

TECHNICAL NOTE

WINGS NURSERY, LIDSEY ROAD, WOODGATE, WEST SUSSEX

Response to West Sussex County Council Highway Comments.

Date: December 2017

Ref: ADMA/17/3711s

1 INTRODUCTION

- 1.1 This Technical Note has been prepared by Russell Giles Partnership Ltd (RGP) in response to West Sussex County Council's (WSCC) formal consultation response regarding the planning application (ref.AL/115/17/OUT) for residential development and associated access on land to the west of the A29 Lidsey Road, Woodgate, West Sussex. WSCC's highways comments are attached at **Appendix A** for reference.
- 1.2 The highways comments raised objection to the development proposal on the following grounds:-
 - i. Sustainability
 - ii. Access
 - iii. Highways Safety
 - iv. Traffic Impact
- 1.3 This Technical Note sequentially reviews the WSCC highways consultation response rebutting the comments and identifying the deliverability of the scheme.

2 CONSULTATION RESPONSE REVIEW

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 given the number of dwellings proposed, any blocking-back would create delays leading to emerging vehicles queueing within the estate.

- 2.1 The manoeuvre suggested whereby vehicles bypass queuing traffic on the site's primary access by driving on the wrong side of the road relies on an assumption that:-
- i. Drivers would habitually contravene the rules of the road
 - ii. That there is sufficient evidence this manoeuvre frequently occurs and is causing safety issues.
- 2.2 It is consider unlikely that this manoeuvre would be ordinarily attempted and therefore not a material safety concern. Highways design cannot take account for anomalous driving behaviour. The PIA incident data reveals a single incident associated with a similar manoeuvre, this is however a standalone incident that cannot be considered statistically significant. To enable right turns out of the site and avoid any perceived issues associated with potential flow restriction we have shown a right turn exit lane in the attached drawings.
- 2.3 It must also be recognised that queuing associated with the crossing barriers is not a junction or carriageway capacity issue. Whilst queuing will occur as a consequence of the crossing, the actual design capacity of the junction and carriageway is sufficient in normal free flow conditions (60% of the time). The potential restriction in movement to and from the site is no different to other residential or commercial development that adjoins the A29 Lidsey Road in this locale. The site's peak hour trip generation is such that that any exacerbation of queueing is negligible (this is addressed in more detail subsequently in this Technical Note).

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.

- 2.4 Refuse servicing would occur infrequently, typically taking place once a week. Whilst it is recognised that refuse vehicles cannot pass a stationary car at the access junction, this is typical of junctions provided in line with local and national design guidance materials. The perceived complication caused by queuing associated with the crossing gates would be immaterial, the likelihood of a refuse vehicle arriving at the access point when cars are queued as a consequence of the level crossing barriers being down is extremely unlikely. It is also worth noting that RGP have tracked a Phoenix Duo Refuse freighter which is the largest commercial refuse freighter specification available – the actual refuse vehicle accessing the site is likely to be smaller and more manoeuvrable.

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.

- 2.5 Network Rail have been consulted on the full application by the local planning authority but have not responded. RGP did not consult Network Rail directly because the type and volume of traffic generated by the development proposal is of a level that would not typically be a material concern. The number of HGV movements generated by the proposal, which can have a detrimental impact on crossing points, would be negligible.

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).

- 2.6 The recommended measures within the Stage 1 Road Safety Audit have been accepted and changes accordingly made to the access as demonstrated in the attached drawings.

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.

- 2.7 The frequency, pattern and incident circumstances identified in the PIA data is such that there are no prevalent patterns of incident that are of concern. To suggest that a single incident involving circumnavigation of queued traffic is of statistical significance, and suggest there is a highways safety issue as a consequence is incorrect.

The Highway Authority has reviewed the information provided (including swept-path diagrams of vehicles entering and leaving the junction). Based on that provided, three 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.

- 2.8 This matter has been previously addressed in this response.

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.

- 2.9 This matter has been previously addressed in this response.

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.

- 2.10 The recommended measure in the Stage 1 Road Safety Audit has been accepted and identified in the attached drawings.

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.

2.11 A29 Lidsey Road is not a true DMRB environment in the vicinity of the site. The 30mph speed limit, presence of development frontage and footways on both sides of the carriageway, and street lighting provision means the proposal needs to be considered in line with Manual for Streets (MfS) design guidance.

2.12 Even if considered under DMRB criteria the site's AADT would not require a ghost island right turn lane and is therefore suitably served by a simple priority arrangement.

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.

2.13 The issues identified have all been justified in this report or mitigated where necessary.

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. However, no explanation of how the recommendations would be achieved is offered. Until such time as the designer provides appropriate replies and further information, the Highway Authority is not satisfied the Audit recommendations have been accepted.

- 2.14 The Stage 1 Road Safety Audit's standard designer's response identifies solutions to the problems raised, which in this case have all been accepted. The recommendations have where possible been shown within the attached drawings. The designer's response only requires description of alternative measures where the designer is proposing a different mitigating solution to that proposed within the Stage 1 Road Safety Audit.

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.

- 2.15 In order to keep TRICS data representative, the TRICS database updates every three months. As consequence there will always be discrepancy between TRICS assessments carried out at different times, even if the same filtering parameters are used. To use a TRICS assessment from 2012 associated with a different proposal would be unrepresentative of the site. The TRICS assessment provided in the Transport statement is representative and any further reference to trips in this response relates to the original assessment and not that proposed within WSCC's consultation response.

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 queueing 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.

- 2.16 As identified in WSCC's consultation response the crossing gates are down 40% (24mins) during the peak hour, whilst 60% (36mins) of the time the traffic is in free flow conditions. It is worth noting that the 40% barrier down time is not a single event and involves several separate crossing events in which traffic control is required. The inconsistency of these crossing events across the peak hour makes quantification of queue lengths associated with the site inaccurate.

- 2.17 Assuming a flat traffic arrival and departure flow profile to and from the site, it can be crudely quantified that 40% of the site's peak hour traffic flows would be effected equating to 13 vehicular movements. In terms of the potential increase to existing queue lengths this number would need to be divided by the number of separate barrier events and would be further diminished by the distribution of traffic as some vehicles would head south towards Bognor Regis. Considering these factors, the additional queuing traffic associated with the proposal is estimated to be in the order of 2 vehicles. It is considered that the extent of this impact cannot be defined as severe.

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 no assisted ways to cross the A29 which if provided, could provide some access opportunities to formal Public Rights of Way (PRoW) leading towards Barnham and its railway station.

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.

- 2.18 With reference to sustainability and accessibility, the NPPF identifies that different measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. The impact therefore has to be considered relative to its context - in this particular case on the rural / urban fringe.
- 2.19 It is recognised that the development's location means that accessibility credentials are not optimal, this does not however mean that the level of accessibility is inappropriate or that the residual cumulative impact is 'severe' and therefore contrary to the NPPF.
- 2.20 With reference to bus services, just north of the development site c. 1.3km (a c.12-15 minute walk) in Westergate, bus stops provide a significant number of services, the 66A, 66C, 85, 85A, 228, 658, and 665, provide links to Chichester, Arundle, Littlehampton, Bognor Regis, Yapton and Tangmere. It is therefore not accepted that the bus services are insufficient in this location.
- 2.21 In the immediate vicinity of the site the existing community is supported by convenience facilities, local schools, and leisure facilities. As demonstrated in Plan 01 (attached) the site provides pedestrian and cycle connectivity to these services. The applicant is happy to cooperate in providing crossing facilities as required by the LHA, where cost effective and the level of mitigation offered is justified.

- 2.22 Bus services provide links to Barnham Rail Station. Barnham station is a 'junction station' for the Bognor and Littlehampton Branch Lines and is a key transport hub in the area offering faster services to London terminals and Gatwick. The station offers an improved level of service by comparison to other local stations.

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.

- 2.23 The submitted Travel Plan is a Framework Travel Plan - targets and specific measures will be worked on in partnership with WSCC's Travel plan officer post any potential consent at full planning application stage.

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.

- 2.24 WSCC's previously raised concern dates back 3 years - without details of the proposal, unsupported by highway assessment, and in the context of the local refusals, this position is to be expected. Reliance cannot be placed on a response to different proposal - each site should be judged on its own merits within the current planning context and the assessment provided.

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

1. Unsustainable development.

The proposed development is contrary to National and local Planning Policy Guidance as it is not well located in terms of accessibility to employment centres, retail centres, schools, community facilities and regular bus and train services (further exacerbated as a result of the frequent railway crossing closures nearby).

- 2.25 With reference to sustainability and accessibility the NPPF identifies that different measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. The impact therefore has to be considered relative to its context - in this particular case on the rural / urban fringe. It is recognised that the development's location means that accessibility credentials are not optimal, this does not however mean that the level of accessibility is inappropriate or that the residual cumulative impact is 'severe' and therefore contrary to the NPPF as identified in this response.

2. Highway safety for pedestrians and cyclists.

The proposed development does not provide adequate pedestrian and cycle links to local facilities in the village or to the nearest major employment centres, retail centres, schools, community facilities nor bus infrastructure to the detriment of highway safety.

- 2.26 Pedestrian footways provide connectivity to the majority of services along the A29 heading into westergate. Whilst there is scope for upgrade, to which the applicant is happy to contribute, the majority of existing facilities are navigable to NMUs and not a safety issue.

3. Access.

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

- 2.27 The assertion of a 'severe' impact relies on the identification of anomalous hypothetical scenarios that might cause safety or operation issues. There is insufficient evidence from existing junctions and direct access points on to the A29 Lidsey Road in the vicinity of the site to suggest that there are material safety and operational concerns.

4. Traffic impact.

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

- 2.28 The additional queuing traffic associated with the proposal is estimated to be in the order of 2 vehicles. The extent of this impact cannot be defined as severe.

PLANS

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	SITE LOCATION
	RAIL STATION
	RAILWAY
	LOCAL BUS STOPS
	2KM WALKING ISOCCHRONE
	LOCAL CYCLEWAY
	LOCAL FOOTPATHS
	PEDESTRIAN CONNECTIVITY
	LOCAL AMENITIES



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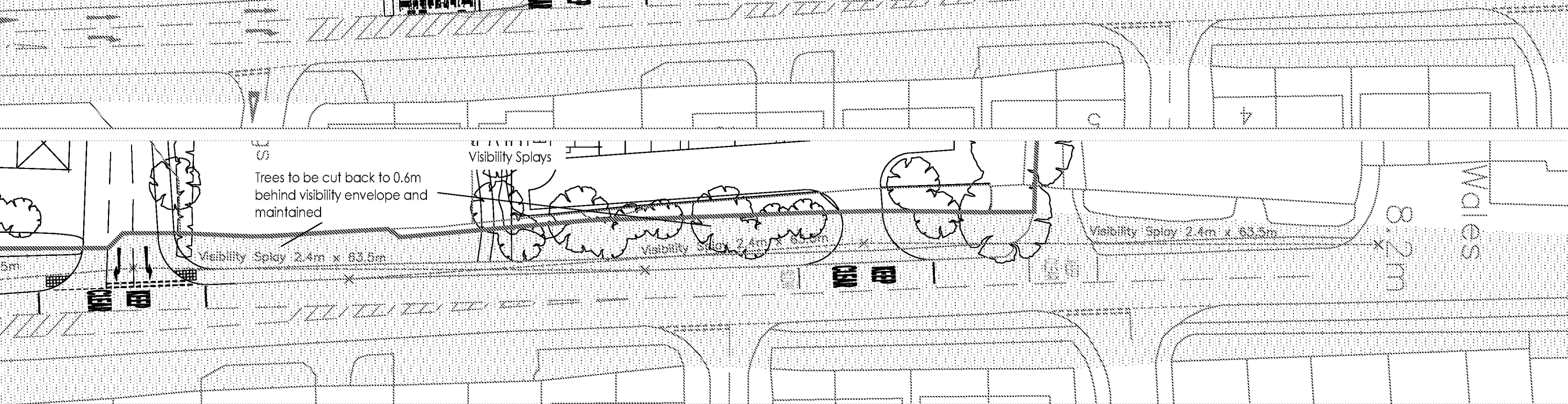
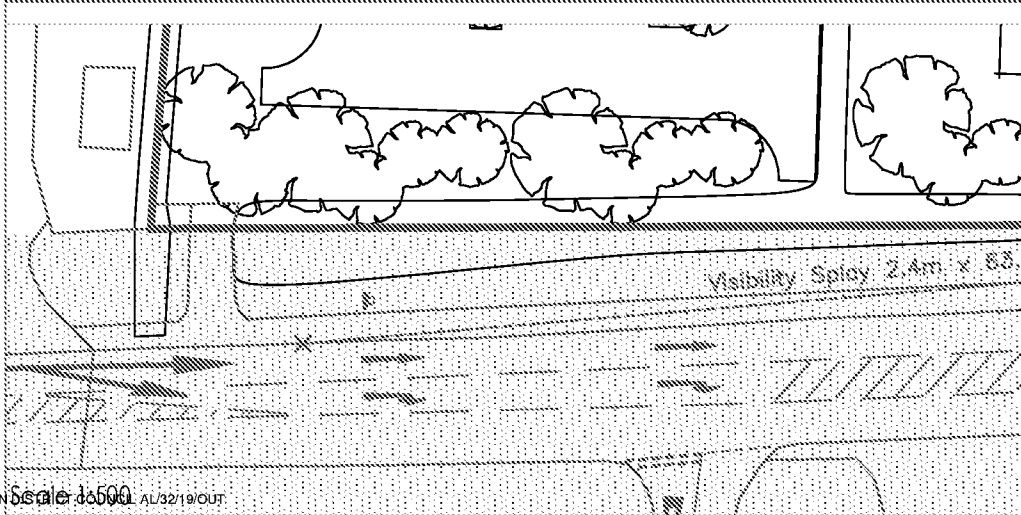
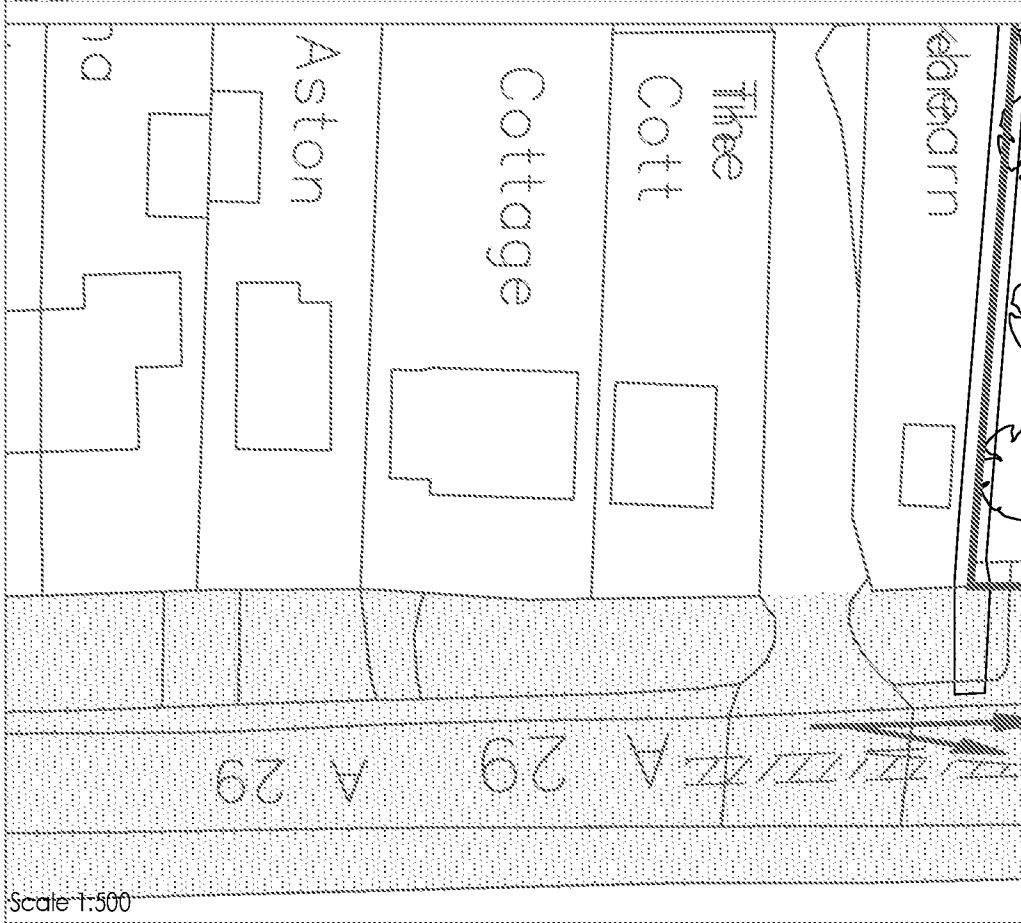
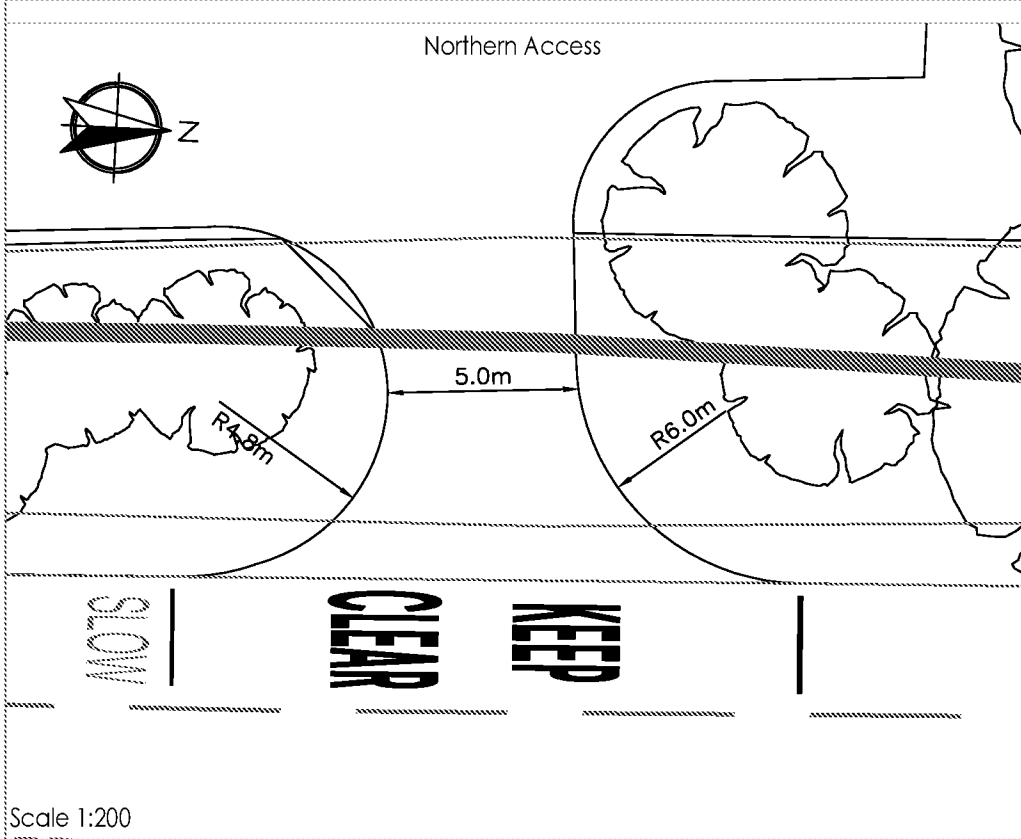
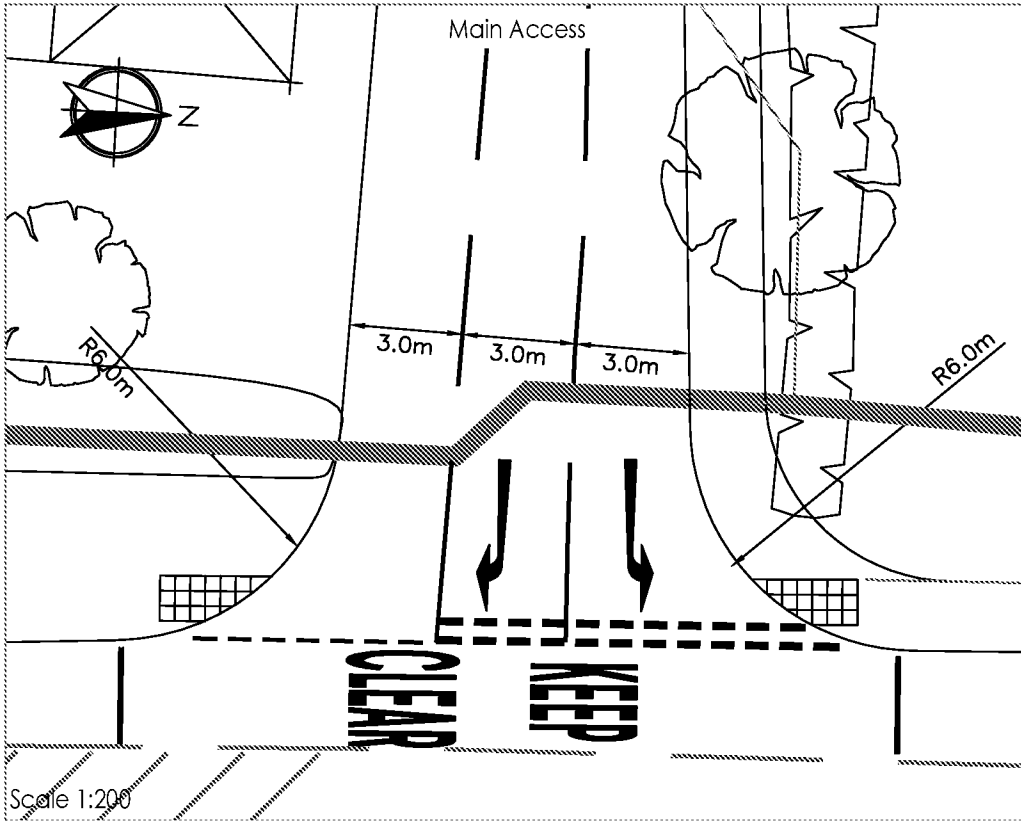
Wings Nursery, Lidsey Road

Site Location & Accessibility Plan

Scale: NTS

Rev:

DRAWINGS



-LEGEND-

- Site Boundary
- Proposed Road Makings
- Highway Boundary

Vehicle Dimensions

Vehicle	Overall Length	Overall Width	Overall Body Height	Min Body Ground Clearance	Max Track Width	Lock to Lock Time	Kerb to Kerb Turning Radius
0032 Private Car	4.23m	1.80m	1.42m	0.30m	1.80m	0.00s	9.00m
Phoenix 2 Duo (P2-15W with Elite 6x4 chassis)	12.00m	2.40m	3.00m	0.30m	2.40m	0.00s	9.00m

The mass is based on a representative form clearance in survey points with the permission of Cambridge University on behalf of the Cambridge of Her Majesty's Treasury Office (CJ).

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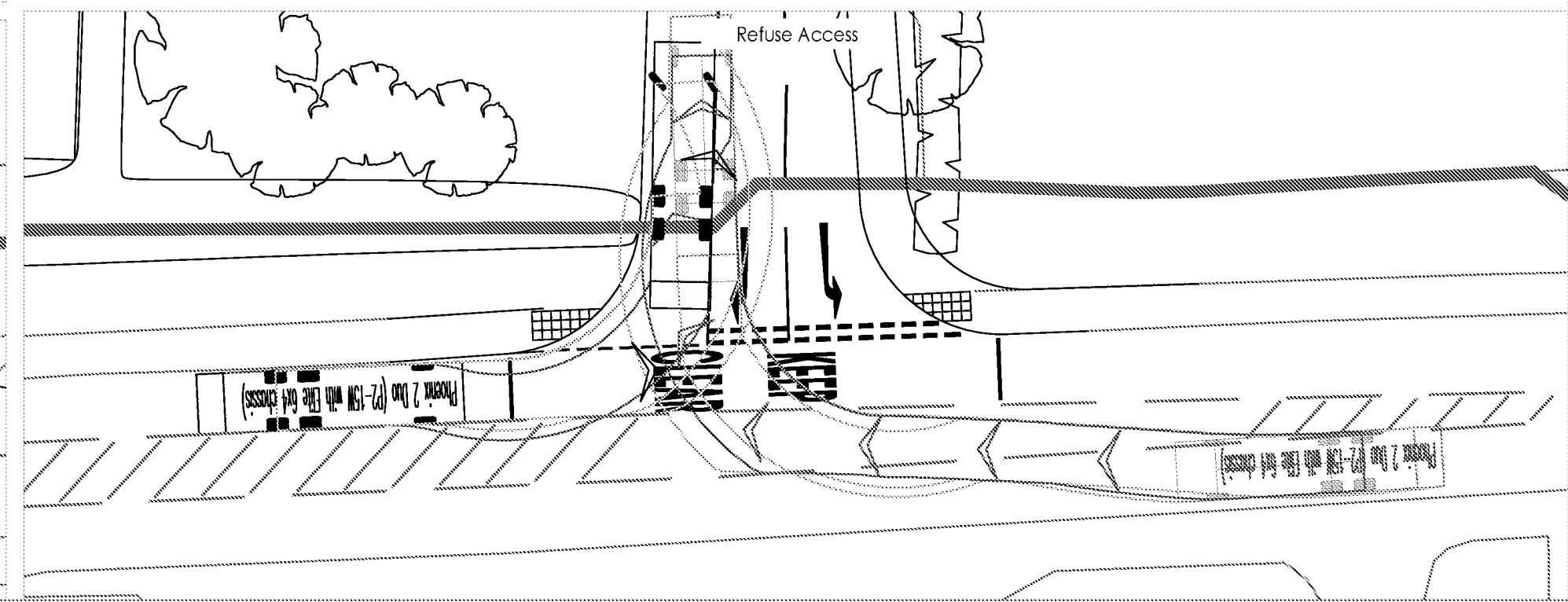
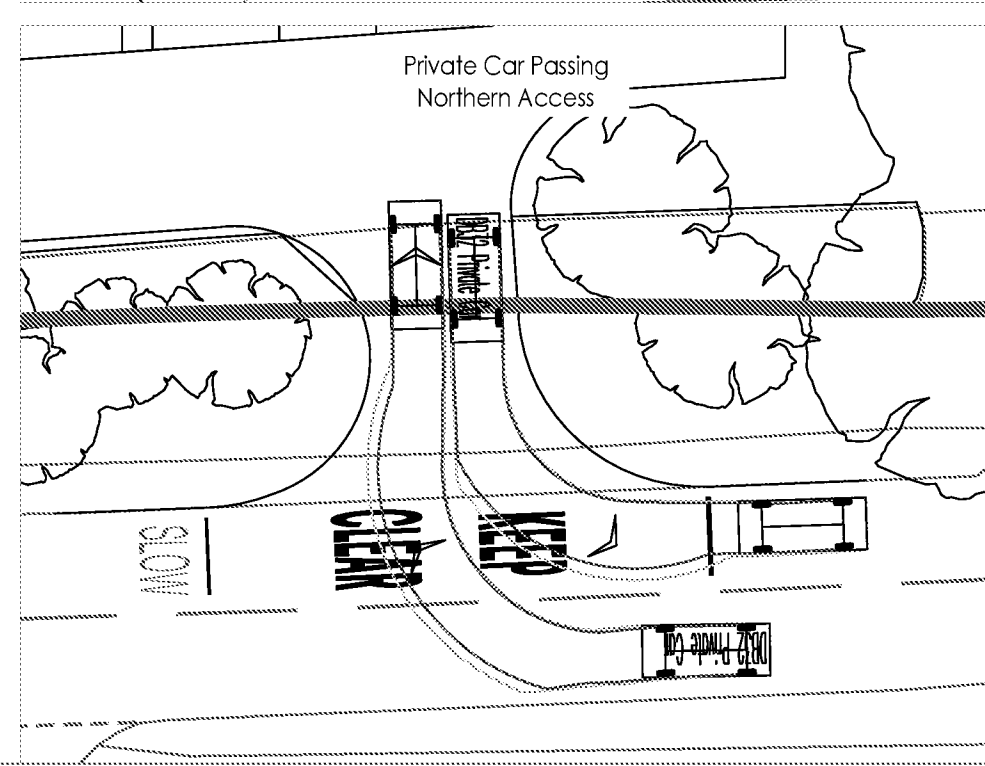
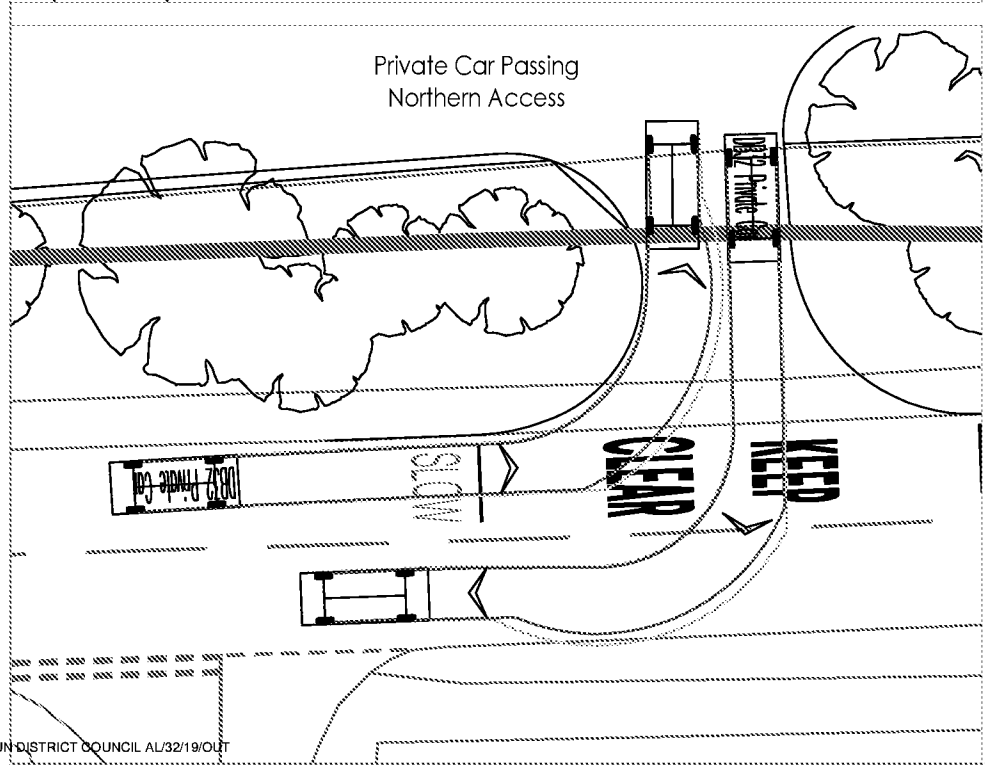
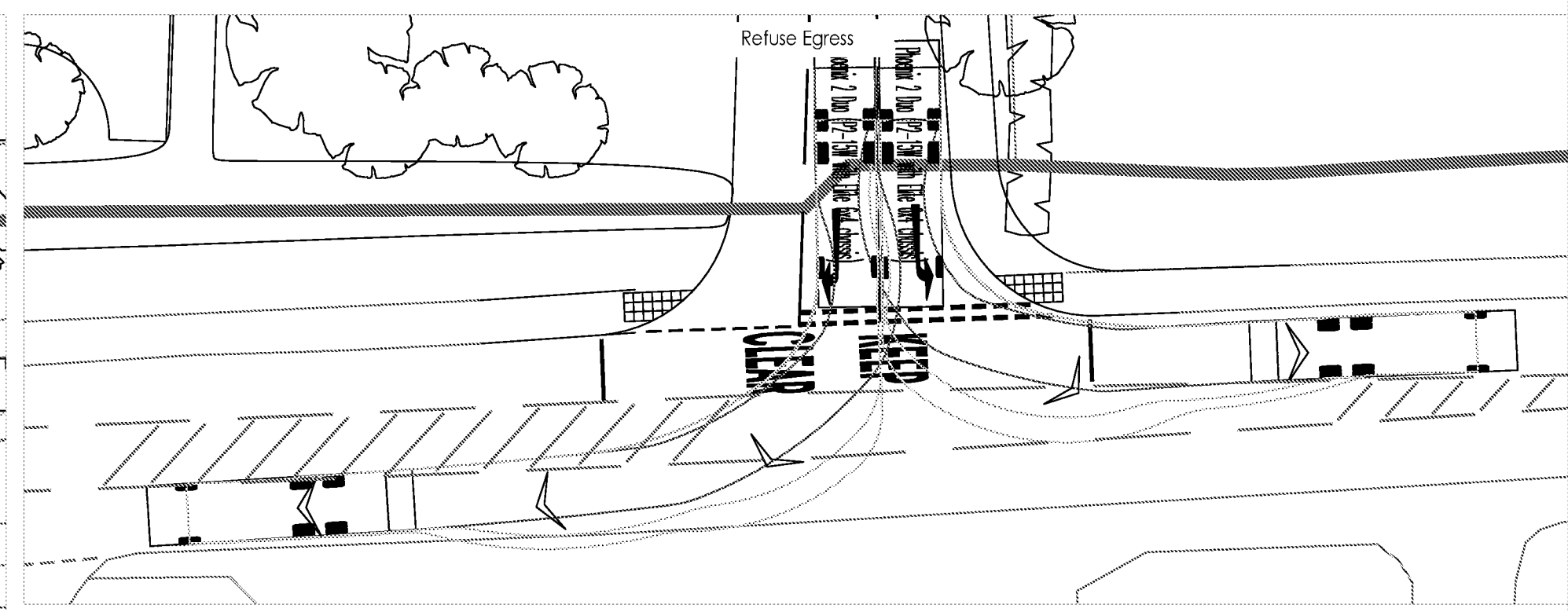
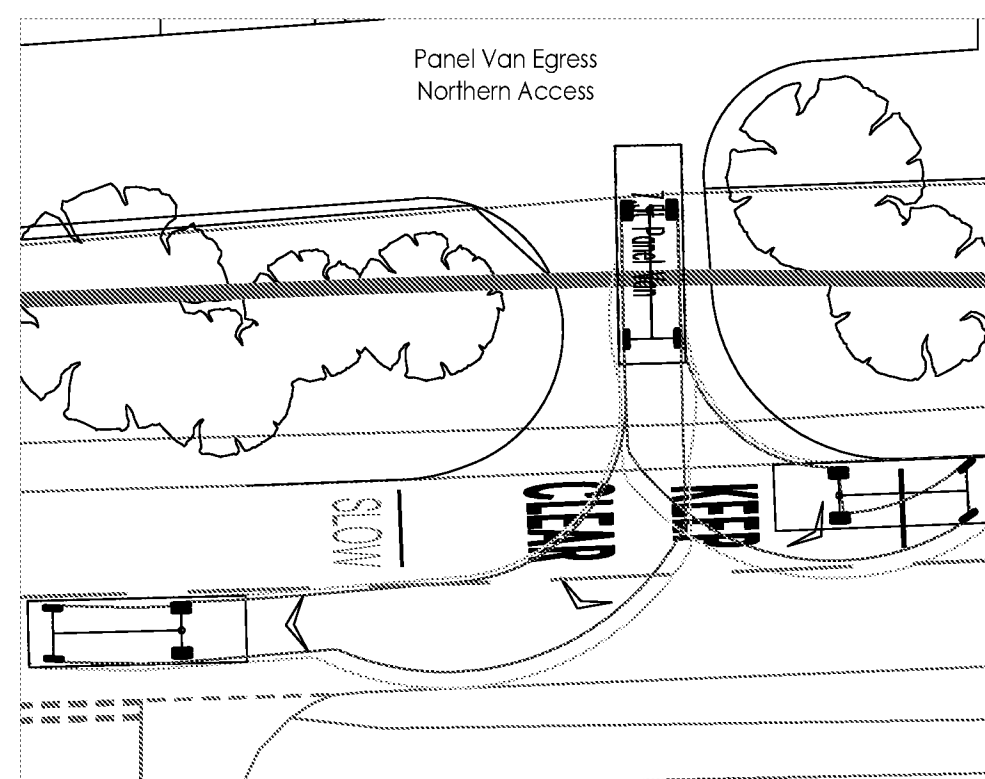
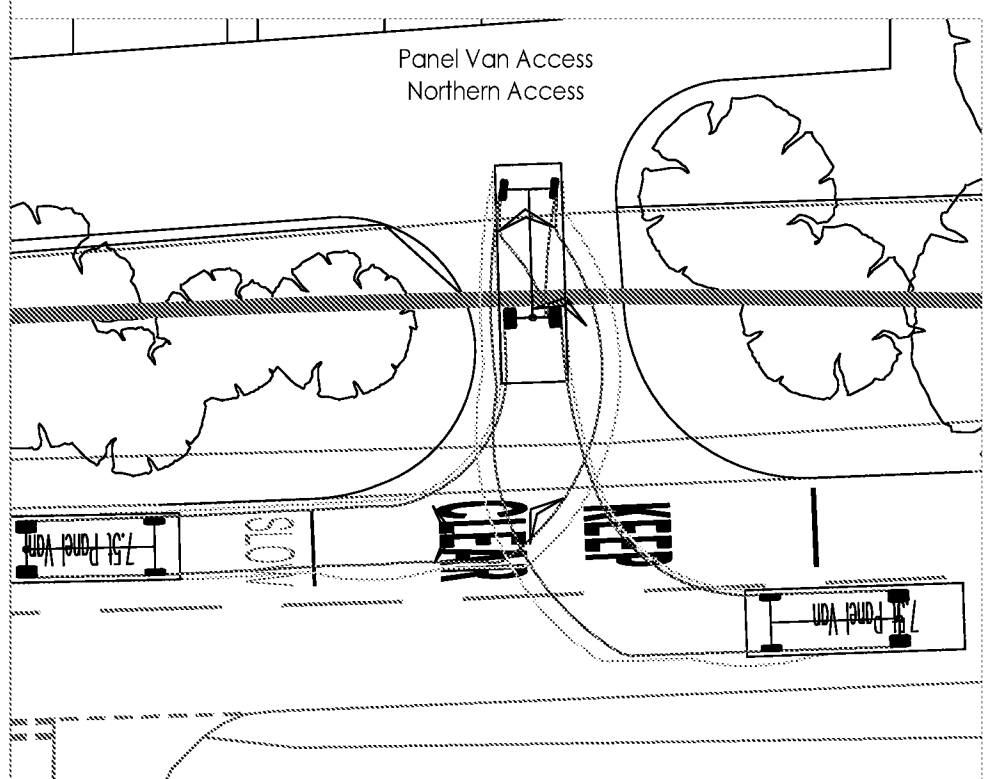
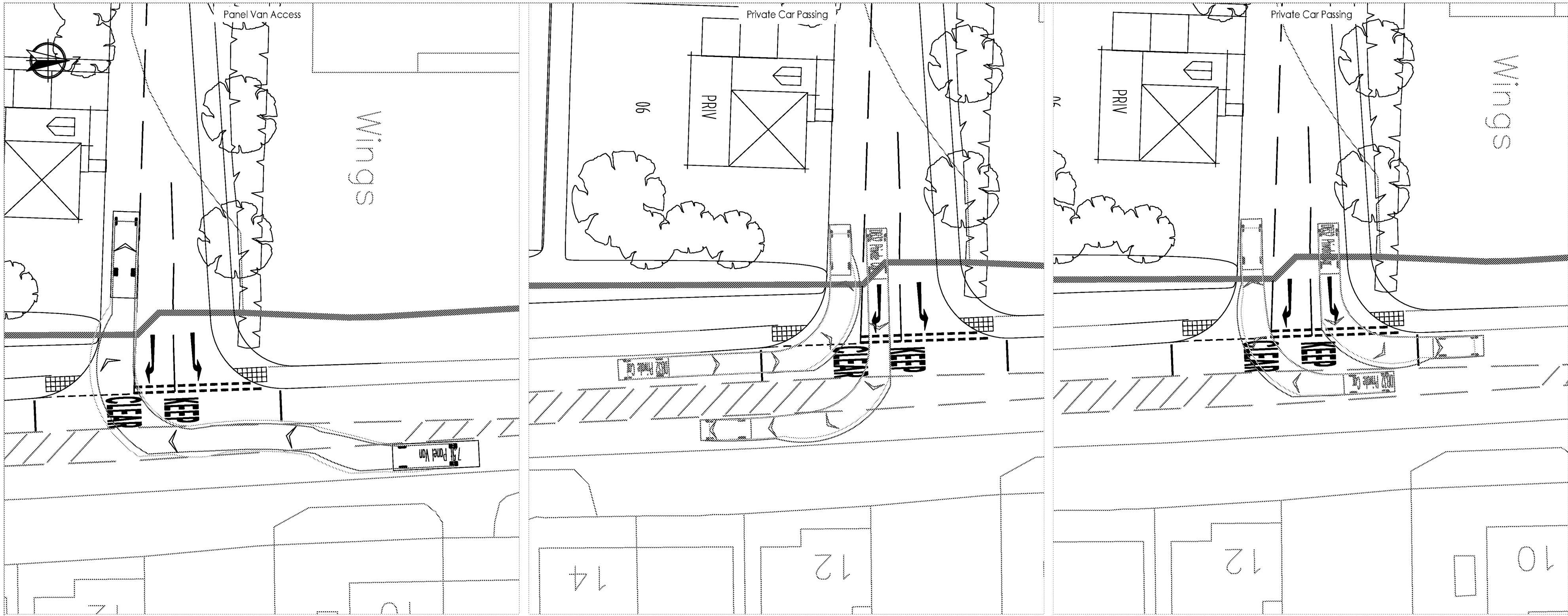
ADM Architects

Wings Nursery

Sweep Path Analysis and Visibility Spays

Varies @ A2 SMO ALB PMR

December 2017 2017/3711/001 C



-LEGEND-

- Site Boundary
- Existing Road Makings

DB32 Private Car

Overall Length	4.223m
Overall Width	1.970m
Overall Body Height	2.550m
Min Body Ground Clearance	0.318m
Track Width	1.860m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	5.760m

Phoenix 2 Duo (P2-15W with Elite 6x4 chassis)

Overall Length	11.200m
Overall Width	2.550m
Overall Body Height	2.550m
Min Body Ground Clearance	0.318m
Track Width	1.860m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	9.500m

7.5t Panel Van

Overall Length	7.210m
Overall Width	2.192m
Overall Body Height	2.550m
Min Body Ground Clearance	0.318m
Track Width	1.860m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	7.400m

The model is based on an independent firm Clearance in Survey (CIS) report with the permission of Clearance in Survey on behalf of the Council of Haringey's Planning Office (CPO).

Ground Clearance: 0.318m (Minimum) - 0.318m (Maximum) - 0.318m (Average)

The drawings are based on the Clearance in Survey report.

RGF accept no liability for any third parties with the data.

rgp

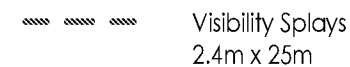
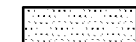
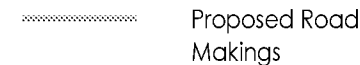
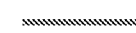
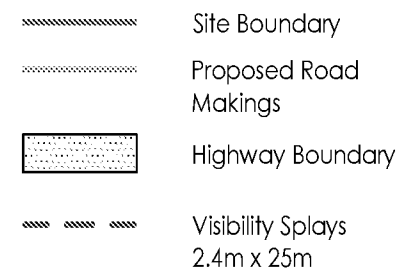
Transport Planning and Infrastructure Design Consultants
Specialist in the design of roads, bridges, and other infrastructure.
Tel: 01483 861881 Fax: 01483 861882 www.rgp.co.uk

ADM Architects

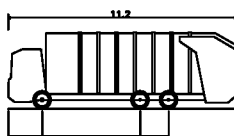
Wings Nursery

Swept Path Analysis

Scale	1:250	Drawn by	SMO	ALB	PMR
Date	December 2017	Checked by	2017/3711/002	C	



DB32 Private Car	
Overall Length	4.223m
Overall Width	1.715m
Overall Body Height	1.392m
Min Body Ground Clearance	0.233m
Max Track Width	1.629m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	5.780m



Phoenix 2 Duo (P2-15W with Elite 6x4 chassis)	
Overall Length	11.200m
Overall Width	2.530m
Overall Body Height	3.751m
Min Body Ground Clearance	0.504m
Track Width	2.500m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	9.500m

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Transport Planning and Infrastructure Design Consultant
 Zhongkehai (Shanghai) Engineering Consulting Co., Ltd.
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ADM Architects

Wings Nursery

Site Overview

1:500	Drawn By SMO	Checked By ALB	Approved By PMR
Date December 2017	Drawing No. 2017/3711/003		Rev. C

Site Overview

to be born

Chipmings Cottage

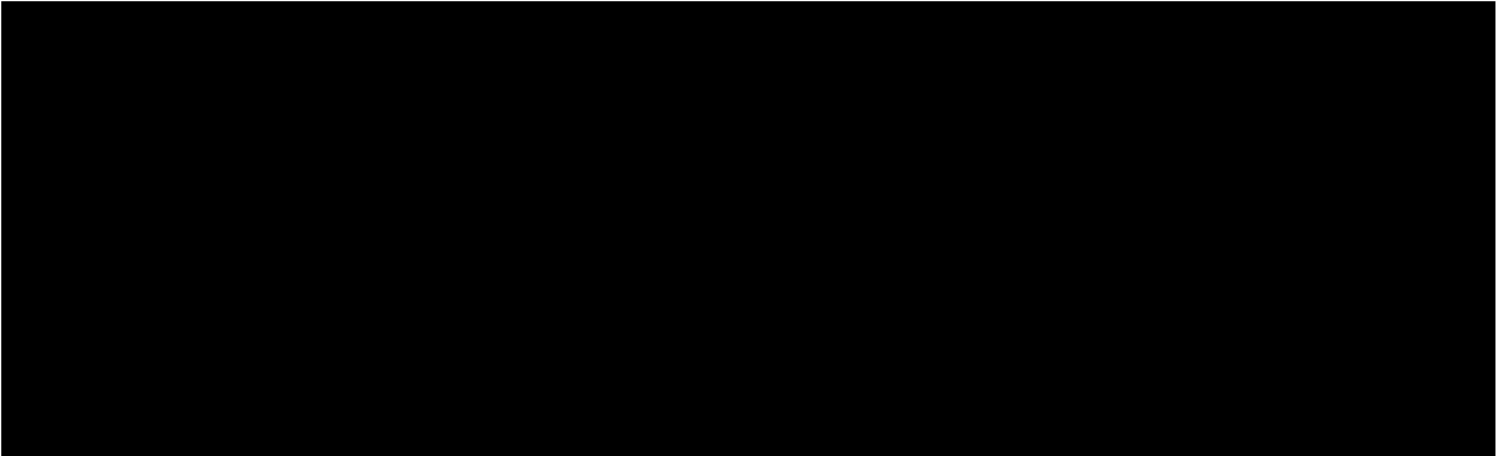
Stock/Edgar

2005

Footways resurfaced
to prevent pooling

Footways resurfaced
to prevent pooling

APPENDIX A



From: Tim Townsend [REDACTED]
Sent: 27 November 2017 09:41
To: Planning.Responses
Cc: Richard Temple; Darryl Hemmings; Caroline West; Derek Whittington
Subject: AL/115/17/OUT - Outline applicaiton with some matters resevred for 55 homes - Land at Wings Nursery, Lidsey Road, Woodgate - WSCC highways and transport response dated 27th November 2017

Dear Arun Planning Department,

Please find attached WSCC highways report dated 27th November 2017 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: 27th November 2017

**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 Highway Authority's 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.

Summary position of Highway Authority.

Following consideration of the proposal the Highway Authority objects to the proposal for the following reasons:

- It has not been demonstrated that part of the proposed access/junction arrangements where they meet the A29 Lidsey Road comply with current design guidance and/or standards, thereby potentially leading to conditions prejudicial to highway safety.
- The site does not demonstrate adequate access by pedestrians and cyclists to local facilities, regular bus and train services in accordance with recognised criteria, thereby resulting in a reliance on use of the private car.
- The development would lead to queueing within the main access to the site and increased queueing on Lidsey Road (A29) in peak periods (where in respect to the latter, queues are already prevalent) when the nearby railway crossing gates are closed.

Specific objections can be found at the foot of this 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 and occasionally (in peak periods) back to the 'Lidsey Bends' (where a canal once crossed/ran) and 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 given the number of dwellings proposed, any blocking-back would create delays leading to emerging vehicles queueing within the estate.

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, three 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.

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. However, no explanation of how the recommendations would be achieved is offered. Until such time as the designer provides appropriate replies and further information, the Highway Authority is not satisfied the Audit recommendations have been accepted.

Trip generation.

Russell Giles Partnership Highways and Transport Planning Consultants have provided information to support the application. 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.

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 queueing 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.

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 no assisted ways to cross the A29 which if provided, could provide some access opportunities to formal Public Rights of Way (PRoW) leading towards Barnham and its railway station.

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.

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 a 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 it 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 Westergate Community College 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 can be 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.

As submitted, the TP is not agreed and further work is required.

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.

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 capacity 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. Unsustainable development.

The proposed development is contrary to National and local Planning Policy Guidance as it is not well located in terms of accessibility to employment centres, retail centres, schools, community facilities and regular bus and train services (further exacerbated as a result of the frequent railway crossing closures nearby).

2. Highway safety for pedestrians and cyclists.

The proposed development does not provide adequate pedestrian and cycle links to local facilities in the village or to the nearest major employment centres, retail centres, schools, community facilities nor bus infrastructure to the detriment of highway safety.

3. Access.

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

4. Traffic impact.

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

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:-

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

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.