

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Arun District Council FAO: Anita Gardner
FROM:	WSCC - Highways Authority
DATE:	8 September 2021
LOCATION:	Land South Of Littlehampton Road and East of Worthing Road Angmering BN12 6PN
SUBJECT:	A/168/21/PL Erection of 76 No. dwellings, means of access, public open space, play areas, associated infrastructure & landscaping. This application is a Departure from the Development plan, is in CIL Zone 5 and is CIL Liable as new dwellings & affects a Public Right of Way.
DATE OF SITE VISIT:	n/a
RECOMMENDATION:	More Information
S106 CONTRIBUTION TOTAL:	n/a

Summary

1. West Sussex County Council, in its role as Local Highway Authority, has issued pre application advice in respects of this proposal. The pre application discussions were in respects of the scope of the Transport Assessment. Copies of the pre application advice given are included in the submitted TA.
2. In reviewing this planning application, the following documents have been reviewed,
 - Transport Assessment, from i-transport dated 28th June 2021
 - Travel Plan, from i-transport dated 28th June 2021
 - Hard Landscaping Proposals, drawing number RED23031-12 Sheets 1-4, dated June 2021
 - Planning Layout, drawing number 03 Revision W

Access

3. WSCC Highways have commented upon the proposed access arrangement separately as part of A/169/21. The majority of the comments made as part of A/169/21 remain applicable and are repeated below. There are also a number of additional points that relate to the current application.
4. The access is proposed as a left in, left out with a diverge lane for vehicles entering the access on the westbound A259 dual carriageway. In this location the A259 is subject to a 50mph speed limit. Visibility splays of 4.5 by 160metres are proposed, which are adequate for the posted speed limit

based on the standards included within the Design Manual for Roads and Bridges.

5. In submitting the current access details, the applicant has identified three departures from standard. The applicant has sought formal approval for these departures as part of the current application. There is however no design audit submitted that identifies the design standards applied by the applicant. Prior to WSCC Highways formally considering the DfS's, a design audit would be required. This should identify all standards used in the design of the proposed access.
6. It is also noted that no Stage One Road Safety Audit has been submitted. The applicant has confirmed that a Stage One RSA will be undertaken once the departures have been agreed. Planning permission must not be granted prior to the departures being agreed and a Stage One RSA being submitted in accordance with current WSCC Policy with all problems resolved to the satisfaction of WSCC Highways. A Stage One RSA must not be conditioned given the potential for this to identify unresolvable problems.
7. Although the DfS's have not been formally considered by WSCC Highways, one of the DfS's is recognised as relating to the retention of an existing bus stop on the A259. The general starting point with DfS's is that these are designed out where possible. In this instance, WSCC Highways would request that the bus stop to be removed in light of there being suitable alternate provision being available within reasonable walking distance. Given the bus stop is within the live nearside lane of a 50mph dual carriageway, there is an overall safety benefit for the stop being removed.
8. The only other matters are in respects of the retention of the two existing accesses currently serving the land. There is an existing left in, left out access onto the westbound A259 located a short distance east of the proposed left in, left out. The current proposal is rendering this superfluous with there being a new internal access road connection leading to the various existing uses as indicated through notations on the submitted drawing. There is seemingly no reason for this access to be retained. The existing access onto the westbound A259 should consequently be permanently closed as part of the current proposal.
9. The retention of the access directly onto the A259 Roundstone By-Pass Roundabout, which is to be downgraded to an exit only from the roundabout (i.e. allowing entry only into the existing development), would avoid the need for any lengthy detours for those vehicles approaching from the west given the site can be accessed only from the westbound A259. As part of A/169/21, it was accepted that this existing access would be no more

intensively used than at present. The residential use alters this and it's unclear if alternate options have been considered in light of the potential additional use. The need to retain the legal right of access for oversized agricultural vehicles is acknowledged as a complication.

10. For example, in principle, it would be more desirable to relocate this access further south onto Old Worthing Road, thereby removing the additional arm from the roundabout. Such an arrangement would result in an access in quite close proximity to the Old Worthing Road exit from the roundabout.
11. Alternately, the existing access from the roundabout could be gated to prevent general development traffic from using the access but still permit agricultural vehicles when needed. The gates couldn't be located within the public highway but could be sited on private land outside of the highway boundary.
12. In the event that the access is retained, a Traffic Regulation Order would be required to make enforceable the prohibition on vehicles entering the roundabout from the development. The TRO would be subject to a further statutory consultation process, the outcome of which cannot be guaranteed. If the TRO is not made, the applicant would need to consider alternative. At the very least for the current scheme, further measures would be required to ensure the proposed one way routing is self-enforcing and would not require unreasonable levels of enforcement. Removable features could be used to restrict and narrow the access for smaller vehicles, but that could then be removed when required for the larger vehicles, for example. If the access is retained, a monitoring strategy would be recommended to see how the access is used to ensure any measures included operate as anticipated and provide a mechanism to require further enforcement measures if needed.
13. Prior to WSCC Highways providing a formal recommendation, the applicant should address the above points.

Trip Generation and Highway Capacity

14. The development is forecast to generate 37 two trips in the AM network peak hour (0800-0900) and 40 in the PM peak hour (1700-1800). Vehicular trip generation is based upon TRICS. TRICS is a database of traffic surveys of completed developments. The database can be refined so as to use developments comparable in transport terms to the development proposed. The use of TRICS is widely used and an acceptable means of forecasting trip generation. The use of TRICS and the trip rate has been agreed through pre application discussions.

15. In order to determine which junctions would be affected by the increase in development vehicle trips, Census Journey to Work data has been applied. It's acknowledged that Census data used is taken from existing residents. This data is considered as an acceptable proxy for residents of the new development. A simple gravity model has been used to determine destinations for trips for other purposes (i.e. education, retail, etc). This works on the premise that residents travel between areas would be proportionate to the population of the area being travelled to and distance; simply put, the larger the area and closer it is, the more draw there would be for residents trips. Again, this approach is widely used and has been accepted through pre application discussions.
16. The impact of the additional vehicle trips have been assessed for a future year scenario of 2026 (five years post submission of the planning application). The development is modelled as being complete and fully occupied by 2026. It's also assumed that the current WSCC led A259 improvement works will be fully complete by 2026.
17. In order to generate the 2026 without development traffic flows, a growth rate has been applied to surveyed traffic data from 2015. It would be desirable for the base traffic surveys to be more recent. However, traffic flows have been affected significantly due to restrictions imposed by the Covid 19 pandemic. To the immediate west, work has also been on-going on the A259 improvement scheme. The traffic management imposed by these works may also affect traffic flows with traffic diverting to alternate routes. As such, it's accepted that the developer has been unable to collect representative traffic data and would not be able to for sometime. In principle, the approach of using traffic data from 2015 and a growth rate to derive a suitable base year is accepted. The growth rate is taken from anticipated traffic growth forecast by the National Transport Model.
18. In saying the above, whilst the approach used is acceptable, it would still be appropriate for the applicant to demonstrate that the 'growthed' traffic flows are representative. Typically, the applicant would have applied a growth rate to the 2015 data to create a pre-Covid restrictions (i.e. pre March 2020) base year. The 'growthed' 2015 data could then be verified for representativeness against traffic data obtained from nearby permanent count sites. A further growth rate could then be applied to generate the 2026 data.
19. The above issue aside, the applicant has nevertheless used 2015 data with a growth rate to 2026 within the capacity modelling submitted. The modelling has made use of industry accepted computer software. The extent of the modelling has been agreed with WSCC through the pre application discussions, and is based upon the anticipated trip generation and

distribution. Modelling beyond the junctions indicated would not be considered necessary with development trips indiscernible from background variations in traffic.

20. From the modelling outputs, it's apparent that the development will have negligible impact upon nearby junctions. For completeness, the applicant would still be requested to validate the 2015 survey data and demonstrate that this is appropriate.

Accessibility by Non-Car Modes

21. The TA considers accessibility by walking, cycling, and passenger transport (bus and train). It's accepted that there's a limited range of services within reasonable walking distance (defined and accepted as being 1.6km or 1 mile). Safe and suitable routes are available to those facilities listed.
22. There are a wide range of services within cycling distance. The approach applied to determine those services within cycling distance is accepted. It's apparent that there is a wide range of services within cycling distance of the site. Dedicated cycling infrastructure is not in place from the site to all of the services listed. The lack of infrastructure and therefore the need for cyclists to share the carriageway with vehicular traffic may influence modal choice for some users. However the TA still demonstrates those services that could be reached.
23. There is an existing shared use foot/cycle way that runs along the southern side of the A259 and past the proposed development. It's reasonable to expect new residents to make use of this existing route to reach nearby services. The existing shared use route is somewhat narrow however. Reference is made within the TA to the widening of the route as part of the development. The drawing referred to within 4.3.11 that covers the widening doesn't appear to be included within the TA. Consequently it's unclear of the extent and length of the widening proposed as part of the development; ideally the widening would achieve a route of at least 3 metres and continue eastwards as far as the Asda entrance. This can be achieved using the existing highway verge. The constraint imposed by the existing Lime trees on the southern side of the A259 Roundstone by-pass Roundabout and the ability to widen the cycleway in this location is duly recognised although hand dig construction would still permit some works. The drawing referred to should be provided in the first instance.
24. The site is well placed for residents to make use of the existing 700 bus service albeit WSCC Highways are advising that the existing stop on the A259 westbound carriageway is removed as part of the developments access

works. There is still an alternative stop on the Old Worthing Road that is well within reasonable walking distance.

25.The nearest railway station is Angmering. Although there is a direct walking route and continuous footway available towards Angmering, the walking distance is slightly above the reasonable distance applied. This isn't necessarily an unacceptable constraint however; the flat and direct route still provide an attractive route. It's accepted that Angmering station is well within cycling distance of the development.

26.A Travel Plan Statement has also been submitted. With the exception of one minor point in terms of the TRICS surveys, the travel plan is acceptable.

8.1.3 indicates that the first TRICS survey would be completed during the first year of occupation. For a site of this size, the first survey should be undertaken at final occupation. This minor point could be addressed at this stage rather than revised details being sought via condition.

27.The applicant should also note that WSCC are now applying a auditing fee to reviewing travel plans. A fee of £1,500 would be applicable. This should be covered within any s106 agreement.

28.As per paragraph 110 of the National Planning Policy Framework, its considered that the developments offers appropriate opportunities to promote sustainable transport modes given the type of development and its location.

Layout, including car parking

29.The application form implies that the internal roads are to be offered for adoption as public highway. Whilst WSCC Highways are not approving any roads for adoption as part of the current planning application (matters of adoption are not a planning matter and would be covered as part of an agreement under Section 38 of the Highways Act 1980), where appropriate comments may be made in respects of the potentially adoptability of the details submitted.

30.Details of materials are also included. WSCC Highways are commenting only on the acceptability in terms of planning for the materials indicated. The acceptability for adoption would be reviewed through any Section 38 agreement.

31.The majority of the development is indicated to be of standard construction with segregated footways 2metres wide and carriageways measuring 5.5metres wide. There are a few sections of shared surface, where pedestrians and vehicular traffic use the same area, but these are effectively driveways leading to a handful of dwellings. There's no particular concerns

with the layout as indicated although and with respects to the retained access onto the A259 Roundstone By-Pass Roundabout, the layout could have been better designed so to discourage movements from the development onto the roundabout; the inclusion of the kerb tightening within the layout is noted but more could have done with the design of the roads.

32. With respects to the materials shown on the hard landscaping drawings, the only comment would be as to why the visitor parking lay-bys are proposed in blockwork rather than tarmac as per the carriageways. In the event the site is offered for adoption as public highway, it would be preferable for the material in the lay-by to be consistent with the carriageways and footways.

33. Car parking is understood to be compliant with the Arun DC parking standards. The Planning Authority may wish to verify this.

34. The applicant should also provide a plan and confirm the number and location of electric vehicle charging points. This is referenced in the TA but no further details are provided.

Conclusions and Further Actions

35. Further information would be sought prior to WSCC Highways making a formal recommendation. The following information is required,

- A Design Audit identifying all design standards used and any departures
- A further assessment regarding the retention of the arm onto the A259 Roundstone by-pass Roundabout
- Validation of the 2015 traffic surveys
- The plan referred to within the TA showing the extent of the cycle way widening
- Amend the travel plan

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