

From: Sue Bowley On Behalf Of Planning
Sent: 30 July 2018 15:36:06 (UTC) Dublin, Edinburgh, Lisbon, London
To: Anita Gardner
Subject: FW: Additional Comments re A/36/18/OUT

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Save the environment - think before you print.

From: [REDACTED]
Sent: 29 July 2018 16:47
To: Planning
Subject: Additional Comments re A/36/18/OUT

Dear Arun Planning,

Further to my earlier correspondence with you relating to the above application, consequent to the applicant's revised Transport Assessment, I make additional observations as below. (I apologise for being unable to contain these observations to the required character limit for online submissions).

Concentrating solely upon the replacement Transport Assessment;

Section 2.2.1 describes the B2225 Arundel Road as "... benefiting from street lighting and subject to a 30 mph speed limit." Whilst this is true for much of its southern section, this is not the case for the point at which the proposed development is intended to access the network or indeed anywhere within sight thereof - here it is unlit and subject of the national 60 mph speed limit.

In describing the Existing Highway Network, the report makes no mention of the recently implemented, extensive traffic management scheme traversing Angmering village via Water Lane and Station Road, extending the (also unmentioned) 20 mph speed limit and installing numerous raised tables and speed cushions.

The report incorrectly describes the junction of Arundel Road and Station Road as being 3 kilometres from the roundabout junction with the A259 - the junctions are in fact 1.24 km apart; 3 km would place an observer at the low water mark of East Preston beach.

No consideration is given to the existing permission for 9 dwellings (A/131/16 Out) with access onto Arundel Road within approximately 40 metres of this development's proposed main access and the impacts thereof.

It is notable that the designers now suggest that all traffic (apart presumably, from westbound vehicles seeking to travel beyond Poling etc) will turn right from the estate and utilise Arundel Road - this, at peak times, including whilst two primary schools are being accessed by hundreds of pupils, parents and vehicles - plus scheduled buses.

The report quotes traffic speed as being 37mph. This is misleading - the 85th percentile speed is quoted extensively as being 37.6 mph. All conventions accept that fractions in excess 0.5 and above be rounded up, not down. Accordingly, this speed should be quoted as 38 mph. This is not mere pedanticism - Manual for Streets (2) guidance in such matters may not be applicable within situations where the existing speed limit is 40 mph or above and the 85th percentile speed is found to exceed 37 mph. In such cases, the Design Manual for Roads and Bridges' standards should be applied (with a respective safe stopping distance of 120 m). The Audit Team saw fit to comment thereon in their initial report of January 2018 (section 1.11). This would seem even more relevant given that the speed limit here is 60 mph, with survey data clearly showing vehicles **lawfully** travelling up to such speeds past the proposed junction.

Whilst the statistical analysis, which includes an average of largest core speed groups, indicates the quoted 85th percentile of 37.6 mph, analysis of the whole data set shows that 33.5% of northbound vehicles (currently up to 409 vehicles per day) travel in excess of that speed and that acceptance of the MfS safe stopping distance, could prove dangerously inadequate.

I note that an earlier approved planning application (A/131/16 OUT) - the access road to which which is situated some 40 metres south of this application - recorded the northbound 85th percentile as being 43.8 mph. It was found to be appropriate to apply the DMRB standard to this application, "given the recorded road speeds, taking account of local context and traffic flows ...". It would seem logical to apply similar consideration in this matter, particularly given the considerably greater volume of vehicle movements generated by this development.

It is still unclear what purpose the second (southern) access road is to serve - secondary or alternative main access? It is notable that no centre ghost island is proposed at this point, which suggests that vehicles waiting to enter the site from the north would cause tail backs of traffic into the nearby 60 mph section and towards the hill crest, with limited visibility thereof for drivers of approaching southbound vehicles.

The Safety Audit covering the second (southernmost) potential access point, continues to raise concerns over encroachment of turning refuse (and any other similarly sized vehicles) accessing the site at this point. This is again dismissed by the designers, this time as being at a time when "vehicles turning into the site should be minimal"; this ignores the existing traffic which will be travelling south along Arundel Road to the two primary schools etc (as there is to be no ghost centre lane). Additionally, no consideration seems to have been given to the effect of the priority controlled traffic calming feature some 40 metres south of this entrance, where priority is afforded to northbound traffic. At peak times, even if existing traffic flows are ignored, once three or possibly four vehicles from the site are brought to a halt at this feature by northbound priority traffic, nothing will be able to exit the site. If this occurs when the refuse vehicle needs to enter the site, it would be unable to proceed and no traffic could flow at all.

Furthermore, assuming that grid-lock has thus far, miraculously been avoided, the number of vehicles arriving at the junction of Arundel Road and Station Road, will not be (as assumed by the calculations) a gentle 1.1 vehicles per minute but most likely in "plugs" of 10 to 20.

The Safety Auditors' comments relating to the encroachment of refuse vehicles into adjoining lanes at the proposed primary access, are dismissed by the engineers who imply that the encroachment would be "minimal." This is not the view of the auditors, who are clearly and understandably, concerned as to the extent of encroachment displayed within the submitted Swept Path Analysis and show effectively complete occupation of opposing traffic lanes.

Despite the additional time permitted for this application to readdress the numerous inaccuracies initially presented, it is disappointing (if not unsurprising) that the report still finds time to repeatedly refer to the A259 as the A529.

Yours sincerely,

Albert Mariner