



Clover House
Western Lane
Odiham
Hampshire RG29 1TU
Tel: 01256 703355
Fax: 01256 704934
Email: info@bellamyroberts.co.uk

LAND AT MILL HILL
SHOREHAM

RESPONSE TO WEST SUSSEX COUNTY COUNCIL COMMENTS REGARDING ACCESS PROPOSALS

GDB/4826/01
December 2016

Partners: GD
Bellamy BSc CEng MICE IT
Roberts MCIHT
Associate: TEN
Bright BSc (Hons) MSc MCIHT

Bellamy Roberts LLP (trading as Bellamy Roberts) is a Limited Liability Partnership registered in England.

Reg No OC303725, Registered Office:
Clover House, Western Lane, Odiham,
Hampshire RG29 1TU





CONTENTS

| | | |
|-----|--------------------------------|---|
| 1.0 | INTRODUCTION | 1 |
| 2.0 | REACTION TO WSCC COMMENTS..... | 2 |
| 3.0 | CONCLUSIONS | 4 |

ANNEXES

| | |
|---------|-------------------------------|
| Annex 1 | Email from Planning Authority |
|---------|-------------------------------|

1.0 INTRODUCTION

1.1 As part of a representation (rep No. 54), submitted by Savills, an Access Feasibility Report was prepared by Bellamy Roberts. This sought to demonstrate the possibility of providing suitable and safe access for development of the Mill Hill site.

1.2 In response to the Savills letter, West Sussex County Council set out their thoughts to Adur and Worthing District Council and those are copied below for convenience. A copy of the email from the Planning Authority passing on those comments is attached at **Annex A**.

"West Sussex County Council would have concerns that the mitigation outlined in the representation may not be sufficient to achieve safe access and traffic movement, therefore would not support a site allocation in this location at this time without further transport and access work being undertaken.

Regarding the more detailed consideration of the representation sent through for comment – these are Guy's thoughts which are attached for your information. The representation submitted to the Regulation 19 consultation suggested an additional site for up to 120 dwellings into the Local Plan at Mill Hill, which is located to the south east of the Adur Valley interchange on the A27, but is accessed from the southeast via Erringham Road, from Upper Shoreham Road. A secondary access route is via The Street which leads into the conservation area of Old Shoreham.

The document considers two possible access options:

- 1) mid way along the part of The Street which runs along the southern boundary of the site*
- 2) at the junction of The Street with Erringham Road and Mill Hill at the south east corner of the site where there is an existing agricultural access*

Option 1) has problems with levels and requires a lot of earth movement and tree removal and the rep dismisses this without going further into the environmental impacts of this.

Option 2) is preferred in the rep, by replacing the current triangular layout by what is effectively a staggered priority crossroads – although the rep refers to it as “a T-junction”

There are some concerns about the proposed layout on safety grounds as traffic emerging from Mill Hill would be on the inside of a bend with the new access road given priority. There is existing poor visibility to the right emerging from Mill Hill, but the new development and layout change shown at Appendix 3 would intensify traffic on the major arm and could increase traffic speed. No safety audit has been prepared. No traffic flow, speed or accident information is included. A narrow triangle of third party land on the west side of Mill Hill, limits what can be done to modify the Mill Hill approach to the junction without first obtaining control over that land.

It is considered that the rep as put forward does not demonstrate that a safe acceptable access can be formed to this land, but don't believe we can say that there is a “showstopper” that a safe and acceptable design for this could not be achieved, although there may be barriers to overcome in doing so. It may be better to look at a mini-roundabout layout for the junction with The Street in order to reduce speed, but this would also have to be subject to safety audit and traffic analysis”.

2.0 RESPONSE TO WSCC COMMENTS

- 2.1** Firstly, attention should be drawn to the final paragraph of the WSCC comments in which they state that whilst the representation does not demonstrate that a safe acceptable access can be formed to the land, WSCC don not believe that they can claim that there is a “show stopper” regarding provision of safe and acceptable access design. Given that this discussion is in relation to Local Plan allocations, the fact that the Highway Authority does not consider that provision of access to this site could be a “show stopper” is of fundamental importance. However, there are a number of technical points raised in the WSCC comments and our response to those is now set out below:-

-
- 2.2** The first concern expressed by the Highway Authority is that there may be a safety problem because traffic emerging from Mill Hill would be on the inside of a bend in the new access road into the site which would be given priority. However, whilst that could be a problem, the layout demonstrates that satisfactory visibility from Mill Hill can be provided for drivers emerging from that road with clear visibility in excess of 4.5m x 60m readily achievable. Given that the internal distributor road connected to this proposed site access would be designed to 20mph in accordance with good practice as set out in Manual for Streets (MfS), approach speeds to the junction of the site access with Mill Hill could be and would be controlled down to 20-25mph and, therefore, full visibility in accordance with standards can readily be achieved for the proposed design.
- 2.3** WSCC then identify the existing poor visibility to the right for traffic emerging from Mill Hill and comment that the proposed layout changes would intensify traffic coming from the right and could increase traffic speed. Firstly, the Feasibility Report submitted as part of the original representation identified the existing poor visibility to the right and argued that the proposed access layout would resolve that existing problem for traffic emerging from Mill Hill, which would be an overall benefit to all road users. Whilst the proposed development of the site would increase traffic flows across the junction with Mill Hill compared with the current position, the new junction would be designed in accordance with proper standards and, as set out above, approach speeds from the development would be controlled down to 20-25mph in accordance with good design practice. Therefore, concerns about increases in traffic speed at the Mill Hill junction are merely a matter of design detailing to be resolved at a later stage.
- 2.4** Similarly, WSCC then comment that no safety audit, traffic flow, traffic speed or accident details were included in the Feasibility Report. We would argue that these are all matters relating to detail rather than the principle of whether or not a safe access can be created at this location, and whether or not what is proposed meets that requirement. Nevertheless, before proposing an access layout, even at the feasibility stage, we always conduct an internal safety audit process to ensure that what is being proposed will prove feasible when detailed and subject to a formal safety audit. Existing traffic flow information will be of relatively little value in the context of a proposed development of approximately 120 houses on the site and, similarly, traffic speeds along The Street will be altered by the changes

proposed to the existing highway layout. Again, existing accident information is not fundamental to whether or not safe access can be achieved to this site but, for the record, examination of the Crash-map website shows that there have been no accidents in or around this locality during the last ten years.

- 2.5** Finally, WSCC suggest that there might be merit in looking at a mini roundabout layout for the junction with The Street. We would, of course, on behalf of Brighton & Hove City Council, be prepared to consider such options but our initial appraisal of options for providing access to the site indicated that a mini roundabout junction could not conform to current visibility design requirements given the available land. However, as with the number of the other responses set out above, that is a matter of detail as to how best to provide the access rather than whether or not access can be achieved.

3.0 CONCLUSIONS

- 3.1** For the reasons set out above we do not believe that the issues raised by WSCC as highway authority represent fundamental difficulties with achieving an access of the form suggested in our Feasibility Report. The points raised are valid, but are matters which can be resolved by detailed design at a planning application stage and it is clear that there are no fundamental constraints to doing so.
- 3.2** For those reasons, we believe that WSCC are correct when they state that they do not believe that provision of access to this site is a “show stopper” (i.e. access can be achieved in-principle), and it is our view that safe and appropriate access for the scale of development proposed can be achieved.

ANNEX 1

From: Moira Hayes [<mailto:moira.hayes@adur-worthing.gov.uk>]
Sent: 31 October 2016 17:07
To: Andrew Watson <AJWatson@savills.com>
Cc: Guy Parfect <guy.parfect@westsussex.gov.uk>
Subject: Re: Adur Local Plan: Land at Mill Hill

Andrew,

Apologies for the delay in responding, I have been on leave.

The following response was received from WSCC re access issues relating to the proposed site at Mill Hill.

"West Sussex County Council would have concerns that the mitigation outlined in the representation may not be sufficient to achieve safe access and traffic movement, therefore would not support a site allocation in this location at this time without further transport and access work being undertaken.

Regarding the more detailed consideration of the representation sent through for comment – these are Guy's thoughts which are attached for your information. The representation submitted to the Regulation 19 consultation suggested an additional site for up to 120 dwellings into the Local Plan at Mill Hill, which is located to the south east of the Adur Valley interchange on the A27, but is accessed from the southeast via Erringham Road, from Upper Shoreham Road. A secondary access route is via The Street which leads into the conservation area of Old Shoreham.

The document considers two possible access options:

- 1) mid way along the part of The Street which runs along the southern boundary of the site
- 2) at the junction of The Street with Erringham Road and Mill Hill at the south east corner of the site where there is an existing agricultural access

Option 1) has problems with levels and requires a lot of earth movement and tree removal and the rep dismisses this without going further into the environmental impacts of this.

Option 2) is preferred in the rep, by replacing the current triangular layout by what is effectively a staggered priority crossroads – although the rep refers to it as "a T-junction"

There are some concerns about the proposed layout on safety grounds as traffic emerging from Mill Hill would be on the inside of a bend with the new access road given priority. There is existing poor visibility to the right emerging from Mill Hill, but the new development and layout change shown at Appendix 3 would intensify traffic on the major arm and could increase traffic speed. No safety audit has been prepared. No traffic flow, speed or accident information is included. A narrow triangle of third party land on the west side of Mill Hill, limits

what can be done to modify the Mill Hill approach to the junction without first obtaining control over that land.

It is considered that the rep as put forward does not demonstrate that a safe acceptable access can be formed to this land, but don't believe we can say that there is a "showstopper" that a safe and acceptable design for this could not be achieved, although there may be barriers to overcome in doing so. It may be better to look at a mini-roundabout layout for the junction with The Street in order to reduce speed, but this would also have to be subject to safety audit and traffic analysis".

If you wish to discuss these issues in detail, the best contact is Guy Parfect at West Sussex County Council.

Kind regards,

Moira