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Dear Peter

Proposed Change of Use of Units 2-5 from Use Class B1 to Food Production (Use Class B2) and Ancillary Offices at 52-55 Dolphin Road, Shoreham-by-Sea, West Sussex
Local Planning Authority Reference: AWDM/0126/21

I write with reference to the planning application, submitted on behalf of Higgidy, for change of use of Units 2-5 at 52-55 Dolphin Road, Shoreham-by-Sea from Class B1 to food production (Use Class B2) together with ancillary offices.

You have kindly forwarded to me a copy of the comments issued in response to this application by West Sussex County Council (WSCC) as Highway Authority. This requests the submission of additional information.

I enclose with this letter a Car Parking Plan (Drawing No: 2032-P111), a 'Tracking Overview' Technical Note (reference ITB15674-001), and an updated Operations Area Plan (Drawing No: 2032-P110 Rev A). I would be grateful if the latter could supersede the earlier submitted version.

I respond to the questions raised by WSCC Highways Authority below, using the headings referred to in the bullet point list by WSCC Highways Authority.

Please note that this response sets out the parking, turning and access arrangements, together with overall activity levels (employee numbers, etc) as anticipated to arise as a result of the combination of the change of use scheme envisaged under this application (AWDM/0126/21) and the proposals for the rear extension of the existing Higgidy main production area at Units 6-9, 57-60 Dolphin Road (application reference AWDM/0318/21).

Car Parking Spaces

The enclosed Higgidy Car Parking Plan details that the existing Higgidy operations are principally served by car parking spaces located within the forecourt of Units 6-9 (12 spaces); the forecourt of Unit 1, 56 Dolphin Road (6 spaces); the car parking area to the north of Unit 1 (27 spaces); the parking area parallel to the access road running north to connect to Middle Road (25 spaces); and the forecourt of 3 units leased by Higgidy in the G3 Business Park (15 spaces). The latter units are used for dry, non-ingredient, storage, such as packaging.

The plan also details the proposed car parking arrangements that would arise in conjunction with the change of proposed for Units 2-5. This would generate a further 28 car parking spaces.

The nature of the Higgidy operations, and in particular that use of land elsewhere for the purposes of unloading and turning of HGV's, etc (see below) enables the provision of more car parking spaces on the site, than would be likely to arise from alternative occupiers of the units, where vehicular access to each building would be more likely to be required.

Lorry Unloading/Loading Spaces

The plans attached to the Tracking Overview Technical Note detail the location of the lorry loading/unloading areas used as part of the Higgidy operations. This details the existing arrangements for loading and unloading HGV's, and this would be retained as part of the application proposals.

Under the Higgidy operations, the Unit at number 48 Dolphin Road is used as the reception area for the delivery of raw ingredients. Drawing No: ITB15674-GA-003 details the route of articulated HGV's that deliver to the forecourt of Unit 48, and the subsequent exit route.

Vehicles access the unit by turning left into the site, parking parallel to the front of the building, and then exit in an eastbound direction. The vehicle then utilises the turning-head formed of the east-west and north-south sections of Dolphin Road to undertake a turning manoeuvre, prior to travelling west along Dolphin Road. The Swept Path Analysis demonstrates that the manoeuvre can be satisfactorily undertaken within the confines of the carriageway.

Goods manufactured by Higgidy are subsequently dispatched from Unit 1, 56 Dolphin Road. This unit is located immediately north of the application site. The plans attached to the Tracking Overview Technical Note detail an articulated HGV entering the forecourt on the north side of Unit 1, and subsequent exit. It shows that this area is accessed by vehicles reversing, utilising the east-west section of Dolphin Road directly opposite the loading area, and upon exiting, the vehicle turns right out of the site and along Dolphin Road. The Swept Path Analysis demonstrates that the manoeuvre can be satisfactorily undertaken within the confines of the carriageway and without encroaching on to identified on-site car parking areas.

Current and Expected Number of Deliveries

Raw ingredients are delivered to number 48 Dolphin Road, and manufactured goods are subsequently dispatched from Unit 1, 56 Dolphin Road.

At present, there is an estimated 8 HGV's per day delivering ingredients to Number 48 Dolphin Road, and some 4 HGV's per day dispatching manufactured goods from Unit 1.

These numbers are exclusive of deliveries to the units occupied by Higgidy in the G3 Business Park (eg packaging).

The application for the proposed change of use of Units 2-5, together with the application for the extension to the existing operations area of Units 6-9, would result in an increase in food production by Higgidy.

It is anticipated that it would result in an increase of 4 HGV's per day delivering raw ingredients to the site (number 48 Dolphin Road), and an additional 2 HGV's per day dispatching manufactured goods from site (Unit 1, 56 Dolphin Road).

This would result in an increase of some 6 HGV's per day. This modest increase reflects the rationalisation and efficiencies of delivery/dispatch that will arise through the proposed operations (i.e. HGV's would be likely to deliver and dispatch more goods/products than at present).

Dispatched products are taken by a centralised specialised transport operator to a central distribution warehouse, from where they are subject to onward distribution to retail outlets etc.

Staff Numbers

Higgidy food production operates on a 24-hour basis, across a 4-shift rotation. Each shift is 12 hours, and comprises some 50 production staff onsite at any one time. In addition to this, there are circa 60 office based staff.

It is likely that up to 12 members of production staff for each 12-hour shift (i.e. 48 overall) would occupy the application site, together with a number of office based staff.

It is not yet known how many staff will be moved to the application site from the existing operations area, or how many will be new members of staff. It is considered prudent to assume that 50% (i.e. 6 people) of the production staff working at the application site would be new, additional employees. It would therefore add a further 6 workers operating for Higgidy onsite at any one time, with an increase of 24 overall (split between the 4 production shifts).

Many of the existing Higgidy office based staff are currently working from home. This significantly reduces the number of staff onsite at any one time. It is estimated that some 70% of office based staff are currently working from home. This is currently under review for the post Covid-19 period, but it is anticipated that future flexible working arrangements will result in approximately 40% of time will be spent working from home (i.e. 2 days per week), and 60% in the office (ie 3 days per week).

Travel to Work Patterns

The application site is located within the defined built-up area of Shoreham-by-Sea, and is readily accessible by a range of non-car modes of transport. The train station is some 1.2km to the west of the site.

As a result of this, there are extensive opportunities for staff to access the site by non-car modes of transport (foot, bicycle, public transport).

In addition to this, the fixed, shift pattern nature of the production staff means that there is ready opportunity for employees to car share. Production staff working within the same shift commence and finish work at the same time.

Having regard to the above, it is estimated that the travel to work mode by staff is as follows:

- 20% individual car;
- 50% car share;
- 10% public transport;
- 20% bike/walk.

Analysis

These submissions detail that the Higgidy operation has an existing level of car parking, deliveries/dispatch arrangements, and commuting patterns and modes, that satisfactorily and safely operates within the local highway network.

The changes that would arise from this application (AWDM/0126/21), and the proposed modest extension to the east of the existing main premises (AWDM/0318/21) would not be likely to result in a significant increase in vehicular traffic either from deliveries/dispatch or staff commuting.

The combination of additional HGV's arriving from goods in/goods out would be likely to amount to some 6 per day, undertaken reflecting the loading/unloading arrangements of the existing operations. The additional numbers of staff arising from the scheme is likely to be circa 6 per 12-hour shift, and this can be satisfactorily catered for within the vehicular car parking spaces that would arise as a result of the development (28 spaces).

The beneficial synergy arising from Higgidy's occupation of the application site and their current premises means it is likely to result in a net reduction in traffic compared to an alternative, occupier of the commercial units. The latter would also be likely to result in greater levels of delivery/dispatch, and require greater area for loading/unloading.

The nature of the Higgidy food production under shift operation, and the effects of the Covid-19 pandemic, which are likely to substantially change long term patterns of the presence of office based staff, mean that there is unlikely to be any undue effect arising from additional travel by staff associated with this application.

Having regard to the above, it is submitted that the application will have no undue impact on highway safety or capacity, and as such, is in accordance with Chapter 9 of the NPPF, and Policy 15 and 28 of the Adur Local Plan.

I trust that the enclosed is helpful, and will enable the application to progress to positive determination. However, should you require anything further, please do not hesitate to let me know.

Yours sincerely



Dale Mayhew BA (Hons) BTP MRTPI
Director

Enc: Drawing No: 2032/P111 - Higgidy Car Parking Plan
Tracking Overview Technical Note prepared by i-Transport
Drawing No: 2032/P110 Rev A - Higgidy Operations Area Plan
Drawing No: ITB15674-GA-003
Drawing No: ITB15674-GA-004
Drawing No: ITB15674-GA-005