

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Arun District Council FAO: Mr K Roberts
FROM:	WSCC - Highways Authority
DATE:	3 September 2019
LOCATION:	Arundel Acre Arundel Road Angmering BN164EU
SUBJECT:	A/100/19/PL Change of use of land from agriculture for 3 No. travelling showpeople plots (Sui Generis) with associated storage barn, maintenance area, landscaping & infrastructure.
DATE OF SITE VISIT:	n/a
RECOMMENDATION:	Objection
S106 CONTRIBUTION TOTAL:	n/a

This application has been dealt with in accordance with the Development Control Scheme protocol for small scale proposals which include up to 5 residential units or extensions to single units accessed from roads that do not form part of the Strategic Road Network (SRN). As such the comments provided by Planning Services should be considered to be advice only, with respect to this planning application.

This proposal has been considered by means of a desktop study, using the information and plans submitted with this application, in conjunction with other available WSCC map information. A site visit can be arranged on request.

I refer to your consultation in respect of the above planning application and would provide the following comments.

While this application has not been assessed with the support a site visit, visits were made in assessing previous applications at the site.

History:

The site has relevant planning history involving highways consideration which I have summarised below:

A/111/17/PL – Retrospective change of use land to storage (B8 Storage or Distribution), erection of barn & hardstanding.

A highways objection was raised on the basis that inadequate information was submitted to demonstrate visibility and turning and that the increased use of a substandard access would add to the hazards of the highway user to an unacceptable degree. The application was subsequently withdrawn.

A/3/18/PL – Change of use of land to storage (B8 Storage or Distribution), erection of barn & hardstanding (resubmission following A/111/17/PL)

The application was re-submitted with the support of a Transport Assessment prepared by Motion Transport Planning. After significant negotiations it was concluded that improvements in the primary direction could be achieved and these were supported with actual 85th percentile wet weather speeds.

However no additional evidence was provided to support the maximum achievable visibility in the trailing direction conformed to any recognised guidance or standards.

It was also concluded that an open B8 use would result in a material intensification of use at the access point. It was also concluded that the use of planning conditions to limit trips and types of vehicular movements to such a degree where an intensification of use would not occur would be problematic and likely unenforceable.

A highways objection was raised and the applications refused for the following reason:

- 1 The increased use of the access to the public highway would add to the hazards of highway users to an unacceptable degree in conflict with policies TSP1, TDM1 & EMPDM1 of the Arun District Local Plan, policy TM1 of the Angmering Neighbourhood Plan and paragraph 109 of the July 2018 National Planning Policy Framework.

The decision was appealed and subsequently dismissed by the planning inspectorate.

Context:

This application is similar to that previously sought under A/111/17/PL & A/3/18/PL; however the proposal now seeks change of use of the land from agriculture to 3 x travelling showpeople plots (Sui Generis) with associated storage barn, maintenance area, landscaping & infrastructure. The applicant has replaced the open B8 element of the previous application with 3 x travelling showpeople plots with associated storage barn to mitigate the highways concerns previously raised.

The application has not been supported with a revised Transport Statement nor does the current application seek to implement the improvement works relating to visibility north out of the access point.

Existing Use & Access:

On the current application the existing use is listed as agricultural, previously it was being considered as a small holding with the presence of two sheds on the site.

It is noted within the history of the site that under A/49/92 approval was granted for the erection of an animal shelter and feed store, and under A/106/96 approval was granted for a wooden agricultural building. On this basis it is accepted that the site historically has held some form of limited agricultural use. However no evidence has been submitted to demonstrate that this use has generated any significant number of vehicular trips in recent years.

The Local Highway Authority (LHA) is satisfied that historically there is evidence of a vehicle access point in this location. However, it does appear to be informal and likely only used to service the land in recent years. The access location is in proximity to the corner of the plot where traffic joins the 'C' classified Arundel Road from the A27 slip road. The plans provided are not representative of the road layout, as previously observed on site. The plans detail a priority junction whereas the deceleration lane that is in place would result in higher speeds approaching the access point.

Trip Generation

The current application is specifically for 3 no travelling show people plots, with associated storage of fairground rides etc. The applicant states that this change in principle of the development will not result in any material intensification of use at the site as the specified storage of fairground rides will limit the trips more than open B8 would have done due to the nature of the operation.

It is not unreasonable to make the assumption that each plot could generate similar movements to that of an independent dwelling, this is widely accepted as being between 6-8 one way movements per day, a potential total of 18-24 one way movements per day.

In addition the associated storage use is proposed. The LHA accepts that the vehicle trips generated by the operation requirements of the associated storage will not be as frequent as open B8 use.

However given the limited existing use the LHA is minded to conclude that the proposed will result in a material intensification of use at the existing site access.

Internal Access

The applicant has not demonstrated with swept path tracking how suitable vehicles associated with the site would be able to access, turn and leave in the forward gear. The presence of large slower moving vehicles reversing onto Arundel Road would add to the hazards of the highway user. The LHA accepts that tracking could be provided to mitigate this concern, but it has not been provided to date in support of this application.

Visibility Primary Direction (North)

The application has not been supported with a revised Transport Statement nor does the current application seek to implement the improvement works relating to visibility north out of the access point.

As per A/3/18/PL it was accepted that a visibility splay of 2.4 x 21 metres is achievable and would be considered an improvement against the existing situation, where visibility is extremely limited.

The LHA is satisfied that such a condition could be imposed to secure such an improvement, however the Local Planning Authority (LPA) would be advised that the formation of such a splay is going to have a significant impact upon the vegetation boundary in this location, and may require the removal of a mature tree.

Visibility Trailing Direction (South)

As previously assessed under A/111/17/PL & A/3/18/PL visibility in the trailing direction was extremely limited due to 3rd party land. The maximum available visibility was demonstrated as 2.0 x 8.2 metres, measured 1.0 metre into the carriageway. The LHA did not accept that a 2.0 metre 'X' distance should be used. Nevertheless this would only equate to the stopping sight distance of an approach speed of 7 mph as per Manual for Streets calculation coefficients.

No evidence, previously or as part of this application has been provided to demonstrate such visibility is suitable or that any significant improvements could be made.

It should be noted that the proposal will still promote trips from slower moving larger vehicles.

Conclusion

On balance the LHA considered this application will result in a material intensification of use at the existing site access point.

While some improvements could be secured via planning condition, namely improvements to visibility in the northern direction, these improvements do not outweigh the harm created by intensifying the use of a substandard access point.

As such the increase in movements from both large and small vehicles, where on site turning has not been demonstrated, at an access point which is considered substandard will result in an unacceptable impact upon highway safety contrary to paragraph 109 of the National Planning Policy Framework. As such an objection would be raised.

Ian Hayward
West Sussex County Council – Planning Services