

Proposed Extension & Modifications Mayberry Garden Centre, Portslade

# **Transport Statement**

For

Tate Brothers Limited





# **Document Control Sheet**

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This document has been issued and amended as follows:

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Motion
84 North Street
Guildford
GU1 4AU
T 01483 531300
F 01483 531333
E info@motion.co.uk
W www.motion.co.uk



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## 1.0 Introduction

- 1.1 This Transport Statement has been prepared to accompany a planning application by Tate Brothers Limited (the Applicant) for an extension and other modifications to Mayberry Garden Centre, Portslade.
- 1.2 The application site lies to the south of Old Shoreham Road and comprises the existing garden centre and land immediately to the west, totalling circa 1 hectare. The site is located within Portslade and north of Fishergate railway station. The garden centre site is located within the administrative boundary of Brighton and Hove City Council (BHCC), while the site of the proposed extension falls within the administrative boundaries of Adur District Council and West Sussex County (WSCC). There is an existing public right of way along the local authority boundary line and land to the west of the garden centre is subject of a development brief published in October 2015, which identified the land with potential for employment (business) development.
- 1.3 The development proposals comprise the modernisation, re-organisation and extension of the existing garden centre. A new goods/service yard separated from the existing parking area is also proposed as well as the diversion of the existing public footpath around the extended garden centre site. The application proposals have been subject to pre-application discussions during 2020 with the District, County and City councils, as planning and highway authorities.
- 1.4 This Transport Statement has been prepared having regard to advice received at pre-application stage as well as relevant guidance. In summary, this report demonstrates that:
  - ▶ The proposals accord with national and local policies relevant to transport;
  - The site is accessible by public transport, walking and cycling;
  - ▶ A review of personal injury accident information has identified no significant issues associated with the local highway network that are detrimental to the existing standard of road safety;
  - ► The existing site access from Old Shoreham Road will be retained to serve the existing parking area and a small number of service vehicles;
  - Safe and suitable vehicular access to the proposed service yard can be achieved from Old Shoreham Road in accordance with relevant design guidance;
  - ▶ The diverted PRoW provides significant enhancements to the nature of this section of footpath in terms of width, openness and natural surveillance, and is considered to accord with wider aspirations of the District Council;
  - ► The proposals include appropriate provision for servicing via a separate vehicular access to a new service yard, which will separate customer parking from servicing activity;
  - No material change to customer car parking is proposed, and appropriate provision is made for car parking, including for disabled persons and electric vehicles, as well as for cycles, having regard to adopted parking standards;
  - ▶ It is not anticipated that the proposals will result in a material increase in vehicle movements by staff and customers. Vehicle movements associated with servicing and deliveries will change as a result of the proposals, with larger vehicles used, resulting in fewer movements overall. On this basis, it is considered the proposals will not interfere with the operation of the adjoining highway network.



- 1.5 Following this introduction, this Transport Statement is split into 5 sections as follows:
  - Section 2 outlines the transport planning policies that are considered to be relevant to this application;
  - ▶ Section 3 provides information on the site, reviews the accessibility of the site by all modes of transport and assess existing traffic and road safety conditions;
  - ▶ Section 4 provides an overview of the proposed development, including details of the proposed access, parking and servicing arrangements;
  - ▶ Section 5 considers the change in vehicle movements arising from the proposals, specifically in relation to servicing and deliveries; and
  - ▶ Section 6 summarises the key findings and conclusions of this report.



## 2.0 Policy Context

#### **Overview**

- 2.1 This section summarises the relevant transport policy documents against which the development proposals should be considered at a national and regional level. The most relevant policy documents relating to this study are detailed below:
  - National Planning Policy Framework (June 2019);
  - Brighton & Hove City Plan Part One (March 2016);
  - Brighton & Hove City Plan Part Two (Submission Stage) (April 2020);
  - Brighton & Hove Local Plan (2005) (Saved Policies) (March 2016);
  - Brighton & Hove Local Transport Plan (LTP4) (March 2015);
  - ▶ Adur District Local Plan (December 2017); and
  - Eastbrook Allotments Development Brief (October 2015).

## **National Policy**

- 2.2 The current version of the National Planning Policy Framework (NPPF) was published in July 2018 and updated in February 2019 (with additional amendments relating to on-shore oil and gas exploration in May 2019). It sets out the Government's planning policies for England and how these are expected to be applied. The document sets out a presumption in favour of sustainable development that recognises the importance of transport policies in facilitating sustainable development.
- 2.3 In promoting sustainable transport, the NPPF identifies at paragraph 103 that:

"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."

- 2.4 Paragraph 108 of the NPPF states that:
  - ▶ "In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:
  - appropriate opportunities to promote sustainable transport modes can be or have been taken up, given the type of development and its location;
  - safe and suitable access to the site can be achieved for all users; and
  - ▶ 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."
- 2.5 Furthermore, paragraph 109 states that:

"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 would be severe."



- 2.6 With regard to car parking, the NPPF does not refer to maximum or minimum standards for new development, and instead promotes a flexible approach to car parking provision having regard to the accessibility of a development by non-car modes, local car ownership and the need to ensure adequate provision for 'plug-in' and other ultra-low emission vehicles. Paragraph 106 states:
  - "Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport."
- 2.7 The NPPF also outlines that Transport Assessments and Travel Plans are necessary where development will generate significant amounts of movement. Planning Practice Guidance, which supplements policy outlined in the NPPF, provides further information on Transport Assessments and Travel Plans, recognising that these documents,
  - "...can positively contribute to:
  - Encouraging sustainable travel
  - Lessening traffic generation and its detrimental impacts;
  - Reducing carbon emissions and climate impacts;
  - Creating accessible, connected, inclusive communities;
  - Improving health outcomes and quality of life;
  - Improving road safety; and
  - ▶ Reducing the need for new development to increase existing road capacity or provide new roads."

## **Brighton & Hove Local Policy**

## Local Transport Plan

- 2.8 The Brighton & Hove Local Transport Plan is in its fourth iteration and was adopted in March 2015. The Plan outlines the priorities, projects and programmes that will be implemented to improve sustainable movement within Brighton.
- 2.9 The Plan outlines seven strategic goals for transport including a reduction in carbon emissions, improving health and well-being, enhancing the public realm and the use of transport in promoting and securing economic growth.
- 2.10 With regard to cycling, it is noted that the Plan highlights improvements that are required to the local cycle network stating:
  - "Cycling Ambition Network: focused on improvements to identified gaps in the current cycle network on two east-west transport corridors - Old Shoreham Road and Marine Parade - and measures will reallocate road space using high quality design and materials."
- 2.11 Should this link be implemented, an improved connection for cyclists would be provided between the site and Marine Parade via Brighton city centre.

## City Plan Part One

2.12 Part One of the Brighton & Hove City Plan was adopted in March 2016 and sets out the planning policies for the city and how these are expected to be applied.



- 2.13 Sustainable transport is considered at Policy CP9 with the aim to promote and provide measures to help manage and improve mobility via sustainable modes of transportation. In order to deliver the priorities of the transport strategy, the following will be undertaken:
  - ▶ "Directing significant development into areas with good sustainable transport links and ensuring that major development will be located in areas where measures can be taken to secure accessibility improvements for all (see DA1-DA8 Development Areas). Sustainable transport measures will be focused into these areas.
  - Improving access to significant uses, facilities and services by supporting or providing sustainable transport measures (public transport, cycle and pedestrian and wheelchair friendly), better public realm and improved safety.
  - ▶ Ensuring that all new, major development schemes submit a Transport Assessment to identify the likely effects of the demand for travel they create and include measures to mitigate their impacts by reducing car use, implementing agreed travel plans and making appropriate contributions towards sustainable transport measures (see CP7 Infrastructure and Developer Contributions).
  - Working with communities to identify priorities for improved public realm, safer areas (e.g. child-friendly streets) and sustainable transport improvements (see SA6 Sustainable Communities)."

#### City Plan Part Two (Submission Stage)

- 2.14 The Brighton & Hove City Plan Part Two (Submission Stage) has been developed to promote economic and social development within the city. The Plan underwent consultation in 2020, prior to examination this year, and is expected to provide the base of policy in the city from 2020 to 2030.
- 2.15 Emerging Policy DM33 considers safe, sustainable and active travel outlining a requirement for development to provide convenient access for all pedestrians regardless of personal mobility and cognition. In addition, there are expectations to provide high quality cycle facilities to encourage cycling.
- 2.16 With regard to transport statements, emerging Policy DM35 states that:
  - "Transport Statements, Transport Assessments, Construction and Environmental Management Plans and Travel Plans are required to support planning applications for all developments that are likely to generate significant amounts of movement/travel in line with the NPPF or any subsequent national or locally derived standards and guidance."
- 2.17 Furthermore, emerging Policy DM35 considers the role of the above documents in enhancing sustainable travel with an expectation for new developments as follows:
  - "All development proposals should include appropriate measures to ensure that journeys by private car are minimised and to make the greatest possible use of sustainable travel in order to deliver the objectives for sustainable transport set out in Policy CP9 of the City Plan Part One. Where necessary, planning obligations will be sought to facilitate or support such measures."

#### Local Plan (Saved Policies)

- 2.18 The Brighton & Hove Local Plan was adopted in July 2005. Following the adoption of the City Plan Part One, some policies have been replaced whilst others have been saved and will continue to apply until the City Plan Part Two is adopted.
- 2.19 Saved Policy TR7 considers safety and new development stating that:
  - "Planning permission will be granted for developments that do not increase the danger to users of adjacent pavements, cycle routes and roads. Where there are no acceptable solutions to problems that arise from development proposals, planning permission will be refused."



## **Parking Standards**

2.20 Parking standards for BHCC are set out within Supplementary Planning Document 14 (SPD14, October 2016). The table below summarises the parking standards associated with A1 retail, the use class within which garden centres of this nature fall.

Туре	Standard	
Car (maximum)	1 space per 30 square metres (sqm) gross floor area (GFA)	
Cycle (minimum)	1 space plus 1 space per 150 sqm GFA customer short-stay,	
Cycle (minimum)	plus 1 space per 5 staff long-stay	
Blue Badge (minimum)	0-200 bays – 3 bays or 6% (whichever is the greater)	
Motor-cycle (minimum)	At least 5% of maximum total car parking demand for	
Motor-cycle (minimum)	major development (case-by-case for minor development)	
Electric Vehicle Charging (minimum)	For schemes over 1,000 sqm, 10% of all parking spaces will	
Liectic vehicle charging (minimum)	have EV provision, plus 10% with passive provision	

Table 2.1 - BHCC Parking Standards (A1 Retail)

## **Adur Local Policy**

#### Local Plan

- 2.21 Adur District Council adopted its Local Plan in December 2017 which outlines the vision and strategy for the future of the district until 2032.
- 2.22 Policy 12 of the adopted Local Plan relates to Southwick and Fishersgate and refers to the Eastbrook Allotments Development Brief, which is considered later in this section.
- 2.23 Policy 15 outlines criteria for ensuring quality of the built environment and public realm. In relation to transport and highway matters, the policy indicates that development should:
  - ▶ "Have safe access to the highway network, and not result in harm to highway safety;
  - ▶ Have acceptable parking arrangements (in terms of amount and layout)".
- 2.24 Policy 28 of the Plan considers transport and connectivity, stating that:

"In order to secure significant improvements to transport and mobility in Adur, new development should:

- Improve public transport and access to it where opportunities arise.
- Work with West Sussex County Council and Brighton & Hove City Council to promote a sustainable transport system along the coast to help in the regeneration of the area including Shoreham Harbour, ensuring that the A259 is improved.
- Provide for improvements to the road network, including the A259 and A27. Measures include junction improvements, traffic calming, and where necessary new roads. Appropriate mitigation measures to address capacity issues at a number of key junctions on the A259 and A27 will be sought.
- ▶ Encourage proposals to extend the existing cycle network and secure a network of cycle, pedestrian and bridleway facilities linking urban areas, key sites, open space, countryside and coast. These will include new and improved rights of way (suitable for a range of users, including those with mobility difficulties, where appropriate) as well as improved access across the A27.
- ▶ Ensure that new development is located and designed to minimise the need for travel, facilitates and promotes the use of sustainable alternatives to the private car, and provides or contributes to the necessary infrastructure to serve the development and to mitigate against any adverse impacts to an acceptable level. Travel plans and Transport Assessments will be required for certain developments in line with West Sussex County Council guidance and the National Planning Policy Framework.



- ▶ Ensure new development contributes to the mitigation of air pollution, particularly in Air Quality Management Areas. Air quality assessments may be required. Where practical, new development should be located and designed to incorporate facilities for electric vehicle charging points, thereby extending the current network.
- ▶ Implement a range of measures to address car parking issues in Shoreham town centre.
- Incorporate appropriate levels of car and cycle parking having regard to West Sussex County Council quidance, taking into consideration the impact of development upon on-street parking.
- Pursue with West Sussex County Council ways of managing the impact of HGVs in Adur and implement measures as appropriate.
- Implement an area-wide behaviour change programme to encourage sustainable modes of transport and reduce demand for the private car. This should include a package of travel behaviour initiatives."
- 2.25 Policy 29 of the adopted Local Plan relates to delivering infrastructure and indicates that development will be required to provide or contribute to appropriate facilities, infrastructure and services made necessary by the proposals.

## Eastbrook Allotments Development Brief

- 2.26 A development brief was published in October 2015, which outlines a number of planning considerations associated with three site that have been identified by the District Council as having potential to provide a mix of uses. Land at the former Eastbrook Allotments (forming part of the application site) is identified for potential employment use in the form of 'business development'. The following matters are considered in the brief relating to transport and highways:
  - ▶ The brief identifies that new access arrangements will be required where proposals generate an increase in traffic and use by larger vehicles, which should be designed to accord with WSCC guidance;
  - ► The impact of development should be considered within an appropriate Transport Assessment or Transport Statement and be supported by a Travel Plan;
  - An assessment of the impact of traffic on the nearby air quality management areas will be necessary;
  - ▶ The opportunity to upgrade the existing public footpath to create an improved green infrastructure link from the Coast to the South Downs National park is identified, such as widening, upgrading the route to a bridleway so it can be used by cycles, lighting and opening up to establish a Green Infrastructure Corridor.

## Summary

- 2.27 On the basis of the above policy review, it is evident that development should support objectives to reduce the need to travel and minimise the distances involved, particularly by private car. Proposals should include safe means of access as well as measures to mitigate the negative impacts of development. The policies outline that appropriate provision should be made for facilitating access by more sustainable forms of travel by providing connections to existing networks and parking having regard to adopted standards and appropriate to the location of the site and surrounding conditions.
- 2.28 The next section of this report outlines the existing/baseline conditions surrounding the site, against which to consider the policies outlined in this section, e.g. relating to accessibility and traffic conditions. The development proposals are described in section 4 and the impact of the proposals in terms of vehicle movements is considered in section 5.



## 3.0 Baseline Conditions

## **Site & Surrounding Area**

3.1 The site is located to the south of Old Shoreham Road (A270) and comprises the Mayberry Garden Centre and land to the immediate west. The site is approximately 800 metres to the north of Fishergate station whilst local bus stops are provided on Old Shoreham Road adjacent to the site boundary. The site is also well located with regard to the wider highway network with access to the A27 (Shoreham Bypass) provided approximately 2.2 kilometres to the north west. The site location in relation to the surrounding area is shown in Figure 3.1.

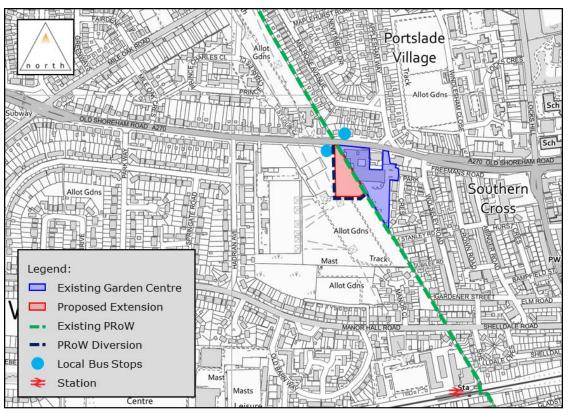


Figure 3.1 - Site Location Plan

## **Local Highway Network**

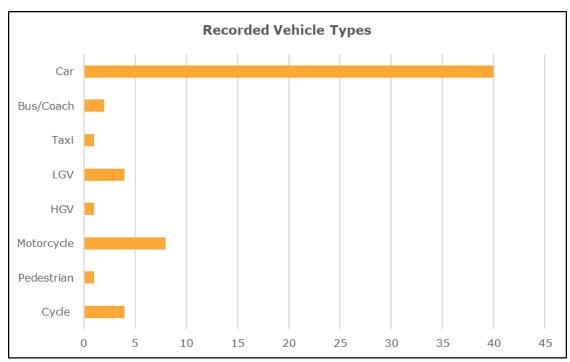
- 3.2 Old Shoreham Road (A270) is a dual carriageway with no physical separation between running lanes, and is subject to a 40mph speed limit in the vicinity of the site. Old Shoreham Road provides access to the wider highway network operating on a largely east-west alignment between the A27 and A283 respectively.
- 3.3 To the east, the A270 provides access to Hove as well as Brighton city centre before connecting to the A27 at Falmer. The A27 operates between Portsmouth to the west and Eastbourne to the east via Chichester and Worthing. In addition, the A27 connects to both the A3(M) and M27 to the west at Portsmouth providing onward routes to London, Guildford and Southampton.
- 3.4 The A283, the Steyning Bypass, can be accessed from Old Shoreham Road to the west of the site. The bypass operates between the A27 and A24 and provides an onward route to the M25 to the north which can be joined at Leatherhead.



## **Highway Safety Review**

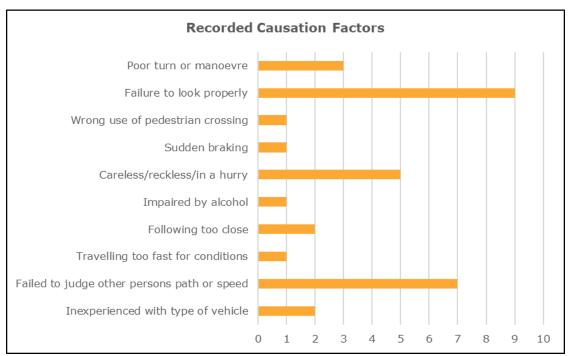
- 3.5 In order to provide a review of the existing highway conditions, Personal Injury Accident (PIA) data for a section of Old Shoreham Road between the junctions of Mile Oak Road and Locks Hill has been obtained from Sussex Safer Roads Partnership (SSRP) for the most recent 5 year period, ending in August 2020. The full survey extent is illustrated in the plan included at Appendix A.
- 3.6 The information identified a total of 30 incidents within the study area during the defined period comprising 7 accidents resulting in serious injury and 23 resulting in slight injury. Of the recorded PIAs, 9 occurred in wet conditions with the remaining 21 occurring in the dry whilst 9 occurred during the hours of darkness and 21 during the day.
- 3.7 Of the recorded incidents, 22 occurred in the vicinity of existing junctions; in this regard, it is not uncommon for incidents to be clustered around junctions. Incidents occurred at the following junctions:
  - Old Shoreham Road / Mile Oak Road / Southwick Street 3 incidents;
  - Old Shoreham Road / Hadrian Avenue 5 incidents;
  - ▶ Old Shoreham Road / St Louie Close 1 incident;
  - Old Shoreham Road / Applesham Way 5 incidents;
  - ▶ Old Shoreham Road / Freemans Road 1 incident; and,
  - ▶ Old Shoreham Road / Locks Hill / Trafalgar Road 7 incidents.
- 3.8 Two incidents were also recorded in the vicinity of the existing garden centre access. One of these incidents was related to a vehicle turning right into the access from Old Shoreham Road, and the second incident involved a vehicle turning left out of the site access and heading west. Both incidents involved two cars, with one turning into the path of oncoming traffic, with the cited causation indicated 'failed to judge other persons speed or path' or 'failed to look properly'.
- 3.9 The types of vehicles involved in the incidents is shown in the graph below. It should be noted that more than one vehicle is typically involved in each incident. It is evident that four incidents involved cyclists, one involved a pedestrian and eight involved motorcycles.





Graph 3.1 - Summary of Recorded Vehicle Types

3.10 The graph below summarises the causation factors cited for the recorded PIAs. It should be noted that more than one factor can be identified for each incident.



Graph 3.2 – Summary of Recorded Causation Factors

3.11 On the basis of the information received, it appears that the incidents summarised in the graph above occurred as a result of driver/human error rather than defects associated with the highway. It is therefore considered that there are no significant safety issues associated with the local highway network that contributed to the identified incidents or are detrimental to the standards of road safety.



## **Sustainable Transport Accessibility**

#### **Overview**

- 3.12 It is generally accepted that walking and cycling provide important alternatives to the private car, and should also be encouraged to form part of longer journeys via public transport. The Chartered Institution of Highways and Transportation (CIHT) have prepared several guidance documents that provide advice with respect to the provision of sustainable travel in conjunction with new developments. Within these documents it is suggested that:
  - Most people will walk to a destination that is less than one mile (circa 1.6 kilometres) Planning for Walking, 2015;
  - ► The bicycle is a potential mode of transport for all journeys under five miles (approximately 8 kilometres) Planning for Cycling, 2015; and,
  - Walking distances to bus stops should not exceed 400 metres, whilst people are prepared to walk twice as far to rail stations - Planning for Walking, 2015.
- 3.13 The following paragraphs consider the opportunities for sustainable transport that are available within the vicinity of the site with reference to accessibility by foot, cycle and public transport.

## Accessibility by Foot and Cycle

- 3.14 Footways are provided on both sides of local roads including on the north and southern sides of Old Shoreham Road and provide connections to nearby amenities such as the adjacent petrol filling station with shop. A signalised pedestrian crossing is available at the northern site boundary creating a safe pedestrian route across Old Shoreham Road to the residential area to the north and to eastbound bus stops on the northern side of Old Shoreham Road. A further signalised pedestrian crossing is located approximately 380 metres to the east of the site.
- 3.15 An existing public right of way (PRoW), footpath 14So, is located to the west of the site and provides a traffic free connection from Old Shoreham Road to Fishergate station to the south. To the north of Old Shoreham Road, the PRoW connects to local residential areas. As part of the development proposals, outlined in the next section of this report, the PRoW would be diverted along the southern and western boundaries of the garden centre. Figure 3.1 above shows the diversion proposed.
- 3.16 Old Shoreham Road forms part of a local cycle route operating between Lancing to the west and Brighton to the east, with the latter providing access to a wider range of further cycle routes including access to national cycle network (NCN) route 20. Route 20 provides a long-distance connection between Brighton and Crawley from which route 21 can be joined for access to central London.
- 3.17 In addition to the above, NCN route 2 operates to the south of the site and can be accessed via quieter residential streets. Route 2 is a long-distance route connecting the local area to St Austell to the west and Dover to the east.
- 3.18 In response to the current Covid-19 pandemic, BHCC has introduced a temporary cycle lane to the east of the site, operating from Hangleton Road towards Hove and Brighton city centre. WCSS has also implemented a temporary cycle lane along Upper Shoreham Road. It is understood from BHCC that there are aspirations to retain this route on a permanent basis and extend the temporary lanes to the WSCC boundary. This scheme was included in the City Council's Tranche 2 bid to the Government's Emergency Active Travel Fund, awarded in November 2020. At the present time, it is understood that use of the lanes in BHCC and impact on traffic is being monitored to inform a decision on retaining this route on a permanent basis. In West Sussex, a cycle scheme is identified along Old Shoreham Road (route 210) in Adur and Worthing's Local Cycling and Walking Implementation Plan (June 2020).



## Accessibility by Bus

- 3.19 The nearest bus stops to the site are located at the northern boundary on Old Shoreham Road and are served by bus routes 2, 46 and 59A. The former operates every 15 minutes between Steyning and Rottingdean whilst route 46 operates every 15-20 minutes between Southwick and Hollingbury. Route 59A is a local school service, operating twice daily on school days, connecting Seven Dials, Mile Oak Gardens and Portslade Old Village with Newman School.
- 3.20 Further bus stops are located on Fishergate Terrace (A259) approximately 1 kilometre to the south of the site. These stops are served by the 700 Coastliner service which operates every 10 minutes serving Brighton to the east and Shoreham, South Lancing, Worthing, Goring, Littlehampton and Wick to the west

## Accessibility by Rail

- 3.21 The site is approximately 800 metres to the north of Fishergate station which can be accessed via the PRoW operating through the site. Services from Fishergate operate towards London Victoria and Littlehampton every 30 minutes as well as to Portsmouth Harbour on an hourly basis.
- 3.22 Additional rail services can be accessed from Portslade station, located approximately 1.4 kilometres to the south east of the site. In addition to the services operating from Fishergate, trains from Portslade serve Brighton every 15 minutes and Southampton Central every 30 minutes.

## **Summary**

- 3.23 The information provided in this section identifies that the application site is accessible by a variety of modes of transport that have the potential to reduce reliance on the private car. In this regard, it is considered that the location of the site accords with planning policies introduced in section 2.
- 3.24 A review of PIA information has identified no significant issues associated with the local highway network that are detrimental to the existing standard of road safety. The next section of this Transport Statement outlines the development proposals subject of the application.



## 4.0 Development Details & Impact

#### **Overview**

- 4.1 The development proposals comprise modernisation, re-organisation and extension of the existing garden centre into land within the WSCC boundary. Existing protection canopies will be replaced/enlarged and a new external (plant/accessories) sales area will be provided to the west of the existing facility. A new goods/service yard separated from the existing parking area is also proposed. The application proposals do not include any works to the existing café or pet shop.
- 4.2 The proposals will increase the existing internal retail floor area (RFA) from 1,192 square metres (sqm) to 1,735 sqm. The external retail area is proposed to be increased from 1,137 sqm to 2,384 sqm. The increase in total retail floor area (internal and external) amounts to circa 1,790 sqm. The overall gross internal floor area amounts to 3,523 sqm, including retail space, storage and circulation and ancillary areas such as customer toilets and staff rooms/offices.
- 4.3 The application proposals seek to increase the retail offer of the existing garden centre and provide a more attractive shopping environment in order to enhance viability in the longer-term. Further, provision of a new goods warehouse, seeks to address the existing lack of storage space on site and upgrade delivery space, which is not currently considered fit for purpose.
- 4.4 The existing site access from Old Shoreham Road will be retained for customers and staff. A separate service/delivery access provided from land adjoining the site to the west, will connect to Old Shoreham Road via a new access. The access also forms part of a separate planning application for development of a car showroom with service centre on land to the west of the garden centre. That application has been submitted in parallel with the garden centre application.
- 4.5 As described in section 3, a PRoW runs along the western boundary of the existing garden centre, through the application site. The proposals will involve diversion of this existing PRoW around the western and southern boundaries of the extended garden centre site.
- 4.6 The remainder of this section provides a summary of pre-application highway and transport advice received from the relevant highway authorities and provides further information on the proposed access, parking and servicing arrangements associated with the proposals.

## **Pre-Application Advice**

- 4.7 The application proposals have been subject to pre-application discussions with Brighton and Hove City Council (BHCC) and West Sussex County Council (WSCC) as the relevant highway authorities. A separate pre-application process has been completed with Adur District Council on wider planning matters.
- 4.8 This Transport Statement has been prepared having regard to advice received at pre-application stage as well as relevant guidance. The pre-application meetings and liaison have been a key part in developing the proposals for the site and ensuring the assessment of the proposals is appropriate in view of the current planning context.
- 4.9 In summary the advice indicated in respect of the garden centre proposals:
  - Appropriate visibility splays should be provided at the new site access (providing access to the new garden centre service yard) based on relevant stopping sight distance guidance;
  - A Stage 1 Road Safety Audit of the access arrangements should be completed in accordance with GG119, and any issues considered within a Designer's Response;
  - An acknowledgement that an increase in retail floor area does not necessarily give rise to additional vehicle movements associated with customers, where there is no material change in parking;



- Consideration of car parking provision should be set out in a Transport Assessment/Statement having regard to adopted standards and the results of a parking survey;
- ▶ The number/type and frequency of anticipated service vehicle movements associated with the new access to the garden centre service yard should be quantified in a Transport Assessment/Statement accompanying an application based on a survey of the existing garden centre. Or with reference to TRICS.
- Swept path analysis of the new site access and service yard should be prepared; and
- Diversion of the PRoW should be progressed under section 257 of the Town and Country Planning Act.

#### Access

- 4.10 The existing site access to the garden centres from Old Shoreham Road will be retained for customers and staff. To provide access to the new goods/service yard, a separate access is proposed from Old Shoreham Road. The new access falls within the Adur District/WSCC boundary and is subject to a separate planning submission for development of a car showroom, which has been submitted concurrently to this application.
- 4.11 The proposed access is in the form of a simple priority junction with pedestrian refuge and has been designed to accommodate the largest vehicle anticipated to require access. It also includes footways leading into the site on both sides of the access.
- 4.12 The access geometry consists of a 7.3 metres wide internal gated access road, which widens out to a bellmouth, incorporating corner radii tapers and a central refuge splitter island. The bellmouth corner radii tapering arrangement generally follows the principle as shown in figure 5.6.2N2 of the Design Manual for Roads and Bridges (DMRB) section CD 123, which is designed to accommodate heavy goods vehicle (HGV) turning manoeuvres. In order to determine the access geometry, the principles of Manual for Streets 2 (MfS2) have been observed and the access has been designed to use minimum carriageway area whilst still safely accommodating the largest vehicles likely to visit the site. This has resulted in a corner radii of 8 metres on the western side and 10 metres on the eastern side.
- 4.13 The drawing in Appendix B shows the achievable visibility splays of 2.4 by 120 metres at the site access. The 120 metre 'Y' distance is derived from the stopping distance for 40mph roads as set out in DMRB section CD 109. It is acknowledged that the splay in the leading direction passes through a bus layby and will periodically be obstructed by buses; however, bus stops within splays are not uncommon in urban environments and buses will only cause a temporary obstruction.
- 4.14 The access arrangements have been subject to a Stage 1 Road Safety Audit (RSA) completed in accordance with GG119. The RSA, which is included at Appendix C, identified no issues with the access arrangements or highway alterations.

## **Public Right of Way Diversion**

- 4.15 The application proposals involve diversion of the existing PRoW, which currently runs along the western boundary of the site, following the boundary line between the local authorities. It is intended that the route will be diverted around the western and southern boundaries of the extended garden centre site.
- 4.16 The footpath connection with Old Shoreham Road will be relocated approximately 7 metres to the west of the existing point. The diverted route will then lead south from the A270 between the extended garden centre site (to the east) and parking associated a proposed new car showroom (to the west) and turn east to connect back to the existing path to the south of the garden centre building.



- 4.17 The existing path is narrow, enclosed, unlit and has poor natural surveillance. The diverted route will comprise a 3 metre wide path with soft verges either side of between 1.5 and 2 metres in width along the north-south section, and greater green space along the east-west section. The perimeter of the garden centre will be enclosed by a mesh fence, similar to the existing arrangement. The boundary with the car showroom site will remain open. The design of the diverted route has sought to enhance natural surveillance and provide good forward visibility. It is also intended that the section of the diverted footpath will be lit, as will the length of the existing footpath where it runs parallel to the garden centre car park.
- 4.18 The section of the footpath to be diverted measures approximately 105 metres in length. The new route measures circa 160 metres. This equates to an increase in length of around 55 metres. Applying an average walking speed of 1.5 metres per second, the additional time taken to walk along this diverted section of footpath equates to 37 seconds, which is not considered to be significant, particularly when taking account of the enhancements proposed to the nature of the route.
- 4.19 It is acknowledged that the proposed access to the garden centre service yard will cross the diverted footpath. However, vehicle movements are anticipated to be low (considered in the next section), with vehicles travelling at low speeds. The access is located on a straight section of the path, which affords good visibility.
- 4.20 The opportunity to upgrade the existing public footpath to create an improved green infrastructure link from the Coast to the South Downs National park is identified in the Eastbrook Allotments Development Brief, introduced in section 2. Enhancements identified include widening, upgrading the route to a bridleway so it can be used by cycles, lighting and opening up to establish a Green Infrastructure Corridor. It is understood from pre-application liaison that Adur District Council is preparing a Green Infrastructure Strategy. Whilst it is acknowledged that the enhancements to the footpath only relate to a section of a longer PRoW, it is considered the improvements accord with the wider aspirations of the District Council. Further, delivering a wider route along this section opens up the potential for the footpath to be upgraded to a bridleway, subject to land control and relevant process, which could then also be used by cycles.

## **Parking**

## **Car Parking**

- 4.21 No material change to customer parking provision is proposed as part of the application. A total of 100 car parking spaces will be available for the garden centre, including 10 spaces for disabled persons. In terms of provision for electric vehicles, it is intended that 10% of bays will benefit from active provision, with an additional 10% provided with passive provision. Having regard to adopted parking standards introduced in section 2, a maximum of 117 car parking spaces could be provided to serve the extended garden centre. On this basis, it is evident that provision accords with the adopted maximum standards. The provision also includes appropriate blue badge and electric vehicle charging provision having regard to BHCC guidance.
- 4.22 As described at the beginning of this section, the proposals seek to increase the retail offer of the existing garden centre and provide a more attractive shopping environment. It is not anticipated that the application proposals will increase customers to the store, although the dwell time of visitors will increase. Due to the current Covid-19 pandemic, it has not been possible to commission surveys of the existing garden centre car park as suggested in pre-application advice from BHCC and it is understood the authority is not currently accepting surveys due to this. In addition, there are generally lower numbers of visits to garden centres during autumn/winter, and so usage of the car park is unlikely to be reflective of typical demand. However, on the basis that provision accords with the City Council's maximum parking standards, it is considered provision is adequate to serve the modified garden centre.



## Cycle Parking

- 4.23 The proposals include secure cycle parking for 24 staff cycles in the form of double racks located in a sheltered store approximately 30 metres to the north-east of the main entrance to the building. Additional provision for visitors (6 existing Sheffield stands, accommodating 12 cycles) is located close to the main garden centre entrance.
- 4.24 The standards set out in section 2 indicate that a minimum of 1 cycle parking space, plus 1 space per 150 sqm GFA should be provided for customers (short-stay), plus 1 space per 5 staff (long-stay) for retail development.
- 4.25 It is understood the site currently employs 68 staff (41 paid hourly and 27 salaried) and that the application proposals will result in an additional 25 staff (13 additional staff paid hourly and 12 extra salaried). The total gross internal floor area following implementation of the proposals will be 3,523 sqm. Having regard to the adopted standards, provision should therefore be made for 24 short-stay and 19 long-stay cycle parking spaces. The adopted standards relate to retail generally. In view of the nature of goods sold at the site, it is considered that staff may be more likely to travel to the site by cycle than customers. The quantum of short and long stay cycle parking has therefore been adjusted to reflect this. On this basis it is considered appropriate provision is made for cycle parking having regard to relevant local guidance and the nature of the site use.

## Servicing

- 4.26 At present there is a small external storage area to the south of the existing garden centre building.

  Deliveries to the garden centre take place in the existing car park and some HGVs unload at the entrance to the site.
- 4.27 A new goods/service yard separated from the existing parking area forms part of the application proposals. This yard is served via a new access from Old Shoreham Road, described above. The access has been designed to accommodate the largest vehicle anticipated to require access, including 16.5 metre articulated vehicles. Swept path analysis in Appendix D demonstrates the ability of this vehicle to use the site access, internal access road and turn within the proposed service yard/site access road to exit in a forward gear.
- 4.28 Delivery/service vehicles visiting the garden centre service yard are able to either reverse into the yard entrance or turn within the yard itself. As described above, the access will also serve a proposed car showroom (subject of a separate application). However, there is space within the showroom site for larger vehicles to load/unload along the internal access road, without obstructing operational parking and access to the garden centre service yard. In this respect, it is evident that the servicing areas for the two uses can operate independently. As described in the next section of this report, it is expected that servicing and delivery related activity can be managed and will typically take place outside of peak times.

## **Summary**

- 4.29 This section demonstrates that:
  - Safe and suitable vehicular access to the goods/service yard can be achieved from Old Shoreham Road and the access arrangements have been designed to reflect current design guidance and subject of a Stage 1 RSA;
  - ▶ The diverted PRoW provides significant enhancements to the nature of this section of footpath in terms of width, openness and natural surveillance, and is considered to accord with wider aspirations of the District Council;
  - Appropriate provision is made for car and cycle parking, based on adopted standards; and,
  - ▶ The proposals include suitable arrangements for delivery and servicing vehicles.



## 5.0 Development Impact

#### **Overview**

- As part of pre-application discussions with BHCC, it was considered that vehicle movements associated with customers to the garden centre are unlikely to materially change on the basis that no change in parking is proposed. As such, this section focuses on daily vehicle movements associated with servicing and deliveries to the new goods yard, accessed via the creation of the new access to Old Shoreham Road. It is expected that such activity can be managed and that movements will occur outside peak times on the local highway network.
- Pre-application advice from BHCC indicated that the number of anticipated service vehicle movements associated with the new garden centre goods yard should be made with reference to a survey of the existing site access. However, it is understood the authority is not currently accepting surveys commissioned during the Covid-19 pandemic. Restrictions associated with the pandemic during the summer of 2020 and more recently would have been likely to influence the number of vehicle movements recorded at the garden centre access. In addition, there are generally lower numbers of visits to garden centres during autumn/winter. As such, it is not considered a survey would be representative of typical operations at Mayberry Garden Centre. Further, it is understood service and delivery related vehicle movements to the garden centre will be different following implementation of the application proposals to modify and extend the facility.
- 5.3 Against this background, reference was made to the TRICS database to establish potential movements by heavy and light goods vehicles. However, no survey data was available for weekdays, when it is considered the majority of such activity would occur. This section therefore provides a first principles estimate of movements by delivery and service vehicles based on information provided by the Applicant.

### **Change in Vehicle Movements**

- 5.4 As described in section 4, the proposals seek to increase the retail offer of the existing garden centre and provide a more attractive shopping environment, as well as to address existing on-site storage provision and inefficient delivery arrangements.
- 5.5 Against this background, and given no material change in car parking is proposed as part of the application, pre-application advice from BHCC accepted that there would be unlikely to be any material change in vehicle movements associated with customers.
- 5.6 It is typically accepted that provision of additional floor area to an existing retail unit does not result in a pro-rata increase in customer numbers. This is consistent with the objectives of the application proposals, which is to improve customer experience. Therefore, no material change in vehicle movements is anticipated as a result of the proposals.

## **Existing Delivery & Service Vehicle Arrangements**

- 5.7 As explained above, service and delivery related vehicle movements to the garden centre will be different following implementation of the application proposals subject of this report to current arrangements.
- 5.8 At present, the existing garden centre has limited storage space and so stock is stored at another store operated by the Applicant in Hassocks. Stock is transported to Mayberry Garden Centre 1-2 pallets at a time by van and this takes place on a daily basis.



5.9 The application proposals include a new 'goods in' warehouse, which means stock can be delivered directly to Mayberry Garden Centre and stored on-site. Whilst this will mean larger vehicles visiting the garden centre (via the new car showroom access) associated with deliveries, it will also result in a significant reduction in vehicle movements using the existing garden centre access. For example, if a 40 foot container of furniture was delivered to the Hassocks site (the minimum size delivery in most cases), on a 16.5 metre articulated lorry, it would take several days to transport the stock by van to Mayberry Garden Centre. Similarly, for each delivery of compost to Hassocks, there are around 24 inter-branch vehicle movements (minimum) to transport the compost to the Mayberry site.

## **Anticipated Future Delivery & Service Vehicle Movements**

5.10 The tables below summarise the servicing and delivery vehicles estimated by the Applicant to the garden centre at present and following implementation of the application proposals. These are based on experience of operating a number of garden centres (e.g. Paradise Park in Newhaven, South Downs Nurseries & Garden Centre in Hassocks and Old Barn Nurseries & Garden Centre in Dial Post) and having regard to the scale of the proposed development. It considers likely vehicle numbers in both high and low season, per week.

Type of Vehicle	Stock	Estimated Vehicles per	
Type of Vehicle	Stock	High Season	Low Season
16.5m Articulated Lorry	Garden centre goods	3	1
Refuse Lorry	Refuse/recycling	1	1
7.5t box van	Garden centre goods	20	5
Panel Van	Garden centre goods	48	36
	Office supplies	1	1
	TOTAL	73	44

Table 5.1 - Estimated Existing Weekly Garden Centre Service & Delivery Vehicles

Type of Vehicle	Stock	Estimated Vehicles per Week		
Type of Vehicle	Stock	High Season	Low Season	
16.5m Articulated Lorry	Garden centre goods	7	2	
Refuse Lorry	Refuse/recycling	1	1	
7.5t box van	Garden centre goods	5	2	
Panel Van	Garden centre goods	15	10	
	Office supplies	1	1	
	TOTAL	29	16	

Table 5.2 – Estimated Future Weekly Garden Centre Service & Delivery Vehicles

5.11 Based on the estimates outlined in the table above, it is anticipated there could be around 7 deliveries per week (14 movements) in high season by HGVs associated with garden centre goods for sale, with potentially 21 additional service/delivery related visits (48 movements) per week by smaller vehicle. Importantly, it is evident that deliveries will reduce compared to those estimated at present, for the reasons outlined earlier in this report. It is expected that movements by larger vehicles and associated with deliveries and servicing of the garden centre will be managed and typically take place outside peak periods.

## **Traffic Impact**

5.12 WSCC 'Transport Assessment Methodology' (July 2007) in respect of assessment of highway capacity states:

"Generally the study area will include all junctions where there is a predicted increase in total entry flows of 30 or more vehicles in any hour – or if the junction already experiences peak period congestion an increase of 10 or more vehicles – as a result of the development proposals."



5.13 It is evident that the garden centre proposals will result in significantly less than the identified 30 vehicle threshold referenced in the County Councils guidance. As such, more detailed assessment is not considered to be necessary as part of this application. It is therefore considered the proposals will not be detrimental to the capacity or operation of the adjoining local highway network. Notwithstanding this, an assessment of the new site access has been completed within the Transport Assessment accompanying the proposals for a new car showroom, to the west of the garden centre site.

## **Summary**

5.14 It is considered the proposals will not result in a material increase in traffic that would be detrimental to the capacity or operation of the adjoining local highway network and on this basis, more detailed capacity assessment is not necessary.



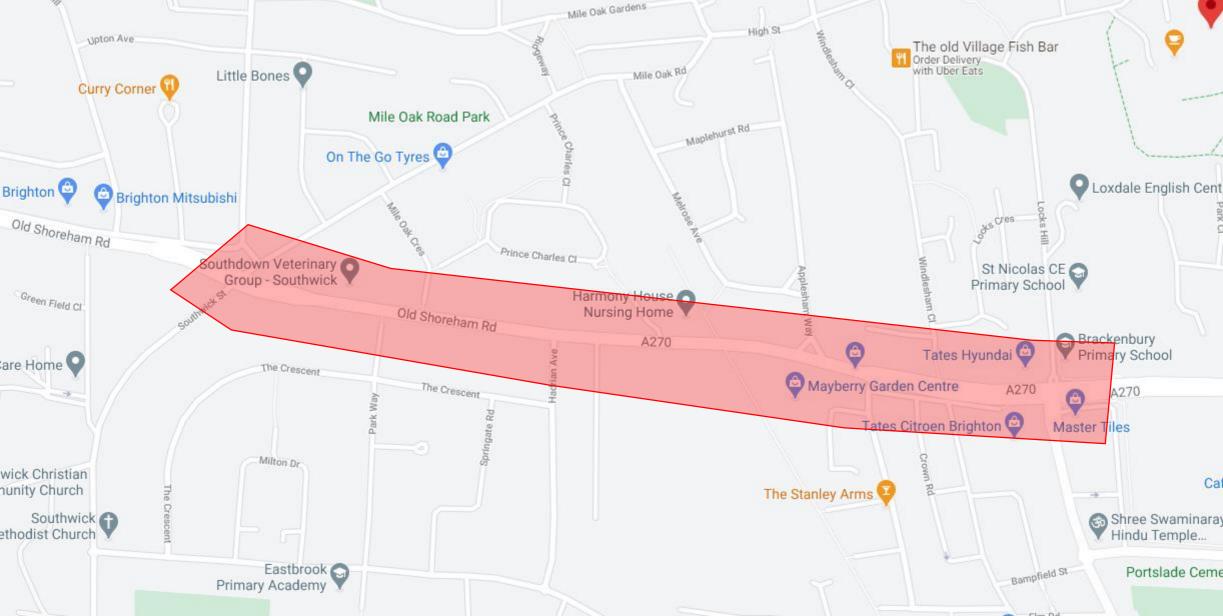
## 6.0 Summary and Conclusions

- 6.1 This Transport Statement has been prepared to accompany a planning application by Tate Brothers Limited for an extension and other modifications to the existing Mayberry Garden Centre, Portslade.
- 6.2 The proposals have been subject to pre-application liaison with the relevant planning and highway authorities. This Transport Statement, which has been prepared having regard to relevant guidance and taking account of pre-application discussions, demonstrates that:
  - ▶ The proposals accord with national and local policies relevant to transport;
  - ▶ The site is accessible by public transport, walking and cycling;
  - A review of personal injury accident information has identified no significant issues associated with the local highway network that are detrimental to the existing standard of road safety;
  - The existing site access from Old Shoreham Road will be retained to serve the existing parking area and a small number of service vehicles;
  - Safe and suitable vehicular access to the proposed service yard can be achieved from Old Shoreham Road in accordance with relevant design guidance;
  - ▶ The diverted PRoW provides significant enhancements to the nature of this section of footpath in terms of width, openness and natural surveillance, and is considered to accord with wider aspirations of the District Council;
  - ► The proposals will formalise existing parking on-site, with no material increase in provision, and appropriate provision is made for car parking, including for disabled persons and electric vehicles, as well as for cycles, having regard to adopted parking standards;
  - The proposals include appropriate provision for servicing via a separate vehicular access to a new service yard, which will separate customer parking from servicing activity;
  - ▶ It is not anticipated that the proposals will result in a material increase in vehicle movements by staff and customers. Vehicle movements associated with servicing and deliveries will change as a result of the proposals, with larger vehicles used, resulting in fewer movements overall. On this basis, it is considered the proposals will not interfere with the operation of the adjoining highway network.
- 6.3 On the basis of the above, it is concluded that the proposals accord with national and local transport policies and can be accommodated without detriment to the safety or operating capacity of local highway or sustainable transport networks. As such, it is considered there is no reason why the proposals should be resisted on traffic or transportation grounds.



# **Appendix A**

Personal Injury Accident Study Area





# **Appendix B**

Proposed Garden Centre Service Vehicle Access Arrangement



(based on information provided by West Sussex County Council and Brighton & Hove Council)

Boundary between West Sussex and Brighton & Hove (based on information provided by West



Revision:

В



# **Appendix C**

Stage 1 Road Safety Audit

MAYBERRY GARDEN CENTRE, OLD SHOREHAM RD, PORTSLADE

Proposed Access Arrangements and Highway Works

Stage 1 Road Safety Audit Requested by Motion

November 2020



Road Safety Engineering

Project: Mayberry Garden Centre, Old Shoreham Rd, Portslade

Proposed Access Arrangements and Highway Works

Client: Motion

Project Sponsor: West Sussex CC/ Brighton & Hove CC

Document: Stage 1 Road Safety Audit

Gateway TSP ref: WP/SG/1907047 RSA1 v2.0

Issue date: 7th December 2020

Status: Final v2.0

Authorised by: WP

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Road Safety Engineering

84 North Street Guildford Surrey GU1 4AU 01483 679350 admin@gateway-tsp.co.uk www.gateway-tsp.co.uk



## **CONTENTS**

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6	Audit Team Statement	. 7

# Appendices

Appendix A: Location Plan(s)

Appendix B: Designer's Response

Gateway TSP

## 1 INTRODUCTION

- 1.1 This report describes a Stage 1 Road Safety Audit (RSA) of proposals on land at Mayberry Garden Centre, Old Shoreham Road, Portslade.
- 1.2 The highway works considered by this Audit comprise;
  - a new access to be created to serve a proposed car showroom and provide access to a new goods/service yard for the existing garden centre;
  - · removal of one traffic island; and
  - realignment of the existing bus stop lay-by reducing its length and provision of one disabled parking bay.
- Old Shoreham Road (A270) in the vicinity of the site is a four lane carriageway with no physical separation between running lanes except occasional traffic islands, subject to a 40 miles per hour (mph) speed limit. The area is mainly residential and there are footways on both sides and street lighting throughout.
- 1.4 This Road Safety Audit was carried out by Wendy Palmer and Steve Giles and consisted of a desktop study and a site visit, which was carried out on Monday 30<sup>th</sup> November 2020 between the hours of 14.00 and 14.30, when the weather was overcast and the road surface damp. Traffic flows were moderate for the time of day and pedestrian flows were low.
- The terms of reference for this RSA are as described in the Design Manual for Roads and Bridges (DMRB) document GG119. The Audit Team is independent of the project design team and has not been involved in the design process in any other capacity. The audit considers only the potential road safety implications of the scheme and has not verified compliance of the design with any other criteria.
- 1.6 The Audit Team has not been made aware of any Departures from Standard. Whilst reference may be made to design standards, this report is not intended to provide a design check.

Ref: WP/SG/1907047 RSA1 v2.0



1.7 Recommendations are aimed at addressing the identified potential road safety problems. However, there may be other acceptable ways to overcome a problem, considering wider constraints and opportunities; the Auditors would be pleased to discuss such alternative solutions as appropriate. The recommendations contained herein do not absolve the Designer of his/her responsibilities.



# 2 ITEMS CONSIDERED BY THIS ROAD SAFETY AUDIT

Document ref.	Rev.	Originator	Title
1907047-04	В	Motion	Proposed Access Arrangement and Visibility Splays
1907047-05	Α	Motion	Suggested Highway Layout, Old Shoreham Road
1907047-TK01	Α	Motion	Swept Path of 16.5m Artic Entering Site
1907047-TK02	Α	Motion	Swept Path of 16.5m Artic Exiting Site
1907047-TK12	Α	Motion	Swept Path of Car Transporter Entering Site
1907047-TK13	Α	Motion	Swept Path of Car Transporter Exiting Site
20003 2.01	-	Folkes Architects	Proposed Site Plan

# Additional/background information provided to the Audit Team

- Audit Brief
- SSRP Collision Data



# 3 COLLISION DATA

Personal Injury Collision (PIC) information was provided from Sussex Safer Roads Partnership for the latest available 60-month period to end August 2020, which reveals that 30 PICs occurred between Locks Hill and Mile Oak Road; 23 of slight and 7 of serious severity.



4	PREVIOUS ROAD	) SAFFTY AUG	TIC

4.1 A previous road safety audit was carried out by GTSP in April 2020 on an alternative scheme which is superseded by these proposals.



5	PROBLEMS IDENTIFIED BY THIS ROAD SAFETY AUDIT
	General Matters
5.1	The Audit Team raises no concerns at this Stage 1 RSA in respect of general matters.
	Local Alignment
5.2	The Audit Team raises no concerns at this Stage 1 RSA in respect of local alignment.
	Junctions
5.3	The Audit Team raises no concerns at this Stage 1 RSA in respect of junctions.
	Walking, Cycling and Horse Riding
5.4	The Audit Team raises no concerns at this Stage 1 RSA in respect of walking, cycling and horse riding.
	Traffic Signs, Carriageway Markings and Lighting
5.5	The Audit Team raises no concerns at this Stage 1 RSA in respect of traffic signs, carriageway markings and lighting.

November 2020



### 6 AUDIT TEAM STATEMENT

6.1 We certify that this Road Safety Audit has been carried out in accordance with DMRB document GG119.

#### Audit Team Leader

Wendy Palmer MCIHT, MSoRSA, HE Cert Comp Road Safety Engineer

Signed:

Date: 30<sup>th</sup> November 2020

#### Audit Team Member(s)

Steve Giles BEng (Hons), IEng, FIHE, MCIHT, MICE, CMILT, MSoRSA, HE Cert Comp Director & Senior Road Safety Consultant

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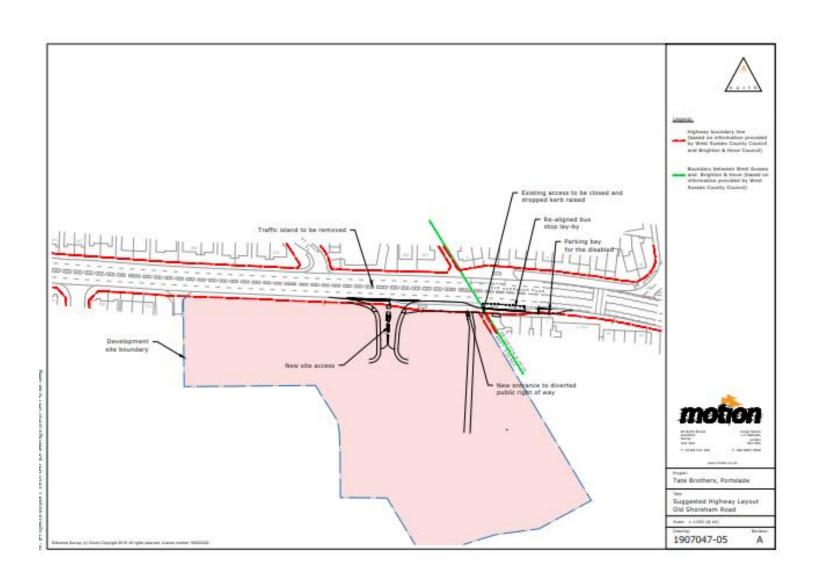
Date: 30<sup>th</sup> November 2020

November 2020



# APPENDIX A Location Plan(s)







## APPENDIX B Designer's Response



Mayberry Garden Centre, Old Shoreham Rd, Portslade Proposed Access Arrangements and Highway Works Project:

Motion Client:

Stage 1 Road Safety Audit WP/SG/1907047 RSA1 v2.0 Document: Gateway TSP ref: Status:

Final v2.0

Issue date: 7th December 2020

Item No.	Audit Team Recommendation	Designer's Response	Audit Team's Further Comments
5.1	n/a	n/a	
5.2	n/a	n/a	
5.3	n/a	n/a	
5.4	n/a	n/a	
5.5	n/a	n/a	



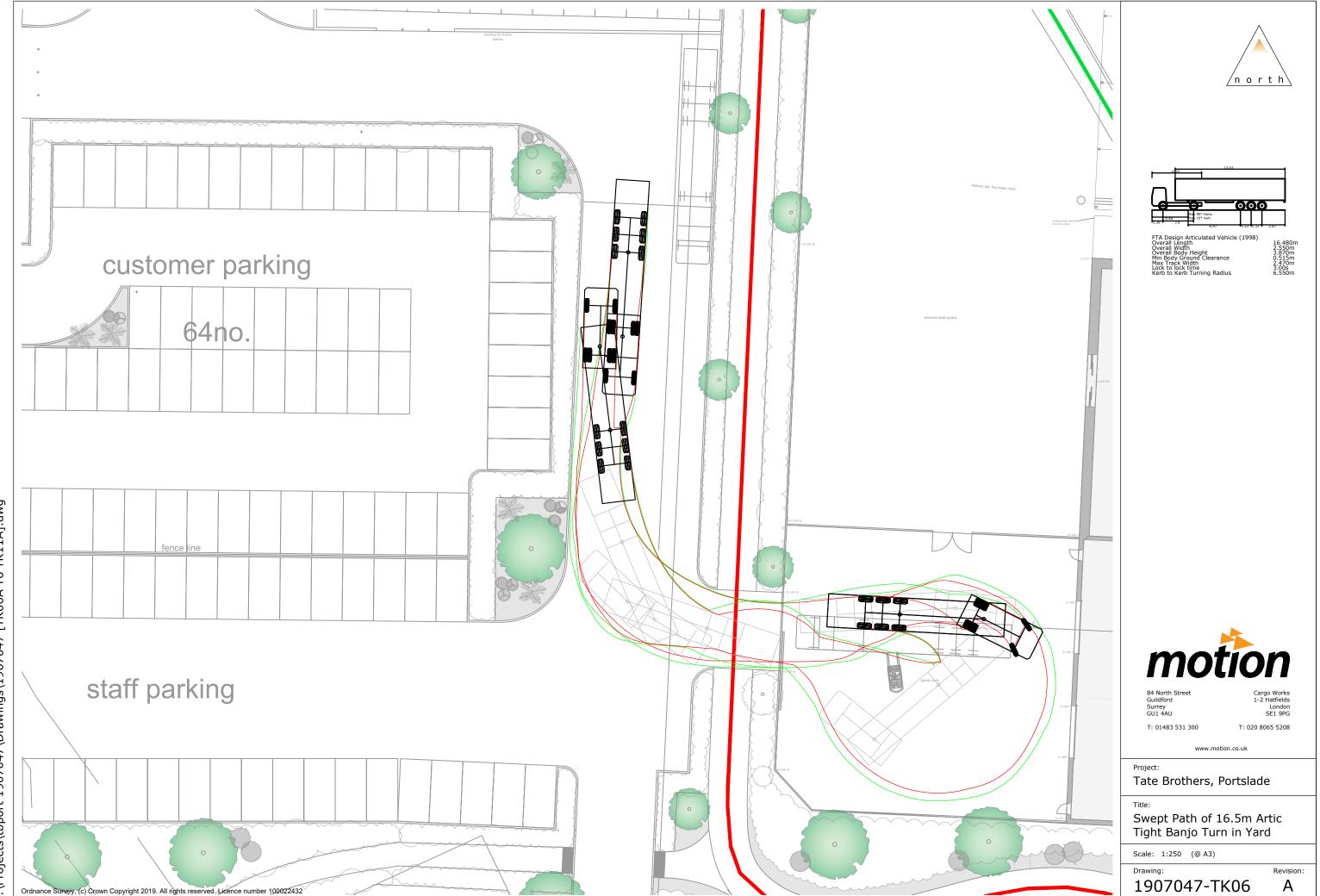
Project:  Client: Document: Gateway TSP ref: Status: Issue date:	Mayberry Garden Centre, Old Shoreham Rd, Portslade Proposed Access Arrangements and Highway Works Motion Stage 1 Road Safety Audit WP/SG/1907047 RSA1 v2.0 Final v2.0 7th December 2020			
	nsidered the items that have arisen in the Stage 1 Road Safety Audit to its recommendations are set out above.			
Designer: Phil Bell	I			
Date: 3/12/20	)20			
Audit Team Statement: We agree/do not agree are provided above.	: [delete as appropriate] with the Designer's Response and our comments			
Audit Team Leader:	Wendy Palmer			
Date:	7/12/2020			
	ject Sponsor/ Client Organisation Statement: the Designer's Response (delete as appropriate)			
[Name], on behalf of Highway Authority/Project Sponsor/Client Organisation (delete as appropriate)				

Date:



**Appendix D** 

Swept Path Analysis



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