Development will be permitted provided it:

- (i) *makes efficient use of land or buildings and, in the case of new residential development, achieves net densities of at least 30 dwellings per hectare;*
- (ii) *demonstrates that it responds positively to the identified characteristics and resources of the site and the area to create attractive places and spaces with the needs of people in mind and respects and enhances local distinctiveness;*
- (iii) *promotes sustainable development, including the effective use and conservation of energy and reducing the need to travel, particularly by private car;*
- (iv) *does not have an unacceptable adverse impact on adjoining occupiers, land, uses or property and, where relevant, facilitates the development of adjoining sites;*
- (v) *takes account of any unacceptable adverse impacts that may arise from adjoining land uses or property;*
- (vi) *retains significant open or wooded areas which, in their own right, make a material contribution to the local environment;*
- (vii) *allows for the safe movement of pedestrians and vehicles, giving priority to pedestrians;*
- (viii) *provides for vehicle parking in accordance with Policy GEN12 and Appendix 2 and open space in accordance with Policy GEN20.*

In all cases, the District Council will expect a high standard of design and layout and all applicants will be encouraged to improve the visual amenities of the particular locality in scale, external appearance, hard and soft landscaping and materials.

POLICY GEN32 Noise Pollution

Noise sensitive development will not be permitted if its users would be affected adversely by noise from existing or proposed noise-generating uses.

Development which is a potential source of significant noise pollution will not be permitted unless the Council is satisfied that appropriate measures have been included in the proposal to reduce noise pollution to acceptable levels. Details of such measures will be required as part of the planning application.

Arun DC Environmental Health department were consulted on the original application and concluded that the noise levels were unlikely to breach the required noise level or give rise to complaints.

In the Conditions applied to the Decision by Arun DC to permit the application, deliveries were to be limited to three per day. This was in the interests of, and to safeguard the amenities of the neighbouring properties.

In the AW/237/19/PL application form, the text for a variation to Condition 8 has:

‘...other deliveries (not restricted to 2 N^o) to be between 0700 and 2130’.

The accompanying text to the Delivery Management Schedule in this application (the response from Calford Seaden on 23rd September 2019 to queries from the Arun DC Environmental Health officer, submitted as part of this application) indicates that the number of vehicles is an estimate. If the application is passed, will Arun DC have the resources to monitor the deliveries and does the Council have authority to sanction the store management or senior controlling management if the conditions are broken?

We would respectfully ask the committee members to consider that agreeing to this application would permit multiple deliveries in one day. Has the Delivery Management Schedule designer considered that two or more vehicles could arrive at the same time?

We have no comment on the GEN32 Policy in relation to Conditions 8 and 10, but we consider that the Policy GEN7 reason given for the Conditions has not been addressed by this new application.



OBJECTION: In the original Application, permitted by the Members with Conditions, deliveries were limited to three per day in the interests of, and to safeguard the amenities of the neighbouring properties. These Reasons have not been addressed in this application to vary the Conditions.



Summary

We have shown that the application to vary the conditions of the original application is flawed. Our objection is based upon five premises; any of which we consider would be fitting grounds for rejection.

This objection seeks to ask the members of the Development Control Committee of Arun District Council to reject the application AW/237/19/PL by One Stop Stores Ltd of Apex Road, Brownhills WALSALL WS8 7HU to vary the conditions applied to application AW/211/14/PL concerning the number and times of delivery to their proposed convenience store at the former Ship Inn, Aldwick Street BOGNOR REGIS PO21 3AP.

The Development Control Committee of Arun District Council is requested to consider the above premises for the objection by the Friends of the Ship Inn, and to reject this new application outright.

APPENDIX A Car Dimensions

Top ten best-selling cars 2019 obtained from:

<https://www.autoexpress.co.uk/best-cars/94280/best-selling-cars-in-the-uk>

accessed 21:51 08/01/2020

Vehicle dimensions obtained from:

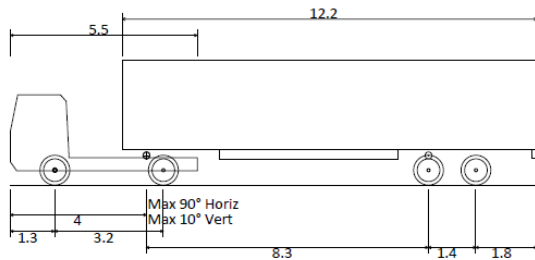
<https://www.automobiledimension.com>

accessed 22:01 08/01/2020

Width measurements in metres are indicated (1) without exterior mirrors (2) with mirrors unfolded

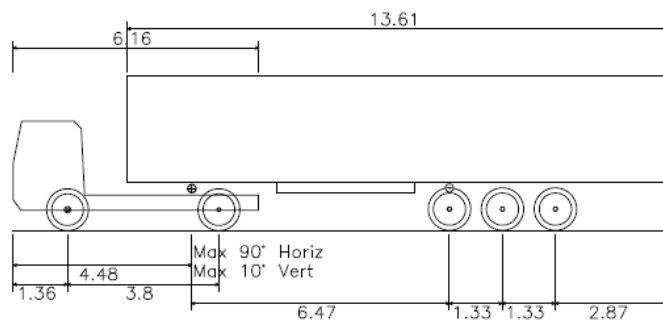
	(1)	(2)
1. Ford Fiesta – 77,833 registrations	1.735	1.941
2. Volkswagen Golf – 58,994 registrations	1.799	2.027
3. Ford Focus – 56,619 registrations	1.825	1.979
4. Vauxhall Corsa – 54,239 registrations	1.765	1.960
5. Mercedes A-Class – 53,724 registrations	1.796	1.992
6. Nissan Qashqai – 52,532 registrations	1.806	2.070
7. Ford Kuga – 41,671 registrations	1.838	2.086
8. MINI – 41,188 registrations	1.727	1.932
9. Volkswagen Polo – 37,453 registrations	1.751	2.018
10. Kia Sportage – 34,502 registrations	1.855	2.110 (estimated)
AVERAGE	1.790m	2.012m

Appendix B Swept Path Vehicle Template Examples



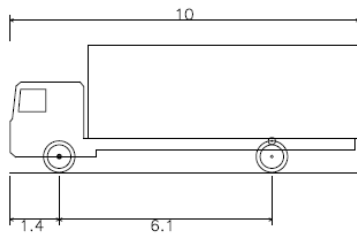
FTA Design Articulated Vehicle (1983)	
Overall Length	15.500m
Overall Width	2.500m
Overall Body Height	3.695m
Min Body Ground Clearance	0.428m
Track Width	2.500m
Lock-to-lock time	6.00s
Curb to Curb Turning Radius	6.750m

FTA Design Articulated Vehicle 1983 (FTA 1983)



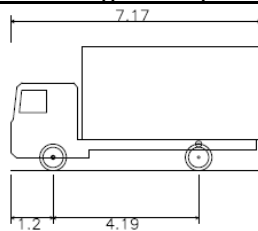
FTA Design Articulated Vehicle (1998)	
Overall Length	16.480m
Overall Width	2.550m
Overall Body Height	3.870m
Min Body Ground Clearance	0.515m
Max Track Width	2.470m
Lock to Lock Time	3.00s
Kerb to Kerb Turning Radius	6.550m

FTA Design Articulated Vehicle 1998 (FTA 1998)



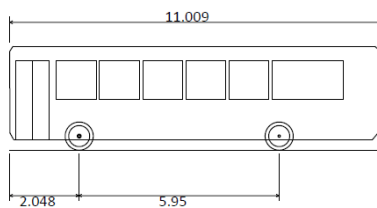
FTA Design HG Rigid Vehicle (1998)
 Overall Length 10.000m
 Overall Width 2.500m
 Overall Body Height 3.645m
 Min Body Ground Clearance 0.440m
 Track Width 2.470m
 Lock to Lock Time 3.00s
 Kerb to Kerb Turning Radius 11.000m

FTA Design Heavy Goods Rigid Vehicle 1998



FTA Design LG Rigid Vehicle (1998)
 Overall Length 7.170m
 Overall Width 2.300m
 Overall Body Height 3.580m
 Min Body Ground Clearance 0.375m
 Track Width 2.120m
 Lock to Lock Time 3.00s
 Kerb to Kerb Turning Radius 7.000m

FTA Design Light Goods Rigid Vehicle 1998



Dart SLF 11.20m
 Overall Length 11.009m
 Overall Width 2.401m
 Overall Body Height 3.077m
 Min Body Ground Clearance 0.312m
 Track Width 2.360m
 Lock-to-lock time 4.00s
 Curb to Curb Turning Radius 9.518m

Dennis Dart Super Low-Floor Bus

References:

Designing for Deliveries: Freight Transport Association: 2006
published by The Freight Transport Association (note later edition published 2016)

Residential roads and footpaths: layout considerations. Design Bulletin 32. Department of the Environment/ Department of Transport: 1977
published by HMSO (note 2nd edition published 1992) (superseded by Manual for Streets)

Manual for Streets Department for Transport 2007
published by Thomas Telford Publishing Ltd London

Design Manual for Roads and Bridges Volume 6 Section 1 Part 1 CD127: Department for Transport: 2019
published by Highways England

Safety at Street Works and Road Works – A Code of Practice: Department for Transport: 2013
published by The Stationery Office

Traffic Signs Manual Chapter 8 Part 1: Design: Department for Transport: 2009
Published by The Stationery Office

HSE Guidance on Vehicle Loading and Unloading:
<https://www.hse.gov.uk/workplacetransport/factsheets/loading.htm>
Accessed 09/01/2020

The Management of Health and Safety at Work Regulations 1992: UK Statutory Instruments 1992 No. 2051 as amended.

Submitted with application AW/237/19/PL:

Drawing B190031 B 102 Site Location Plan with Vehicle Tracking: Articulated Vehicle: Calford Seaden: September 2019
downloaded from Arun DC Planning portal

Drawing B190031 B 103 Site Location Plan with Vehicle Tracking: Rigid Vehicle: Calford Seaden: September 2019
downloaded from Arun DC Planning portal

Drawing B190031 B 104 Site Location Plan with Vehicle Tracking: Cars Passing Delivery Vehicles: Calford Seaden: October 2019
downloaded from Arun DC Planning portal

Correspondence RE: AW/237/19/PL – The (former) Ship Inn, Aldwick Street, Aldwick, PO21 3AP: email from Pierre Langlois of Calford Seaden to Simon Davis of Arun DC concerning queries raised by Arun DC Environmental Health: 23rd September 2019
downloaded from Arun DC Planning portal

Delivery Management Scheme (rev 3): One Stop: October 2019
downloaded from Arun DC Planning portal

Submitted with application AW/211/14/PL:

Transport Note Proposed 'M' Local to Replace Ship Inn Aldwick Street, Bognor Regis: Transport Potential Ltd: July 2014
downloaded from Arun DC Planning portal

Planning Statement Wm Morrison Convenience Stores Ltd The Ship Inn, Aldwick Street, Bognor Regis: Peacock and Smith: August 2014
downloaded from Arun DC Planning portal



Proviso

This objection is prepared by Lawrence Dooley in good faith using the knowledge and experience gained during employment. It is prepared for the Friends of the Ship Inn to assist in their campaigns. The author cannot be held responsible for loss or damages incurred to any party as a result of reliance on this document.