From: Debbie Farrell <debbie.farrell@westsussex.gov.uk>
Sent: 13 December 2024 15:21:31 UTC+00:00
To: "Jo Morin" <jo.morin@adur-worthing.gov.uk>
Subject: RE: AWDM/0709/24 Greater Brighton Metropolitan College - Compass Travel

Hi Jo

The Highways Authority have no objection to the discharge of the Travel Plan condition. Regarding the Operational Management Plan Condition, I need to go through the application in a bit more detail especially with regards to the right-turn ban. I will call you early next week as I think a discussion is needed.

Kind regards
Debbie

From: Jo Morin <jo.morin@adur-worthing.gov.uk>
Sent: Tuesday, December 10, 2024 9:12 AM
To: SU Local Development <su.local.development@westsussex.gov.uk>
Cc: Debbie Farrell <debbie.farrell@westsussex.gov.uk>
Subject: AWDM/0709/24 Greater Brighton Metropolitan College - Compass Travel

****EXTERNAL****

Good Morning

I am not sure if Debbie is still working with you. I would be very grateful for a response to my email dated 11 October 2024 and attachments submitted in response to Debbie's comments dated 19th June 2024.

Regards

Jo Morin

---------- Forwarded message ---------
From: **Jo Morin** <jo.morin@adur-worthing.gov.uk>
Date: Mon, 11 Nov 2024 at 08:54
Subject: Fwd: AWDM/0709/24 Greater Brighton Metropolitan College - Compass Travel
To: Debbie Farrell <debbie.farrell@westsussex.gov.uk>

Good Morning Debbie

Sorry to chase, but I wondered if you'd had a chance yet to look at my email (below) and attachments? We are expecting a fresh application for permanent use of the site by Compass Travel imminently and it would be helpful to have approval of the OMP (Condition 17) prior to that.

Kind regards

Jo Morin

---------- Forwarded message ---------
From: **Jo Morin** <jo.morin@adur-worthing.gov.uk>
Date: Fri, 11 Oct 2024 at 10:23
Subject: AWDM/0709/24 Greater Brighton Metropolitan College - Compass Travel
To: Debbie Farrell <debbie.farrell@westsussex.gov.uk>

Good Morning Debbie

I refer to your previous comments on this approval of conditions application dated 19th June 2024.

Please find attached an updated Travel Plan v.3 for your comment.

I would also be grateful for your comment on the attached Operation Management Plan v.2 submitted to discharged condition 17 of AWDM/1444/22 which states:-

17. Within 3 months of the date of this decision notice a Operational Management Plan (OMP) as described within the submitted Transport Report shall be submitted to and approved in writing by the Local Planning Authority setting out how the routing of traffic associated with the proposal is controlled and include the following matters:
• Bus and staff operational details
• Bus and staff parking details and manoeuvring
• Operation and management of gated access
• Mechanism to limit and control use of the access
• Directional controls and limitation placed on bus drivers
• Reporting and monitoring mechanism
Once approved the use shall be always undertaken in accordance with the approved OMP.

Reason: *In the interests of highway safety and to encourage sustainable transport to and from the site.*

I have a number of questions about the OMP:-
(i) The document refers to there being 2no Vehicle Entrances (p.4). I'm not sure that it fully explains when and by whom the vehicle access from Littlehampton Road (shared with Greater Brighton Metropolitan College) is used? Perhaps only by staff arriving by car.
(ii) I understand that buses/coaches only use the vehicle access to/from Titnore Lane. Under 'Depot Details' (p.4) there is reference to 'customers' - but I am unclear who the customers are (unless this relates only to the coach hire element of the business). I think it should be explained further who the customers are?
(iii) Section 2.02 (Staff Parking p.9) states that on arrival first staff park their vehicles in the 'access road' to avoid disturbing residents. I am unclear from the Site Plan (p.3) which is the access road? It goes on to state "*once all full in the access road, staff are directed to park alongside the northern section of the eastern boundary with acoustic fencing*." I can't see that staff parking is marked on the Site Plan at all.

(iv) 4.00(a) (Mechanism to limit and control use of the access p.10) This states the Titnore Lane access is restricted to Compass Travel staff only, but seems in conflict with Depot Details p.4 which also refers to customers.

I attach the Reeves Transport Statement that accompanied AWDM/1444/22 and draw your attention to Paragraph 4.15 which refers to the possible banning of a right turn (out) onto Titnore Lane, and left turn (in). The submitted OMP at 5.00 'Directional Controls and limitation placed on bus drivers' (p.10) makes it clear these turns are taking place. The Consultant at Reeves Transport Planning has commented:-

> I understand that the Local Planning Authority (LPA) are concerned that the submitted Operational Management Plan no longer includes the commitment to ban right turn (out) and left turn (in) manoeuvres. These were included to ensure that buses using the access would not affect the proposed informal pedestrian crossing on Titnore Lane, just to the north of the access. Please note. that the concerns were not about the 'traffic island' as noted in the LPA's comments. The concerns related to a proposal to extend the traffic island and reconstruct it as an informal pedestrian crossing.
>
> The restriction on turning manoeuvres is no longer necessary to make this application acceptable in planning terms. Below I have summarised why it was agreed to ban the manoeuvres and why this ban is no longer necessary.
>
> Reeves Transport Planning undertook a formal pre-application consultation with West Sussex County Council, acting in their capacity as the Local Highway Authority (LHA). As a part of these discussions the LHA Officer identified that a nearby planning application(AWDM/1264/20), although it had been refused, was the subject of an Appeal. That application incorporated works to the traffic island on Titnore Lane to create an informal pedestrian crossing, which extended the island towards the south, closer to the access used by Compass Travel.
>
> As part of the pre-application consultation tracking plans were provided that proved buses used by Compass Travel will have no impact on the proposed informal crossing. The LHA Officer was concerned that buses could still manoeuvre relatively close to the proposed informal crossing, which would introduce a public safety hazard. These works had not

been approved, so there was no justification for taking it into consideration.

The correct mechanism would have been for the manoeuvring concerns to be tested by an independent Road Safety Audit, which is a requirement of the detailed design stage. If the manoeuvre was raised as a concern by the Road Safety Audit the designers are required to set out why the problem was not a material concern or amend the design as mitigation. However, Reeves Transport Planning agreed with the LHA that a limitation on right turn (out) and left turn (in) manoeuvres would be an acceptable solution, rather than leave an issue that would need to be addressed at a later date, if the Appeal had been allowed.

Subsequently, the Appeal was dismissed. Therefore, the works that prompted the safety concern are no longer a material consideration. The series of photographs attached to this email shows buses manoeuvring into the access from the north (lefthand side) and out towards the north (righthand side). In addition, tracking plans are also attached that show the same manoeuvres passing the existing traffic island.

The details attached and information set out above confirms that the requirement to ban right turn (out) and left turn (in) manoeuvres are no longer necessary to make the application acceptable.

I am also minded to observe that Public Service Vehicle license holders are skilled professionals with a duty, as we all are, to use the roads in an appropriate manner for the condition. And that the route to and from the north is the shortest direction to a number of bus routes operated by Compass Travel. Using the northern part of Titnore Lane, minimises the risk of delayed arrival at the start of the timetabled routes and reduces the CO2 emissions of the fleet that service them.

I hope this email clarifies why the manoeuvres were initially agreed to be banned and in turn why such a ban is no longer necessary.

I would be grateful for your comments on this issue in particular. To update you on AWDM/1264/20, following an appeal to the High Court, a second Public Inquiry into the Council's refusal of outline

planning permission finished earlier this week. A decision on whether the appeal is allowed/dismissed will be issued in due course by the Planning Inspectorate.

Apologies if my questions appear pedantic. The current temporary permission AWDM/1444/22 expires at the end of Jan 2025, and my understanding is that Compass Travel will be looking to make a new application seeking permanent permission for the bus depot at this site.

Regards
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