

Technical Note 2: Response to Consultee Comments



Project: Proposed Leisure Development, Rustington
Prepared by: James Werby
Approved by: Andrew Whittingham
Date: 27/07/2017

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1.0 Introduction

- 1.1 Motion has been instructed by Rustington Golf Centre Limited to provide transport advice in relation to a leisure development on land that forms part of the Rustington Golf Centre, located off Golfers Lane in Angmering. The site is within an area of mixed land uses including residential, commercial and open space and falls within the administrative boundaries of Arun District Council (ADC) and West Sussex County Council (WSCC).
- 1.2 A planning application (reference A/84/17/PL) was submitted in April 2017 for the construction of a retail unit, service road and alterations to car parking at Rustington Golf Centre. It is noteworthy that planning permission was granted in January 2017 (planning reference A/77/16/PL) for a leisure development on the site, which comprised of 963 square metres of pub / restaurant use (Class A3 / A4), a 63 bed hotel (Class C1), 555 square metres of nursery use (Class D1), 2,544 square metres of trampoline / laser centre (Class D2), 9 five a side football pitches and 465 square metres of changing facilities (Class D2), forest adventure and a 100 square metre kiosk (Class D2).
- 1.3 The most recent planning application (reference A/84/17/PL) maintains most of the uses of the consented scheme but replaces the 9 five a side football pitches with a 3,807 square metre retail unit. Other aspects of that application have also changed such as parking numbers and servicing arrangements.
- 1.4 Following formal planning submission of the current scheme, WSCC Highways raised no objection to the proposals. WSCC Highways were satisfied with the traffic impact, external and internal infrastructure and proposed parking levels on-site. Their comments are attached at **Appendix A**.
- 1.5 However, it is noted that other consultees including Angmering Parish Council, Rustington Parish Council and Littlehampton Town Council have objected to the scheme while the Joint Eastern Arun Area Committee (JEAAC) 'expressed their severe concern' on highway related points. The comments received are attached at **Appendix B** and are summarised below:
- ▶ The impact of development on traffic levels on the A259;
 - ▶ Highway safety concerns as a result of the increased vehicle movements; and
 - ▶ The accessibility of the site for modes of travel other than the private car.
- 1.6 This Technical Note provides a response to the comments raised above and should be read in conjunction with the submitted Transport Assessment (TA) dated April 2017 in support of the planning application (reference A/84/17/PL). Reference should also be made to the WSCC Highways response to the application which did not raise an objection.
- 1.7 Having regard to the points above, this note demonstrates that the proposed development will not have a material impact on traffic or highway safety and that the site is accessible by means of transport other than car.

2.0 Traffic Impact

- 2.1 A detailed analysis of the traffic impact of the proposal was presented in the submitted TA which WSCC have agreed with. In particular, they were satisfied that the A259/Mill Lane/Golfers Lane junction will operate within theoretical capacity subject to improvements along Golfers Lane suggested as part of the planning application. It has therefore been demonstrated that the impact of the current proposals is not expected to have a detrimental effect on the surrounding road network.

3.0 Highway Safety

- 3.1 It is noteworthy that WSCC Highways and Highways England made no mention to highway safety as a result of the proposed development. As concluded within the submitted TA, it is still considered that the local highway network does not exhibit a noteworthy accident pattern.
- 3.2 Furthermore, as part of the previous scheme (planning reference: A/77/16/PL) a Stage 1 Road Safety Audit (RSA) was undertaken of the site access / proposed footway and cycling link along the northern side of the A259. Following a review of the Stage 1 RSA it was considered that there were no fundamental / significant concerns relating to the proposed access improvements, which the Highway Authority also agreed with. It is noteworthy that apart from an extension of the nearside lane of the roundabout there is no material change to the site access and therefore there are no safety concerns in relation to the access for this scheme.

4.0 Accessibility

- 4.1 As part of the consented scheme a shared use cycle and pedestrian facility (footway?) on the northern side of the A259 (implemented as part of WSCC improvement works) is to be extended to the west to provide improved access to the site.. As part of the proposals for the current planning application the pedestrian facilities into the site will be enhanced via a new 2 metre lit footway along Golfers Lane. This footway will provide a connection into the site from the proposed footway extension along the northern side of the A259.
- 4.2 It is also noted that Golfers Lane and the inner road network, particularly the service road, have been widened to accommodate the likely vehicles that will serve the site and it has been demonstrated within the submitted TA that two way movement can be achieved.
- 4.3 As part of one of the comments, reference was made to the potential provision of a foot bridge or subway over/under the A259. This is not considered suitable and as stated in Manual for Streets (MfS), foot bridges and subways should be avoided. Subways, in particular can raise concerns over personal security.

5.0 Summary and Conclusions

- 5.1 This Technical Note has been prepared on behalf of by Rustington Golf Centre Limited in relation to comments received from Angmering Parish Council, Rustington Parish Council, Littlehampton Town Council and the Joint Eastern Arun Area Committee for the proposed leisure development on land that forms part of the Rustington Golf Centre, located off Golfers Lane in Angmering.
- 5.2 In summary, the report highlights the following:
 - ▶ WSCC were satisfied with the traffic impact presented within the TA and it has been demonstrated that the net additional traffic impact of the retail unit will not have a detrimental impact on the surrounding road network.
 - ▶ It is considered that the local highway network does not exhibit a noteworthy accident pattern. It is also noteworthy that a Stage 1 Road Safety Audit was undertaken of the site access / proposed footway and cycling link along the northern side of the A259. This concluded that there were no concerns with the design.
 - ▶ The pedestrian infrastructure will be enhanced as part of this application as the infrastructure of part of the consented scheme will be extended into the site.
 - ▶ Golfers Lane and the inner road network, particularly the service road have been widened to accommodate the likely vehicles that will serve the site and it has been demonstrated that two way movement can be achieved.

Appendix A

West Sussex County Council
Highways Response

**WEST SUSSEX COUNTY COUNCIL
PLANNING SERVICES CONSULTATION**

DATE: 17th July 2017

**FROM: Dominic Smith TO: Arun District Council
FAO: David Innes**

SUBJECT: A/84/17/PL

New retail unit with mezzanine together with associated car parking & service road - This is a Departure from the Development Plan.

Rustington Golf Centre, Golfers Lane, Angmering, West Sussex, BN16 4NB

RECOMMENDATION:

Advice	☒	Modification	☐	More Information	☐
Objection	☐	No Objection	☒	Refusal	☐

West Sussex County Council (WSCC), in its capacity as the Local Highway Authority (LHA), has been consulted on the proposed development of a retail unit, mezzanine floor and associated parking and service road on land at Rustington Golf Centre, Angmering.

Consent was granted to application A/77/16 for various uses on-site, including a pub/restaurant, trampoline/laser centre, children's nursery, forest adventure area and nine five-a-side football pitches. This consent also included modification to the site access roundabout and the introduction of cycle and pedestrian connection to the site.

The proposed development replaces the consented football pitches with retail provision. Parking provision is increased by 44 spaces and 3 lorry bays, a new service road and a footpath along Golfers Lane.

No objection is raised, subject to the replication and updating of conditions/obligations associated with consent A/77/16.

Traffic Impact

A Transport Assessment has been submitted in support of the application, building upon work undertaken in support of application A/77/66. Trip generation of the retail provision has been assessed utilising the TRICS database and the LHA are satisfied with the outputs derived through this assessment.

As the increase in traffic generated by the proposal exceeds 30 entry movements onto the A259/Mill Lane/Golfers Lane junction, ARCADY junction capacity testing has been provided. The assessment demonstrates that the existing layout of the roundabout results in an impact that would be considered 'severe', taking the Golfers Lane arm of the junction significantly in excess of theoretical operating capacity. The Applicant proposes modification of the Golfers Lane arm, as previously assessed through A/77/16, and future year testing of the proposed layout demonstrates that the operation of the junction (in particular the Golfers Lane arm) will operate within theoretical capacity.

Infrastructure

Aside from the aforementioned junction improvements, a cycle/footway connection is proposed as per the previous application. This will now connect into an internal 2m wide footway, with cyclists discharged onto Golfers Lane.

Internally, a service road provides access to the rear of the commercial buildings. Tracking demonstrates that HGVs can negotiate the internal layout and turn within the confines of the site in order to enter and exit the site in forward gear.

Parking

Demand for car parking has been forecast using accumulation of trip data derived from TRICS. The proposed provision of 278 falls within the maximum car parking standard of both WSCC and Arun District Council. The forecast indicates that circa 35% residual capacity will remain, which will ensure a sufficient supply of parking to cater for peak periods associated with the uses (i.e. school holidays/Christmas period).

Dominic Smith
Planning Services

Appendix B

Consultee Responses



Angmering Parish Council
The Corner House
The Square
Angmering
West Sussex
BN16 4EA

Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex BN17 5LF
Planning General Enquiries
Tel: (01903) 737756 Fax: (01903) 730442
Dx: 57406 Littlehampton
Minicom: 01903 732765
e-mail: planning@arun.gov.uk
website: www.arun.gov.uk/planning

Your Ref: OWQC14472

Our Ref: A/84/17/PL

Please ask for:

Mr D Innes

3rd July 2017

Dear Sir/Madam

Town & Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015

New retail unit with mezzanine together with associated car parking & service road -
This is a Departure from the Development Plan
Rustington Golf Centre Golfers Lane Angmering

Thank you for your internet comments made on 30th June 2017 which has been recorded as **'an objection'** with the comments as follows:

*Considered at the Housing, Transport & Planning Committee meeting on 27/06/2017.
This is a significant change to the leisure scheme originally proposed and approved. The grounds for the objection are:*

- 1) Impact on surrounding area, particularly traffic levels on the A259;*
- 2) Highway safety, as a result of the increased vehicle movements (comments from Highways England also noted)*
- 3) Need for a retail development of this kind in the area is not demonstrated. Multiple negative impacts on local retail outlets. Retail assessment does not include Angmering.*

Your views will be considered before the application is determined and I shall write to inform you of any decision made.

Please be aware that if the application is to be determined by the Council's Development Control committee and your letter has been received at a late stage after the Agenda has been published you will not receive a separate letter notifying you of the date of the meeting and procedures for public speaking. In such circumstances it is recommended that you track the progress of the application on the Council's website or telephone the Council for further information. Please be advised that any comments you make that are not included within the Committee Agenda will be reported to the Members of the Development Control committee. Please also be aware that only a small number of all planning applications received go the Development Control Committee. Most are determined under delegated powers by Officers in which case your comments will again be considered before the application is determined.

Please be aware that Planning Services operate an 'open file' policy and will publish details of your comments on the internet on the Arun District Council Planning section. Please ensure that you only provide information that you are happy will be made available in this way. If you supply information belonging to a third party, please ensure you have their permission to do so. If you do not wish your comments to appear on the 'open file' please confirm this in writing and I will arrange for it to be destroyed although this means that its contents will then be disregarded.

In the event of a subsequent written representations appeal, against a refusal of planning

permission on a householder application, any representations made on the application will be automatically forwarded to the Secretary of State. Unlike all other types of appeal, there will be no further opportunity to comment at the appeal stage.

Yours faithfully



A handwritten signature in black ink, consisting of stylized initials 'NC' followed by a surname, with a small dot at the end.

Neil Crowther
Group Head of Planning



Rustington Parish Council

Council Offices, 34 Woodlands Avenue, Rustington, West Sussex BN16 3HB

Head of Planning Services
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex BN17 5LF

Our Ref: CW/PLAN/17
Date: 20 July 2017

Dear Sir

A/84/17/PL - New retail unit with mezzanine together with associated car parking and service road - This is a Departure from the Development Plan - Rustington Golf Centre, Golfers Lane, Angmering

My Council has considered this application in great detail and wishes to object to it on the following grounds:-

- (a) It is understood that A1 permission is being sought for a standalone retail unit, with a particular tenant in mind, which could arguably result in a positive impact in this area. However, if this tenant does not subsequently move into this unit, then permission would be in place for any type of retail unit, which could result in yet another grocery/food outlet in what can only be described as an already saturated area in respect of such units. The retail impact of this possibility is not assessed in this Application and, therefore, significant changes would need to be made to the Retail Assessment to consider any other such operator
- (b) The Section 106 Agreement from Application No. A/77/16/PL makes financial provision for an improvement of access at the entry point to the site for cycles and pedestrians. This needs to be a condition of this Application and should also be part of the remit for the Travel Plan Co-ordinator, as without correct implementation of this access route the Travel Plan Co-ordinator will be unable to achieve and deliver its own objectives
- (c) Whilst the comments from Highways England are welcomed, it is unfortunate that the West Sussex County Council Highways Department does not consider that the severe increase in traffic, which will most certainly be generated by the introduction of this major retail unit, will be a risk to the current strategic network in this vicinity. The current congestion at all times of the day in Mill Lane is of extreme concern, particularly as any increase in traffic levels will result in gridlock for road users exiting Rustington

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Rustington Parish Council operates an open file policy. Any correspondence with the Council may become public. For the Purposes of the Data Protection Act Rustington Parish Council is the Data Controller.

VAT Registered: 945 2052 29

- (d) Taking this into account, the Travel Plan does not comply and, most certainly, contravenes the Arun District Council Local Plan 2003 Transportation Policies, namely:-

GEN4:-

- (i) Located so as to minimise the demand for travel;
 - (ii) It does not materially add to existing road congestion and air pollution; and
 - (iii) Appropriate provision is made for safe and convenient access by public transport, cyclists and pedestrians
- (e) The Travel Plan contains a number of inaccuracies, including the fact that there is currently no No. 12 bus service. Whilst this is scheduled to be reinstated with effect from September 2017, this is purely on a six-month trial basis and there is no guarantee without the necessary funding from relevant bodies that this service will continue.

My Council would also like its previous objections in respect of Planning Application No. A/77/16/PL on the same site, to receive the consideration of the local Planning Authority when determining this Application, taking account of the fact that it is a standalone Application:-

Issue 1

Access by motor vehicles on to the A259 via the roundabout was not acceptable in its current form. In the light of the current difficulties of exiting from this site, namely having to cut across traffic to exit into Rustington, the Committee was of the opinion that this situation would only get worse. In fact the Traffic Assessment itself stated that there had been significant accidents and that as numbers increased, this junction would have to be enhanced by 2021.

The current reported accidents on this roundabout number 28 (Section 4.16 to 4.18), and had, it seemed, been put to one side and discounted in the Summary (Section 4.19) on the basis that they were caused by drivers 'being careless/reckless/in a hurry/failing to look or being nervous or uncertain'. This was how most accidents happen, and more traffic would, on average, see more accidents.

The reliance, as part of the plan, being to cut increases in cars by greater car sharing, was felt to be over optimistic and, whilst some success might be achieved with staff, by enforcing car sharing, it was not realistic to assume that this was something already endorsed by the general public when they could.

/s/3...

The Committee's proposal to alleviate these problems and its objection was to review:-

- (i) The bringing forward of the enhanced 2021 plan for entry, egress and road improvements
- (ii) With the West Sussex County Council Highways Department, the possibility of a new second entrance, with appropriate slipways in and out, from the A259 at the western end of the site, close to the proposed Restaurant. This would have the effect of splitting the traffic between the two ends of site, thereby reducing the pressure from the roundabout exit.

Issue 2

Accessibility to access site by foot - The Committee believed that the Transport Assessment and Travel Plan did not fully address this issue and appeared to have a number of omissions relating to foot passengers.

Its main concerns were for pedestrians crossing from Rustington, on the south side of the roundabout and new retail site, to the proposed development, on the north side of the roundabout. As there was no pedestrian crossing at the roundabout, the only access by foot to the site from Rustington, was to walk some distance to the east and use a light controlled traffic crossing at the junction for the Sainsbury's Supermarket and Retail Park.

Again, the Committee felt that this was where both the Travel Assessment and Travel Plan fell down, as there was no real provision for pedestrians to walk from the aforementioned crossing to the site, other than at points across grass verges. It was also noted that when entering the site by foot, and in particular with pushchairs, prams, wheelchairs and electric buggies, the entrance was small and there was no adequate pedestrian provision. This followed on to the actual access road within the site which was very narrow and afforded no pedestrian areas or paths, and there was no evidence that this was to be enhanced in any way.

The Committee's proposal to alleviate the problems and its objection was to review:-

- (i) The provision of a foot bridge or subway from the south-west side of the roundabout over/under the A259 to the north-west side of the entrance to proposed development
- (ii) The provision of a suitable footpath between the Sainsbury's/Retail Park crossing and the north-east entrance to the site, so that pedestrians from the eastern end of Rustington and East Preston could safely enter and exit

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- (iii) Moving forward the 2021 enhancement of the entrance (as mentioned above) to be implemented at the same time as the development, to provide improved pedestrian access at the entrance to the site and along the main site access road to the proposed development.

Issue 3

Accessibility of accessing and egressing the site by cycle - Apart from the access from the east where there was a cycle path, though not continuous, to the development entrance, all cycle access appeared to be the same as for motor vehicles.

The Committee found this to be inadequate on such a busy roundabout. The Travel Assessment did not cover, or make clear, these cycle requirements and this was not covered to any degree in the Travel Plan.

Its proposal to alleviate the problems and its objection was to review:-

- (i) Much the same as with pedestrian access, and consider the provision of a subway from the south-west side of the roundabout, under the A259, to the north-west side of the entrance to the site
- (ii) The provision of a cycle path between the Sainsbury's/Retail Park crossing and the north-east entrance to the site, to facilitate the safe passage of cyclists from the east end of Rustington and East Preston to enter and exit the site
- (iii) The bringing forward of the 2021 enhancement of the entrance (as mentioned above) and to implement improved cycle access at the entrance to the site and along the main site access road to the proposed development.

Yours faithfully



Mrs Carole Ward
Clerk of the Council

The Town Clerk
Littlehampton Town Council
The Manor House
Church Street
Littlehampton
BN17 5EW

Your Ref: OWPC14393
Our Ref: A/84/17/PL 27-04-2017
Please ask for:
David Innes

28th June 2017

Dear Sir/Madam

Town & Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order 2015

New retail unit with mezzanine together with associated car parking & service road -
This is a Departure from the Development Plan
Rustington Golf Centre Golfers Lane Angmering

Thank you for your internet representation made on 27th June 2017 which has been recorded as '**an objection**' with the comments as follows:

Extract MINUTES of a MEETING of the PLANNING AND TRANSPORTATION COMMITTEE held in the MILLENNIUM CHAMBER, MANOR HOUSE, CHURCH STREET, LITTLEHAMPTON on MONDAY 26 JUNE 2017 at 6.30PM

19.2 Planning Application A/84/17/PL - Rustington Golf Centre Golfers Lane Angmering

19.2.1 The Committee had before it details of the above planning application (previously circulated) proposing the creation of retail development on part of the existing Rustington Golf Centre complex. Although not in the Parish, it was considered prudent that the Committee be made aware of the proposals because of the recently approved hotel development on the same site and its proximity to the recent applications to expand retail outlets on the same section of the A259.

19.2.2 Members proceeded to consider the application in more detail and discussion focussed on the movement of pedestrians and vehicles around the site. Observing that West Sussex Highways had yet to comment on the application, concerns were expressed regarding the ability of pedestrians to safely negotiate the site and it was considered that more footpaths were required to facilitate this. The lack of access to the site for pedestrians from the direction of Rustington and Littlehampton was also highlighted, as well as the current absence of public transport. Concerns were therefore expressed that if this was not rectified attempts would be made to cross at this highly dangerous roundabout. Reflecting on the increase in visitor traffic that would undoubtedly be generated by the addition of another retail outlet at the site, it was also considered that the inner road network should be widened to accommodate the growth in traffic. The application also failed to acknowledge other means of accessing the site, particularly the possible need to facilitate buses in the future. It was therefore considered that if approved, a contribution should be sought from the applicant towards the development of public transport initiatives. It was therefore RESOLVED that:

The Committee's views as set out in Minute 19.2.2 above be submitted to the Planning Authority

Your views will be considered before the application is determined and I shall write to inform you of any decision made.

Please be aware that if the application is to be determined by the Council's Development Control committee and your letter has been received at a late stage after the Agenda has been published you will not receive a separate letter notifying you of the date of the meeting and procedures for public speaking. In such circumstances it is recommended that you track the progress of the application on the Council's website or telephone the Council for further information. Please be

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Yours faithfully

Neil Crowther
Group Head of Planning



Working with Town and Parish Councils

Joint Eastern Arun Area Committee

C/o County Hall, Chichester, West Sussex PO19 1RQ



planning@arun.gov.uk

18 July 2017

Dear Sir/Madam,

Planning Application A/84/17/PL

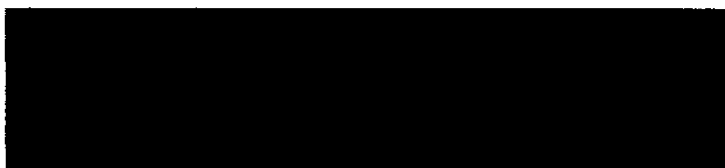
The Joint Eastern Arun Area Committee (JEAAC) Highways and Transport Sub Group recently reviewed the above planning application.

Members of the Sub-Group expressed their severe concern that this application would result in a major increase in traffic activity in the vicinity to the detriment of road users. It was also felt that the internal road configuration would need to be widened to cope with the increased traffic volume entering and leaving the site

At the subsequent full meeting of the JEAAC on 11 July 2017 it was agreed that the Committee should make formal representation in response to the planning application.

I therefore wish it to be included that JEAAC have concern in respect of the traffic flow problems that the increased use of the access from the roundabout would cause for highway users, and concern over the road width and capacity within the site.

Yours sincerely,



Deborah Urquhart
Chairman
Joint Eastern Arun Area Committee