

**WEST SUSSEX COUNTY COUNCIL
STRATEGIC PLANNING CONSULTATION**

DATE: 2nd July 2018

FROM: Peter Hayward TO: Arun District Council
FAO: Daniel Vick

SUBJECT: EG/46/17/OUT - Land at Spode Cottage, Eastergate Lane, Fontwell PO203AA

I have reviewed the proof of evidence of Mr Hurlstone dated April 2018 and submitted in support of the appeal made by Hatch Homes against the decision of Arun District Council to refuse the above application for outline planning consent for up to 30 dwellings. Whilst framed as a proof of evidence the document is to all intents and purposes a transport statement and introduces additional information not provided to inform the determination of the application.

As the application is in outline with all matters reserved I am uncertain of the relevance of Mr Hurlstone's evidence as it does not seem that matters of access will be considered at this time although the submission seeks to address part of the second reason for refusal; *"...with limited access to local facilities and services by foot or public transport would encourage the use of private car and is not considered to be sustainable development..."* and the fourth reason for refusal; *"In the absence of sufficient highways and transport information it has not been proved positively that the development would not have an adverse impact on the surrounding highways and potential highways danger and safety impacts contrary to saved policy GEN7 (vii), and emerging policies TSP1 and TDM1 of the Arun Local Plan 2011-2031 (Publication Version) and paragraph 32 of the National Planning Policy Framework."* I would make the following observations:

Existing Situation: The submission describes the existing physical infrastructure and achievable visibility from the proposed access to Eastergate Lane and at the junction between Eastergate Lane and the A29 factually. I am satisfied that visibility at these junctions meets or exceeds the criteria for the posted speed limits with the exception of that to the west from the proposed access to Eastergate Lane.

Existing Traffic Flows: The submission reports the installation of traffic counters on both the A29 and Eastergate Lane. I am content that these were well placed to establish traffic flows and installed during a neutral survey period. However the one of Eastergate Lane is reported to have been installed to the west of the proposed access and as such is likely to have recorded a lower traffic speed than that at the proposed access location as vehicles accelerate away from the junction.

Highway Safety: The submission reports an analysis of the collision data in the vicinity of the site over a 5 year period. This identified 3 locations where multiple incidents resulting in slight or serious casualties have been recorded. Whilst none of the causation factors for these were attributable to the physical infrastructure rather were primarily associated with driver error this clusters of incidents indicate a tendency for collisions in these locations in greater propensity than is the norm.

Proposed Development: The submission confirms that the application was made in outline with all matters reserved yet included an indicative layout showing 2 access points but was not supported with either design nor traffic generation information. The LHA would seek to resist the creation of a new access to the A29 in principle that being in conflict with the primary purpose of the link and likely to increase the risk of accidents whilst an alternative access capable of serving the site is available via Eastergate Lane is achievable. The likely traffic generation is considered in

paragraphs 5.3 and 5.4 with the trip rate found through analysis of the TRICS dataset for privately owned houses applied to the proposal. The commentary is made that this is likely to be higher than the actuality which is likely to compromise a component of affordable housing. The data sets in TRICS have been found to underrepresent the actual traffic generation from residential development in the surrounding villages where the data set for privately owned houses better reflects that found for mixed private and affordable dwellings. This is very similar to the trip generations accepted for assessment of the proposed initial phase of development on the BEW strategic land allocation envisaged in the emerging local plan. As a consequence I am comfortable that this assumed traffic generation reasonably reflects the likely generation from the proposed site although not that this would necessarily represent a worst case scenario.

Trip distributions have been determined in the same proportion as existing traffic flows on the road with the following increases established in peak periods:

Location	Additional Movements	
	AM Peak	PM Peak
A29 North of Site Access	10	9
A29 South of Site Access	9	7
Eastergate Lane West of Access	2	2

Access Visibility: Section 6 of the submission considers the achievable visibility at each of the access points indicated on the illustrative layout and concludes that acceptable visibility can be achieved in each instance. Whilst I largely concur with that finding it is likely that the traffic survey location in Eastergate Lane to the west of the proposed junction underestimates the traffic speed upon which the visibility requirement should be established. Having said that, I am satisfied that the visibility achievable here significantly exceeds that required for the measured traffic speeds between the proposed junction and the A29 is likely to be adequate to for a single point of access serving the development plot.

Whilst I would agree that adequate visibility can be achieved at the proposed access location on the A29 the introduction of an additional junction at this location would be in conflict with the primary purpose of the road and the site could be served by a vehicular access from Eastergate Lane.

Development Traffic Impact: Section 7 of the submission compares the quantum of additional traffic arising from the development with the existing traffic flows on the network and associated link capacity. Whilst I would agree that the quantum of additional traffic movement is not material when compared with the existing traffic flow on the roads, it is important to recognise that the development site is located within the A29 corridor where there are a number of pre-existing traffic capacity constraints both at the A27/A29 junctions to the north and on the route to the south.

The A29 realignment scheme is proposed in the Publication Version Arun Local Plan 2011-2031 to provide access to the Barnham, Eastergate and Westergate (BEW) strategic development location and mitigate the cumulative impacts of development in the area. The scheme is necessary in order to ensure the cumulative impacts on the transport system of development in the Arun Local Plan are not severe in line with paragraph 143 of the NPPF. This application is a departure from the emerging local plan and it is the contention of the LHA that any development within the A29 corridor should make a proportional contribution to the delivery of the A29 realignment scheme and strategic District wide infrastructure in line with Policy INF SP1 in the emerging Arun Local Plan and the Infrastructure Delivery Plan (IDP). It is envisaged that a contribution in the region of £7100 per dwelling will be necessary if the infrastructure package set out in the IDP is to be delivered in full.

Sustainability: The submission reasonably describes the proximity and access routes to local facilities although does not address the deficiencies of the local bus services to provide practical options for commuter nor the local reliance placed on access to the rail network at Barham to facilitate such journeys.

The submission correctly identifies the existence of a footway alongside the A29 and a connection could be provided directly to that from the site. However it then seeks to rely on the outdated IHT Guidelines for Providing for Journeys on Foot to wrongly conclude that the local facilities are within a reasonable walking distance of the site. This guidance has been updated by the CIHT publication *'Planning for Walking'* published April 2015. This identifies at paragraph 6.3 *'Land use planning for pedestrians'* that *'Most people will only walk if their destination is less than a mile away.'* It continues to explain that *'Walking neighbourhoods are typically characterised as having a range of facilities within 10 minutes' walking distance (around 800 metres).'* And that *'The power of a destination determines how far people will walk to get to it. For bus stops in residential areas, 400 metres has traditionally been regarded as a cut-off point and in town centres, 200 metres. People will walk up to 800 metres to get to a railway station, which reflects the greater perceived quality or importance of rail services.'* Barnham Rail Station is approximately 2.7km (1.68 miles) from the site which is too distant to assume that this journey will be made by walking. Car parking at the station is limited and frequently oversubscribed with many commuters forced to park on-street. I am not satisfied that there is sufficient additional capacity on street to accommodate any additional parking demand which may arise from this development

This issue was recognised in the appeal decision on the proposed development at Fontwell referenced at paragraph 8.17 in the submission which found both a contribution towards the A29 improvement scheme and provision of a shuttle bus enhance sustainable travel links to Barnham Rail Station. The argument is made at paragraph 8.28 of the submission that the development would equally benefit from this service adding to the critical mass to help make the service sustainable in the longer term. I would concur with that view although find that the shuttle bus service would need to be in place to facilitate sustainable transport connections to the rail station and as a consequence would recommend that any consent granted for this development be subject to a Grampian condition restricting occupation until such time that such a service has been established.

Similarly the submission does not reflect on the unsuitability of the A29 to provide a comfortable environment for cyclists to access either Barnham to the southeast or Fontwell to the north. There is a good route to Barnham for cyclists via Eastergate Lane and Barnham Lane and to Fontwell via Wandley's Lane with linkage provided for through the proposed development referenced at paragraph 8.17 of the submission. The link from the site to Wandley's Lane requires cyclists riding along the A29 which less confident individuals may not find conducive. The site has a frontage with Wandley Lane and any development thereof should provide for an internal cycle / pedestrian link between Eastergate Lane and Wandley's Lane

Policy Considerations: The LHA position on policy considerations is already exemplified in the LPA statement of case and there seems little merit in providing further commentary on that at this stage

Conclusion: Whilst this proposal is framed as an outline application with all matters reserved in light of the further information now provided in Mt Hurstone's submission I am satisfied that a safe and adequate vehicular access can be achieved to the site via a new junction with Eastergate Lane. However the LHA would oppose the creation of a further access to the A29 being unnecessary, contrary to the primary purpose of the road and likely to increase the risk of collisions.

Whilst adequate pedestrian and cycling infrastructure is largely in place the development should provide a link between Eastergate Lane and Wandley's Lane for cyclists to encourage the activity and allow access to both Fontwell and Barnham without having to cycle on the A29.

The local bus services are inadequate to provide for commuting trips and the distance between the site and Barnham Rail Station is too great to make walking a reasonably likely travel option. There is inadequate capacity to accommodate further onstreet car parking in the vicinity of the station although a shuttle bus is proposed to resolve the same issue for the proposed development at Fontwell which would be accessible to residents of this development. If that was in service prior to the occupation of this development that would resolve the accessibility concern.

The development site is located within the A29 corridor where there are a number of pre-existing traffic capacity constraints. This application is a departure from the emerging local plan and it is the contention of the LHA that any such development within the A29 corridor should also make a proportional contribution to the delivery of the A29 realignment scheme and strategic District wide infrastructure in line with Policy INF SP1 in the emerging Arun Local Plan and the Infrastructure Delivery Plan (IDP). It is envisaged that a contribution in the region of £7100 per dwelling will be necessary if the infrastructure package set out in the IDP is to be delivered in full.