

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Arun District Council FAO: Simon Davis
FROM:	WSCC - Highways Authority
DATE:	27th October 2021
LOCATION:	The Chalet Littlehampton Road Worthing BN12 6PG
SUBJECT:	FG/163/21/PL Development compromising marine workshop & boatyard, martial arts gym (Class E) & storage container compound (Class B8) to replace former glasshouses. This site is a Departure from the Development Plan & is in CIL Zone 3 (Zero Rated) as other development.
DATE OF SITE VISIT:	Site and access known to officer
RECOMMENDATION:	Advice
S106 CONTRIBUTION TOTAL:	

The Local Highway Authority (LHA) has been re-consulted on the above application, with regards to any highway safety or capacity aspects of the proposal. No transport/highway information was previously supplied with regards to trip generation or a comparison between the proposal of the 3 different proposed uses and the previous use. An email from ECE Planning has been received which outlines the proposed use of the site for the occupier/owners, likely trips related to the Marine workshop and size of the vehicles related to the proposal.

As a consultee to Arun District Council (ADC) the LHA has a statutory duty to provide the Local Planning Authority (LPA) with an assessment of planning applications based on the submitted planning documents or to seek more information to make an informed assessment. With the proposal in highway terms being considered against the National Planning Policy Framework (NPPF), paragraphs 110 – 113 (revised 20th July 2021).

The development team has a duty to provide supporting documentation to evidence that their proposal in highway terms meets the NPPF criteria of ensuring 'safe and suitable access to the site can be achieved for all users' and to evidence that the proposal would not have an unacceptable impact on highway safety or a residual cumulative impact on the road network that could be severe. It is the responsibility of the development team to provide adequate documentation to be assessed to support the application. It is not the role of the LHA to be providing this detail or running traffic generation reports to compare different uses to justify and support a proposal. Our role is to assess the information provided and provide a technical report to the LPA whilst remaining in a 'consultee' position.

Site Context

The site is occupied/owned by the applicants and they live on the site. The application form indicates that the site is currently residential, granted by a Certificate of Lawfulness in 2005. The Planning Statement and further supporting email from ECE Planning states that the site has a previous horticultural use and contains 2006sqm of glasshouses. This is a material planning consideration and previous vehicle trips should have been provided with the application to give a baseline to compare it's use with the proposed use.

Proposal

Redevelopment of the site to provide the following,

- A Marine workshop and martial arts gym totalling 450sqm of 'other class E' use, the Planning statement states this will be subdivided flexibly between the two uses.
- A B8 self-storage container facility with up to 37 containers

Section 4.4 of the PS refers to the size of the building for the marine workshop not relating directly to the level of activity that may occur under it's use class as this is to accommodate boats under cover while they are worked on.

The application form states that there are currently 2 full time employees, and the proposal would increase this to 5 full time employees and 5 part time employees.

Access and Traffic Generation

Section 6.4 gives a brief overview of access into the site and how the site will operate.

Given that there are 3 proposed uses on the site it is expected that trips to and from the site will increase, but no detail has been provided to indicate to what level, when compared with the previous use. TRICS has no category for horticultural nurseries. It is expected that trips would have been related to employees and delivery/dispatch vehicles mainly, with perhaps the odd trade customer. But would not be as intensively used as say a garden centre with high customer trip rates.

ECE Planning's email details that the Marine Workshop element will produce minimum trips, with around 2 boats arriving per week and these being around 20ft, arriving on a trailer towed by a car/4x4. As well as any trips related to the servicing and repair of boat engines, outboard motors or equipment being dropped off or collected.

Trips related to the self - storage element for 37 units are likely to be low and not reach such levels of 30 or more two-way movements in any one hour which would then require further assessment of the access or local junctions.

Trips related to the Martial Arts gym are expected to be outside of the normal working day hours so wouldn't add to trips during the daytime or AM peak hours. Although operating hours of 6am – 10pm are proposed. It's stated that there are currently around 20 members at present. It's not known if this part of the proposal is a class set up where everyone will arrive and depart at the same time or what class sizes are. Its also not known if classes will span across the day given the proposed operating hours.

Access off the A259 is adequate in terms of visibility and there are no recorded accidents to indicate that this access or it's set up has or is causing a safety issue. The access entrance to the site and the private access road into the site is set back approximately 17m from the

edge of the A259 carriageway. This will allow space for vehicles to wait to pass off the A road, given the long access road into the site which can cater only for one-way movement before passing can occur within the site area. Given the sites proposed uses there is a higher chance of conflicting vehicle movements than compared with the previous use.

Summary

Based on the information in the PS and email from ECE Planning the LHA would not expect the 'described' uses by the current owners/occupiers to attract a significant unacceptable level of HGV movements, or an unacceptable level of vehicle trips to warrant an objection based on the NPPF criteria. However, the LHA must consider the applied for use classes and the potential related vehicle movements, as well as the types of vehicles that are involved under these classes with the broad range of commercial businesses that can operate under them. If the LPA are minded to grant planning consent it would be suggested that a personal permission is granted to the owner/occupier of the site to operate in line with their described use under the planning application, to ensure that safe and suitable access for all can be maintained.

Emma Avis (MCIHT) – Transport Planner
West Sussex County Council – Planning Services

[REDACTED]

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[REDACTED]

Further WSCC Highways comments.

From: Emma Avis [REDACTED]
Sent: 27 October 2021 20:09
To: Huw James [REDACTED] Simon Davis <Simon.Davis@arun.gov.uk>
Cc: Saskia Lower [REDACTED]
Subject: FG/163/21/PL The Chalet, Littlehampton Road, Worthing BN12 6PG - Highways Report WSCC

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Evening Huw/Simon,

Please find attached our highways report, based on the submitted further information email below and Planning Statement.

Kind Regards,
Emma

From: Huw James [REDACTED]
Sent: 18 October 2021 16:58
To: Emma Avis [REDACTED]
Cc: Saskia Lower [REDACTED]
Subject: FW: FG/163/21/PL The Chalet, Littlehampton Road, Worthing BN12 6PG

Dear Emma,

We have received the WSCC Highways reply and request that you accept this response as additional information required for you to complete West Sussex County Council's assessment. Much of the information requested in the consultation response has already been provided. No TA was submitted with the application due to the low key nature of the proposals which are explained in detail within the submitted Planning Statement. It is important that you review the Planning Statement and accompanying information in detail but a summary is provided below.

The proposed uses on site relate to a family business, run by a husband and wife - they currently have no other employees. The proposed uses on site will be owned and managed by them.

The marine workshop and yard, 'NS Marine' is run by the husband Savio Aragona who currently operates from a single garage. NS Marine is a well-established local engineering and repair business, previously based at Downsview, Littlehampton Road, BN12 6PW. In terms of size it is worth noting that, the proposed workshop does not relate directly to the level of activity of the business. The size of the workshop allows boats to sit within a sheltered space to enable the restoration and maintenance in a covered space. The arrival and departure of boats at the premises is infrequent and they will receive typically only 2 boats per week, with minimal impact upon the highway. It is typical for a boat to remain at the premises for up to 6 months at a time whilst repairs or maintenance are carried out and it is taken off site.

The proposals would require the construction of a new pre-fabricated single storey building of 450 m2, a yard area for boat storage and associated parking for at least 10 cars. The building would be subdivided flexibly between the workshop and martial arts gym uses with 3 roller shutter doors and internal WC facilities.

The part of the proposed building used as a martial arts facility would be by Worthing Modern Martial Arts Academy, also owned and run by the applicant. His full time business is the marine repairs and therefore this is carried out in his spare time, during weekday evenings between 1800 and 2100 and occasionally on weekends. The membership is currently around only 20 persons.

The container storage facility is proposed for self-storage uses (B8). There would be up to 37 containers totalling 546 m2, formed in an enclosed compound. There are at least 10 parking spaces provided adjacent to the access road into the storage area. This would be owned and operated by the applicants.

Vehicle and pedestrian access to the site will be achieved via Littlehampton Road to the south and east of the site. The proposal will include at least 20 car parking spaces overall, comprising 10 for the new building and 10 for the storage compound, which is in line with the Arun District Council Parking Standards and West Sussex County Council (WSCC) Car Parking Standards. As can be seen from the site photographs at Figures 1 and 2 of the Planning Statement there are large private access gates (set well back from the highway) that will be controlled by the applicants allowing management of both arrivals and departures from the site (as is currently the case).

Existing Site and Precedent

The **existing site** contains extensive areas of former horticultural glasshouses (approximately 2006 m2) associated with the former nursery use plus a former farm managers cottage (where the applicants now live). This is relevant as

a fallback position which could in effect be recommenced at any time. West Sussex County Council will have relevant TRICS data for such uses.

The site forms part of the Highdown Farm group of commercial/industrial uses where the following current uses and planning history are specifically relevant:

Land at former McIntyre Nursery Littlehampton Road Ferring BN12 6PG which adjoins this site to the north.

FG/123/20/PL- Demolition of a polytunnel, storage building & scaffolders' shelters & racking, use of land for Class B8 container self-storage & the siting of 79 No. single-stacked storage containers, part regrading of the ground, new fencing, CCTV & lighting. Allowed at Appeal Ref: APP/C3810/W/21/3269319 on 20/07/2021.

No Transport Assessment, TRICS data, RSA or any form of highways evidence was presented as part of the planning application or subsequent Appeal.

Comments from County Highways: No objection

It is via an existing access along bridleway 2135. There appears to be no visibility issue onto the A259. The proposed use would not be a material intensification. A plan showing parking has not been submitted, therefore this is required. It is noted that an articulated lorry would visit the site every 4-6 weeks which would exit into the full width of the dual carriageway.

FG/74/19/PL- Highdown Industrial Park Littlehampton Road Ferring BN12 6PG which is north of the site and immediately adjacent to a large light industrial storage building used by PHS. 2 No. commercial B1/B8 use buildings with associated car parking, access & refuse storage. Allowed at Appeal Ref: W/4000626 10/09/2021.

No Transport Assessment, TRICS data, RSA or any form of highways evidence was presented as part of the planning application or subsequent Appeal.

Comments from County Highways: No objection or concerns raised.

FG/135/19/PL- Silo at Former McIntyre Nursery Littlehampton Road Ferring BN12 6PG. Demolition of a silo & erection of an office building (B1(a) Business), 6 No. parking spaces for office workers & erection of boundary fencing. Approved 27/05/2020.

No Transport Assessment, TRICS data, RSA or any form of highways evidence was presented as part of the planning application.

Comments from County Highways: No objection or concerns raised.

The above represents a snapshot of recent planning approvals at the Highdown Farm estate for larger and more substantial business and industrial uses, in addition to the existing large and well established businesses such as AVS Fencing and PHS Services. It is requested that West Sussex Highways respond to the submitted information (including the Planning Statement and supporting documentation) in the context of the existing site, existing and proposed uses in line with their statutory duty. The National Planning Policy Framework (NPPF) Paragraph 111 states that development should only be prevented or refused on highways grounds if the development site is deemed to have an impact on highway safety, or could cause a residual cumulative impact on the road network.

Proposed Uses

Self Storage - The proposed storage use is proposed to be carried on between 06:00 - 22:00 from Monday to Sunday, in common with neighbouring facilities where the public expect to be able to access the storage units outside of normal working hours and at weekends. The recent Appeal attached at Appendix C to the Planning Statement included no restriction on hours of use for the allowed storage container scheme. West Sussex County Council will have relevant TRICS data for such uses but the family run business will be low key and intermittently used.

Martial Arts - The membership is around 20 members at present. The current activities are carried out in evenings (18:00 - 21:00) and on weekends and is a quiet non-intensive use. The proposed hours of use are 06:00 - 22:00 Monday to Sunday, mainly to provide flexibility for the future. West Sussex County Council will have relevant TRICS data for such uses although should this fall into Class E data, it must be noted that this would be a worst case scenario as the business is operated by 1 person.

Repairs - The applicant has independently run NS Marine since 2001 and has periodically or indirectly employed additional people including marine engineers, upholsterers, carpenters, apprentices and yard staff. It is a small family business run by the applicant although there is the opportunity to grow to employ at least 5 members of staff over time. The proposed hours of operation/use would be between 08:00 - 20:00 Monday to Sunday. In terms of operation as a small light industrial business that is operated by the applicant there will be limited traffic movements. It is notable that nearby developments (B1/B8 development at Highdown Farm (Appendix B of the Planning Statement) and B8 container storage at Land at former McIntyre Nursery (Appendix C of the Planning Statement) within the site area have been approved without traffic information be provided and with no objections from County Highways.

Most of the business work will be servicing and repair of boat engines, outboard motors or equipment with low numbers of movements. In terms of boat repairs, it is important to note that the arrival and departure of boats at the premises is infrequent and they will receive typically only 2 boats per week, with minimal impact upon the highway. Boats are a hobby activity and most arrivals will be off peak and within owner's spare time. Typical boat deliveries would be boats of 20ft in length on a trailer towed by a car or 4x4 - often from an owner's own driveway. The drop off of any boats will be pre- arranged and managed with the applicant pre instructing/directing clients and meting them on site and signage will be provided. It is typical for a boat to remain at the premises for up to 6 months at a time whilst repairs or maintenance are carried out and before it is taken off site. The applicants already receive boats from time to time and we can confirm that there is sufficient turning space (left turn off the A259) into the site and sufficient space to immediately pull clear of the highway. There is a 65m private driveway within which vehicles and potentially boats being towed, can utilise before entering the site (up to the private gates). Within the site there is ample space for the turning and manoeuvring of boats and vehicles to exit the site in forward gear. When exiting the site there is excellent visibility as noted by previous Appeal Inspectors for vehicles to enter the A259 in an easterly direction.

West Sussex County Council will have relevant TRICS data for such uses although should this fall into Class E data, it must be noted that this would be a worst case scenario as the business is operated by 1 person.

Access and Sustainability

The proposed development will be accessed to the south east of the site, off the existing access route through the private driveway to the residential dwelling 'The Chalet'. The proposed storage area has been oriented to allow continuation of the existing approach while implementing a one way system around the proposed site. Employee and visitor parking is proposed along the east boundary for the storage containers. The area has allowed enough turning space for visitors and employees in which they will exit through the same access route. The marine workshop has 10 car parking spaces and adequate yard space to accommodate the boats under repair.

The proposal will provide a minimum of 20 car park spaces, entirely appropriate with the Arun District Council Parking Standards. The proposal is also in close walking distance to the existing bus stop and train station, which means employees and visitors will not be dependant on travel by car. There is ample space within the site to facilitate cycle parking. Access into the development site will be gated at the entrance and exit of the site, ensuring the maximum level of security for the storage units and the new workshop and martial arts gym.

The site is accessed via the existing private driveway located off the north carriageway of the A259 Littlehampton Road. There are a variety of local services and amenities available along the Littlehampton Road with the built up areas of Goring and West Durrington and Ferring in immediate proximity. A bus stop is located (approx. 100 metres) of the site, which has local bus services running from Arundel all the way to Shoreham-by-sea. Goring-by-Sea train station is (approx. 1.25km) of the site and can be accessed via pedestrian safe footpaths, with a walk time under 15 minutes, an acceptable distance for commuting. The station offers direct links to London Victoria, Brighton and other surrounding areas. Additionally, the proposed development will also provide social sustainable benefits through local employment opportunities. Therefore it is considered the proposal will make a positive contribution to the local area which is supported by development plan policy.

In terms of parking and access, as family run businesses these would be controlled by the applicants in terms of the secure operation of the site to visitors and clients via the main entrance gates. The parking is split between the Class E and the B8 areas of the site but with flexibility between these uses for both parking areas to be used by visiting

clients of either facility. Furthermore, the martial arts gym would be frequented outside of normal working hours of the marine workshop and the parking spaces therefore would be used flexibly and shared during evenings and weekends.

Summary

In summary, the proposals include family run businesses that would be owned and operated by the applicants within the commercial/industrial areas of the site adjacent to their family home. It is important to the applicants that the residential property is maintained as their family home but that they can accommodate and grow both their existing businesses and the new storage facility. The entire site, including the residential dwelling and outbuildings and the new proposed industrial/commercial areas would be occupied, run and lived in by the applicants and they intend for this to be their home and place of work for the foreseeable future.

The proposals utilise the existing well used, historical and visible access from the A259 to the Highdown Farm estate and an existing private access and private gates previously used by the former nursery. No additional works will be required either within the site, on its existing private access route or to the public highway where the existing bellmouth allows movement of HGVs, goods vehicles and vehicular traffic associated with the range of light industrial and storage (self- contained facilities and timber depot/yard) uses. In decision-making terms, the National Planning Policy Framework (NPPF) Paragraph 111 states that development should only be prevented or refused on highways grounds if the development site is deemed to have an impact on highway safety, or could cause a residual cumulative impact on the road network, neither of which is the case.

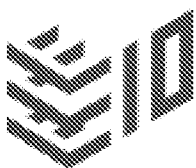
We look forward to your reply.

Kind Regards,

Huw James MRTPI
Director

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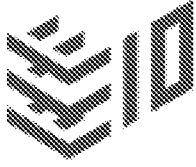
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Kind Regards,

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