

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Arun District Council FAO: Anita Gardner
FROM:	WSCC - Highways Authority
DATE:	14 April 2022
LOCATION:	Rustington Golf Centre Golfers Lane Angmering BN16 4NB
SUBJECT:	A/45/22/PL Erection of 167 No new homes in a mix of 1-4 bedroom properties (2-4 bedroom homes and 1 bedroom apartments), with associated landscaping, parking, open space, play areas, construction of a new vehicular access from Golfers Lane and all other associated development works (resubmission following A/129/21/PL). This application is a Departure from the Development Plan and is in CIL Zone 3 and is CIL Liable as new dwellings.
DATE OF SITE VISIT:	14th April 2022
RECOMMENDATION:	More Information
S106 CONTRIBUTION TOTAL:	See below for breakdown.

1. West Sussex County Council in their role as Local Highway Authority has previously issued comments on a very similar scheme submitted for this site (Arun District Council planning reference A/129/21). It's noted that the current application proposes a reduced number of dwellings compared with the earlier scheme (reduced from 191 to 167). Quite a number of highway matters otherwise remain comparable between the two applications although additional supporting information is included within the latest submission.
2. In making these comments, the following information has been reviewed
 - Transport Assessment (reference PLN-1-4106-R006), dated 4th February 2022
 - Road Safety Audit, dated 19th July 2022
 - Residential Travel Plan, drawing number PLN-1-4103-Roo3, dated 4th February 2022
 - Proposed Access Arrangements, drawing number A351-PLN-1-4005 Revision A
 - Site Layout, drawing number PLN-1-1101 Revision L

Access

3. The development is to be accessed via a simple priority junction onto Golfers Lane, which is privately maintained and does not form part of the public

highway. No permissions would be required from WSCC Highways to enable any alterations to Golfers Lane. The form of access is considered appropriate, however the junction radii (of 10 metres) is excessive. Given the nature of the majority of traffic expected to use it, the 10 metre radii are quite substantial and could be reduced. The junction in all other respects appears acceptable.

4. The site will access the wider highway network via the existing northern arm of the A259 Mill Lane Roundabout. Given this arm is existing and already in use, there are no in principle issues with the continued and more intensive use of this arm. Minor alterations are proposed to increase the width of the entry flare and thereby allow two vehicles to queue side by side on the Golfers Lane arm.
5. Access by non-vehicular modes are covered in the following section.

Access by Non-Car Modes

6. Reference is made within the TA to 2km being an acceptable walking distance to local facilities and amenities. The 2km walking distance is taken from rather dated guidance and the distance relates primarily to acceptable walking for commuting/travel to school purposes. More recent evidence suggests the majority of walking trips are below 1 mile or 1.6km. With this reduced distance applied to the services listed within table 3.2, it's still apparent that there are a range of facilities within reasonable walking distance. For the most part, there are existing facilities available to accommodate additional pedestrian trips.
7. For cycling, a greater travel distance would be accepted. It's recognised that cycling will not appeal to all residents and that cycling will not be appropriate for all journey purposes. Nevertheless, there is existing cycle infrastructure in the immediate area that residents of the development could use.
8. In considering walking and cycling trips, it's apparent that the A259 would pose a significant barrier. The developer is consequently proposing an additional length of foot/cycleway from Golfers Lane to join the existing route where this presently terminates at the traffic signals and associated crossing points leading to the Rustington Retail Park. This improvement has been proposed as part of other planning applications at this site so has been previously accepted.
9. The developer is also proposing a new signalised crossing to the west of the A259 Mill Lane Roundabout. The crossing will be for both pedestrians and cyclists (Toucan crossing). WSCC has commented on the principle of a crossing in this location as part of the pre application comments. In principle and providing all necessary design criteria are met, at grade controlled crossings are acceptable with similar crossings proposed as part of the

current A259 improvement scheme. It's accepted that that traffic signals would introduce delays to traffic when the crossing is in use. Any delays would only be experienced when the crossing is in use will be short lived and any delay would need to be viewed on balance against the positive benefit a controlled crossing would bring for pedestrians and cyclists.

10. In terms of the design, current design standards do not allow for standalone signalised crossings on roads where 85th percentile traffic speeds are greater than 50mph. The proposed crossing is within the existing 50mph speed limit, which changes to 70mph a short distance to the west. The crossing is also close to the A259 Mill Lane Roundabout, which may result in reduced approach speeds. Given the proximity of the crossing to the roundabout, the applicant has been advised to undertake speed surveys to determine 85th percentile speeds. The results of the speed survey are included in the TA.
11. From the summary of speeds provided in table 4.1, it's apparent that eastbound 85th percentile speeds were significantly greater than 50mph on one survey day and just below 50mph on the other. Looking at the detailed survey data for the day when the 85th percentile speeds were below 50mph, it's apparent that during the AM recorded speeds were notably lower than at all other times of the day. As such, During one time interval, 85th speeds were recorded at 39.8mph. This is 10mph lower than the time periods immediately before and after, and 20mph lower than at other times. Clearly something was influencing vehicle speeds and using the Friday AM survey results is distorting the average summarised in the TA. The results are not reflective of normal conditions and should not be used in the design process.
12. As there are differences between the two days, the higher recorded speeds should have been adopted to determine the 85th percentile speed. This follows the approach as set out within paragraph 2.12 CD 185 (the standard used to inform vehicle speed measurements). If viewed against the Monday speed data alone, it's apparent that eastbound approach speeds are too high and that the installation of a standalone signalised crossing would constitute a departure from standard. The provision of the crossing should therefore be viewed in this context. WSCC Highways have a standard means of assessing the acceptability of a departure from standard. This information can be provided to the applicant accordingly.
13. The applicant has given consideration to further measures to mitigate the high vehicle speeds and allow for the crossing installation. Such measures could be used to justify any departure from standard. This mitigation includes the possibility of extending the 50mph speed limit westwards and thereby ensuring the signals are provided with a greater distance from the speed limit change. The change in speed limit would require changes to the existing traffic regulation order, which in turn would require a statutory

consultation process. The outcome of the consultation process as well as its influence on actual speeds could not be guaranteed. It would consequently be inappropriate to take into account the potential speed reduction as part of the proposed design. Related to the speed limit change and as further justification for this, reference is also made to the character of this section of the A259 changing due to the residential development. Given that the residential development is setback some distance from the A259 and accounting also for the significant landscape buffer, drivers passing the site may not readily perceive the development or alter their speeds as a consequence.

14. Very limited consideration is given to the westbound approach to the crossing. Whilst traffic is likely to be travelling slower than that heading eastbound, the approach speed of 33mph quoted within the Designers Response to the Stage One Road Safety Audit doesn't appear to be supported by speed data. The stopping sight distance also appears to be based upon Manual for Streets, which given the context of the road is not considered appropriate. The applicant should clarify exactly what design standards have been given to the westbound approach to the crossing. This is a concern as drivers may not be anticipating the crossing or expecting to stop. The Road Safety Audit also appears to raise the westbound approach as a concern (although the audit appears to incorrectly reference 'eastbound' whereas the problem description seems to relate to 'westbound' traffic) with the recommendation to move the crossing further west. This recommendation hasn't been addressed by the designer.
15. Based on the information submitted, there remains concerns in terms of the appropriateness of the at-grade crossing given the high eastbound 85th percentile speeds and the lack of information in terms of the determination of the stopping sight distance for westbound traffic.
16. Notwithstanding the at-grade crossing, the TA also gives consideration to grade separated solutions (an underpass or bridge) for crossing the A259. It's apparent that such a solution is not feasible as there is very limited landing room on the southern side of the A259 to site any bridge or underpass entrance
17. The applicant should also note that further information is required for the Stage One Road Safety Audit. This includes a requirement for the audit to be signed by the audit team as well as a response form that accords with that in GG 119. The submitted response form doesn't include anywhere for WSCC (as Overseeing Organisation) to include comments or allow for any agreed actions to be recorded. The revised RSA response should be submitted to and agreed with WSCC Highways.

18.The submitted travel plan is noted. This accords with the requirements of WSCC. The applicant should note that WSCC apply an auditing fee to all new travel plans. The travel plan and associated auditing fee would be secured via a s106 agreement.

Traffic Impact

19.Reference is included within the TA to the previously consented development on the site (for a non-food retail unit) and the associated traffic generation. It's acknowledged that this previous consent had the potential to generate more vehicular trips than the proposed residential units. However, as this previously consented use has now lapsed, no account can be given to this within the traffic assessment.

20.The submitted TA outlines the approach taken to assess the impact on the local highway network arising from the increase in traffic. In summary,

- Vehicle trip generation is based on 167 dwellings and makes use of the same trip rates used within A/129/21 and agreed with WSCC during pre-application discussions.
- Vehicle trip rates are provided for the AM and PM network peak hours. These hours are recognised as those most sensitive to change.
- The site is estimated to generate 94 (23 arrivals, 70 departures) two way movements in AM peak hour and 95 (63 arrivals, 32 departures) two way movements in the PM peak.
- Trips are distributed using Census Journey to Work data for the local area. This is taken as a proxy for where residents of the new development will likely travel to.
- Vehicle trips have been assigned using the most direct route towards the identify destination. As route choices are known, this then identifies those junctions that will experience traffic increases.
- The impact at identified junctions is considered for with and without development future year scenario for 2026.
- The growth rate used to produce the 2026 future year will include other committed developments along with general background traffic growth.

21.In light of the above, the impact of the increase in vehicle trips has been formally assessed for the A259 Mill Lane Roundabout only. It's evident from the assessment that the development would have minimal impact upon queues and delays. Based on the distribution, it's apparent that other junctions on the A259 (namely the Body Shop roundabout to the west and the Station Road roundabout to the east) would meet the threshold for formal capacity assessments. Whilst neither of these junctions is to substantially change, the link capacity along the A259 between Angmering and Littlehampton is being improved by way of the current road scheme. As highway capacity is already being increased, it's considered unnecessary to require the further modelling of these junctions.

22. The overall acceptability of the development in capacity terms has been considered against paragraph 109 of the National Planning Policy Framework. The NPPF is quite clear in stating that development should only be prevented or refused on highway grounds where the residual cumulative impacts are severe.

Layout and Car Parking

23. The proposed internal road layout comprises a mix of segregated foot/carriageways and shared surfaces on those lightly trafficked areas. The main spine road is indicated as being 6 metres wide along its entire length. The areas of shared surface are of variable width but the majority are 6 metres from edge to edge. The broad layout arrangements are considered to comply with the guidance within Manual for Streets.
24. With respects to more detailed aspects of the layout,
25. The carriageway alignment in front of plot 130 is less than ideal. The arrangement is recognised as being proposed to retain the existing tree belt and would at least act as a speed reducing feature.
26. A 3 metre wide shared foot/cycle way appears to be proposed along the southern side of the spine road. The route then connects through to the proposed foot/cycle way extension alongside the A259. In terms of the route within the development, given the low speed/lightly trafficked nature of the development, a dedicated shared use route would not be necessary. Based on the guidance within the LTN 1/20, on-road conditions will be such that all users could use the carriageway. It is acknowledged that the inclusion of this route would provide for some users albeit the majority would use the carriageway.
27. A pedestrian route is shown along the southern perimeter of the development connecting to Golfers Lane. The route also extends up to the site's western most boundary and then appears to continue beyond the site. Confirmation would be sought as to whether this is correct and how far this route may then continue beyond the site boundary. There would be particular interest in this route if it connects to public right of way number 2160 which runs to the immediate west of the development. Within the TA, the applicant has examined and ruled out the possibility of the development increased use of PROW 2160 where this crosses the A259 primarily as there is no direct link from the site to the right of way. However the proposed pedestrian route suggests that a connection to the right of way might now be proposed.
28. The TA indicates that parking across the site accords with the Arun DC Parking Standards. Whilst WSCC are satisfied with the parking proposed, the

Local Planning Authority may wish to review the parking arrangements.
Provision should be made for disabled parking as per the Arun DC standards.

Conclusions

29. Based on the information submitted, concerns would be raised with the proposed at-grade signalised crossing, which is considered to constitute a departure from standard. The applicant should therefore apply for and allow the crossing to be assessed via the WSCC departure from standard process. The response to the Stage One Road Safety Audit is also not in the correct form.

Ian Gledhill
West Sussex County Council – Planning Services