

[REDACTED]

From: Amanda Scholes on behalf of Planning.Responses
Sent: 06 December 2019 09:09
To: Planning Scanning
Subject: FW: A/100/19/PL - Arundel Acre - response to Highways England and WSCC

From: Karl Roberts [REDACTED]
Sent: 05 December 2019 16:04
To: Joney Ramirez [REDACTED]
Cc: Planning.Responses [REDACTED]
Subject: RE: A/100/19/PL - Arundel Acre - response to Highways England and WSCC

Hi, many thanks for the comments. I will take these on board when I sit down to prepare my report.

When I indicated to you the timing of when I hoped to write the report I forget next week was the week of the General Election. I am involved in this from an administration perspective. Therefore is your client content for the EoT to be the 20th Dec 2019.

Regards
Karl

Regards
Karl

From: Joney Ramirez [REDACTED]
Sent: 05 December 2019 15:13
To: Karl Roberts [REDACTED]
Cc: Nick Laister [REDACTED]; nic burrell [REDACTED]
Subject: RE: A/100/19/PL - Arundel Acre - response to Highways England and WSCC
Importance: High

Dear Karl,

Following the responses from Highways England and WSCC (dated 04/12/2019 and 02/12/2019 respectively) we would like to respond as follows:

- **Highways England** raises no objection subject to 3 conditions. We agree to proposed Conditions 1 & 3. However, there is an issue regarding the proposed timing of implementation of **Condition 2**. As worded, it is required vegetation clearance takes place outside bird nesting season but within 2 months of the grant of the permission. Bird nesting/breeding season runs from February – August. If permission is granted in the next few months it will be impossible for the applicant to comply with the requirement of carrying out the works within 2 months of the granting of permission and outside the bird nesting season. We recommend the wording to be amended as to avoid reference of vegetation clearance within a set period of time (but still relate to work outside bird nesting season) as to avoid conflicts on timings.

Subject to the above we are of the view that the concerns previously raised by Highways England, particularly regarding the proposed visibility splay to the north, have now been addressed.

- **WSCC LHA** raises an objection based on the following; our responses are next to each of the identified issues:

- i. **No evidence has been submitted to demonstrate the existing use has generated a significant number of vehicular trips in recent years** – Paragraph 4.13 of Appendix D submitted with the application shows a record of vehicular activity for the site during 2017, with a maximum of 20 vehicular trips generated during the year, and no trips generated between January – April resulting from the use of the site as storage of fairground rides /trailers in connection with the applicant’s business. There has been no significant change on the use of the site over 2018 & 2019 and there is no evidence to indicate there will be a significant change on the number of vehicular trips to be generated by the storage of fairground rides /trailers in connection with the proposed use of the site as a showpeople’s yard. As such, the baseline to take into account when assessing whether the proposed development would generate a significant number of vehicular trips should be based on this information.
- ii. **The block plan is not representative of the road layout and the deceleration lane would result in higher speeds approaching the access point** – Submitted drawing No. JNY10317/01a is based on OS mapping and accurately shows the road layout. Although lane delimitation is not shown, the submitted ATC, plans and supporting documents provide, in our view, an appropriate level of detail to allow the LHA to assess the proposal, with the ATC providing specific detail regarding speeds.
- iii. **The LHA concludes the proposal will result in a material intensification of use at the existing access** – building on the information provided on point i) above, it has been shown that the vehicular movements of trailers in and out of the site are, and will continue to be, minimal throughout the year. The LHA has accepted that 26-48 two way movements per day will result from the residential element of the proposal, which will therefore be the increase on use of the vehicular access of the site. The total number of two-way vehicle movements on Arundel Road, taken from the most recent ATC survey range between 1408 and 2011, depending on day of the week. The average over 7 days is 1806. The impact from the residential units can be measured against the background traffic flows. These range between 3.4% and 2.4% increase in two way vehicle movements depending on the day of the week. The average increase is 2.7% over 7 days. **Such increase is negligible** and therefore we are of the view that **the proposal will not result in a material intensification of use** at the access.
- iv. **It is acknowledged an improvement over the existing situation; however it appears the southern splay will require the use of 3rd party land** – We welcome the LHA’s acknowledgement that the proposed relocation of the access will represent an improvement compared to existing and, in order to provide clarification, the proposed splays **will not** require the use of 3rd party land.
- v. **The southern splay is significantly short of what would be expected given the approaching road speed, with MfS requiring a stopping sight distance (SSD) of 50m** – The southern visibility splay would be able to achieve SSD between 25.5m – 30.1m and given other site’s constraints, this would be the maximum achievable on site. It is the case that Paragraph 10.5.9 from Manual for Streets 2 indicates that, although the ‘Y’ distance of a visibility splay should be based on the recommended SSD, *“unless there is local evidence to the contrary, a reduction in visibility below recommended levels will not necessarily lead to a significant problem.”* Taking into consideration: i) the number of two-way vehicular trips which will result from trailers or large vehicles will be less than 0.1 per day; ii) the nature of this part of the road, where there exist residential accesses with limited visibility which are similar in scale and nature to the proposed residential movements to be generated from the proposal, as well as the existence of a caravan park to the south of the site which possibly generates a higher number of larger vehicles coming in and out of the site and iii) the lack of parking restrictions on the road, essentially meaning that vehicles are capable of parking on the road thus potentially reducing vehicle speeds; we are of the view that local circumstances clearly exist to conclude that a reduction in visibility below the recommended level will not lead to a significant problem.

Based on the information provided above we are of the opinion that there would be **no material intensification of the access**. Subject to appropriately worded planning conditions and based on **local circumstances** the proposed splays will adequately address visibility in both directions and therefore the proposal **will not lead to severe harm** to the highway, in line with the requirements of Paragraph 109 of the NPPF.

Taking into account the identified need for showpeople's yard within Arun DC and the significant benefit of the proposal on this respect, the sustainable location of the proposal, the lack of impact upon neighbouring amenity, the limited impact upon visual amenity and the minimal impact upon the local highway, the benefits of the proposal significantly outweigh any potential harm thus the proposal would be in line with planning policy and other material considerations.

We would appreciate if you can take the above comments into consideration and please do not hesitate to contact me if you have any queries. I appreciate you might want to revert back to WSCC for their response and if so, we look forward to receiving their views on the points raised.

Many thanks,

Joney

Mrs Joney Ramirez MRTPI
Senior Planner
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