

[REDACTED]

From: Neil Crowther <Neil.Crowther@arun.gov.uk>
Sent: 18 August 2021 07:56
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: Planning application CM/34/21/PL carwash A259 Clymping

From: Steven Shaw [REDACTED]
Sent: 16 August 2021 16:07
To: steve grimwood [REDACTED]
Cc: [REDACTED]; Jacky Pendleton
[REDACTED] Cllr. Amanda Worne [REDACTED]
[REDACTED] Neil Crowther <Neil.Crowther@arun.gov.uk>; Karl Roberts
<Karl.Roberts@arun.gov.uk>
Subject: RE: Planning application CM/34/21/PL carwash A259 Clymping

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Dear Mrs Grimwood,

Thank you for your email.

In terms of highway safety my previous email was simply making reference to the proposals as part of CM/34/21/PL and other recent planning applications on this site. These proposals are not considered to exacerbate any highway safety issues or due to deficiencies in the design pose any new safety concerns. Whilst the accident data shows that there are accidents along the A259 there is not sufficient evidence through the design or the forecast impact of

these proposals that they would further contribute or have negative implications to highway safety that justify a refusal of planning permission.

In terms of the closure of Crookthorn Lane our understanding was that in your original correspondence you were making reference to WSCC comments on another planning application rather than the A259 consultation. The closure of Crookthorn Lane was one of several proposals that were put forward for consideration as part of a key stakeholder engagement for the A259 Littlehampton to Bognor Regis feasibility corridor study in Summer of 2020. As part of this study and given its early feasibility stage a number of alternative arrangements were considered. As a result of the key stakeholder engagement and subsequent conversations with local interest groups, the arrangement proposing closure of Crookthorn Lane is under review.

The closure of Crookthorn Lane was considered as a potential option to reduce some of the different movements onto the A259. It was not introduced because the turning into Crookthorn Lane is deemed to be inherently unsafe and therefore it is not correct to infer that the movement into the Maidenhead Aquatics site is unsafe as it is closer to the Oystercatcher Junction. In the last 5 year period there have not been any accidents at the access to the Maidenhead Aquatics site.

In terms of the comments about the need for a revision to the Maidenhead Aquatics access this is as a result of any revised arrangement at the Oystercatcher junction and the need to change this access to appropriately accommodate a revised junction arrangement such as a roundabout at the Oystercatcher.

I note the other parties you have copied into this correspondence so they are aware of it and I have also forwarded a copy of our correspondence to the Arun District Council planning case officer so they are aware of the issues you have raised.

Regards

Steven Shaw BA (Hons) MSc MCIHT

County Highways (Development Management) Team Manager

County Highways Team, Planning Services

West Sussex County Council, Ground Floor, Northleigh, County Hall, Chichester PO19 1RH

From: steve grimwood [REDACTED]

Sent: 10 August 2021 16:57

To: Steven Shaw [REDACTED]

Cc: [REDACTED] Jacky Pendleton

neil.crowther@arun.gov.uk; karl.roberts@arun.gov.uk

Subject: Planning application CM/34/21/PL carwash A259 Clymping

Dear Mr Shaw

Thank you for your prompt reply.

Please could I have it confirmed: your department is stating that along this stretch of the A259 it is not manoeuvres on and off the main road that affect highway safety, simply the amount of vehicles already on the A259? If that is the case, why is the Highways department is proposing a multi-million pound project to re-align or introduce roundabouts a matter of metres from the Maidenhead Aquatic access point? Roundabouts will only affect the flow of traffic entering and leaving the A259 not the amount of traffic already on the road. So, according to your department's criteria for road safety there can be no justification for them unless, perhaps vehicles turning on and off the A259 here does affect road safety? It

should be noted that the fatalities along this stretch of road have, in the main been, at junctions, when vehicles have been entering the A259, not caused by volume or the speed of traffic already on the road.

Secondly, I am totally bemused by your comment 'we are unaware of the specific comments relating to prevention of vehicles turning into Crookthorn Lane.' Your department issued proposals for public consultation one of which was 'Closure of Crookthorn Lane and convert into a shared use footpath/cycle path'. If it is deemed that turning south off the A259 is dangerous, how can a few metres up the road, 6 businesses, all with differing opening times, and clientele, plus a construction worksite also using the access point not deemed to affect highway safety? The Highway department also states in its 'improvement' proposals that 'the access arrangement for Maidenhead Aquatics may be subject to revision.' If it is not considered a problem now, why may it be an issue when all the other 'improvements' have been carried out?

The Highways Authority proposal also states that 'improvements' need to be carried out 'To address road safety concerns, reduce delays from side roads' but if I understand your email correctly amount of traffic turning on and off the A259 is not a safety issue, only the total volume of traffic on the A259. If this is not the case and delays accessing the A259 are a safety concern, then the Maidenhead Aquatics access point being used by 6 different businesses and a construction work site, could, I'm sure your department would have to agree, cause considerable delays in accessing the A259, with the probability of increased frustration and therefore risk taking to join the flow of traffic?

I am copying our correspondence to various interested parties such as Cllr Jacky Pendleton, Cllr Amanda Worne, MP Nick Gibb, Parish Councillor Colin Humphris, ADC Director of Place Karl Roberts and planning officer Neil Crowther. It is important for those making planning decisions to understand that the 'advice' given by the Highway Authority for this planning application directly contradicts other proposals being made by the same department and is based solely on desk / map working, when the real life situation needs to be analysed at, for example 8.00 on a weekday morning in term time.

I look forward to you clarifying the points that I am unsure of and answering the 5 questions I have asked.

Yours sincerely
Rachel Grimwood

Steven Shaw s [REDACTED]
Tue 8/10/2021 1:56 PM

Dear Mrs Grimwood,

Thank you for your recent enquiry to West Sussex County Council (WSCC) in relation to planning application CM/34/21/PL. My name is Steven Shaw and I manage the County Highways team at WSCC who assess the transport implications of new development; I have therefore been asked to look into your enquiry.

One of the key considerations when assessing a planning application is the Government's National Planning Policy Framework (NPPF). Paragraph 111 of the National Planning Policy Framework states that development should only be prevented on highway grounds if it would result in an unacceptable highway safety impact, or if the cumulative impact on the road network would be severe. This is the context for what we have to assess planning applications against.

When assessing a planning application, we assess the specific impact that development shall have and the potential increase in trips the proposals shall generate. Whilst the proposals at this site could result

in an increase in trips on the A259, not all the trips associated with these proposals are newly generated trips. For example, given the nature of the proposals, some of the trips associated with the proposed uses may be “pass-by” trips that are already travelling on the network but simply stop to visit the site on a trip elsewhere. Taking this into consideration, the proposals are not anticipated to result in a significant material intensification of movements on the local highway network that would be deemed to have a severe impact or unacceptable highway safety impact; as per the NPPF.

Regarding the use of the existing access on the A259, we have assessed the suitability of the existing access in accordance with the stopping sight distances (SSD) requirements outlined in the Design Manual for Roads and Bridges (DMRB), namely the CD-109 Highway Link Design. CD-109 provides technical requirements for all aspects of highway link design, including vehicular visibility splays and stopping sight distances. For roads subject to a 40-mph speed restriction, this sets out a requirement of visibility splays of 2.4m x 120m in both directions at the point of access onto the maintained highway. An inspection of local mapping shows that visibility splays in excess of this minimum requirement are achievable at the existing point of access onto the A259. The proposed access is therefore considered to be a safe arrangement for the likely level of traffic.

In reference to your comments regarding previous WSCC comments at the site, we are unaware of the specific comments relating to prevention of vehicles turning into Crookthorn Lane. However, considering the above, it is not possible to provide suitable justification or evidence that the proposals would have a severe transport impact on the local highway network or an unacceptable highway safety concern.

Planning application CM/34/21/PL shall ultimately be determined by Arun District Council rather than WSCC. Therefore if you haven't already I would recommend that you also put in writing any comments you have on the planning application to Arun District Council in their role as Local Planning Authority.

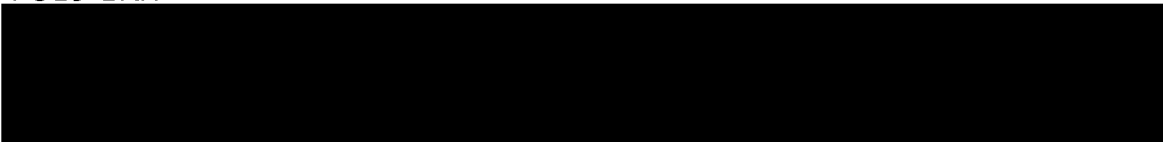
Regards

Steven Shaw BA (Hons) MSc MCIHT

County Highways (Development Management) Team Manager

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