

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Arun District Council FAO: Emma Sheppard
FROM:	WSCC – Highways Authority
DATE:	4 July 2025
LOCATION:	Units 5-7 Watersmead Business Park Norway Lane Worthing Road Littlehampton BN17 6LS
SUBJECT:	LU/93/25/PL Part demolition, conversion, refurbishment and re-elevation of Units 5 and 6 and construction of retail (food and non-food), leisure and food & beverage units (Use Class E), together with associated car parking, access, loading areas, landscaping and associated works. This application is in CIL Zone 2 and is CIL Liable.
DATE OF SITE VISIT:	n/a
RECOMMENDATION:	More Information

The above proposal has been considered by WSCC as the County Highways Authority (CHA). Pre-application advice with WSCC was also sought in September 2024.

WSCC consider all applications against the NPPF paragraph 115 & 116, which state:

115. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code⁴⁸; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

116. ‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios’

The documents reviewed are:

1. Transport Assessment, Connect Consultants, 240084/TA, April 2025
2. Travel Plan, Connect Consultants, May 2025
3. Stage 1 Road Safety Audit, The Safety Forum, IG-JC-2025-4673-RSA1.1, March 2025

Background and existing situation

The site was previously in use as the headquarters of The Body Shop, providing a mix of office and warehousing space, and a 438-space car park. The main office building is currently being demolished as phase 1 of the development of the site to make way for this proposal.

Access to the site is taken from the public highway at the A259 northern arm of 'The Body Shop' roundabout. This is a private road called Norway Lane and provides two access points into the site, these are for the main car park, and servicing bays to the rear.

Pedestrian access from the site is currently provided with footways on both sides of Norway Lane, connecting into existing footways on the A259. The A259 western arm currently provides a staggered controlled pedestrian crossing to connect with the southern footway. The eastern arm of the A259 currently provides an informal uncontrolled crossing from the site to link with footways into Rustington and Littlehampton. The southern arm also provides an informal uncontrolled crossing across the junction.

Access Arrangements and Internal Layout

The proposals will see the creation of 13,693sqm of retail and mixed-use development and provide a total of 331 car parking spaces.

Vehicular access will continue to be taken from the northern arm of 'The Body Shop' roundabout via Norway Lane. This will be widened, between the car park access and roundabout, to accommodate two HGVS using the road to enter the roundabout, as shown on the drawing titled 'Proposed Highway Improvements and site access arrangements' and numbered 24084-010-A.

These widening works can be delivered via a S278 highways agreement as off-site highway works and can be controlled by a suitably worded condition.

***For completeness WSCC would ask the applicant to provide a dimension drawing to include the existing and new widths proposed and the new kerb radii proposed for planning approval.**

The main car park access from Norway Lane, a privately maintained road, will remain in use as the main car park access and changes will be made to the internal layout of the car park. These changes aim to provide better flow and movement of vehicles around the site.

An additional access will also be created onto Norway Lane at the northwest corner of the proposed car park. WSCC acknowledge this is in private land however we would advise the northwest access is designed to allow two cars to pass with ease and provide visibility spays to match the speed limit of the road.

The existing delivery service access to the far northeast of the site will be retained and re-used. All delivery and servicing of the site will be taken from this access into the rear of the site. Swept path diagrams have been provided in the Transport Statement and confirms a 16.5m and 10m rigid vehicle is able to enter turn and exit in forward gear.

The internal layout of the site and in particular the footways that link into the public highway should be of the same width throughout the development to provide a consistency. Our recommendation for footways in the public highway should be shared use to accommodate pedestrians and cyclists and be 2m or wider if possible.

The pedestrian access from the proposed Toucan Crossing into the site will take people on foot or wheels through the existing gardens where there are two small ponds, and provision of seating areas to provide resting spaces. The pedestrian routes also link into the car park and provide a direct route to the front of the retail area.

***WSCC would ask the applicant to provide a dimensioned drawing to show the width of all footways, including where they link into the car parking area to ensure these are consistent and the widths do not change.**

Toucan Pedestrian Crossing & Pedestrian Access into the site

Improvements to the northeastern arm of the A259 have been provided to replace the current informal crossing of this arm, and to encourage both walking and wheeling to the site from this side of the roundabout. Therefore, a pedestrian and cycle access from the eastern arm of the A259 will be made safer with a formalised push button toucan pedestrian crossing. This will provide a staggered crossing layout, which will allow pedestrians to cross the road in two phases, as shown on the drawing Proposed Highway Improvements and site access arrangements' Dwg 24084-010-A.

The proposed crossing has been reviewed by the WSCC Traffic Signals team. The following comments have been received from the WSCC Principal Traffic Signals Engineer

- A speed limit reduction is essential here.
- A maintenance bay/identified safe location to park will be required to facilitate all visits to site by ourselves/our maintenance contractor, positioned on the same side of the carriageway as the controller.
- There will need to be at least 3m offset between two crossing points. With this current layout, I would recommend the southern crossing point is moved further away from the roundabout, preventing reduction in queuing space for eastbound traffic that could impact the roundabout.
- Consideration should be given by the designer into minimising the potential for see-through of the Green Man (as suggested within the attached image; the far-side Green Man can be observed, and pedestrians could become confused and walk into live traffic), when waiting on the outer-most crossing points. We have found that this can be overcome by either increasing the offset between crossing points, or by reversing the direction in which non-motorised users turn, when in the centre island.

***Please can the applicant ensure all these points have been addressed and sent back to the LPA for approval in an updated drawing.**

WSCC would also ask the applicant to show more information regarding access on foot and by bicycle.

- **More consideration needs to be given to the provision of shared use footways linking into the toucan crossing as the current drawing only shows a footway when there is already a shared use path on Worthing Road it could connect into for consistency.**
- **On the western side of Norway Lane, the shared use cycle route in the highway boundary terminates abruptly, away from any dropped kerbs, or connections for a cyclist to enter the site.**

***Please can the applicant ensure all these points have been addressed and send back to the LPA for approval in an updated drawing**

40mph speed limit reduction

The proposed crossing has been reviewed by the WSCC Road Safety Team to assess the extent of the 40mph speed limit. The following comments have been received from the WSCC Road Safety Engineer: -

- We are supportive of the introduction to the staggered sheep pen style crossing but agree with the RSA recommendations.
- The RSG are not designers but can advise on best practice and policy application, for that reason we are unable to suggest a specific location. A safe speed should be attainable for decelerating westbound drivers before reaching the crossing area, so extending the 40mph eastward of the filling station may be prudent.
- It would be worth noting that the speed limit terminals for eastbound traffic do not have to align with the westbound terminals, so they can be offset from each other.

*WSCC are aware that no development can come forward until we are certain that the 40mph speed extension has been through the TRO process and works completed. This is because the crossing is reliant on the 40mph speed reduction for the crossing to be implemented. WSCC are mindful this all needs to be secured and in place before occupation.

Therefore, WSCC will be looking into how we can secure the speed limit extension and Toucan Crossing and will provide further information in our final comments.

Stage 1 Road Safety Audit

A stage 1 Road Safety Audit and Designers response has been submitted in accordance with GG119. Three problems were identified and responded to in the designer’s response. These relate to: -

1. The need to reduce speed on the northeastern arm of the roundabout in the location of the proposed toucan crossing to 40mph.
2. Right turning lane insufficient length for a vehicle to wait leading to shunt type collision when turn right on Norway Lane into the car park access.
3. The car park turning area is insufficient to accommodate large vehicles turning into and out of the parking area.

WSCC as the Overseeing organisation has responded to these comments as part of the designer’s response. The designer agrees with all but one of the problems which related to the removal of the right-hand turn lane on the car park access road leading into the distribution road. WSCC do not take a view on this matter as it does not fall within the public highway. The designer and auditor should come to a mutual decision outside of this process.

RSA problem	RSA recommendation	Design Organisation response	OOR	Agreed RSA action
3.1 – See RSA	<i>It is recommended that the existing 40mph speed limit on the A259 is extended on the entry and exit lanes to the toucan crossing to encourage vehicles to slow down.</i>	<i>Point is accepted. Revised drawings to show the 40mph speed limit extended east such that the 40mph speed limit covers the crossing have been produced. The exact location of the 40mph extent to be agreed with highways</i>	<i>Agreed</i>	<i>Plans to be submitted for approval as part of the planning approval process to show the location and extent of the 40mph speed limit to cover the toucan crossing.</i>
4.1 – see RSA	<i>It is recommended that the right turning lane is removed and all vehicles wait in the</i>	<i>The level of right turning traffic will be small there is no reason to assume that shunt type collisions would</i>	<i>The car park does not form part of the public highway the designer should liaise with the</i>	<i>Designer and auditor to agree on this point outside of the public highway.</i>

	<i>inbound lane when turning right.</i>	<i>occur as drivers waiting /slowing from right turning vehicles in front is commonplace occurrence regardless of whether the vehicle fits partially or wholly within any right turn lane</i>	<i>auditor to come to an agreed plan of action.</i> <i>It is not considered that the right-hand turn lane would cause issues if it was left in place or if it was taken out as the number of people making this movement would be low.</i>	
<i>4.2 – see RSA</i>	<i>It is recommended that a swept path analysis is undertaken for the proposed new development to make sure all vehicles that will be using the turning area on the approach to the parking can be accommodated.</i>	<i>The car parking area is intended to be used by car and van sized vehicles only those that would fit in a standard car parking spaces. A swept path analysis of a large van turning in and out of the parking area is shown on plan ‘proposed site access improvements swept path analysis 4.5 tonne rigid vehicle’ – 24084-sk20250402.1</i>	<i>Agreed.</i>	<i>Agreed. Plan ‘proposed site access improvements swept path analysis 4.5 tonne rigid vehicle’ – 24084-sk20250402.1 to be included as part of the final planning approval.</i>

Parking

There will be a loss of parking from 438 spaces to 331 spaces as a result of the proposed changes. WSCC has considered the ADC SPD which suggest a parking standard of 1 space per 14sqm. Whilst this is much higher

than proposed the applicant has provided a parking accumulation survey based on the expected trip rate taken from the TRICS data.

These results show a maximum demand for parking at 264 spaces on the Saturday peak hour of 12-1pm. This highlights that the proposed parking would be ample in accommodating expected demand.

Of the 331 spaces 32 will be provided as larger bays to accommodate disabled users, this is in line with Manual for Streets guidance for 5% of all parking spaces to be provided for disabled users. These are also located at the front of the store, alongside 28 parent and child spaces.

20 EVC spaces are also provided as active spaces with another 62 to be provided passively for connection at a later date. 12 motorcycle spaces are also provided, and 9 staff spaces are located at the rear of the site in the servicing area. The provision of parking for all uses has been considered by WSCC and no issues are raised with the parking strategy.

Cycle Parking

70 cycle spaces in the form of 35 Sheffield stands will be provided in blocks of 5 provided around the site evenly but with the majority being provided near to the front of the retail units. These will be covered to protect from the elements. Also to support the vision of the development which is to encourage sustainable travel modes to the site WSSC would also recommend the following:

- 5% of spaces to be provided for adapted and larger bikes to accommodate people with mobility impairments.
- For workplace cycle parking, to encourage the number of residents that could be potential employees to travel sustainably are lockers, changing facilities and showers available, as per the LTN 1/20 and WSCC Cycle Design Guide.

Vehicle Trips and Highway Impact

Whilst parts of the site have been vacant for some time (and at the time of writing is in the process of being demolished) TRICS data has been used to understand the likely trip impact of the previous use. This can be compared against the anticipated development site trips to evaluate if there will be a net increase.

It was found that existing trips could attract 128 vehicle movements during the weekday AM peak hour and 123 vehicle movements during the weekday PM peak hour. No Saturday data was available for warehouse or office.

The proposed development could attract an average of 168 vehicle movements in the weekday AM peak hour, 459 vehicle movements in the weekday PM peak hour and 757 vehicle movements in the Saturday peak hour. This includes an allowance for any internal linked trips.

Net Increase

Therefore, the development has a net traffic effect at the Body Shop Roundabout, of 44 trips in the AM peak, 256 trips in the PM peak and 438 trips in the Saturday peak hours respectively. It is noticed the Saturday PM peak hour will generate the biggest increase in trips.

Primary – New/Transferred & Secondary - Pass by/ Diverted & Linked Trips

It's generally accepted that new retail and food developments generate relatively few new trips to the highway network with new stores simply providing an alternate destination for trips that are already taking place. In these respects, the proposals would be expected to generate an increased use of the existing vehicle access but not necessarily across the wider network. The TRICS Research Report 14/1 has been used as a guide to

applying an assessed value to pass by (i.e. trips on the network that visit the site and then continue) and diverted trips (i.e. trips attracted to the site rather than heading elsewhere) the site will receive, based on the surrounding location and other retail and food offers locally. There will also be a number of trips that may visit multiple stores or uses (i.e. linked trips). WSCC are satisfied with the approach taken. Census data has also been used to understand the distribution of new and transferred trips.

A summary of trip types and values as per the box below is considered to be a reasonable assessment.

Table 4.11 – Summary of Trip Types

Trip Type	Assessed Value (%)	
	Foodstore	Retail Park Excluding Food
Primary - New	20%	50%
Primary - Transferred	50%	0
Secondary - Pass-by	30%	30%
Secondary - Linked	0%	20%

Traffic Assessment

The traffic impact of this proposal has considered the effect of the proposed development on traffic on the following junctions as outlined in WSCC pre-application advice:

1. The Body Shop Roundabout
2. Golfers Lane (Mill Lane)
3. Fitzalan Roundabout (Worthing Road roundabout)
4. Wick Roundabout
5. Bridge Road Roundabout

Existing traffic flows were derived using vehicle turning counts surveys to understand the peak hour traffic flows. The assessment was based on a future assessment year of 2030 (Application year + 5 years) at which time the proposal development is expected to be complete and fully occupied. Growth factors have been applied to the 2024 surveyed traffic flows to represent the future year to account for projected economic growth and local development forecasts.

The growth factors have been derived based on the TEMPRO database (Version 8.1) for the period between 2024 and 2030. As the development site and local study junctions are located within two Middle Super Output Areas (MSOAs) – Arun 004 and Arun 007 – an average of the growth factors for the two MSOAs has been used.

Committed development (developments with planning permission but not yet constructed) have also been included as these may have a future impact on the future traffic. These are: -

1. Hampton Park
2. Littlehampton Academy
3. Land at Golfers Lane
4. Lyminster by-pass (which is acknowledged as now having opened)
5. Note: Land to the west of New Courtwick Lane (LU/72/25) **was not** included as it is presently not committed however any crossover impacts are expected to be limited.

Junction capacity assessments were also undertaken using industry standard software called ARCADY and PICADY. These have been undertaken to show that whilst there will be an increase in trips at 'The Body Shop Roundabout' these are not considered to be significant with an RFC value under 1.0 at all arms.

The results of this work showed the traffic increase to be negligible or minor at all junctions within the agreed study area. The traffic effect is therefore not likely to unacceptably impact the operation of the surrounding road network in line with the vision of the proposed development.

RTCC

WSCC has considered the Road Traffic Casualty and Collision Database which records any reported incidents within a five-year period. No fatal incidents have occurred however 7 serious incidents, and 11 slight incidents have been recorded at the Body Shop Roundabout since 2020.

This is similar to the other roundabout locations on this stretch of road and the majority of incidents were attributed to driver error or impairment over any highway defect.

Travel Plan

WSCC has reviewed the Travel Plan dated May 2025. The key points in the travel plan are:

- Establish a TP Coordinator and to undertake a staff travel to work survey in the first 6 months.
- Focus is on staff travel to reduce dependence on private car.
- To encourage cycling to work – provision of showers & lockers etc
- Bus stops are in close proximity

Targets will be based on travel questionnaire results but initially the census data has been used to create a target of 5%. This will move once the travel plan staff questionnaire is completed.

***Please can the applicant confirm if this will be a framework travel plan, and how do you see this working as and when the units are occupied? Please provide more information on what you intend and how this will work.**

Travel Plan fee

West Sussex County Council (WSCC) require a Travel Plan (TP) to be submitted as part of this planning application to support and encourage sustainable and active travel. A fee of £3,950 is a requirement of any submitted travel plan to cover the additional resource implications and costs of assessing and auditing the Travel Plan through the lifetime of the plan and its 5-year monitoring period. WSCC would expect to see this included in a S106 agreement, to ensure the plan can be enacted.

Summary

To summarise, the documents submitted have been reviewed and WSCC do not consider this application to create any unacceptable impact on the highway network in terms of capacity.

However, in order for this development to be acceptable in highways terms the applicant will need to provide mitigation in the form of off-site highway works to include:

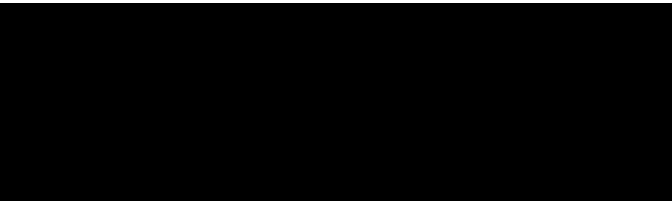
- Staggered Toucan Crossing on Eastern Arm of A259
- TRO and TRO works to support a speed limit reduction from 60mph to 40mph on the eastern arm of the A259
- Widening of Norway lane to allow tow vehicle entry onto the Body Shop Roundabout
- Widening and extension of existing footways to link into new highway works to provide good quality shared use cycle/footway provision in and out of the site.

WSCC still require **MORE INFORMATION** regarding the proposed highway improvements and as such would ask for more information on the following :-

1. Provide a separate dimension drawing for the proposed carriageway widening works to include the existing and new widths proposed and the new kerb radii proposed for planning approval.
2. Can the Toucan crossing design be updated incorporating WSCC Traffic Signals and Road Safety Group comments including the proposed extent of the 40mph speed limit.
3. The vision of the site is to encourage more walking to the site especially for staff in the local area. Therefore, WSCC would like to see dimension drawings to provide clarification over widths and types of paths into the site from all directions including Norway Lane and the eastern A259 crossing.
4. WSCC would also like the applicant to consider cycling as part of this vision, especially how the site connects into the existing shared use networks around the site.
5. Provide more information on how the travel plan will work with multiple operators in the site. Will this Travel Plan be a Framework plan and if it is this need to be clear with individual occupiers then required to provide a separate Travel Plan.

Alison Meeus
West Sussex County Council – Planning Services

WSSC Highways response



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From: [Redacted]
Sent: 04 July 2025 10:16
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: Response To Application Number LU/93/25/PL at Units 5-7 Watersmead Business Park Norway Lane Worthing Road Littlehampton BN17 6LS

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Please could the attached response be distributed to the relevant case officer. Emma Sheppard

More Information is required.

Regards

Alison Meeus

Please do not reply directly to this email.

Any formal reconsultation on the application should be directed to

██ but the responding officer can be contacted directly via email if there are any questions relating to this response.

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