

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Arun District Council FAO: Simon Davis
FROM:	WSCC - Highways Authority
DATE:	31 March 2020
LOCATION:	The Beach Hotel, former Mud Club & 2-4 Waterloo Square Bognor Regis PO21 1SU
SUBJECT:	BR/282/19 Redevelopment into 49 No apartments consisting of 24 No 1 & 25 No 2 bed apartments & 2 No commercial units (A3 Restaurant & Cafe). This application affects the character & appearance of The Steyne, Bognor Regis Conservation Area & may affect the setting of a listed building.
DATE OF SITE VISIT:	29 March 2020
RECOMMENDATION:	Modification

Summary

West Sussex County Council, in its capacity as Local Highway Authority (LHA), have been re-consulted on proposals for 49 x flats and 2 x commercial units (restaurant/cafe) on ground floor with new vehicular access to basement level car park. In comments dated 3 December 2019 the LHA requested further information on a number of matters including clarification of proposed access arrangements and Stage One Road Safety Audit (RSA), demonstration that the proposed car parking layout is workable, provision of a Transport Statement (TS) and demonstration that the proposed servicing bay off Norfolk Street would be a workable arrangement.

A Transport Statement has been provided and is accompanied by a Travel Plan Statement (TPS) which aims to encourage use of sustainable transport modes for residents and is discussed further on in this report. For clarity, the LHA have based our comments on the latest information and plans provided within the TS and TPS alone.

Access Arrangements & RSA

The TS clarifies that the new vehicle access to the basement car park would be 5.8 metre wide and feature 4 metre kerb radii. There would also be dropped kerb/tactile paving either side of the access to facilitate pedestrian movement across the existing footway. It is anticipated that some extent of the existing dropped kerb would also require re-instatement to re-form the kerb line. All of these works would be carried out under a minor works S278 agreement to be obtained from the WSCC Implementation Team.

Swept path tracking plans have been provided which demonstrate that an estate sized car can manoeuvre the access point. A car is also able to wait clear of the footway in the scenario where the proposed traffic light system was in operation. The traffic light system would stay on red at the site entrance in the scenario that a car was exiting the basement car park.

The servicing for the A3 restaurant/cafe will be from the rear of the site from the one way Norfolk Street. It has been demonstrated via swept path tracking that a panel van can access the service bay for delivery purposes. The LHA consider that any larger vehicles including refuse collection would be required to stop on Norfolk Street to serve the rear of the site. Considering the one way nature of the road this would block traffic temporarily however is considered an existing scenario for nearby businesses and is not anticipated to result in a highway safety concern.

A Stage One RSA has been carried out to GG119 standards, to assess the proposed access and highway modification works. This raised two items as outlined below:

2.1 - Risk of collisions due to congestion as vehicles wait to enter site and passing traffic attempts to pass those waiting on Waterloo Square

The width of Waterloo Square in vicinity of the site is 8 metres however the presence of pay-and-display parking opposite the access (western side of carriageway) narrows the available carriageway width to 6 metres. Where the two on-street parking bays are present on eastern side of carriageway (south of site access), the carriageway width further narrows to approximately 4 metres which does not allow two cars to pass in opposing direction. The auditors observed cars having to give way on this section of the carriageway. A concern was raised with increase of vehicles that a second vehicle attempting to enter the site from the south would be required to wait on Waterloo Square, potentially blocking right hand turn from vehicles exiting the development or blocking passage of southbound passing traffic. In turn collisions for vehicles attempting to pass could occur or increased risk of collisions with pedestrians crossing site access. The auditor recommends that the two on-street parking bays south of site access are removed and 'Keep Clear' markings introduced. The Designer agrees with this recommendation.

LHA Response: The width of the carriageway at the point where on-street parking can take place both sides is an existing scenario with no evidence of highway safety concern (no recorded injury data within past five years). It is considered that the increase in vehicles would be small considering the restricted amount of parking proposed. Furthermore, the data from TRICs would suggest that most inward trips would be expected in the PM peak and outward trips in the AM peak. The probability of more than one vehicle waiting to enter the site whilst the traffic light system is operational is considered slight and not anticipated to result in a highway safety concern. The LHA therefore disagree with the auditor and consider that the two parking bays south of the site access can remain.

2.2 - Risk of side impact and rear shunt collisions due to on-street parking bay immediately north of site access restricting visibility

The auditor raises that the on-street parking bay north of site access could restrict visibility of vehicles exiting site and could also impact vehicles entering site from the north. A left turner may need to brake suddenly if realising a vehicle is already waiting to enter the site (if vehicle happens to be exiting car park). This could lead to increased risk of rear end shunts by through traffic. The auditor recommends that the permit holder bay north of site is relocated 6m further north-west, creating improved visibility. The Designer agrees with this approach.

LHA Response: As per comments for 2.1, the likelihood of more than one vehicle waiting whilst a vehicle exits the site is considered negligible due to the proposed traffic light system and most departures being expected during the AM peak and arrivals during the PM peak (see Trip Generation section). It should also be noted that Manual for Streets (MfS) paragraph 7.8.5 states that "Parking in visibility splays in built-up areas is quite common, yet it does not appear to create significant problems in practice. Ideally, defined parking bays should be provided outside the visibility splay. However, in some circumstances, where speeds are low, some encroachment may be acceptable". The LHA consider MfS to be applicable guidance in this location and therefore do not agree that the parking bay to the north of the access would require relocating.

The Designer should provide an RSA Audit Log in the format show in table F4 and section F5 of GG119. The LHA, as Overseeing Organisation, would then be in a position to fill out the relevant column. In the first instance the designer is advised to pass these comments to the auditor for further consideration.

Visibility

Drawing no. 2020-6153-001 Rev A demonstrates vehicular visibility splays of 2.4m by 43m. This is suitable Stopping Sight Distance (SSD) for new accesses where 30mph

speeds feature. Furthermore, considering the road layout and proximity of the site access to the junction with The Esplanade, vehicle speeds are not anticipated to be exceeding the posted limit.

The northern splay utilises the width of the existing footway and is not obscured by on-street parking. The southern splay extends to the junction and crosses a small section of the on-street parking bays. The splay has also been drawn to an offset from the centre-line to represent where the driver would be present (with it not anticipated that a car would be travelling in the opposing lane at the junction). MfS2 expands on visibility splays where on-street parking is present by stating that *"Vehicle exits at the back edge of the footway mean that emerging drivers will have to take account of people on the footway. The absence of wide visibility splays at minor accesses will encourage drivers to emerge more cautiously - similarly to how vehicles pull out when visibility along the carriageway is restricted"* (paragraph 10.6.1). The LHA considers that MfS is applicable in this instance and that it would be appropriate in this location for a car to edge forward considering the anticipated low speeds, presence of similar accesses and suitable forward visibility along Waterloo Square.

It is also considered that due to the set back of the proposed building that some level of visibility of pedestrians will be available either side of the access, upon a car exiting. Comparing the extent of highway boundary mapping to the red edge plan of the site, it would appear that there is a strip of land not public footway and not within the red edge of the site. A small section of this land immediately south of the proposed access could be kept clear to allow for improved visibility of pedestrians on the adjacent footway. The applicant could also propose to put this strip of hardstanding forward for adoption under a S38 agreement. The applicant is invited to clarify this point.

Parking and Internal Layout

The TS refers to WSCC Car Parking Demand Calculator. However, car parking for developments in Arun District should now be assessed against the Parking Standards Supplementary Planning Document (SPD) – January 2020. The SPD refers to car parking demand for both residential and commercial uses and provides guidance on electric vehicle charging points and bicycle parking provision. Marine ward is in parking zone 4 and therefore residential units of both 1 and 2-bedrooms would require 1 car parking space per unit, resulting in a requirement for 49 x car parking spaces.

The amended car parking layout shows a total of 19 x unallocated spaces (including 2 x disabled spaces). One of the disabled spaces has not been fully marked out although both now include 1.2m access aisle surrounding these. Whilst parking provision for residential element is a shortfall in 30 x spaces the LHA previous comments in respect to the accessibility of the site by modes other than the private car should be noted. Furthermore, the nearby road network features protection markings in locations where on-street parking could be deemed detrimental to highway safety and there are also resident permit holder parking only restrictions in the vicinity. Future residents should be aware that they may not be able to obtain parking permits to enable them to park in the Controlled Parking Zone (CPZ).

With the reduction in spaces from 22 to 19, relocation of motorcycle parking and alterations to traffic light system waiting spaces, manoeuvrability space now appears improved and has been demonstrated with swept path tracking, including illustrating that space 14 is accessible.

As per the SPD document, an A3 use could see a demand for 1 space per 5 sqm of public area and 2 spaces per bar (or 5m length of bar for large bars) with staff parking clearly marked. As per previous comments the commercial element will not feature any dedicated parking, which is not uncommon for an A3 use on a seafront location, especially where such site constraints are present and on-street parking and public car parks are available and within walking distance of the site.

It is also advised that 20% of spaces (4 x spaces) are provided with electric vehicle (EV) charging infrastructure although it is acknowledged that further details of this could be secured via condition.

Trip Generation & Road Network Capacity

Section 4 of the TS assesses the anticipated impact of the development in terms of vehicular trips created. The previous use included 5 x flats, 3 x restaurant units and 2 x retail units. It also included a nightclub use although this has not been included as movements would be expected outside peak traffic hours. The TRICs (Trip Rate Information Computer Systems) database has been interrogated to determine the amount of vehicular trips that could be associated with the previous permitted uses at the site. Using suitable parameters an assessment of each individual previous use was carried out. The resulting total trips are estimated at 12 two-way movements in the AM and 37 in the PM peak with 492 movements over the day. It should be noted that this is considered a worst case scenario and due to the seafront location and no existing dedicated parking being in place, trips are anticipated to be spread over the nearby road network or also include travel by foot to the site for the retail/restaurant uses.

The anticipated vehicular trip generation from proposed development of 49 x flats and 2 x restaurant/cafe units has also been assessed using suitable parameters in TRICs and found that 14 x two-way trips in the AM peak hour and 28 x two-way trips in the PM peak hour could result with a total of 349 x trips over the day. The proposed development could therefore see an increase of 2 x trips in the AM peak and reduction of around 11 x trips in the PM peak with an overall reduction in daily trips. The potential increase of trips in the AM peak could be a result of the increase in residential units at the site. As per previous comments it is important to note that the proposed car park provides a limited number of spaces (19). This restriction, along with no dedicated parking being provided for the restaurant uses could result in less trips to and from the site in peak hours than outlined by the TRICs assessment. In summary the LHA does not consider that the proposals would result in a significant increase in vehicular trips to the nearby road network over what could already be supported and no capacity issue is raised in relation to the operation of the nearby road network.

Accessibility

The TS sets out the accessibility of the site by modes other than the private car. Street lit footway is present either side of Waterloo Square and The Esplanade with crossing facilities in the vicinity in the form of dropped kerbs, pedestrian refuge islands and a signalised crossing across The Esplanade. The footways provide a continuous link throughout Bognor town centre with various retail, services and amenities within 1 km walking distance of the site (as per recommended average length of journey on foot as set out in Chartered Institute for Highways and Transport 'Providing for Journeys on Foot').

The Train Station is approximately 0.4 mile north of the site, accessible by foot or bicycle (with bicycle parking available) and features regular services to locations such as Chichester, Horsham and London. Various bus stops are also within walking distance with the nearest from West Street and further services from High Street (Bognor town centre).

National Cycle Route 2 runs along the seafront and facilitates access along coast to other locations such as Felpham and Littlehampton. This also connects to the South Coast Cycle Route 1 km west of the site. There is also a cycle route adjacent A259 between Bognor and Chichester. It is considered that the extent of Bognor is within comfortable cycle distance (8 km as set out in CIHT's publication 'Cycle Friendly Infrastructure') for commuters and that off-road cycle routes are available. The TS outlines that 50 x bicycle parking spaces will be provided for the residential use. This meets with the Arun SPD whereby 1 space should be provided per flat, in a communal location. For the restaurant/cafe use a total of 4 x staff spaces and 20 x visitor spaces are proposed. This meets with the SPD requirement of 1 space per 4 staff (presuming a total of 16 staff) and 1 space

per 25 sqm for customers. Staff and resident cycle parking is to be located in a secure store to the rear of the site and customer cycle parking is provided via Sheffield stands front (west) side of building.

Travel Plan Statement (TPS)

A TPS has been submitted with the aim to reduce the long-term reliance upon the private car by increasing awareness of alternative modes and the associated benefits of sustainable transport for residents. Whilst a TPS would not require modal shift targets it is acknowledged that the TPS sets an aim of reducing private car trips to the site by 10% over the first 5 years of occupation.

The TPS also sets out that an information pack will be provided to residents including details of the financial, environmental and personal health benefits associated with the 'active' travel modes of walking and cycling including poster obtained from WSCC's website, local walking and cycling route maps, public transport fares and maps showing the location of the nearest bus stops / rail station and bus and rail service timetables, details of local facilities / services within the surrounding area and contact details of the appointed Travel Plan coordinator. Car sharing will also be promoted and a travel voucher with a value of £150 per household would be provided to new residents (for bus/rail season ticket).

A Travel Audit would also be undertaken within 3 months of operation. A travel survey sent to residents would determine travel patterns, modes, distance and journey times and could provide ideas from residents on how uptake of sustainable transport modes could be increased.

The TPS should also make reference to the EV charging points in the car park and how use of these is to be promoted. The LHA are satisfied with the main detail of the TPS however would require that final detail of this, including TPS Coordinator details and information pack details could be secured via condition.

Conclusion

In summary the LHA does not raise an objection to the principle of the application in highway safety or capacity terms. Nevertheless, the findings of the RSA are disputed and other matters require addressing:

- Provide Designers Response in RSA Audit Log in the format show in table F4 and section F5 of GG119 – taking account of LHA disagreement with RSA findings.
- Clarify red edge of site – does this include strip of hardstanding adjacent western side (south of proposed access and where customer Sheffield stands are proposed). And is this to be adopted as footway?
- Both disabled car parking bays to be fully marked and EV charging points on 20% spaces.

Please ask the applicant to address these points, including LHA comments on the RSA findings, and re-consult.

Katie Kurek

West Sussex County Council – Planning Services