

Subject: **Outline planning application for land at Ford Airfield**

Reference: F/4/20/OUT

Objection and Comments from A J Lovell MSc. C.Eng. FICE, FICHT (retd.) - 18/12/20

Context: This major proposal is for 1500 new homes and a considerable amount of other commercial and recreational development **will totally change the character of this area**. It is sited on generally agricultural land between the villages of Yapton, Ford and Climping. Climping is a small village of about 400 dwellings and is immediately to the south of the development site with just Horsemere Green Lane (HGL) between the existing housing and the new development. There is no real spatial separation in this proposal which would help Climping to retain its own, separate identity. This needs to be changed.

In addition the Arun Local Plan (2018) provides for 300 new homes within Climping (next to the A259) , 1000 new homes on land to the west of the River Arun at Littlehampton and a further 500+ new homes on various sites in and around Yapton. **A total of well over 3000 homes in and around the immediate area by 2031.** The approved Climping Neighbourhood Plan did not include any new housing within the village but did include a number of traffic and safety schemes and it should be noted that the only access to the existing homes to the south of HGL is from that road via the junctions at Yapton Road and Church Lane.

It is significant that the current application has made hardly any mention of Climping at all, and Horsemere Green Lane was not even included in the list of local roads and junctions looked at within the applicant's submitted 'Transport Assessment', a clear indication of the inadequacy of their approach. But there are also many other important issues which will be explained below.

Bearing in mind that there are over 300 related documents on the planning web site and that the applicant's own submission contains many long documents (the Transport Assessment alone has well over 130 pages), I think it unlikely that any member of the public (and probably not our elected members either) will go through them all. I have not been able to do that so my comments are confined to what I regard as the major traffic issues in support of my objection.

Traffic assessment and impact

Overview

It is perfectly obvious to conclude that the 3000+ planned new homes by 2031 will have a very substantial impact on Climping and the other nearby villages, particularly on traffic, transport and safety issues, and that the huge Ford Airfield development will play a major part in that. The local roads are narrow, there are many junctions which suffer from peak hour congestion, much recorded speeding and some 57 recorded personal injury accidents

in the last 5 years at 20 locations in the area with a much higher number of additional , but unreported 'damage only' collisions.

Despite all this the broad outcome of the submitted Transport Assessment is that the existing network will cope with the additional traffic with some minor improvements and a relatively small contribution to some of the improvement schemes still in the planning stages by WSCC and the Highways Agency. I note that both Highways England and Network Rail have indicated that they are not in complete agreement with the information contained within the Transport Assessment or the conclusions derived from it, and neither am I.

Site Access

The submitted scheme proposes two access point with a new roundabout junction at Yapton Road and another at Ford Road. From these two points all traffic to and from the site will travel along Yapton Road and Ford Road (connecting to Church Lane). Traffic travelling to the south to use the A259 (which I would judge to be the majority) will have to use either the priority Oystercatcher junction or the roundabout at Church Lane, merging with all the traffic to and from the Rudford industrial estate.

I must stress that THERE IS A FAR BETTER SOLUTION FOR THE YAPTON ROAD ACCESS POINT which will help resolve several problematic issues:-

Climping Parish Council has for several years promoted a new link road between the A259 (just to the west of the Oystercatcher) travelling northwards and crossing the Yapton road where the new roundabout is to be located. Phase 2 of the scheme would extend the route through the housing site and onwards to link with Ford Road and then at a new junction to the proposed A27, Arundel Bypass. Only Phase 1 (A259 to Yapton Road) needs constructing at this point. (NB. I can make a sketch plan of this layout available if required)

There are many clear benefits to this alternative approach:

1. It avoids the need to 'improve' the Oystercatcher junction, which could actually be closed and a cul-de-sac created there allowing just cyclists and pedestrians access.
2. It would permit all the existing and new traffic using Yapton Road to access the A259 safely in either direction at a newly designed roundabout junction.
3. It would permit both cycle and foot traffic to proceed safely along Yapton road southwards from HGL to the Oystercatcher which it cannot do now.
4. It will avoid the need for a new and costly road improvement at the existing and dangerous 'S' bends on Yapton Road just south of HGL.

I would submit most strongly that this option should be properly considered before any agreement is reached on the current proposals as it is a far better long term solution.

A259 Junction Improvements:

It should be noted that the possible future improvements to the key junctions on the A259 (which include Church Lane, Oystercatcher and Comet Corner) **are not yet either programmed or funded**. They are therefore hoped for, but by no means a certainty. We have seen many such aspirational projects disappear in the past. (e.g. Arundel Bypass). (See also further comments below under 'Delivery of the essential road network improvements.')

The housing site layout

It is regrettable that notwithstanding a number of approaches made in recent years the developer has not included provision for a possible future North – South route within the master plan. If the site layout is constructed as presently shown it would rule out what is potentially the saving grace for traffic movements within this whole area; a new link road between A259 and the A27, thus providing a far better alternative link to the A27 than either Yapton Road or Ford Road for all traffic, including the many HGVs from the commercial activities at Rudford and elsewhere.

The traffic impact analysis

I have major difficulties in accepting the outcomes and conclusions from this work. I question the following points:

1. The traffic generation rates used. They chose to use 2-way trip ratios of 0.359 (am) and 0.259 (pm) having examined a number of other sites with differing local conditions. The range of other ratios they looked at and might have chosen instead is from 0.683 (am) to 0.623(pm). Use of these ratios would have led to almost a doubling in the number of vehicle travelling to and from the site from the 537/577 vehicles they quote up to 1047am and 1044pm.

This is clearly a massive difference and whilst these higher trip rates may be too high there is a strong case for using a range of different trip rates to ensure that a worst case scenario is tested. This should be required of the developer.

From a straightforward common sense appraisal of the development, when one considers that there will be 1500 homes on this site, during each morning peak hour it seems highly likely that at least half of these homes will generate at least one outward bound vehicle trip (750 vehicles one way) during the morning peak hour. And then there are the additional trips generated by the school, business and commerce to add in as well. This simple approach does support my view that the traffic generation figures provided fall considerably short of reality.

2. The traffic model used attempts to distribute all the vehicle trips to and from the site to the selected road network. Unfortunately Horsemere Green Lane was not (as far

as I can tell), included in the network so we have no way of knowing what the increase in traffic levels is likely to be in this important local road. Since HGL is already a busy cut through and gets used much more whenever there are delays on the A259, Church Lane or Yapton Road, it is absolutely essential that further modelling is carried out (using the higher trip generation rates as well) so that we can see what the traffic effects on HGL are likely to be.

There is no doubt in my mind that the increase in traffic over today's flows in HGL will be huge and that a new traffic management scheme will need to be devised that restrict traffic on HGL to 'access only' thus removing through traffic.

[NB. Traffic modelling is a complex science/art involving algorithms to determine how drivers will behave in order to achieve their destination, but taking into account matters such as route distance, the type of road, the weight of traffic, highway and junction capacity, likely congestion etc. The outcomes need to be examined carefully to judge whether the parameters chosen and the model itself are providing sensible outcomes. If the outcome is suspect then the model is not performing properly and needs adjustment. When we looked at the model outputs produced for the Arun Local Plan it was clear that they were not realistic, at least in the Climping area, but regrettably the Planning Inspector chose to accept the figures produced by the WSCC model rather than consider their actual output, which was clearly not realistic in some places. This conclusion was actually verified by the subsequent reversal by WSCC on the need to improve all the junctions along the A259.]

3. What new or proposed developments were included within the model?

This is another key factor as during the period to 2031 there will be many new developments besides the Ford Airfield and others that were included in the model. I understand (but I am not certain at this point) that the following proposals were not included, (and there may be others too)

- The effects of closing the Yapton Road access to Ford market, thus diverting all the traffic (hundreds of vehicles) to the other entrance in Ford Road via local roads.
- The LP allocated development of 1000 homes on the west bank of the River Arun
- The impact of the proposed Energy from Waste plant sited directly adjacent to this housing site. (As the outcome of the current planning application is not yet known, this site must be included as well.)

4. Traffic Impact on key junctions. This is important because it helps determine what proportion of the total cost of the necessary improvement scheme will be paid for by the developer. For the reasons explained in points 1 and 2 above I think the conclusions given in the report are not acceptable. It is also noteworthy that the junction of HGL and Church Lane was not even modelled so there are no proposals

to improve it, yet it is clearly unsatisfactory now and will become much worse with large numbers of additional vehicles attempting to use it.

Ford Road railway crossing

This crossing is a well known local congestion spot which often causes traffic delays of between 5 and 10 minutes when several trains arrive quite close together and the extensive queues of vehicles cannot clear before the barrier comes down again. I understand that the barrier is 'down' on average for some 40% of each peak hour. It is therefore surprising that the applicant contends that even with increased traffic flows the crossing point will be well within its traffic capacity so will not cause problems! On reflection, this point alone does serve to indicate the rather dismissive approach taken in the Traffic Assessment report. I understand that Network Rail are also not content with the assessment and have submitted an objection.

Delivery of the required network improvements

Back in 2017 when the Arun Local Plan went to Public Inquiry and 'strategic' housing sites such as Ford Airfield and many others were examined by an Inspector, WSCC's conclusion, based on their own transport model outputs, was that no special network improvements were necessary on the A259 to the west of the River Arun and that the impact of each individual development could be dealt with as and when they occurred in the future*. Just two years later they decided that every junction along this part of the route would in fact need improvement and they consulted on a series of options. I believe that the total estimate for these works is now approaching £30million. It is also my understanding that most of the intended S106 contributions for the airfield site are to fund a new local school (£11m) and minor sums for library improvements and the fire service. In comparison the sums mentioned to support road improvements are really quite small, about £212k towards work on the A27 and unspecified amounts as a contribution towards the Oystercatcher and Comet Corner works.

[NB* It is my view that had WSCC taken this view much earlier there would have been a much better opportunity for the majority of the costs to be borne by contributions from all the developments now included within the Arun Local Plan.]

Whilst I understand that a bid has recently been made to central government for partial funding of these A259 improvements there can be no certainty that it will be successful or indeed that WSCC will be able to find its share of the costs. These matters are all speculative at the moment. In consequence:

I believe that until there is some certainty on both the funding and the timing of these essential A259 highway improvements the Ford airfield site should not be allowed to proceed and this application should be considered premature.

Conclusion

Para 11.5.1 on page 125 of the submitted Transport Assessment states:

“ With the delivery of the mitigation via an appropriate contribution to enable WSCC to deliver strategic highway improvements, the impact of the development on the operation of the highway network with Ford, Yapton *[Note: no mention of Climping at all]* and the surrounding area will not be significant *[my underlining]* and falls considerably short of the ‘severe’ test set by NPPF.”

For all the reasons explained in this paper I believe that this is a wrong and inadequate conclusion and that the basis for it requires a totally new look.

To summarise, my conclusions are:

1. The development does not provide sufficient separation from Climping so will effectively merge a small village with its own historic character into a massive new housing estate.
2. The proposed layout will effectively prevent the construction of a new North – South route between the A259 and the A27 which is the only real solution to resolving a whole range of local traffic and safety problems in the longer term.
3. The evaluation of the traffic impact resulting from the development grossly underestimates the likely impact on local roads and junctions and completely ignores its effects on Horsemere Green Lane which is the only means of access to the existing housing.
4. The proposal is reliant on the delivery by WSCC and another developer on the required junction improvements on the A259 at Comet Corner, the Oystercatcher and Church Lane, when none of these schemes is firmly programmed and the funding is still uncertain.
5. There is much reliance (hope?) placed on promoting modal shift towards cycling and walking when the reality, as demonstrated over the past 30 years is that the vast majority of trips in this area will continue to be undertaken in private vehicles, possibly electric powered to reduce emissions.
6. It is very important that a detailed traffic management scheme for Horsemere Green Lane be devised to restrict traffic movement to ‘access only’ to protect residents from the huge traffic impact that they will undoubtedly face if nothing is done; and that a signal controlled vehicle and pedestrian/cycle crossing scheme be implemented at the HGL/Church Lane junction.
7. It is important that modelling of the suggested North –South (A259 to A27) be undertaken now, whilst the route can still be protected and not left for some future time as I understand WSCC are currently intending.