

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Arun District Council FAO: Michael Eastham
FROM:	WSCC - Highway Authority
DATE:	4 March 2022
LOCATION:	Phase 5 Hampton Park Toddington Lane Littlehampton BN17 7PL
SUBJECT:	LU/206/21 Approval of reserved matters following outline consent LU/47/11/ for the development of 260 No. dwellings and the construction of the Central Spine Road running through Hampton Park. This site is in CIL zone SP2 and is not CIL Liable as strategic site.
DATE OF SITE VISIT:	n/a
RECOMMENDATION:	More Information Required
S106 CONTRIBUTION TOTAL:	SEE S106 AGREEMENT FOR OUTLINE PROPOSAL

This is the third WSCC Highways (CHA) response to the above planning application for approval of reserved matters following outline consent LU/47/11/ for the development of 260 No. dwellings and the construction of the Central Spine Road running through Hampton Park.

The response below responds to additional information provided by the applicant's transport consultant (Mayer Brown Ltd.). This response should be read alongside the CHA's previous response dated 20 August 2021 and 8 February 2022.

Response.

In its previous response dated 8 February 2022, the CHA requested that additional information be required to enable it to be able to consider the proposal further. The details of this are found in the main body of the earlier response. Comments below (in black text) are a summary of the points raised in the CHA response dated 20 August 2021; those in *red* are those made in its response dated 8 February 2022 and latest CHA comments in *green*:

1. A Technical Note explaining how the on-site cycle infrastructure meets with the guidance contained in Local Transport Note 1/20 (Cycling Infrastructure Design). *The CHA notes the Mayer Brown Report "Littlehampton, Phase 5 – LTN 1/20 Cycle Infrastructure Design Review". However, the CHA requires details of expected user flows within an updated report and explain how the shared route as proposed would comply with LTN 1/20.*

The additional comments from the consultant made about cycle flows have been acknowledged. However, the formal road junctions within the estate do not show priority for cyclists and pedestrians as recommended in the LTN. As such, the consultant should look to see if this can be provided in accordance with the LTN and additionally, to submit it to the Road Safety Audit Team for a written response.

2. A Road Safety Audit Agreed Actions Log (Designer's Response to the Road Safety Audit).

*Please refer to Mayer Brown "Stage 1 RSA – Road Safety Audit Response Report". The applicant has said that this does not cover the ENTIRE ROAD. **This is required. (PLEASE ALSO SEE CHA COMMENTS BELOW IN POINT 3).***

Please see comments under 3 below about Road Safety Audit.

3. A plan showing the tie-in point of the new spine road with Toddington Lane (and confirmation that the Road Safety Audit Team has considered that in the Stage 1 Road Safety Audit).

Please refer to Mayer Brown "Proposed S278/ Highway Works, Toddington Lane / S38 Spine Road General Arrangement" plan (drawing ref PHTL-MB-S278-XX-DR-D-10).

The consultant states that a RSA has not been completed for this section of the Spine Road past the community centre. Traffic Management Consultancy are to undertake this, taking into account the additional footpath along Toddington Lane. The consultant says that they aim to provide a Designer Response by the end of January in the new year. While the submitted plans do seem to show more detail in this location, WSCC does need to see that this section has been safety audited (and see the RSA and designer's response to it as well) in order to be able to consider the whole design.

The continuation of the new spine road through to Toddington Lane has now been shown and Safety Audited. The CHA notes that the existing bend in Toddington Lane leading south towards the railway crossing is now shown altered with priority given to the new spine road.

At the date of this response the Road Safety Audits are still being considered by the CHA and a response to them – including, where raised, comments in response to parts of the new road alignment - will be issued to the LPA and applicant/their transport consultants shortly.

All Road Safety Audit matters must be resolved to the satisfaction of the CHA **prior** to any decision being issued by the Planning Case Officer for the planning application.

4. A plan showing forward visibility around and across the bend in the spine road adjacent to the LAP.

Mayer Brown "General Arrangement Drawings" (refs PHLITTLE-MAIN.1/10 series) are noted. Splays have been based on a 20mph design speed. However, the applicant should note that to have an actual speed limit of 20mph, special dispensation and an appropriate speed limit Order would be required. However, with narrowings and – further along the road – raised features at junctions etc., when constructed, the speed of traffic would be managed. The design of the road would also concur with previous parts of the road found west. However, unless the appropriate Order and full compliance with WSCC Speed Limit Policy is adhered to, the posted speed limit would otherwise be 30mph with the presence of street lighting. The design does appear to follow the principles of Manual for Streets.

The applicant's consultant has stated that the appropriate permissions for a 20mph speed limit will be applied for.

The applicant is also informed that Traffic Regulation Orders (TROs) will be required for the chicanes proposed on the spine road (and will need to be applied for either before or at time of submission of S38/278 Agreements).

5. A plan showing visibility splays at the pedestrian and cycle crossing points on the spine road.
Mayer Brown "General Arrangement Drawings" (refs PHLITTLE-MAIN.1/10 series) are noted. Please also see comments made above in point 4 about speed limit.
6. Evidence of discussions with bus companies showing confirmation that they are happy with the design of the spine road.
The consultant has said that PHTV has engaged with local bus companies (Stagecoach) in November 2020. Please refer to correspondence provided confirming Stagecoach are happy with the design of the spine road.
7. A plan showing the extent of adoption of the proposed spine road.
Please refer to Mayer Brown "Proposed Adoption Plan, Spine Road" (drawing ref. MSK210821-1 Rev. P2). This will be checked again at detailed design/S38 stage.
8. Plan showing extent of roads to be offered for adoption with comments about service margins etc. addressed.
The consultant has said that the latest adoption plans have been provided by Banners Gate which attempt to address the previous CHA comments made about service margins and footways and their relationship with 'dead-ends'.

Plans provided:

- *Banners Gate "S38 Agreement Plan" (drawing ref 21044 / 100S38)*
- *Banners Gate "S38 Dimensions" (drawing ref 21044 / 135)*
- *Banners Gate "Adoptable Kerbing & Finishes Plan" (drawing refs 21044 / 141 and -/ 142)*

From scrutiny of the plans, the service margins are still missing from parts of the internal road layout. Furthermore, the issues of the footways leading to 'dead-ends' has also not been addressed.

From scrutiny of the plans, there are still some omissions in relation to the service margins. Should the applicant wish to offer the internal road for adoption, appropriately dimensioned service margins must be provided at the detailed design/S38 stage. If not, the roads missing them will have to remain private and/or unadopted. The key areas affected are as follows:

- Cul-de-sac running past plots 122-128 and 141-149 (no service margin shown)
- End of cul-de-sac by plots 113 and 114 (around turning head)
- Cul-de-sac running past plots 238 and 239 – a margin is shown but it is not coloured
- End of cul-de-sac by plots 222 and 259 (no service margin shown)
- End of cul-de-sac by plots 252 and 253 (around turning head)
- End of cul-de-sac by plots 11 and 12 (around turning head)

The CHA will leave it to the Planning Case Officer to decide whether the above amendments need to be done now at the planning stage or whether he considers they can wait until detailed/S38 design stage.

The applicant is advised that all roads intended to be shared surface and offered for adoption should be surfaced in blockwork and in a contrasting colour to the roads to which they join. Tarmac/flexible material shared surface roads will not be adopted.

With regard to the raised tables at certain junctions around the spine road, blockwork can be accepted on the top of the table. However, the ramps must be constructed in tarmac/flexible material as may be approved by WSCC to minimise breaking-out. Additionally, the applicant should ensure – through discussion with local bus providers – that the gradients to the raised areas are acceptable to them.

All footpaths emerging from the cul-de-sacs to the Central Wetland Area shall – as per Safety Audit recommendation – be widened to provide for shared use by pedestrians and cyclists and connect to the internal shared-use paths forming part of the Central Wetland Area.

9. Plan showing hard surfacing to rear of parking laybys.

Please refer to the following plans:

- Mayer Brown "General Arrangement Drawings" (PHLITTLE-MAIN.1/10 series drawing refs).
- Mayer Brown "Construction Treatments Drawings" (PHLITTLE-MAIN.1/30 series drawing refs)
- Banners Gate "S38 Agreement Plan" (drawing ref 21044 / 100S38)
- Banners Gate "Adoptable Kerbing & Finishes Plan" (drawing refs 21044 / 141 and -/ 142)

10. Plan showing all road widths.

Please refer to the following plans:

- Mayer Brown "General Arrangement Drawings" (PHLITTLE-MAIN.1/10 series drawing refs)
- Banners Gate "S38 Dimensions" (drawing ref 21044 / 135)

11. Explanation about hard landscaped areas and why they aren't shown as soft landscaping (yellow areas on adoption plan).

These areas are shown in yellow on Banners Gate "S38 Agreement Plan" drawing ref 21044 / 100S38. According to the key on the developer's drawing, a yellow hatching indicates soft landscaping. To remove the ambiguity, the consultants have said that they will instruct Banners Gate to change the colour of the hatching to green and update their drawing accordingly. The CHA notes this but reiterates that landscaped areas in verges and where visibility splays are required must be grass only.

12. Confirmation that EV parking provision meets with the Arun DC requirements for both 'active' and 'passive' provision.

*The response from the consultant has said that this is outside Mayer Brown's remit and that PHTV would advise first thing in the new year. **This information is still required.***

Information has now been provided and is a matter for the Planning Case Officer to consider.

13. A plan showing cycle parking provision in the form of sheds for those properties without garages.

Drawing No. 546-PL-BS-01 shows this.

14. A plan showing visitor cycle parking provision to be provided throughout the development.

This information is still required.

Noted.

15. Reply to hard-landscaping point raised.

Please refer to explanation to point 11 above.

16. Reply to comment made about access to school site.

The response from the applicant (Mayer Brown) is that the area is currently a work in progress. A current indicative/illustrative plan has been provided (PHTV "Site Layout - Sketch" drawing). Visitor parking laybys have been added along the spine road to the south of the school site access (these are also shown on Mayer Brown's GA and Construction Treatments plans). In addition, two parking areas are to be provided to the west of the school site (south of the community centre) with some unallocated parking spaces. The applicant (Mayer Brown) explains that detailed plans will be submitted once available. These will also include a formal crossing point for pedestrians and cyclists near the bus stop.

Are the parking areas to be considered as part of this planning application or later alongside the school and/or community facility planning application?

It is understood from speaking to the Planning Case Officer that the parking areas clear of the highway are **not** a matter for consideration as part of this planning application. As such, the CHA has not looked at them in any degree of detail but will do when formal planning applications for them are submitted.

*With regard to the laybys, the CHA is concerned that these have the potential to increase the attractiveness of driving to and from the school site – instead the emphasis should be placed on sustainable access being the first choice for access to and from the school. The presence of the laybys could also lead to issues of unregulated crossing on the spine road by users between parked vehicles. **While a layby (possibly suitable for the location of a bus stop) might be something to be explored (it might also be possible to double-up this area for coach parking if on the school-side of the road) the rest should be removed.***

The CHA is still of the same view as previously stated for reasons of road safety and also looking at the scheme from a sustainable travel point of view. While a lay-by might be acceptable for the bus stop on the south-side of the spine road and at a suitable location (possibly doubling-up as temporary coach set-down/pick-up area for the school), the others would encourage parking directly alongside the spine road. Furthermore, the lay-bys on the northern side of the spine road opposite the school are on the inside of the bend in the road, thereby possibly reducing visibility for users of nearby access points, those emerging from their vehicles and also when they are manoeuvring in and out of the spaces (and may also encourage indiscriminate crossing of the spine road with parents, carers

and pupils emerging between parked vehicles). Traffic Regulation Orders for waiting restrictions and zig-zag markings will all need to feature in any final version of the road outside of the school too which the lay-bys would preclude being implemented if constructed in the positions shown. And the indicative position of the pedestrian and cycle crossing does not appear to be well-located to serve the school and may need to be brought further westwards and located more centrally to the school (and any final version would need to be of the push-button signal controlled toucan type). It should also be moved away from the side road junction to avoid conflicts with different users and confusing proliferation of road markings.

While it is understood the controlled crossing does **not** form part of this application (again confirmed verbally by the Planning Case Officer), the above comments (including those to do with the lay-bys) are still relevant in order to inform any future location. Should the LPA be minded to approve LU/206/21, the CHA recommends that any permission granted **does not** include permission for the **crossing** as shown (and in the location shown) nor the **lay-bys**. Should the applicants wish for them to be considered as part of the current application, they should make this known as soon as possible (likewise should the Planning Case Officer want it considered now he should do the same).

Likewise, it is understood that the parking for the community facilities and the parking shown on the south side of the spine road opposite the community facility also do **not** form part of this planning application. However, when they are constructed, the CHA recommends that they be made available for parents to park to discourage on-street parking on the spine road when the school is ready for occupation.

Concluding this matter for purposes of the current planning application for the spine road under reference 206, the CHA recommends that the lay-bys and crossing be removed. When the school and/or community facilities come in for planning permission, the highways and access arrangements should be reviewed then and in a comprehensive way and not piecemeal as currently shown and/or proposed.

Links to and from foot and cycle paths should be demonstrated from the parking areas shown west and north of the school at the point the school is proposed. The CHA has also recommended that as part of any school planning application that a controlled crossing be provided outside the school crossing the spine road and providing links N-S between the site and community centre parking area. TROs would also be required at this stage to deter on-street car parking. Parking on the school site itself should only be for staff and essential visitors – NOT parents. This is again to promote sustainable access and to minimise potential conflicts of users at entrances to the school.

Please see previous green text comment preceding this paragraph.

Other matters.

Structures - In its previous response, the CHA also mentioned the presence of structures within the development. The consultant has said for details, please refer to Mayer Brown "Swales 03 & 04 Construction Details and Setting Out" drawing reference MB/F/03.

The applicant has noted the previous WSCC CHA comments about the minimum 1.2m headroom for culverts defined in CD 529. They have stated that the shared use paths and culverts in the wetland will not be offered for adoption. They also state that the footpath levels are such that the minimum headroom requirement cannot be achieved for the culverts. They also say that these are also less than 12m in length, and therefore the designer considers that the 1.2m minimum headroom should not be required for these structures. They reference Mayer Brown "Proposed Levels and Drainage" drawing ref. PHLITTLE-CWA.10/20. For more details.

Comments noted about these now being footbridges. Further comments by the CHA might be forthcoming following consultation with WSCC Structures Dept.

The applicant also notes the CHA comments with regard to the technical approval process for the BEBO arch and the culverts.

From the CHA's perspective (whether the structures are to be offered for adoption or left private), WSCC would still require oversight of the design for due diligence purposes. Post-planning, the applicant would need to provide details of each of the proposed structures so that WSCC can have an overview and store records of the private structures accordingly. The design submission will need to provide a sound technical reasoning for any lower than desirable headroom proposed.

For information, WSCC is assuming that all of the structures are CAT 0 wherein a Design and Check certificate (in accordance with CG 300, Appendix I) and accompanying drawings will be required.

Garage dimensions – The latest plans provided do not show dimensions of garages. As such, the applicant should provide revised drawings with dimensions marked on and demonstrate compliance with Manual for Streets guidance (i.e. 3.0m x 6.0 – internal dimensions).

Noted.

Please re-consult when the additional information is available, at which time the CHA will consider the proposal further.

Thank you.

Tim Townsend
West Sussex County Council – Planning Services