

planning
transport
design
environment
infrastructure

Transport Statement for Long Rake Spar Co Ltd
Long Rake Spar, Harbour Road, Rye Harbour

November 2020
SM/HB/15068



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1 Introduction

- 1.1.1 DHA has been commissioned by Long Rake Spar Co Ltd to provide transport planning advice in relation to the proposed development at Long Rake Spar, Harbour Road, Rye Harbour.
- 1.1.2 This TS has been produced in accordance with the National Planning Practice Guidance (March 2014). Following this introduction, the TS is structured as follows:
- Section 2 summarises the existing transport conditions local to the site;
 - Section 3 sets out the development proposals;
 - Section 4 provides an assessment of transport planning policy;
 - Section 5 looks at forecast trip attraction and distribution; and
 - Section 6 provides a summary and conclusion.
- 1.1.3 The scope of this TS has been the subject of pre-application engagement with Highways England (HE) given their interest with the A259.

2 Existing Transport Conditions

2.1 The Existing Site

2.1.1 The site is located to the south of Harbour Road, within the Churchfields Industrial Estate in Rye Harbour. The site is shown in a local context in Figure 2-1 below.



Figure 2-1: Site Location (courtesy of OpenStreetMap)

2.1.2 The site is occupied by Long Rake Spar; an aggregate supplier and is currently used for the storage and bagging of aggregates. The site currently operates between 08:00-18:00 on weekdays. It is bound to the north by Harbour Road and to the south east and west by open land. Rye Wharf is also located to the west of the site, along Harbour Road and the residential area of Rye Harbour is located to the east.

2.1.3 The site is currently accessed from Harbour Road and comprises of a number of units in addition to external storage areas. Parking is provided on-site for both cars and HGVs in an informal arrangement.

2.2 Local Highway Network

2.2.1 As noted above, access is achieved via Harbour Road, in the form of a priority junction. The access measures approximately 7 metres in width, increasing to 18 metres at the junction bellmouth.

2.2.2 Harbour Road routes from east to west between Rye Harbour and the priority junction with the A259 Winchelsea Road. The National speed limit is enforced on the section of Harbour Road adjacent to the site access, reducing to 30mph in the east on the approach to the Harbour. Visibility at the site access on to Harbour Road is considered to be reasonable in both directions due to the relatively straight alignment of the carriageway.

2.2.3 The A259 Winchelsea Road takes a general north-east / south-west alignment and provides access to Hastings to the south-west. Routeing north-east, the A259 meets the A2070 which provides a direct link to the M20 Junction 10, at Ashford.

2.2.4 It is therefore evident that the site enjoys ready access to a range of local and regional destinations via the primary and strategic route networks.

2.3 Walking and Cycling Infrastructure

2.3.1 A shared footway and cycleway is provided along Harbour Road, on the southern side of the carriageway. It continues to approximately the A259 to the west and into Rye Harbour Village, as a footway, to the east. It measures approximately 2.5 metres along the site frontage and is maintained to a good standard.

2.3.2 There are also a number of Public Rights of Way (PRoW) within the immediate vicinity of the site, as shown in Figure 2-2 below.

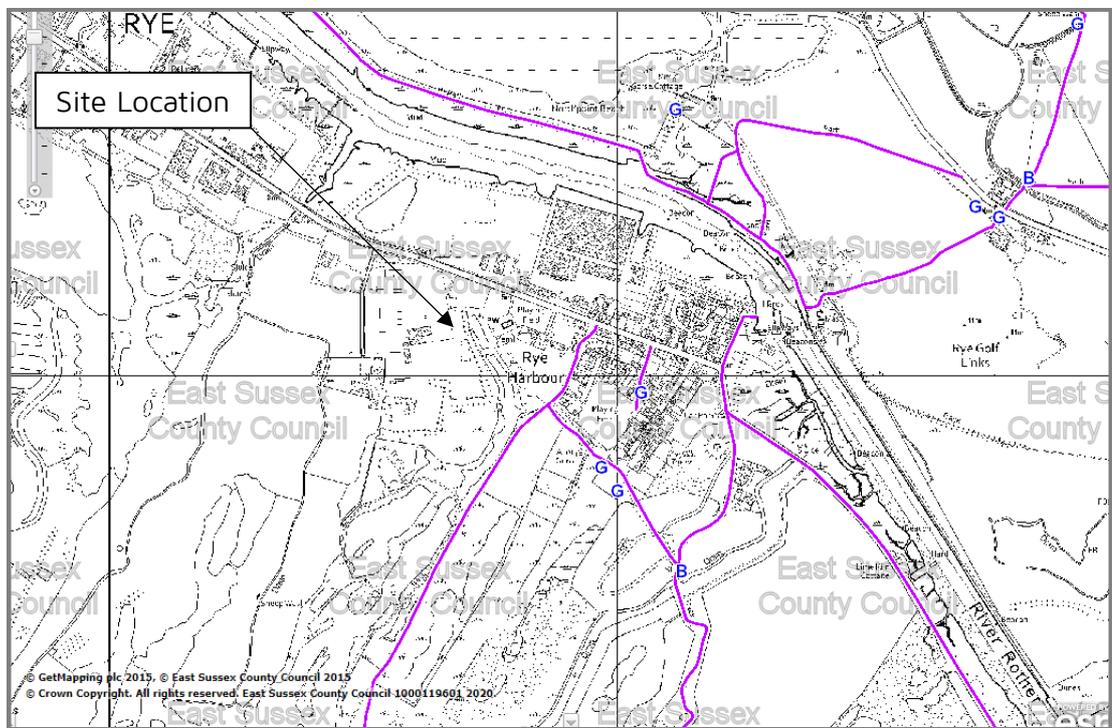


Figure 2-2: Local PRoW Network (courtesy of East Sussex County Council)

2.3.3 In addition to the shared footway and cycleway, National Cycle Route 2 is located to the west of Rye Harbour, within the town of Rye as shown in Figure 2-3 below. This routes to Folkestone heading north-east and continues to the West Country via Brighton, Southampton and Dorchester to the west.

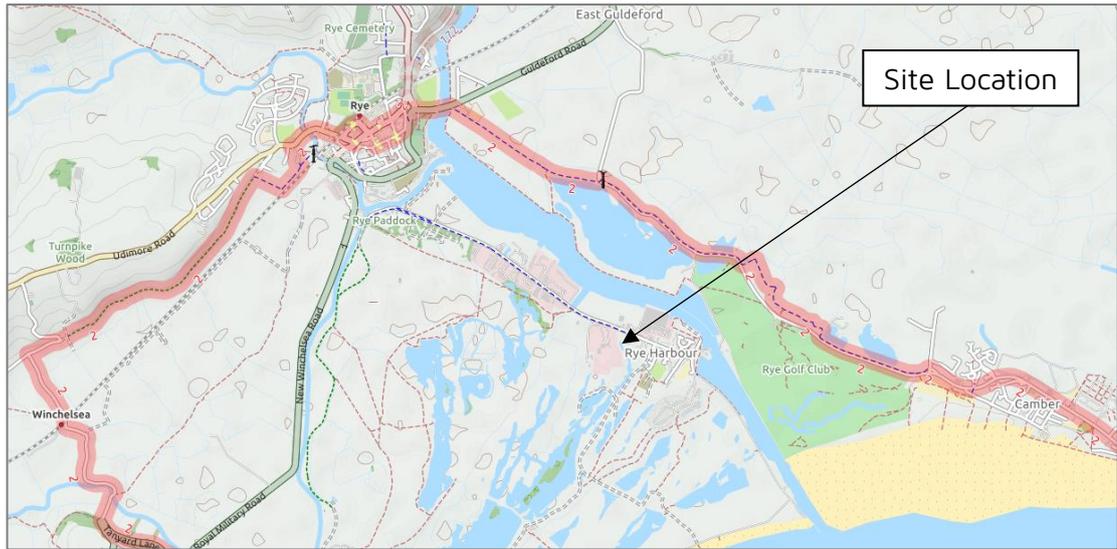


Figure 2-3: Local Cycle Network (courtesy of OpenCycleMap)

2.4 Public Transport Infrastructure

2.4.1 The closest bus stops are situated on Harbour Road, approximately 400 metres from the site, taking five minutes on foot. The bus stops are served by one route, which is summarised in Table 2-1 below.

Service No.	Route	Weekday Frequency
313	Northiam – Peasmarsh – Rye - Rye Harbour	9 journeys

Table 2-1: Local Bus Routes and Frequencies

2.4.2 Rye Station is situated approximately 2.9 km from the site, accessible in a ten minute cycle, 13 minutes by bus (from Harbour Road), or five minutes by car. From this station, services to Ashford International and Eastbourne can be accessed with up to two services per hour on weekdays.

2.5 Road Safety

2.5.1 A review of the CrashMap database for the area surrounding the application site, including the Harbour Road / A259 junction, for the most recent five-year study period up to 2019 has been undertaken and the associated plot is included at **Appendix A**.

2.5.2 In total, five incidents were recorded, of which three were classified as 'slight' in severity, one was classified as 'serious' and one was 'fatal'. One incident was recorded at the Harbour Road / A259 junction, classified as 'slight' in severity and involved a single vehicle. The remaining two 'slight' incidents occurred along Harbour Road, with one taking place at the access with Rye Industrial Park.

2.5.3 The 'serious' incident occurred along Harbour Road, to the east of the site, close to the junction with Oyster Creek. It is noted that this incident involved a young driver, a motor vehicle and a motorcycle.

- 2.5.4 The 'fatal' incident took place to the east of the Harbour Road / Tram Road junction within the village and involved a single cyclist.
- 2.5.5 It is noted that there are no apparent clusters of incidents and as such, it is considered that the likely cause of all incidents was human error. It is also highlighted that no incidents were recorded within close proximity to the site access. Therefore, it is considered that the proposed development is unlikely to exacerbate any pre-existing highway safety concerns.

3 Proposed Development

3.1 Overview

- 3.1.1 The proposed development comprises the extension of the existing operating hours at Long Rake Spar from 08:00-18:00 to 06:00-20:00 on weekdays to accommodate an increased forecast of aggregate capacity.
- 3.1.2 Given the nature of the proposals, the layout of the site will remain as existing and no material changes are proposed.
- 3.1.3 Access to the site is proposed to remain as existing, via Harbour Road to the north of the site.
- 3.1.4 Parking will take place on-site, as per the current situation. Although there are no formal parking areas, the site is able to accommodate the likely demand for parking associated with the proposed development.

4 Transport Planning Policy

4.1 National Planning Policy Framework (NPPF) (2019)

4.1.1 The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other developments can be produced. The NPPF is a material consideration in planning decisions.

4.1.2 At the heart of the NPPF is a presumption in favour of sustainable development. This is reflected in Section 9 of the document where it is noted that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering genuine choice of transport modes. The NPPF advises that in assessing sites, it should be ensured that:

- a) *"Appropriate opportunities to promote sustainable transport can be – or have been – taken up, given the type of development and its location;*
- b) *Safe and suitable access to the site can be achieved for all users; and*
- c) *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."*

4.1.3 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 if the residual cumulative impacts on the road network would be severe."*

4.1.4 Paragraph 110 then goes on to note that applications for development should:

- a) *"Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) *Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) *Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) *Allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) *Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations".*

4.1.5 All developments that will generate significant amounts of movement should be required to provide a Travel Plan, and the application should be supported by a

Transport Statement or Transport Assessment so that the likely impacts of the proposals can be assessed.

4.2 National Planning Practice Guidance (NPPG)

4.2.1 The NPPG was established in March 2012 as a supporting resource in conjunction with the NPPF, which is also a material consideration in determining planning applications. With respect to transport, the NPPG includes a section titled '*Travel Plans, Transport Assessments and Statements in Decision-Taking*'. This provides general guidance on the process of producing these documents

4.2.2 With regard to the purpose of a Transport Assessment or Statement it is noted that:

"The Transport Assessment or Transport Statement may propose mitigation measures where these are necessary to avoid unacceptable or "severe" impacts. Travel Plans can play an effective role in taking forward those mitigation measures which relate to on-going occupation and operation of the development."

4.2.3 In terms of parking provision, the requirements are set out by the Local Authority (as described below); however, further to the NPPF, the following should be taken into consideration:

"Maximum parking standards can lead to poor quality development and congested streets, local planning authorities should seek to ensure parking provision is appropriate to the needs of the development and not reduced below a level that could be considered reasonable."

East Sussex Local Transport Plan (LTP3)

4.2.4 The LTP sets out the transport strategy for East Sussex for the period up to 2026. The specific transport objectives of the LTP include improving strategic and local connectivity to facilitate economic growth; reducing congestion; improving road safety and improving access to jobs, services and leisure.

Rother Local Plan Core Strategy

4.2.5 The Core Strategy was adopted by Rother District Council in September 2014 and sets out the relevant vision and objectives up to 2028. Policy RY1 for Rye Harbour requires development to support traffic management and promote sustainable travel alternatives in accordance with the Local Transport Plan and Rye Local Area Transport Strategy. With regard to transport Policy TR3 new development should minimise the need to travel and support good access to employment. Policy TR4 notes that parking should meet the needs of the development and any safety, congestion and amenity impacts should be considered.

Rother District Local Plan 'saved' policy

4.2.6 The Local Plan was adopted by the Council in 2006 and subsequent to this it has been superseded, although a number of the policies have been 'saved' as agreed with the Secretary of State. These include Policy TR2 which suggests that development should be located to promote sustainable travel choices; and Policy TR3 which notes parking provision should meet the needs of the development.

Additionally, Policy RY7, which considers the Rye Harbour Road area, suggests that proposals for business development (B1-B8) will be permitted provided that where a significant increase in vehicle trips (especially HGVs) is envisaged the suitable mitigation is put in place.

4.3 Policy Compliance

- 4.3.1 The proposals have been found to comply with all levels of transport policy. The NPPF acknowledges that opportunities for sustainable travel will vary depending on location; however, the site enjoys a good level of access for pedestrians and cyclists from surrounding residential areas.
- 4.3.2 The principle of commercial / industrial development in this location is considered to be acceptable under saved Local Plan Policy RY7 and the impacts of the proposals on the local network are not envisaged to be severe (refer to the following sections). Although no designated parking will be provided it is considered that the site allows adequate space to accommodate the parking demand and space for the loading and unloading of lorries.

5 Trip Attraction

5.1 Overview

- 5.1.1 This section outlines the methodology employed to calculate the likely vehicle trip attraction of the proposed development. As the development proposals seek to extend the operational hours of the site, consideration will be given to the existing trips generated by this use. This will be undertaken using a 'First Principles' approach to provide the most robust assessment. Following this, the proposed development trip attraction will be considered, again utilising information provided by the occupier of the site.
- 5.1.2 Using the existing and proposed vehicle trips, a residual trip attraction calculation will then be undertaken, to assess the net impacts of the proposed development. It is noted that aggregate is transported to and from the site via sea freight and road haulage.

5.2 Existing Vehicle Trip Attraction

- 5.2.1 The existing vehicle trip Attraction of the site has been calculated using information and figures contained within the previous Transport Statement for the site. It is noted that Highways England have requested an Automated Traffic Count (ATC) survey of the site to determine existing trips, however it is considered that the information provided ensures an accurate and robust assessment.

Sea-based Trips

- 60 percent of the aggregate arrives by boat (30,000 tonnes per annum) which equates to around 2,500 tonnes per month.
- Four axle, 20 tonne tipper lorries are used to transport the aggregate to the site. Currently, this is transported across one working day generating 125 HGV arrivals and 125 HGV departures, equating to a total of 250 vehicle trips per day.

Land-based Trips

- 40 percent of the aggregate arrives by land (20,000 tonnes per annum) equating to around 80 tonnes delivered per day (assuming a five day working week).
- As each lorry carries 28 tonnes of aggregate, there are three HGV arrivals and three HGV departures per day, equating to a total of six vehicle trips per day.
- It is noted that there are 14 employees at Long Rake Spar. In respect to any employee trips, a 90 percent car mode share has been assumed.
- The site also experiences eight deliveries per day and an additional two 'loose' lorry loads.

Total Vehicle Trips

- 5.2.2 Given the above, a summary of the vehicle trips associated with the existing development on an average day is provided in Table 5-3 below. The HGV trips which take place across one working day per month are shown in Table 5-4 below.

Daily Vehicle Trips	Arrivals	Departures	Total
Cars/Vans	21	21	42
HGVs	5	5	10
Total	26	26	52

Table 5-1: Existing Vehicle Trips (Average Day)

Daily Vehicle Trips	Arrivals	Departures	Total
HGVs	125	125	250

Table 5-2: Existing HGV Trips (Unloading of Aggregate from Ships)

5.3 Proposed Vehicle Trip Attraction

- 5.3.1 On the basis of the current operations at the site and information provided by Long Rake Spar, the proposed trip attraction can be derived.

Sea Based Vehicle Trips

- It is forecast that the total sea based tonnage will increase to 45,000 tonnes per annum, which will be delivered across 18 shipments. Therefore, each shipment will equate to around 2,500 tonnes.
- It is expected that the unloading of cargo will continue to take place across one working day.
- Four axle, 20 tonne tipper lorries will be used to transport the aggregate to the site and this will be undertaken using six lorries working in shuttle movements. This therefore generates 125 HGV arrivals and 125 HGV departures, equating to a total of 250 vehicle trips per day.

Land Based Vehicle Trips

- Going forwards an estimated forecast of 65,000 tonnes of aggregate will arrive by land per annum, equating to around 258 tonnes delivered per day (assuming a five day working week).
- Assuming that each lorry still carries 28 tonnes there will be around nine HGV arrivals and nine HGV departures, equating to a total of 18 vehicle trips per day.
- There is not expected to be any change in staff movements and therefore there will continue to be around 13 staff trips to and from the site every day.

- It is expected that the number of deliveries and additional 'loose' lorry loads will remain as existing e.g., eight deliveries and two 'loose' lorry loads.
- It is suggested that wherever possible these will be return loads to areas within the local vicinity to minimise vehicle movements.

Total Vehicle Trips

5.3.2 Given the above a summary of the vehicle trips associated with the proposed development on an average day is provided in Table 5-33 below. The daily HGV trips which could be expected during ship unloading are shown in Table 5-44 below.

Daily Vehicle Trips	Arrivals	Departures	Total
Cars/Vans	21	21	42
HGVs	11	11	22
Total	32	32	64

Table 5-3: Proposed Vehicle Trips (Average Day)

Daily Vehicle Trips	Arrivals	Departures	Total
HGVs	125	125	250

Table 5-4: Proposed HGV Trips (Unloading of Aggregate from Ships)

- 5.3.3 As can be seen the proposed development could be expected to generate a total of 32 arrival vehicle trips and 32 departure vehicle trips across an average day. This is likely to be a worst case scenario given that it could be expected that a greater proportion of the total aggregate could be transported by ship, therefore reducing the average HGV trips per day.
- 5.3.4 On the days when unloading of the aggregate delivered by ship takes place the number of trips by HGV could be expected to continue at 125 arrivals and 125 departures across the entire day. When adding in the staff and local deliveries this would equate to a total of 157 arrivals and 157 departures per day.
- 5.3.5 It is highlighted that the HGV movements associated with the unloading of ships takes place across a very short distance, from the site access to Rye Wharf, approximately 400 metres to the east of the site along Harbour Road. This journey takes less than a minute and only requires the use of Harbour Road as shown in Figure 5-1 below.



Figure 5-1: Location of site from Rye Wharf

5.3.6 It is also important to note that the bulk of this would only take place across one day (per shipping load), equating to a total of 18 days across the year, and therefore on an average day the impacts would be considerably less.

5.4 Residual Trip Attraction

5.4.1 Utilising the outcome of the above assessment, the residual trip attraction of the site can be calculated by subtracting the existing trip attraction from the proposed development total trip attraction as shown in Table 5-5 and Table 5-6 below.

Daily Vehicle Trips	Arrivals	Departures	Total
Cars/Vans	0	0	0
HGVs	+6	+6	+12
Total	+6	+6	+12

Table 5-5: Residual Vehicle Trips (Average Day)

Daily Vehicle Trips	Arrivals	Departures	Total
HGVs	0	0	0

Table 5-6: Residual HGV Trips (Unloading of Aggregate from Ships)

5.4.2 It has been demonstrated that the proposals at the site will result in a net increase of 12 HGV trips across the average day, with no additional car or van movements. In addition, whilst an increased number of shipping loads are expected per year, the daily movements required to transport the cargo is not expected to increase as each shipping load will contain the same amount of aggregate as existing.

5.5 Distribution

- 5.5.1 It is noted that the proposals will only generate an additional 12 HGV movements across a weekday period, outside of shipping movements, equating to around one additional movement in any direction every two hours.
- 5.5.2 It is also expected that these movements will take place outside of any peak hours, limiting any impact on the capacity of the A259 / Harbour Road junction. Whilst it is acknowledged that Highways England have requested a junction capacity assessment within their scoping response, in this instance it is not considered necessary given the very minor increase in trips as demonstrated above.
- 5.5.3 In summary it is considered that the proposed development will attract a negligible increase in trips, which will not have an impact on the local road network in accordance with Paragraph 109 of the NPPF.

6 Summary and Conclusion

- 6.1.1 This Transport Statement has been prepared on behalf of Long Rake Spar Co Ltd in relation to the proposed development at Long Rake Spar, Harbour Road, Rye Harbour.
- 6.1.2 The site currently comprises Long Rake Spar; an aggregate supplier and is currently used for the storage and bagging of aggregates. The development proposals seek to increase the operational hours of the site from 08:00-18:00 to 06:00-20:00 and as such no material changes to the site layout or site access are proposed.
- 6.1.3 A review of Personal Injury Accident data for the local highway network has concluded that there are no apparent accident patterns that could be exacerbated by the proposed development.
- 6.1.4 Following a review of national and local transport planning policy, the site is considered to comply to relevant policy and guidance and has been demonstrated to operate safely.
- 6.1.5 It has been demonstrated that the proposed increase in working hours at the site will result in a net increase of 12 trips across the average working day, with six arrivals and departures, equating to around one additional movement in any direction every two hours.
- 6.1.6 The increased frequency of shipping loads across the year will not affect the average daily HGV movements to and from the site from Rye Wharf as it is expected that the transportation of cargo will continue to take place across the same time period. These movements will be limited to a short stretch of Harbour Road.
- 6.1.7 It is therefore concluded that the proposed development should not result in significant detrimental impacts in transport terms and therefore there should be no sound transport-based objection to this proposal.

APPENDIX

A



Crash Data Plot



Rye Watersports

Camber Rd

Harbour Rd

Rye Oil

Skinners of Rye

Rye Tyres

IC Laure

Sues Tackle Cabin

Harbour Rd

Harbour Rd</