

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Arun District Council FAO: Karl Roberts
FROM:	WSCC - Highways Authority
DATE:	2 December 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 and creations of new access with associated visibility splays.
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 The application was subsequently withdrawn.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 current application is similar to that previously sought under A/111/17/PL & A/3/18/PL.

Comments, dated 03/09/2019, in relation to this application were previously submitted and maintained an objection on the basis that the application would still result in a material intensification of use at the existing site access point which was considered sub-standard.

Subsequently the application description has now changed and the proposal now seeks the creation of a new access with associated visibility splays. The application has now been submitted with the support of a Highways Technical Note prepared by RPS.

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 proposal now seeks to relocate the access circa 9 metre so the north, in order to facilitate improved visibility.

The access location is in close proximity to the corner of the plot where traffic joins the 'C' classified Arundel Road from the A27 slip road. The block plan submitted is 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 operational requirements of the associated storage will not be as frequent as open B8 use. Given the shared residential / commercial use this will, to an extent, result in shared trips than independent residential / commercial use.

By way of additional information the Technical Note details that a total area of 252 sqm B8 Self Storage use would generate in the order of 13-14 two way movements per day. This has been calculated using the TRICS database and the LHA considers this a reasonable estimation of such trip generation.

The LHA anticipates the proposed residential use will result in 18-24 one way movements being created per day. In addition there will be a small number of trips associated with the storage / show person's use. These additional storage trips are not expected to be as high as the 13-14 two way movements as calculated by the applicants TRICS analysis, however will be an additional generation over and above the residential trips.

On balance given the limited evidence base for the existing use the LHA is minded to conclude that the proposed will result in a material intensification of use at the existing site access, as such its adequacies should be assessed against appropriate guidance and standards.

Visibility Primary Direction (North)

The applicants Technical Note and plan JNY10317/01a details that the access will be relocated circa 9 metres to the north.

Plan JNY10317/01a details that an existing oak tree is within this splay, it is annotated that it will be removed. The Technical Note (Paragraph 1.18) states that the oak tree will remain. This should be clarified with the applicant.

Nevertheless the resultant visibility splay to the north will be 25 metres. While there is an existing mature Oak Tree within the splay it has historically been established that a splay can be provided around the tree and the overall impact to the envelope of visibility is minimal. The Technical Note satisfactorily demonstrates this would also be the case for the revised access location.

The LHA accepts that a visibility splay of 25 metres is in accordance with the splay that would be required using the Manual for Streets stopping sight distance calculation coefficient for the previously recorded 85th percentile approaching road speeds at this location, 20.1mph.

It is accepted that a visibility splay of 2.4 x 25 metres is achievable and would be considered an improvement against the existing situation, where visibility is extremely

limited. The applicant should be aware that they would not be able to store any large items in the area where the splay crosses within the site.

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.

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 stopping sight distance calculation coefficient.

The applicants Technical Note and plan JNY10317/01a details that the access will be relocated circa 9 metres to the north.

This results in a splay of 2.4 x 25.5 metres being provided. A splay of 30.1 metres can be achieved if a 2.0 metre 'X' distance is used. This is an improvement over and the existing situation; however it does seem that these splays require the use of 3rd part land.

The applicant has undertaken a speed survey for northbound traffic in this location. The 85th percentile vehicle speeds are recorded as 33.4 mph. This would equate a stopping sight distance of 50 metres using the Manual for Streets calculation coefficient.

It should be noted that the proposal will still promote trips from slower moving larger vehicles. The demonstrated splays are significantly short of what would be expected given the approaching road speeds.

Vehicle Tracking

The application has been submitted with vehicle tracking to demonstrate the geometry of the proposed access is adequate and that a car towing a trailer can turn within the site. These plans are considered acceptable to the LHA.

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 have been demonstrated the LHA is concerned that the proposed southern splay crosses 3rd party land and therefore could not be secured in perpetuity. Even if the splay is contained wholly within land under control of the applicant or that considered highway it is still 24.5 metres short of what would be required to equate to the Manual for Streets stopping sight distance for recorded approach speeds from this direction.

On balance the improvements do not outweigh the harm created by the proposed intensification of use and shortfall in visibility in the southern direction.

As such the increase in movements from both large and small vehicles at the replacement access point 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