From

Name CHRISTIAN MCLGAR
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Commenting on application ADC/0378/09

TOWN & COUNTRY PLANNING ACT 1990

TOWN & COUNTRY PLANNING (GENERAL DEVELOPMENT PROCEDURE) ORDER 1995

CHIEF EXECUTIVE'S DEPARTMENT
27 OCT 2009

Proposed development
Widening of existing (eastern) vehicular access

Location of development to which application relates
339 Brighton Road Lancing West Sussex BN15 8JR

Comments

Please see attached letter comprising 3 pages.

Unless you indicate below you will not be allowed to speak at the Committee meeting:-

I wish to speak on the application at the Committee meeting – **YES / NO**

To:
Development Control
Planning, Regeneration & Wellbeing
Adur District Council
Civic Centre
Ham Road
Shoreham-by-Sea
West Sussex
BN43 6PR

Signed [redacted]

Date 26/10/09

Proposed development – Widening of existing (eastern) vehicular access

Application Ref: ADC/0378/09

In response to the above planning application I would like to make the following comments:

Access Statement

The access statement submitted with the proposal states that "*the kerbs will be relocated and lowered to facilitate access to the service yard*" and that the "*implementation of the wider crossover will enable the delivery vehicles to access/leave the site easier resulting in a higher level of safety*" and that it will also benefit access for emergency vehicles to the site.

These statements seem to be at odds with the second part of the application which is to lower the pedestrian pavement and walkway and replace the grass verge with concreted surfaces which it is stated would be constructed to be "over-runnable" by delivery vehicles. I fail to see how the area and access will be made safer if the vehicles which are proposed to access the site are so large that they are unable to fit within the existing roadway and access and are required to drive over a pedestrian pavement. In addition it is immediately adjacent to a bus stop where the number of pedestrians is likely to be higher than on other parts of a pavement or walkway and further increases the likelihood of a pedestrian accident occurring.

In the past when the site was used as a car showroom low-loaders carrying six or seven cars at a time were able to use the existing roadway without running over the path or grass area and without any safety issues. It would therefore seem apparent that the proposed use of the commercial unit here requires vehicles that are not suitable for delivery in a residential area. By stating in the application that vehicles will over-run the grass and path it shows a clear intent to do this and this must be taken into consideration as it would seem unacceptable to design a situation where pedestrian areas are driven on by very large delivery vehicles on a daily basis, which I have been informed is the intention.

I would also point out that there have been no difficulties in emergency vehicle access to the inner roadways at Broadway Court in more than twenty-five years. It would appear that the applicant has made many suppositions within the access statement, which have not actually been verified.

Highway Safety, Traffic and Parking

As partly covered above there are questions as to whether safety for pedestrians will be compromised and this also follows for highway safety. As the proposed use of the commercial unit on the ground floor is for a supermarket should this go ahead there will be a very large increase in traffic to the immediate site. The coast road here is a very busy route, with parking along its length in parking bays which already obscure visibility for those entering onto the highway from side roads and domestic premises.

The sighting of a bus stop here also limits visibility on occasion for those leaving Broadway Court when motorists must attempt to view traffic through a bus stop, a bus and parked vehicles. The addition of large articulated delivery lorries will also add to these difficulties.

If/when a supermarket is allowed to operate at the site as well it has been calculated that based on the (at least) ten parking spaces to be provided and with the type of customer visit to the supermarket, i.e. short stay, small purchase transactions, there may be an additional 12,000 vehicular visits to the site every week. Over the course of the year that could result in more than half a million vehicular entries to the site. This increase in traffic would mean that the access/egress from the site would be significantly more dangerous for all vehicles here – delivery vehicles, residents, visitors, customers, buses and those driving past the site. Twelve thousand vehicles trying to "fit into" the already busy road here is very likely to lead to an increase in accidents occurring, especially as this road is deemed to be a dangerous one and has only just recently undergone significant changes in its design, access, parking and speed limit due to the number of accidents and incidents of speeding and dangerous driving.

The increase from perhaps 20 or 30 vehicle movements here each day by residents to possibly 2000 a day by potential shop customers will undoubtedly have serious knock-on effects to the safety of the main road of which reduced visibility by large delivery vehicles is just one factor.

The smaller entrances, high kerbs and grass verge all encourage motorists to enter and leave the site more carefully and diligently than if the entrances were wide, the kerb was flat and could be driven across and the grass was replaced with concrete. The existing access points have been perfectly adequate for commercial and domestic use since the building was constructed fifty or so years ago, and the formation of less rigid and "open" access will result in an increase in vehicle problems here and is envisaged to result in an increase in accidents.

Adur District's Local Plan

In Adur District's Local Plan for Transport it states the following, which I believe will be negatively affected by the application proposal:

Part 8. 3: "*Road traffic growth has led to congestion, pollution and demands for increased parking and road building. Particular problems occur in the District because two main roads pass east-west through it (including through Shoreham-by-Sea town centre), and because access to Shoreham Harbour is through generally residential or shopping areas.*"

Part 8.5e: "*To encourage improvements to the highway network to benefit traffic flow and safety and environmental conditions for residents.*"

Part 8.5h: "*To minimise disturbance and environmental problems caused by heavy lorries travelling on the District's roads.*"

Part 8.8 (1): "*Support for schemes which can be justified in traffic terms, which would*

improve road safety and which are environmentally acceptable. Improvements to environmental quality through such measures as lay-bys, better landscaping and grass verge maintenance."

Part8.8 (5): "*Support for maintenance and way-marking of public rights of way, and encouraging initiatives to improve pedestrian safety.*"

Design, Appearance, Materials and Character

Although only a small area (20m) the grass verge here is the only vegetation in close proximity to the site and softens the appearance of the site which consists of brick, concrete and glass and is generally a rather harsh environment for what is essentially a domestic urban area. Although it is unlikely that this would make any difference to the application being approved or not the complete removal of the grass verge will change the character and appearance of this frontispiece which to the residents of Broadway Court is probably the only "green" area they can view from their home.

If the proposal is accepted consideration should be given to requiring the grass verge to be left in the central section at least, i.e. the area behind the bus stop. This may also encourage drivers to remain in the delivery area and not drive onto the pedestrian pavement by the bus stop which would be very dangerous for those waiting for buses or those walking past.

Flood Risk Assessment

In the planning application under the Flood Risk Assessment section it states "Is the site within an area at risk of flooding?" The applicant has stated "no". This is incorrect. If the applicant had checked the Environment Agency's Flood Risk Map it can be seen that this area is at risk of flooding (as I am reminded of constantly by the EA). As the answer should be "Yes" I believe that the applicant must submit an appropriate flood risk assessment.

Although this may not be an official reason for objection (?) the incorrect submission of a planning application form and failure to follow the correct procedure by the applicant should be addressed, whether the proposal would be affected by any flood risk or not. Requiring the correct procedure and assessments to be followed by the Council not only upholds confidence in the planning process but also covers the Council in any subsequent actions or potential claims of irregularity or malfeasance. The lack of appropriate investigation into this matter could also indicate that other pertinent facts or matters have also been omitted or not investigated by the applicant.

In conclusion it is considered that the widening of the access from the A259 and the removal of the grass verge and limiting the pedestrian walkway combined with the intended use of the access/roadway by very large inappropriately sized delivery vehicles is likely to increase the potential for accidents to occur both to pedestrians and vehicles along this stretch of road.

[redacted]