



From: Tim Townsend [REDACTED]
Sent: 04 January 2018 09:41
To: Planning.Responses
Cc: Derek Whittington; Richard Temple
Subject: AL/115/17/OUT - Proposed development of 55 homes - Land at Wings Nursery, A29 Lidsey Road, Woodgate - WSCC Highways response dated 4th January 2018

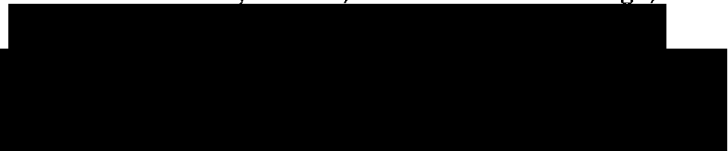
Dear Arun Planning Department,

Please find attached WSCC Highways report dated 4th January 2018 in response to the above planning application.

Should anyone receiving this email wish to discuss it, please do not hesitate to contact me.

Thank you.

Tim Townsend
Principal Planner, Highways – Planning Services
West Sussex County Council, Ground Floor Northleigh, County Hall, Chichester PO19 1RH



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**WEST SUSSEX COUNTY COUNCIL
PLANNING SERVICES CONSULTATION**

DATE: 4th January 2018

**FROM: Tim Townsend TO: Arun District Council
FAO: Richard Temple**

SUBJECT: AL/115/17/OUT - Outline application with some matters reserved for the erection of 55No. dwellings, sustainable drainage measures, public open space, children's play area, landscaping & all other associated works. This application is a Departure from the Development Plan.

LOCATION: Wings Nursery, Lidsey Road, Aldingbourne, PO20 3SU.

DATE OF SITE VISIT: 20th November 2017

RECOMMENDATION:

Advice	☐	Modification	☐	More Information	☐
Objection	☒	No Objection	☐	Refusal	☐

S106 contribution total (see below for breakdown) - Does not include highways.

This is the second County Highway Authority (CHA) consultation response to the planning application for the erection of 55 dwellings on land currently known as Wings Nursery which is found west of the A29 Lidsey Road, Westergate, West Sussex. It responds to additional information provided on behalf of the applicant by their planning and highway consultants, namely:

1. Technical Note (Ref: ADMA/17/3711s) – December 2017, produced by Russell-Giles Partnership (RGP) transport consultants.
2. Letter dated 8th December 2017 from Whaleback Planning Consultants.

Summary position of Highway Authority.

Following further consideration of the proposal in light of the additional information provided and other policy considerations (including Local Plan), the Highway Authority objects to the proposal on road safety, sustainable access and traffic impact grounds given the deficiencies of each as currently presented by the applicant. Full details of the CHA's reasons for objecting can be found in the text of this report with specific objections found at the foot of the report (prior to the non-highways S106 information).

Site location.

The site is located on the western side of Lidsey Road, the A29, an 'A' classification road serving as one of the main routes in and out of Bognor Regis. Vehicular access to the site is shown taken from two points – one to serve 4 homes and the other the remainder of the 55 homes. The northern-most part of the site is located approximately 90m south of a railway level crossing. Access to the 4 houses is approximately 100m south of the railway, whereas the site access serving the remaining 51 would be approximately 220m away from the crossing. Footways are shown either side of the main access with the secondary access serving the four units being designed as a private drive with highway users sharing the available space. It is understood that access is the only matter to be considered in detail with the application. All other matters, if

planning permission is granted, would be considered at a reserved matters stage. However, some comments about internal access arrangements are made elsewhere in this report.

Lidsey Road is the A29 and is one of the main district distributor roads providing access in and out of Bognor Regis, running northwards into Surrey. The section the site fronts (and that generally south of the railway line) serves mainly residential dwellings – mainly to the east side of the road with approximately 9 on the western side (although there is some commercial to the rear). Also to the east, can be found Woodgate Road and Woodgate Close providing access to approximately 32 dwellings - mainly bungalows; Oak Tree Lane (approximately 35 homes – predominantly houses) and beyond that some commercial development on land known as the Woodgate Centre – itself a site where residential development was proposed on two occasions in recent years, refused both times and then dismissed at appeal on sustainability grounds (twice). Lee's Yard can be found on the eastern side of Lidsey Road which is also commercial. North and east of that can be found Willows caravan park.

The A29 in this location has a relatively straight alignment (albeit with a change in the vertical alignment where it crosses the railway), has a 30mph speed limit and street lighting (from the point northwards outside Lee's Yard). The carriageway is generally 6.5m wide, rising to 8.5m wide opposite the former 'Basket World' (the southern part of the site). It has footways on both sides of varying widths – approximately 1.0m along the western side of the road (the site side) but wider in places on the eastern side – approximately 1.0m up to 2.0m. Although running continuously northwards they terminate on the eastern side of the road on the northern side of the Willows caravan park access and on the western side, opposite Lee's Yard. There is a hatched area in the centre to assist turning vehicles using the Willows caravan park access.

Approximately 100m to the north of the site is a railway level crossing, which is closed, on average, for a total of approximately 24mins of every hour period, or 40% of the time. This is because it is used by the South Coast mainline which experiences a high volume of rail traffic. When the level crossing is closed, traffic on the A29 is halted, and vehicles are typically queued back some distance on both sides of the crossing and often beyond the junction of Woodgate Road to the south. Occasionally (in peak periods) the queue extends back to the 'Lidsey Bends' (where a canal once crossed/ran) and on rare occasions, the Robin Hood Public House. This queuing prevents vehicles turning northwards out of local roads onto the northbound carriageway of the A29 and can prevent turning southwards too. This problem is more prevalent in the morning peak hour as many people use the route to travel to and from work. Therefore, traffic flows on the A29 tend to be high with many motorists heading north to gain access to the A27, the major trunk road in this area.

Access.

The proposed access arrangements comprise two junctions – one serving 4 dwellings in the form of a shared private drive with the other one a more formalised road junction with footways running either side. The latter (referred to herein as the 'primary access') has a single lane approach to the A29 Lidsey Road. Residents of the new estate, when emerging, would have to wait at the junction to turn left (northbounds) out of Woodgate Close onto the A29 if a queue of traffic resulting from the railway crossing prevailed. Only when such queuing dissipated, could drivers easily emerge. Drivers wanting to turn right (southbounds) might experience frustration being blocked by the left turners and/or traffic queue. In such circumstances it is likely that right turning drivers may choose to circumvent the waiting driver and use the opposing lane at the junction. This has been observed at Woodgate Road and neighbouring roads. This increases the safety risk should any vehicle co-incidentally be turning into the junction from the A29. While the traffic impact appears modest solely based on the application when viewed on its own, any blocking-back would create delays leading to emerging vehicles queueing within the estate. Furthermore, delays might increase/queues become longer when the site is assessed cumulatively with Local Plan Allocations and other committed developments in the locality.

The Highway Authority also has concerns that due to servicing demands, that any large delivery vehicle may find it difficult to turn into the junction while traffic is queuing in the primary site access. A large vehicle may, therefore, be required to use both lanes to enter and leave the junction. Whilst it is acknowledged that this can be a regular occurrence generally for other road junctions, because of the unusual traffic conditions created by the railway crossing closures, additional development would increase the likelihood of further conflict. Drawings provided by the Transport Consultant show that vehicles larger than cars cannot undertake this manoeuvre without encroaching on opposing lane widths, kerb lines and part of the waiting area proposed as part of the right hand turning lane. This could result in delays and inconvenience to users of the primary access and, in the worst case (because of the aforementioned blocking within the access), queuing back to the railway crossing.

It is not known whether Network Rail has been consulted about this specific point or the application as a whole. Clear evidence of consultation by the applicant with Network Rail and subsequent reply is, therefore, essential.

The risks of blocking back and circumnavigating queues associated with the secondary access are considered minimal given the low number of dwellings. Therefore, detrimental impact at that access – when considered alongside NPPF - is not considered severe on this occasion by the Highway Authority (subject of course to the visibility issue raised in the Stage 1 Road Safety Audit being satisfactorily resolved to the Highway Authority's satisfaction, further turning space and visitor parking spaces provided within the access and 'KEEP CLEAR' markings painted on the carriageway on the northbound carriageway adjacent).

Proposed Primary access road junction details (including off-site road changes).

In an attempt to accommodate the traffic associated with the main part of the development, the applicant proposes a junction arrangement comprising the following:

- 6.0m wide access road
- (What appear to be) 2 x 2m footways either side of the access road linking to existing footways on the site-side of Lidsey Road
- 6m bellmouth radii
- Alteration to the current white lined hatching on Lidsey Road (basically removing some of the hatching replacing it with a waiting area to serve the site)

Accident history (personal injury accidents – PIA).

Three PIAs have occurred along this stretch of the A29 using data taken between 2009 and 2014. It is not known why more recent data hasn't been used. Applicants are required to provide the most up-to-date records. From interrogation of the three recorded incidents in the documentation provided so far, two of these occurred at the junction of Woodgate Road with Lidsey Road with a further (serious) accident at the junction of Hook Lane with Lidsey Road north of the railway crossing. Both of the Woodgate/Lidsey Road accidents resulted in slight injuries being recorded. It should be noted that one of these accidents involved a vehicle travelling on the offside of a stationary queue of traffic as a result of the level crossing being closed in order to turn into Woodgate Road. This supports the Highway Authority's concerns that drivers may experience frustration caused by the queueing caused by the railway crossing closures and possibly undertake manoeuvres that would otherwise not be attempted.

The Highway Authority has reviewed the information provided (including swept-path diagrams of vehicles entering and leaving the junction). Based on that provided, four concerns have been identified. Namely:

1. When queueing prevails on Lidsey Road that extend across the junction, this will cause blocking-back in the access which could lead to drivers wishing to turn right attempting to circumnavigate vehicles intending to turn left.
2. Large vehicles are required to oversail the centreline of the new access road. If they attempt to do this during busy period when traffic might be blocked because of the queueing extending back from the railway crossing, such vehicles could end-up finding their paths blocked, thereby leading to potential blocking on the A29.
3. No 'KEEP CLEAR' markings shown on the A29 (although it is noted that the Stage 1 Road Safety Audit supplied with the application makes mention of this). Although this might – in part - assist with attempting to overcome the issues raised in 1 and 2 above, it would not fully resolve the issue.
4. The proposed alterations to the road hatching is not accompanied with reference to Design Standards (Design Manual for Roads and Bridges). Therefore, in the absence of the applicants/their consultants demonstrating that the arrangements are compatible, the Highway Authority is unable to fully consider the overall proposed access arrangements. In its assessment of what is shown, it would appear the turning lane in the centre of the road would not meet full standards. When considering junction design further, the applicant might wish to look at moving the access further south in an attempt to provide opportunity for a wider turning lane – particularly important given the proximity of the railway crossing and need to minimise chance of blockage of the southbound lane of Lidsey Road when vehicles are attempting to wait to turn right into the site. In any event, the applicants/their highway consultants will need to demonstrate compatibility with design standards. Finally, the applicant/their Transport Consultants should present any changes to the Road Safety Audit team for further comments. Although the applicant's Transport Consultants consider Lidsey Road to not be a 'true DMRB environment', DMRB is, nevertheless, the Design Standard required for designing right hand turning lanes. Manual for Streets does not provide this information, nor is it a Design Standard.

When assessing the road safety implications of the current proposals in light of NPPF guidance, the Highway Authority considers that potential negative road safety impacts have been identified. If measures cannot be demonstrated overcoming identified road safety issues or improving road safety, then the Highway Authority cannot support such proposals.

Road Safety Audit.

A Stage 1 Road Safety Audit accompanies the planning application, prepared by the Safety Forum (September 2017). Three problems have been identified, a summary of which is provided below (full details can be read in the Transport Statement prepared by RGP Highways and Traffic Consultants):

1. Drainage at the proposed/upgraded point of access
2. Design of tactile paving at junction
3. Trees north of access obscuring visibility for emerging vehicles

In the Designer's Response, the applicant appears to agree with all the recommendations. These will be checked again at any detailed design stage, should the development proceed.

Trip generation.

Russell Giles Partnership Highways and Transport Planning Consultants have provided information to support the application. Solely based on the development as presented (and not taking into account other committed developments, DRAFT Local Plan allocations in the area nor, does it appear, current background traffic flow information) Section 4 of their Transport Statement (TS) suggests that the traffic generation would be as follows:

Trip rates per dwelling (TRICS):

- Morning peak period (08:00-09:00) – 0.159 arrivals; 0.345 departures
- Evening peak period (17:00-18:00) – 0.327 arrivals; 0.139 departures
- Daily – 2.331 arrivals; 2.313 departures (Total – 4.644)

This translates to:

Vehicle trip generation (TRICS):

- Morning peak period (08:00-09:00) – 9 arrivals; 19 departures
- Evening peak period (17:00-18:00) – 18 arrivals; 8 departures
- Daily – 128 arrivals; 127 departures (Total – 255)

The Highway Authority has looked again at the Appeal decision for the Woodgate Centre (AL/160/12) as the Inspector assessing that proposal was presented with – and accepted as robust – higher trip rates (apart from the AM arrivals where the rate was slightly lower).

Using these trip rates, the following figures arise:

Trip rates per dwelling (TRICS):

- Morning peak period (08:00-09:00) – 0.152 arrivals; 0.364 departures
- Evening peak period (17:00-18:00) – 0.388 arrivals; 0.235 departures
- Daily – 2.500 arrivals; 2.445 departures (Total – 4.950) (approx.)

This translates to:

Vehicle trip generation (TRICS) (figures in red show increases over applicant's figures):

- Morning peak period (08:00-09:00) – 9 arrivals; 20 (+1) departures
- Evening peak period (17:00-18:00) – 21 (+2) arrivals; 13 (+5) departures
- Daily – 130 (+2) arrivals; 131 (+4) departures (Total – 261 (+6)) (approx.)

The Highway Authority concludes that the development would, based on previously accepted traffic impact information, generate approximately 261 vehicular trips per-day. This level of additional traffic using the site access and Lidsey Road would not itself normally generally trigger the need to consider junction upgrading on the adjacent road (i.e. right hand turning lane). However, given the issues referred to in this report as a consequence of the railway crossing, this does make it necessary to ensure that an appropriately designed turning lane and 'KEEP CLEAR' markings be provided in an attempt to *partially* mitigate the identified highway issues documented in this report. However, for the reasons given elsewhere in this report, a degree of conflict with the NPPF still remains on road safety grounds.

As stated above, as no cumulative impact assessment appears to have been undertaken by the applicant (taking into account committed developments and those proposed in the DRAFT Arun Local Plan), it is not possible to establish the future impact of the development on the road network

in the locality. The impacts of this development need to be considered cumulatively with the permitted developments in the area and the proposed site allocations in the emerging Arun Local Plan, notably the BEW Strategic Development Location.

Impact of railway crossing on traffic queues, pedestrians and cyclists.

The Highway Authority's 'Methodology for Transport Assessments' historically required developments to demonstrate nil-detriment or better be achieved. In light of the NPPF the County Council has reviewed this guidance. The test now looks to see whether any additional impact could be considered severe.

In order to establish what might be considered severe on this occasion, the Highway Authority has looked at a number of factors. Clearly, where traffic flows at a junction reach or exceed theoretical capacity then junction performance can become unstable. In some instances, blocking effects, increased delay and queuing could occur. This is relevant here as junction operation is influenced by the nearby railway crossing. Also, delays of over two minutes begin to have a negative effect on driver state of mind and tolerance, while delays of over three minutes may lead to adoption of behaviours such as 'u' turning and overtaking (the latter to reach a certain destination and to avoid waiting in a queue) – again a consideration for this application given the queues brought about by the railway crossing closures.

Such delays might be classed as severe, typically requiring traffic management measures in an attempt to mitigate.

In-line with good planning practice and guidance, the responsibility for resolution of such matters associated with a development proposal rests with the applicant. The applicant has not provided assessment of vehicular impact of the development on queueing on Lidsey Road. However, in terms of a 'test', the Highway Authority considers that it should object if at least one junction (or link thereto) is congested after development and mitigation and is worse off than without development. In this case there is already congestion at certain times of the day along the A29 caused by the railway crossing. Even with mitigation the development adds to this queuing and subsequent delay to traffic.

Paragraph's 60-64 of the Inspector's Appeal Decision Notice for AL/69/11 for the nearby Woodgate Centre included discussion and conclusions about the impact of the development on queueing. Paragraph 60 states the likely impact of 100 homes (the subject of that application) would increase peak queues by about seven vehicles, or about 40m in length. The result would then be instead of a single vehicle waiting to cross the railway when the gates rise there would be three or four. While the later application (AL/60/12) sought permission for 15 less homes, the impact on the queue length (including any markings and other alterations on the A29) would be similar.

Although the applicant has not undertaken a similar exercise, the Highway Authority concludes that the development proposed under this application would add further to the already significant queue lengths on the A29 – particularly in peak periods – and the impact should, therefore, be classed as severe. Furthermore (and as documented above), as no cumulative impact assessment appears to have been undertaken, the final impact on queueing and associated delays to vehicular and pedestrian traffic is not known.

Transport Sustainability.

The development site is located in the village of Woodgate which forms the southern part of an almost continuous ribbon development northwards along the A29 and eastwards along the B2223 comprising the villages of Westergate, Eastergate and Barnham. It is remote from existing major employment centres in Bognor Regis, Chichester and Littlehampton although there are a number of smaller local employment centres in the aforementioned villages. In terms of transport sustainability, the site is not well located being on the edge of the settlement boundary and remote

from the nearest railway station at Barnham. The level of bus service passing the site is also limited and the main cycle and pedestrian routes are along the busy A29. Cyclists have to share limited road space with other traffic. Pedestrians have to walk adjacent to traffic along the main road – in places where footways are narrow - and have only limited assisted ways to cross the A29.

An analysis of each mode of transport is as follows:

Bus Services – Bus stops are located immediately outside the site on Lidsey Road. Both the north and southbound stops are directly opposite one-another (albeit without facilities to assist pedestrians crossing to and from them). With regard to services, the 66A and 66C Stagecoach services operate along the A29 between 7.10am and 18.14pm. However, buses only call at the stops approximately once in the morning and evening peak periods and then every 1.5 hours (approx.) at other times (Mon-Fri). Also, the route only provides travel between Bognor Regis and Yapton (via Walberton). It does not provide a direct service to Chichester meaning that passengers intending to use public transport to get to destinations further-afield would have to change to another bus or use the railway, either at Barnham or Bognor Regis. The level of bus service to nearby key destinations is therefore infrequent and other than the two buses running at approximate ½ hour frequencies (albeit running opposite ways and only at very specific times) less than the desirable regular half hourly service WSCC refer to in its TA Methodology.

The new Technical Note prepared by the applicant's transport consultants makes reference in paragraph 2.20 to several other bus services, namely:

- 85
- 85A
- 228*
- 658, and
- 665

With regard to service frequencies and where they call, the 85 and 85A - Chichester – Westergate – Arundel – run approximately two hourly Mondays to Saturdays (WSCC Contracted). The 658 - Chichester – Westergate (School service), provides one return journey on schooldays. The 665 - Littlehampton – Westergate – Chichester - is again a school service and again runs one return journey on schooldays.

(*228 was a closed school contract not open to the general public and no longer exists).

Two important points to note here are (1) that services are generally infrequent – particularly the school services and, (2) that they start and finish at Westergate, adjacent to the Ormiston Six Villages Academy. This means that to access them on-foot would require a 1.4km walk or, if transport was used, to get a lift there either by car or to try to use the 66 service to try to coincide with those other services. Bearing in-mind the recommended maximum walking distances of around 400-500 metres to reach a frequent service (or services), the 1.4km from the site somewhat exceeds this. Taking these constraints together, these other services provide little assistance to the site in sustainability terms.

Bus Infrastructure - No bus shelters or realtime passenger information displays are located close to the site. If planning permission were to be secured for this site, the Highway Authority recommend that as part of any mitigation package that bus shelters and real-time passenger information be secured. Furthermore, provision for pedestrians to cross the road between stops should also be considered.

In the absence of regular bus services and suitable associated infrastructure (i.e. waiting facilities, real-time information, crossing facilities etc.), the Highway Authority considers that there is conflict with National Planning Policy Framework (NPPF).

Cycling - The immediate area surrounding the proposed new development is not well provided for in terms of off-road and/or segregated cycling routes. Cyclists would therefore have to use part of the busy A29 to gain access to most employment centres and local facilities including Aldingbourne Primary School and Westergate Community College to the north. The A29 Lidsey Road south of Lee's Yard leading to Bognor Regis and its industrial estates is largely rural in nature, unlit and has a series of tight bends with restricted visibility close to the location of the old canal. No footways are present between Lee's Yard (found south of the site) and Marigold's Caravan Park – the latter found approximately opposite the Robin Hood public house. There is no off-road cycle infrastructure until one reaches the Bognor Regis/Felpham Relief Road found further south. As a consequence and given the amount of traffic present, which includes considerable numbers of large vehicles such as HGVs, PSV's, service and delivery vehicles, the route does not cater well for non-motorised users. Although footways are available outside (narrow – approximately 1.0m wide) and north of the site (variable widths), width of road, presence of on-street car parking (particularly north of Aldingbourne Primary School) and high amount of traffic is not conducive to regular access on foot or by bicycle. Furthermore (and also north of the site), lack of opportunities to cross the road using refuges also prevail. Finally, delays brought-about by the regular closures of the railway crossing also contribute to longer journey times.

Given the above, the Highway Authority considers that there is again conflict with the NPPF.

Rail - The nearest railway station to the proposed development is located in Barnham, approximately 4km away by road. Given this distance, it is unlikely that residents would walk to the station. As such, they would have to use either the bus service; cycle along the busy A29, get dropped-off at the station or use their private car and park at the station (or close to). Currently, the car park serving the station, as well as the side-roads in the immediate vicinity, experiences a high volume of parked cars on weekdays due to commuter traffic. Encouraging further personal vehicular traffic to travel to the site is therefore not desirable, leading to further congestion and inconvenience for all highway users in the vicinity.

Given the above, the Highway Authority considers that there is again conflict with the NPPF. Bus services do travel to and from the station but given the infrequency of services, opportunities to use them to get to the station are limited.

Pedestrians and Local Services - Due to location of the site, there are limited local facilities in the immediate area. Those within a short walking distance are Aldingbourne Primary School, a local convenience shop, 'The Prince of Wales' public house, and further north, the Aldingbourne Community Centre. Furthermore, children attending Aldingbourne Primary School and Ormiston Six Village Academy further north would be more likely to be dropped off/picked up by private car given the lack of bespoke crossing facilities to assist crossing Lidsey Road for the latter. The high frequency of railway crossing closures (and associated length of barrier 'down time') also delay pedestrian access journey times to local facilities. Also and as mentioned earlier in this report, parts of the footways network found alongside Lidsey Road are narrow and are often obstructed by parked vehicles to the detriment of those wishing to travel on-foot.

Given the above, there is again conflict with the NPPF. The lack of suitable pedestrian facilities was identified previously by the Highway Authority in connection with the previous Woodgate Centre planning applications and reiterated at the subsequent Planning Appeals. This was acknowledged by the Inspectors when considering the latter.

Travel Plan.

A Travel Plan accompanies the application. Without prejudice to the comments presented elsewhere in this report by the Highway Authority – particularly with respect to sustainable travel choices and access - the following comments are made:

1. The Travel Plan provides very little commitment to and/or information about the measures that will be provided and the mechanism for delivery etc.
2. The Travel Plan does not appear to contain trip rate reduction targets in accordance with WSCC requirements. Any successful plan should demonstrate modal shift milestones that will need to be reached in order to achieve a 5 year trip rate reduction figure and how they would assist with reducing private travel and traffic impact.
3. No commitment is given to vouchers being provided to residents (WSCC currently request that £150 vouchers be offered to new households towards bus travel, cycle purchase etc.).
4. Grocery home delivery services should be incentivised (e.g. x% off first shop) and a voucher included in the welcome pack.
5. No commitment to, and details about, recovery measures that would be implemented in the event that targets are missed. Examples might be to provide personal journey planning services; incentives to existing residents within 1km of this development and an additional round of travel/bike vouchers.
6. The Highway Authority prefers an experienced external consultant in the role of Travel Plan Coordinator (TPC). The TPC's role should also include provision of a Personal Journey Planning service to all residents of the development.
7. The plan includes statements about the site being accessible which are in conflict with Highway Authority comments in this report. These should be removed. Any comments contained in the plan should be factual stating how they would (in the opinion of the applicants/their consultants) assist with delivering modal shift.

It should be noted, however, that even if a Travel Plan and measures therein could be agreed for this site, they themselves would not overcome the full sustainable deficiencies of the site as documented in this report. It would very much only remain as a tool to support a development where access by sustainable modes cannot be demonstrated.

The applicant's Transport Consultant has replied saying that as the submitted Travel Plan is of a 'Framework' nature, full details will be worked-on with WSCC at any full planning application stage. In the absence of further detailed information at this stage (and still without prejudice to the case made by the CHA in this report), if this outline application is approved, the CHA recommends that a suitable planning condition be attached to any consent to secure an appropriately detailed TP containing – amongst other things – the measures and recommendations made in points 1-7 above and that it be provided before any dwellings are occupied.

Internal layout and parking.

Although not forming part of the detailed submission for this application, the Highway Authority makes the following observations about the internal layout. If this current application is successful, the applicant should attend to what is said below (list should not be considered exhaustive):

- There appears to be lack of convenient visitor parking throughout the layout.

- Turning for vehicles – particularly service vehicles – is lacking in certain areas of the site. This could make it difficult to access dwellings for purposes of refuse collection and, more importantly, fire appliance access.
- Given the proposed form of drainage (permeable surfacing etc.) and surfacing proposed for footways inside the development, both the internal roads and footpaths will not be adopted by the Highway Authority and will need to remain private.
- In-line with the previous point, a management company would need to be secured in a S106 Agreement for maintenance of the development (particularly roads and footways etc.) in perpetuity.
- Again in-line with comments made above, a non-adoption clause would also need to be included in any S106 Agreement to prevent post-development adoption.

Public Rights of Way (PRoW).

Comments will be sent directly from the PRoW team to the LPA.

Surface water drainage.

Comments will be sent directly from the drainage team to the LPA.

Other material considerations.

Following refusal of two planning applications for residential development at the nearby Woodgate Centre proposed under planning references AL/69/11 and AL/60/12, Planning Appeals were lodged followed by Planning Inquiries. Both Inspectors considered a number of matters relating to that site, some of which were highway-related. It is noteworthy that a number of the reasons for refusal put forward by the Highway Authority were upheld at these Appeals. Consequently, both Appeals were dismissed.

In its assessment of this current application, the Highway Authority considers that a number of highway-related safety, capacity and sustainability issues have been identified, similar if not the same as those for the Woodgate Centre. As such, a number of conflicts exist with the NPPF.

Arun Local Plan.

Little reference is made to the forthcoming Arun Local Plan and no consideration of the impact the development will have on the allocations for Woodgate, Eastergate, Westergate, nor what it would contribute towards any Strategic Infrastructure Package associated with the Local Plan allocation. In the absence of this information, the full impact of the development cannot be known.

Pre-application submission.

Highways pre-application advice was sought by Transport Consultants RGP back in 2014 (the same highway consultants now representing the applicant for this planning application). This referred to holiday accommodation initially but moved to discussion about full-time/permanent dwellings. The comments expressed at that time in email dated 4th November 2014 (Dominic Smith WSCC to Alex Budd RGP) were as follows:

***“Our position on this aspect is in respect to the site being for tourist purposes, where the nature of such sites reduces the number of ‘short’ trips to local services – i.e., no school run, no employment journeys etc. This is reflected in the TRICS assessment where the daily trip rate is approximately 1/3rd of that expected for a residential development of a similar scale.*”**

Clarification is sought as to whether the site would benefit from a small retail offering essential goods, such as milk, bread etc. for its customers.

In the event that the site is to be used as full-time residential accommodation we would have concern regarding site sustainability. Our position on this would not differ from the recently refused 'Woodgate Centre' development to the east of Lidsey Road. This was refused on sustainability grounds and upheld at appeal – there have been no material changes to the local infrastructure since this time.

The Highway Authority's current position on this matter remains the same as the comments underlined above.

Conclusion.

The Highway Authority has concerns regarding access to the proposed development. It therefore raises objections to the proposal on the grounds that it is not demonstrated that the development can be satisfactorily accommodated in highway safety and traffic impact terms nor can it be accessed in a sustainable way in accordance with current guidance and best practice. The latter will place reliance on the need to travel to facilities and services using private means (predominantly cars), many of which are not particularly close to the site or at times, difficult to reach because of the regular closures at the nearby railway crossing. Public transport access is infrequent and alongside the access shortcomings identified in this report, including that for pedestrians and cyclists including lack of suitable infrastructure (bus stops, real-time information etc.), conflicts with the NPPF on these points have been identified.

For the reasons given in this report, the Highway Authority raises objections on the following grounds:

1. Sustainable access to and from development.

The proposed development has, in places, substandard walking and cycling infrastructure in proximity to it providing only limited opportunities for sustainable access to employment, retail, schools and community facilities – some of which are some distance away from the site and limited in terms of number and what they provide. This requires such users to negotiate the often busy and, in places, narrow A29 and to traverse distances often in-excess of recommended guidance to reach such destinations and/or frequent bus and rail services – the latter to reach larger employment and retail centres - thereby resulting in reliance on travel by private means (most likely car). This is further exacerbated by the regular down-time of the railway crossing gates which cause delay to travel, thereby extending travel times; all of which is not conducive to such means of travel and contrary to National and Local Planning Policy Guidance.

2. Access.

Satisfactory junction design has not been demonstrated at the junction with A29 Lidsey Road at the point the site joins that road, which would lead to conditions detrimental to highway safety.

3. Traffic impact.

The development, hereby proposed, would result in an increase in traffic to and from the A29 Lidsey Road, adding to the already long queues on that road caused by the regular railway crossing closures, which would result in conditions further prejudicial to the free-flow of traffic in the locality.

4. Cumulative traffic impact.

The cumulative traffic impact of the development has not been demonstrated by the applicant alongside Local Plan allocations (DRAFT or otherwise) and other committed developments. Therefore it is not known what the final level of traffic impact of the development would be/have on the surrounding area, contrary to planning policy guidance.

Tim Townsend
Planning Services

**WEST SUSSEX COUNTY COUNCIL
LOCAL DEVELOPMENT DIVISION: SECTION 106 CONSULTATION RESPONSE (excluding
Transport (known as TAD) contributions)**

DATE: 1st November 2017

FROM: Eloise Short, Monitoring and Records Team

TO: Tim Townsend, Planning Applications Team

DISTRICT COUNCIL: Arun

Application Number: AL/115/17

**The Provision of Service Infrastructure Related to: Wings Nursery, Lidsey Road,
Aldingbourne, PO20 3SU**

Planning Application details – Outline application with some matters reserved for the erection of 55No. dwellings, sustainable drainage measures, public open space, children's play area, landscaping & all other associated works. This application is a Departure from the Development Plan.

Without prejudice to the informal representations of the County Council in respect of the above planning proposal, I am writing to advise you as to the likely requirements for contributions towards the provision of additional County Council service infrastructure, other than highways and public transport that would arise in relation to the proposed development.

The basis for my advice is contained in the adopted Supplementary Planning Guidance document "The Provision of Service Infrastructure Related to New Development in West Sussex – Part 1.

The planning obligation formulae below are understood to accord with the Secretary of State's policy tests outlined by the in the *National Planning Policy Framework, 2012*.

The advice is as follows:

1. School Infrastructure Contribution

- 1.1 The Director for Children and Young People's Services advises that it appears that at present primary/secondary/further secondary schools within the catchment area of the proposal currently would not have spare capacity and would not be able to accommodate the children generated by the assumed potential residential development from this proposal. Accordingly, contributions would need to be requested. However, the situation will be monitored and further advice on all of the main education sectors, (i.e. Primary/Secondary/Further Secondary) should be sought if this planning application is to be progressed.

1.2 Financial Contribution

The financial contribution sought by the County Council would be based on: the estimated additional population that would be generated by the proposed development, reduced to reflect any affordable dwellings (by which we mean Social Rented dwellings, but NOT

Shared Equity, Intermediate or Key Worker status dwellings) for occupation by persons already residing in the education catchment area; the County Council's adopted floorspace standard for education provision; and the estimated costs of providing additional education floorspace. As the housing mix is not known at this stage, I propose the insertion of a formula into any legal Agreement in order that the school infrastructure contribution may be calculated at a later date. The formula should read as follows:

The Owner and the Developer covenant with the County Council that upon Commencement of Development the Owner and/or the Developer shall pay to the County Council the School Infrastructure Contribution as calculated by the County Council in accordance with the following formula:-

DfE Figure x ACP = School Infrastructure Contribution where:

Note: x = multiplied by.

ACP (Additional Child Product) = The estimated additional number of school age children likely to be generated by the development calculated by reference to the total number of dwellings, less any allowance for affordable dwellings, as approved by a subsequent reserve matters planning application. The following criteria are used to generate a child product:

Dwelling Size		Occupancy	
		House	Flat
1 bed	=	1.5	1.3
2 bed	=	1.9	1.9
3 bed	=	2.5	2.4
4+ bed =	3.0	2.8	

Using the above occupancy rates to determine an overall population increase the following factors are applied. According to 2001 census data, there are 14 persons per 1000 population in each school year group for houses and 5 persons per 1000 population in each school year group for flats. There are 7 year groups for primary (years R to 6) and 5 for secondary (years 7 to 11). For Sixth Form, a factor of 0.54 is applied to the Child Product figure as this is the average percentage of year 11 school leavers who continue into Sixth Form colleges in West Sussex.

DfE Figure = Department for Education (DfE) school building costs per pupil place (for pupils aged 4 to 16) as adjusted for the West Sussex area applicable at the date when the School Infrastructure Contribution is paid (which currently for the financial year 2017/2018 are – Primary £15,666, Secondary £23,604, Further Secondary £25,600), updated as necessary by the Royal Institute of Chartered Surveyors Building Cost Information Service All-In Tender Price Index.

- 1.3 The contributions generated by this proposal shall be spent on additional facilities at Aldingbourne CofE Primary School.

The contributions generated by this proposal shall be spent on additional facilities at St Philip Howard Catholic High School.

The contributions generated by this proposal shall be spent on a restructure of the sixth form to cater for the additional student population at St Philip Howard Catholic High School Sixth Form.

2. Library Infrastructure Contribution

- 2.1 The County Librarian advises that the proposed development would be within the area served by Bognor Regis Library and that the library would not currently be able to adequately serve the additional needs that the development would generate.

However, a scheme is approved to provide additional floorspace or facilities at the library. In the circumstances, a financial contribution towards the approved scheme would be required in respect of the extra demands for library services that would be generated by the proposed development.

2.2 Financial Contribution

The financial contribution sought by the County Council would be based on: the estimated additional population that would be generated by the proposed development, reduced to reflect any affordable dwellings (by which we mean Social Rented dwellings, but NOT Shared Equity, Intermediate or Key Worker status dwellings) for occupation by persons already residing in the library's catchment area; the County Council's adopted floorspace standard for library provision; and the estimated costs of providing additional library floorspace. As the housing mix is not known at this stage, I propose the insertion of a formula into any legal Agreement in order that the library contribution may be calculated at a later date. The formula should read as follows:

The Owner and the Developer covenant with the County Council that upon Commencement of Development the Owner and/or the Developer shall pay to the County Council the Libraries Infrastructure Contribution as calculated by the County Council in accordance with the following formula:-

$L/1000 \times AP = \text{Libraries Infrastructure Contribution}$ where:

Note: x = multiplied by.

AP (Additional Persons) = The estimated number of additional persons generated by the development calculated by reference to the total number of dwellings, less any allowance for affordable dwellings, as approved by a subsequent reserve matters planning application. The following figures are given as a guideline:

Dwelling Size		Occupancy	
		House	Flat
1 bed	=	1.5	1.3
2 bed	=	1.9	1.9
3 bed	=	2.5	2.4
4+ bed =	3.0	2.8	

$L/1000$ = Extra library space in sqm. per 1,000 population x the library cost multiplier (which currently for the financial year 2017/2018 are 30sq.m and £4,591 per sqm respectively).

- 2.3 The contributions generated by this proposal shall be spent on expansion of the facilities at Bognor Regis Library.

3. Fire & Rescue Service Infrastructure

3.1 Fire Stations

The County Fire Officer advises that a financial contribution from the proposed development towards the cost of fire and rescue infrastructure, principally fire stations and services serving the area within which the proposal stands, would be required. This is necessary due to proposed development in the Southern division and the resultant need to improve service provision across the area. The proposed development should proportionately contribute towards the cost of necessary infrastructure needed to support development.

3.2 Financial Contribution (excluding provision of fire hydrants)

The financial contribution sought by the County Council would be based on: the estimated additional population that would be generated by the proposed development, reduced to reflect any affordable dwellings (by which we mean Social Rented dwellings, but NOT Shared Equity, Intermediate or Key Worker status dwellings) for occupation by persons already residing in the fire service provision area; the County Council's adopted standards of fire service cover provision; and the estimated costs of providing additional fire stations. As the housing mix is not known at this stage, I propose the insertion of a formula into any legal Agreement in order that the fire service contribution may be calculated at a later date. The formula should read as follows:

The Owner and the Developer covenant with the County Council that upon Commencement of Development the Owner and/or the Developer shall pay to the County Council the Fire and Rescue Infrastructure Contribution as calculated by the County Council in accordance with the following formula:-

$Y \times (Z / M)$ = Fire and Rescue Infrastructure Contribution where:

Note: / = divided by, x = multiplied by.

Y = The estimated adjusted increase in population generated by the development using the following figures as a guideline:

Dwelling Size		Occupancy	
		House	Flat
1 bed	=	1.5	1.3
2 bed	=	1.9	1.9
3 bed	=	2.5	2.4
4+ bed =	3.0	2.8	

Z = the estimated costs of providing additional Fire and Rescue Infrastructure in the Southern Service Division of West Sussex at the time of payment (which, for information, for 2007/2008 was £5,530,000).

M = the projected population of the Fire and Rescue Service Southern Service Division of West Sussex in 2016 at the time of payment (which, for information, for the 2007/2008 financial year was 429,647).

- 3.4 Fire and Rescue Service Contribution to be used towards supply and installation of additional fire safety equipment to vulnerable persons homes in West Sussex Fire Rescue Services Southern Area serving Aldingbourne.

General points

Please ensure that the applicants and their agents are advised that any alteration to the housing mix, either size, nature or tenure, may generate a different population and require re-assessment of contributions. Such re-assessment should be sought as soon as the housing mix is known and not be left until signing of the section 106 Agreement is imminent.

It should be noted that the figures quoted in this letter are based on current information and will be adhered to for 3 months. Thereafter, if they are not consolidated in a signed S106 agreement they will be subject to revision as necessary to reflect the latest information as to cost and need.

Review of the contribution towards the provision of additional County Council services should be by reference to an appropriate index, preferably RICS BCIS All-In TPI. This figure is subject to annual review.

Should you require further general information or assistance in relation to the requirements for contributions towards the provision of County Council service infrastructure please contact, in the first instance, the Planning Applications Team officer, named above.

Where the developer intends to keep some of the estate roads private we will require provisions in any s106 agreement to ensure that they are properly built, never offered for adoption and that a certificate from a suitably qualified professional is provided confirming their construction standard.

Where land is to be transferred to the County Council as part of the development (e.g. a school site) that we will require the developer to provide CAD drawings of the site to aid design/layout and to ensure that there is no accidental encroachment by either the developer or ourselves.