

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Arun District Council FAO: Anita Gardner
FROM:	WSCC - Highways Authority
DATE:	5 May 2021
LOCATION:	Land South Of The Littlehampton Academy Fitzalan Road Littlehampton BN17 6ED
SUBJECT:	LU/116/21/PL Erection of 112 No. residential units with access from Fitzalan Road, open space, hard and soft landscaping works, internal roads/footways, car and cycle parking, substation, bin store and associated engineering and infrastructure works. This site is in CIL Zone 4 & is CIL Liable as new dwellings.
DATE OF SITE VISIT:	n/a
RECOMMENDATION:	More Information
S106 CONTRIBUTION TOTAL:	n/a

Introduction

1. The application is supported by way of a Transport Assessment (TA), Stage One Road Safety Audit (RSA), and Travel Plan. The scope of the TA has been commented on by WSCC Highways.
2. Reference is made within the TA to LU/55/15 (proposed 60 dwellings on the current application site). This planning permission has lapsed and as such is no longer implementable. In transport terms, no weight can be given to this previous application as it doesn't reflect a valid and implementable fallback position.

Access by Vehicular Modes

3. Vehicular access is shown from Fitzalan Road. This length of Fitzalan Road currently only provides access to the Littlehampton Academy. Planning permission has been granted and is the latter stages of being implemented, to enable Fitzalan Road to be extended northwards to a new roundabout junction on the A259. These works will also involve the provision of a new three arm roundabout incorporating the existing vehicular access into the Littlehampton Academy. It's anticipated that the northwards extension (known as the Fitzalan Link Road) will be complete and open to traffic in advance of the residential currently proposed being occupied. The vehicular access arrangement has consequently been viewed on this basis.

4. Vehicular access to the proposed development reflects that shown within LU/55/15. The acceptability of the vehicular access has been considered against the appropriate design guidance (namely Manual for Streets, in light of this section of the FLR being subject to a 30mph speed limit (the speed limit is intended to change to 40mph north of the Littlehampton Academy roundabout). The proposed access arrangement is considered to comply with the relevant geometric design standards. Adequate spacing is considered to be achieved to the existing traffic signals to the south and the proposed roundabout to the north.
5. The vehicular access has also been the subject of a Stage One Road Safety Audit as required by WSCC Policy. The RSA raises two problems both relating to visibility for vehicles emerging from the proposed access. The first problem refers to the potential for the visibility splay to cross 3rd party land and therefore for there to be the possibility that visibility would become obstructed. The designer has confirmed that the visibility splays are entirely within the adopted public highway and would not require 3rd party land. The second problem relates to the potential for vehicles associated with the Littlehampton Academy to obstruct visibility. With this problem, there is an existing scheme of no waiting at anytime restrictions that will be amended to suit the approved FLR road layout. The expectation is that there will be enforceable means in place to ensure vehicles cannot park within the visibility splays of the proposed access.
6. Whilst WSCC Highways are satisfied in principle with the Designer Organisations proposed response to the RSA problems, these would need to be formally set out within a RSA Response template as included within GG119 (the overarching guidance for Road Safety Audits). The RSA Response template should be submitted to WSCC Highways to enable these matters to be formally agreed.
7. The retention of the existing access from Elm Grove is also noted. This is indicated as a pedestrian/cyclist/emergency access. The access is acceptable in principle and the future use should be controlled via condition.

Trip Generation and Highway Capacity

8. The TA identifies that the site will generate an additional 53 two way movements in the AM peak period (0800-0900) and 51 two way movements in the PM peak period (1700-1800). It should be noted that these trip rates are extrapolated from surveys of other comparable residential developments undertaken prior to any restrictions imposed during the current Covid pandemic. The restrictions have enforced different ways of working, which may result in reduced need to travel.

The long term consequences on travel are accepted as unknown. The use of pre-Covid surveys for the purposes of the assessment are taken as representative and potentially worst case.

9. There is very limited further consideration of the impact of these trips, although in principle it's recognised that the trips will disperse quickly across the network and as such the potential for a severe impact is unlikely. Even so, the TA should at the very least include traffic distribution diagrams demonstrating how many trips are anticipated to be added to the A259/FLR roundabout to the north and B2187/FLR roundabout to the south. The TA does try to justify why the above requested information is not necessary. However the justification (based on the current development resulting only in a modest increase in vehicle movements compared with the previously consented scheme) is not accepted given the previous planning approval on the site has lapsed. It is recognised that further formal capacity modelling of these junctions is unlikely but the potential increase in trips through these should be identified.

Access by Non-vehicular Modes

10. There are no particular issues in terms of walking distances or provision for pedestrians from the site towards nearby services and facilities, including passenger transport. Likewise, for cycling, there are a range of services within reasonable distance. It is acknowledged that specific cycle infrastructure within the immediate area is limited; cyclists would have to share the carriageway with other vehicular traffic to reach certain destinations. The site wouldn't however generate such additional demands to warrant specific cycle improvements.
11. The site is considered to satisfy paragraph 108 of the NPPF, inasmuch as it has taken appropriate opportunities to promote sustainable transport modes, given the location of the site, and that safe and suitable access can be achieved for all users.
12. The majority of the travel plan is acceptable. There are a few comments on detailed matters contained within this that may require alterations to the submitted document.
 - It would be helpful to understand the potential build out duration. This is raised in respects of the commissioning of initial baseline travel monitoring, which is indicated to be commenced 6 months after full occupation. This could result in the baseline surveys being undertaken sometime after the first dwelling has been occupied. It may be more

appropriate to consider undertaking the baseline surveys once the site is 75% occupied.

- The 'Travel Plan Measures' section includes a comprehensive range of measures to encourage reduced car use. It would seem that these are only potential measures though rather than firm commitments. Nevertheless, the travel plan will need to employ some of these measures to achieve the identified targets. It is recommended that a final/implemented copy of the travel plan is provided to WSCC in due course once the travel plan co-ordinator is in post and all measures finalised.
- The final comment regarding the travel plan was that monitoring should be via the TRICS Standard Assessment Methodology rather than any alternative.

Layout and Car Parking

13. Whilst the adoption of the proposed access roads as public highway is not a material planning consideration, it would still be useful to understand the applicants intentions in respects of highway adoption. Where appropriate, comments are made regarding aspects of the design and highway adoption. It is accepted that some of these comments may not be applicable if the internal roads are being retained under private maintenance.
14. The internal roads are designed predominantly with footways segregated from the carriageway. Footways are generally 1.5 to 1.8 metres in width, with carriageways mainly 6 metres. Other than a few small areas, which are exclusively restricted to parking courts, there are no shared surfaces. Manoeuvring for a large refuse vehicle is also demonstrated. The principle of the carriageway and footway layout is considered to satisfy current guidance within Manual for Streets.
15. The only specific comment regarding the layout relates to specifics in terms of parking.
 - With those spaces running immediately adjacent to the carriageway edge, if the applicant's intention is to offer the roads for adoption but to allocate parking spaces to specific properties, a margin of at least 0.5 metre would be required between the carriageway edge and what will then have to be private parking spaces (as allocated parking cannot be provided within the public highway). This margin would be required to enable WSCC to maintain the highway edge.

- With respects to the above point, it should be noted that if the spaces are to be allocated/private, the preference would be for the footway (which is likely to be adoptable) to run adjacent to the carriageway edge (which would also be adoptable). The issue with the layout as shown is that this introduces the potential for private car parking spaces to be sandwiched between the adopted footway and carriageway. Again, comments are made on the basis that the layout will be adopted, which may not be the case.
 - Car club parking spaces are also indicated. From the correspondence, the car club operator is willing to operate a single vehicle from the site initially, increasing to two vehicles if demand justifies it. It's recommended that only a single car club space is initially marked out. If the roads are to be offered for adoption, a traffic regulation order would be required to reserve the respective parking space for use the car club use.
16. The applicant has reviewed the overall number of parking spaces against the Arun DC parking standards. Based on adopted standards 188 car parking spaces would be required. The site provides 178. Justification for the reduced level of parking includes the sustainable location promoting less car dependency and inclusion of a number of unallocated (39 plus 10 intended for visitors), and therefore flexible use parking spaces. It is understood from the correspondence included in the TA, that the overall approach to parking has been agreed with Arun DC officers.
17. Whilst it is for the Local Planning Authority to determine the overall acceptability of parking, in highway terms, WSCC Highways are generally satisfied that the reduced parking provision would not result in any highway safety consequences. If parking is insufficient, there are limited opportunities for overflow parking to take place outside the development in the immediate vicinity. This may consequently lead to inappropriate and anti-social parking within the development. The LPA may wish to request specific measures to deter parking on landscaped areas and verges (e.g. bollards or fencing).

Other Matters

18. The Construction Management Plan submitted with the current application is noted. It's understood that the CMP will be updated following the appointment of a principal contractor. The submitted document is therefore taken as draft. At this stage, the only comments are the contradictory times within 2.3.4 and 3.3.3; deliveries must avoid the peak times associated with the pupils arriving at the Littlehampton Academy. The limited provision for contractor parking is also a concern. There is no

possibility for overflow parking to occur on Fitzalan Road due to the waiting restrictions. Parking along Elmgrove Road is already under pressure so opportunities for overflow parking along here are limited. Likewise, Cornwall Road (to the east) already experiences parking pressures. The nearest public car park (St Martins) is a short stay facility and a reasonable walk away. Within the final CMP, it would need to be quite clear how contractor car parking demands will be met.

Summary

19. There are no in principle objections to the proposals. There are a number of matters as identified above that the developer should address prior to WSCC Highways providing a formal recommendation.

Ian Gledhill
West Sussex County Council – Planning Services