

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Arun District Council FAO: Mr. D. Easton
FROM:	WSCC - Highway Authority
DATE:	17 November 2023
LOCATION:	Bognor Regis Golf Club Downview Road Bognor Regis PO22 8JD
SUBJECT:	FP/274/21/OUT Outline planning application with all matters reserved, except means of access, for the erection of up to 480 new homes (C3), the formation of a new means of access onto Golf Links Road, together with the creation of new surface water drainage, new landscaping and habitat creation, ground works and other infrastructure and the retention and re-purposing of the retained club house (F2). This site also lies within the parish of Yapton, affects a Public Right of Way and is a Departure from the Development Plan. This application is subject to an Environmental Statement. Further information provided.
DATE OF SITE VISIT:	8 March 2022
RECOMMENDATION:	Advice
S106 CONTRIBUTION TOTAL:	£ (details TBC)

This is the third WSCC County Highways (CHA) response to the outline planning application with all matters reserved, except means of access, for the erection of up to 480 new homes (C3), the formation of a new means of access onto Golf Links Road, together with the creation of new surface water drainage, new landscaping and habitat creation, ground works and other infrastructure and the retention and re-purposing of the retained club house (F2).

Comments below respond to Technical Note reference JNY10830-) dated 20th May 2022 produced by RPS Transport Consultants, other exchanges of information between the transport consultants and WSCC and information found on the Arun DC website.

Comments below should be read-alongside previous WSCC CHA response dated 31st March 2022 and 28th July 2022.

Additionally, comments below also have also considered GTA Civils' critique of both the applicant's transport consultant's assessment of the proposals and the Highway Authority's.

Response.

In its response to the LPA dated 31st March 2022, the CHA reported that based on the traffic data provided so far, in particular, for the Downview traffic signal junction, the

B2259/Flansham Lane/Hoe Lane junction and the B2259/Middleton Road junction, the CHA raised concerns with the impact that the additional development traffic would have on these junctions. The applicant was then invited to respond to this to try to overcome the concerns stated. Additionally, the following information was also required so that the CHA could consider other parts of the proposal further. The details of this can be found in the main body of the previous response but is summarised below. Comments in *blue italic* text respond to the applicant's additional information provided in the above-mentioned Technical Note and other submitted information.

1. Provision of amended plan/s showing the site access with foot and cycle revisions as mentioned (+ Safety Audit of the same).

*The level of traffic associated with the proposed development at the site access will only be slightly greater than the suggested threshold identified in LTN 1/20 for all cyclists on a 20mph road. However, to encourage the use of cycles, the access layout has been amended to provide 3m wide footway/cycleways on both sides of the access leading into the site which is shown on Drawing No. JNY10830/04F. This has also been tracked to ensure a car and refuse vehicle can pass one-another. Copies of the latter are provided in **Appendix 1** of the Technical Note.*

*The revised layout has been reviewed by an independent Road Safety Auditor, the comments presented and Designer's Response are also included in **Appendix 1** of the Technical Note.*

To the west of the site access there will be an emergency access that can also be used by pedestrians and cyclists. In addition, the applicant has also agreed to contribute towards the upgrading of the existing PRow route 153 between the site boundary and The Stafford (Downview Primary School) to provide a surface route for use by cyclists and pedestrians as well as contributing towards the upgrade of PRow route 154 to the north of the site.

2. Consideration of provision of a foot/cycle way from the point the existing shared-use path emerges from the adjacent housing estate to Shirley Drive and linking to Downview Road and Golf Links Road (+ Safety Audit of the same).

Shirley Drive is currently a private access road and not public highway or a PRow. Therefore, unless private land (and agreement with any private landowners could be secured), the applicants are not able to provide a connection that could be used by the general public. Therefore, the existing arrangement will remain.

They are also unable to provide a connection to this route through the site because they do not own or control the land in-between. However, at the detailed design stage (should planning permission be granted for this outline proposal), the CHA recommends that provision for an ongoing link be provided as far as possible or at least an area of land kept clear to provide for the possibility of a link in the future.

3. Consideration of extended cycle infrastructure on Downview Road (+ Safety Audit of the same).

The applicant has considered whether there is potential to continue the pedestrian/cycleway further on Downview Road. However, at the point closest to the site, the width of the footway on the eastern side of Downview Road is only around 2m wide and there is no room to provide any further widening. In addition, further along (travelling south from the site), although Downview Road has footways, where it is widest (on the eastern side of the road) there are a

number of existing trees which would make it difficult to accommodate a 3m wide footway/cycleway. It is too narrow to incorporate anything along the western side of the road due to width. The proposal will be to encourage cyclists to use the proposed off-road route that will continue alongside Downview Primary school to the B2259 which is being implemented by WSCC. The routing for cyclists will be assisted through the provision of way-finding direction signs.

WSCC confirmed in a meeting on 5th May with the Transport Consultant working on behalf of the applicant that the existing highway layout does not readily allow for an off-road cycle route along Downview Road due to the presence of trees and footway widths that are limited in places. Therefore, on the basis that Downview Road is restricted to a 20mph speed limit and is traffic-calmed (as it is at the date of this response), on-road cycling would be considered acceptable, especially as alternative off-road routes will also be available. However, should planning permission be given, a monitoring mechanism is proposed to be incorporated in a S106 Agreement which will include an obligation on the developer to undertake and provide speed surveys and a review of AIP data at an agreed trigger point during the construction of the development. Should issues be demonstrated to have arisen post-development, then the S106 Agreement will include an obligation on the developer to provide a scheme of measures to mitigate issues identified from the speed and AIP monitoring data.

4. Safety Audit for Downview Road/Felpham Way/Felpham Road junction changes and the same for the works shown at the junction of Felpham Way with Middleton Road (Tesco roundabout) + Designer's Response/Road Safety Audit Log.

This information will be made available in FINAL form - separate to this highways response - to both the LPA and applicant for their respective records.

5. Commitment to provision of an LTN 1/20-compliant off-road path for pedestrians and cyclists from the corner of the school site (Downview Primary) through the site to the existing shared-use path that runs along the eastern boundary of the site – details to be submitted at any reserved matters/discharge of condition stage (affects PRow – Public Footpaths – 153 and 154) and also to a continuation of the path through to the A259.

The developer is willing to contribute towards the upgrading of offsite PRow routes that provide connections to the A259 and Downview School as stated in the TA, which will be included as part of a S106 agreement. This has been agreed with the PRow Team.

6. Applicant to respond to the CHA comments found alongside the as-submitted Road Safety Audit comments made above in this response contained under 'Overseeing Organisation's Response' and 'Agreed Action'.

This information will be made available in FINAL form - separate to this highways response - to both the LPA and applicant for their respective records.

7. Bus stop improvements to be Safety Audited.

These have been audited and no problems identified.

8. Commitment to provision of real-time passenger information to be provided at **all** bus stops.

Appendix 2, found in the Technical Note, is a plan showing the existing bus stop arrangements to the east of the Downview Road signalised junction. Based on OS mapping, the footway width in the location of the westbound bus stop is 2.6m which should be wide enough to allow room for pedestrians to pass those waiting for a bus assuming an open-ended cantilever style bus shelter is used. In addition, the applicant states that there is sufficient room between existing driveways for the bus shelter to sit either against the wall or adjacent to the road. The footway width for the eastbound bus stop which already has a cantilever style bus stop is of a similar width of 2.3m. The applicant considers that the provision of real time information and a new cantilever bus shelter for the westbound services is achievable.

The above should be secured by S106 Agreement.

9. Swept path vehicle analysis for articulated heavy goods vehicles to be provided for Downview Road/Felpham Way traffic signal junction works.

*The swept paths for the junction including a 13.4m articulated vehicle and a 16.5m max legal articulated vehicle have been carried out are included in **Appendix 8** of the Technical Note. The applicants state that it should be noted that a max legal length artic cannot currently turn left into Downview Road from B2259 and therefore has not been shown for the proposed layout. All other movements can be achieved. For purposes of any Construction Management Plan (CMP), the applicant has agreed to large vehicles to enter and leave Downview Road from and to the east only.*

10. Swept path vehicle analysis for a selection of vehicles (including heavy good vehicles) at the revised access to Tesco adjacent to the B2259/Middleton Road junction.

*The proposed arrangement has been amended following further comments received from WSCC and tracked to ensure that movements into and out of the Tesco express are not adversely affected. A copy of the swept paths is included in **Appendix 6** found in the Technical Note.*

*The tracking allows for vehicles parking on the access road outside of the store which is a regular occurrence. With regard to deliveries to the site, a delivery management plan was prepared by Tesco Stores Ltd and approved by WSCC as part of a previous planning application at the store. This requires the area outside of the store to be coned off prior to vehicle arriving. The expectations identified in the TA that was submitted to support the application for the proposed store is that large delivery vehicles would access the site from the west, however tracking has been undertaken for all potential movements. In addition, **Appendix 6** also includes tracking of delivery vehicles in the existing situation to demonstrate that the movement of vehicles into the site is unchanged by the proposals.*

*The proposal has also been subject to an independent Stage 1 RSA, a copy of which is included in **Appendix 3** together with the designer's response.*

The RSA Decision Log will be made available in FINAL form - separate to this highways response - to both the LPA and applicant for their respective records.

11. Travel Plan update.

The Travel Plan has been updated to address the points raised in the CHA's previous comments including the trip rate reduction target (section 6) and SAM

Surveys (Section 4). The Travel Plan also includes for the potential to include a car club within the site although the applicant states that finalised details will need to be discussed further with the relevant operators such as vehicle type, number of cars, location etc.

Final Travel Plan and monitoring fee to be secured by S106 Agreement.

Other matters.

Traffic flows – Tesco RBT (B2259/B2132 Middleton Road) -

The applicant states that the observed flows are correct although they do include the movements from the Tesco express which may be the reason why the movements appear higher than would be expected. Therefore, the queues will be an over-estimation as some vehicles will be queuing from within the Tesco Express car park and not just on Middleton Road. The applicants also state that it should be advised that growth has been applied equally to all movements although in reality the movements in and out of the Tesco Express are unlikely to increase much beyond the level they are currently.

A259 Felpham Relief Road J/W B2259 Flansham Lane –

The proposed mitigation as shown on JNY10830-20 B provides improvements to traffic flows at this junction. Works to be secured by S106 Agreement.

Downview Traffic signals –

Previously, the staging, resultant queue lengths and road safety of the proposed model for the signals was of concern to the CHA.

However, altering the staging to represent the current arrangement, providing additional road space and providing two-stage crossing arrangements on all of the arms of the junction all have a positive effect on the future operation of the junction. One example being delay to traffic changes from 95.87 passenger car unit (pcu)/hr (existing layout 2031 + Committed to 58.60 pcu/hr for the proposed Layout 2031 + Proposed Dev). The knock-on effect of this is that eastbound AM peak queues reduce from 183m without development to 163m with proposed improvements & development. In westbound direction in the AM peak, the queues reduce from 437m to 258m with proposed improvements & development.

Therefore, based on the latest work done to date for this junction, the CHA does not object to the changes proposed.

Conclusion.

Based on the revised information now submitted, the CHA is now satisfied with the proposal from a highways point of view. As such, should the LPA be minded to approve the planning application, the CHA recommends that it only does so subject to the following:

S106 Agreement (to secure):

1. Site access, Downview Road/Golf Links Road.
2. Emergency access.
3. Off-site highways works at B2259 Downview traffic signals and timing of implementation.

4. Off-site Highways works at junction of B2259 Felpham Way with B2132 Middleton Road roundabout junction and timing of implementation.
5. Off-site highways works at junction of A259 with B2259 (Felpham Relief Road) and timing of implementation.
6. Travel Plan.
7. Travel Plan monitoring fee.
8. Bus waiting area improvements including real-time passenger information displays, including timing and method of implementation.
9. Financial contribution towards upgrading of PRoW (Public Footpaths) 153 and 154.
10. Safeguarding of land and provision of costs to deliver part of link road for Bognor Regis Enterprise Zone within that land.
11. Provision of Downview Road speed and PIA monitoring data plus triggers for provision of both plus, if required, submission of measures such as (but not limited to) tactile and corduroy paving, speed tables/humps, crossing points and other measures as might be agreed, should issues be shown to have arisen post-part of the development being constructed and in use, if demonstrated by the speed and AIP data collected.

And,

Conditions:

1. Car parking

No dwelling shall be first occupied until the car parking serving the respective dwelling has been constructed in accordance with plans and details to be submitted to and approved in writing by the Local Planning Authority after consultation with the Highway Authority.

Reason: To provide car-parking space for the use.

2. Cycle parking

No dwelling shall be first occupied until covered and secure cycle parking spaces serving the respective dwelling have been provided in accordance with plans and details to be submitted to and approved by the Local Planning Authority after consultation with the Highway Authority.

Reason: To provide alternative travel options to the use of the car in accordance with current sustainable transport policies.

3. Internal access roads

No part of the development shall be first occupied until the road(s), footways, and casual parking areas serving the development have been constructed in accordance with plans to be submitted to and approved by the Local Planning Authority after consultation with the Highway Authority.

Reason: To secure satisfactory standards of access for the proposed development.

4. Construction Management Plan

No development shall take place, including any works of demolition, until a final Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters:

- the anticipated number, frequency and types of vehicles used during construction,

- the method of access and routing of vehicles during construction,
- the parking of vehicles by site operatives and visitors,
- the loading and unloading of plant, materials and waste,
- the storage of plant and materials used in construction of the development,
- the erection and maintenance of security hoarding,
- the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
- A S59 Agreement (However, this is dependent on the number of HGVs visiting the site on a daily basis during the construction period),
- details of public engagement both prior to and during construction works.

Reason: In the interests of highway safety and the amenities of the area.

Informatives:

1. Section 59 of the 1980 Highways Act - Extra-ordinary Traffic

The applicant is advised to enter into a Section 59 Agreement under the 1980 Highways Act, to cover the increase in extraordinary traffic that would result from construction vehicles and to enable the recovery of costs of any potential damage that may result to the public highway as a direct consequence of the construction traffic. The Applicant is advised to contact the Highway Officer (01243 642105) in order to commence this process (only necessary if daily HGV movements exceed 20 on a daily basis).

2. Works within the Highway – Implementation Team

The applicant is required to obtain all appropriate consents from West Sussex County Council, as Highway Authority, to cover the off-site highway works. The applicant is requested to contact The Implementation Team Leader (01243 642105) to commence this process. The applicant is advised that it is an offence to undertake any works within the highway prior to the agreement being in place.

3. Provision of Adoptable Highway

The applicant is advised to enter into a legal agreement with West Sussex County Council, as Highway Authority, to cover the proposed adoptable on-site highway works. The applicant is requested to contact The Implementation Team Leader (01243 642105) to commence this process. The applicant is advised that any works commenced prior to the S38 agreement being in place are undertaken at their own risk.

4. Temporary Works Required During Construction

The applicant is advised of the requirement to enter into early discussions with and obtain the necessary licenses from the Highway Authority to cover any temporary construction related works that will obstruct or affect the normal operation of the public highway prior to any works commencing. These temporary works may include, the placing of skips or other materials within the highway, the temporary closure of on-street parking bays, the imposition of temporary parking restrictions requiring a Temporary Traffic Regulation Order, the erection of hoarding or scaffolding within the limits of the highway, the provision of cranes over-sailing the highway.

5. Temporary Developer Signage

The applicant is advised that the erection of temporary directional signage should be agreed with the Local Traffic Engineer prior to any signage being installed. The applicant should be aware that a charge will be applied for this service.

6. Temporary directional signs to housing developments (Major apps only 10 units +)

The applicant is advised that they must apply and obtain approval from West Sussex County Council as Highway Authority for all temporary directional signs to housing developments that are to be located on the highway. Further details of the process and how to apply are available here <https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/temporary-development-signs/#overview>

Note to planning case officer:

Given the recent changes to the Building Regulations Approved Document S (Infrastructure for the Charging of Electric Vehicles), it may be that the provision of EV charging is now covered under separate legislation to planning. Therefore, WSCC as Highway Authority have no comment to make upon the EV charging provision as a result of this planning application. However, the planning case officer should check whether the development is being built under the old Building Control regulations, in place prior to June 15th 2022, and if they are, it may be appropriate to secure EV charging provision through the planning process.

Tim Townsend
West Sussex County Council – Planning Services