

**WEST SUSSEX COUNTY COUNCIL
STRATEGIC PLANNING CONSULTATION**

DATE: 18th November 2016

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

SUBJECT: P/76/16/PL - Construction of a building for the packaging, preparation & distribution of fresh foods with ancillary accommodation associated with the existing horticultural business, revisions to internal access road, car parking & hardstanding areas & landscaping & provision of a wetland. This application affects the setting of Listed Buildings.

ADDITIONAL INFORMATION RECEIVED.

LOCATION: Sefter Farm, Pagham Road, Bognor Regis, West Sussex, PO21 3PX.

DATE OF SITE VISIT: 28th July 2016

RECOMMENDATION:

**Advice
Objection**

X

**Modification
No Objection**

**More Information
Refusal**

S106 contribution total (see below for breakdown): £TBC

This is the third WSCC highways and transport response to the planning application. It follows assessment of additional information provided by the applicant's highway consultant in email – Bava Sathan (The Civil Engineering Practice) to Tim Townsend (WSCC Highway Authority) dated 1st November 2016.

Summary position of WSCC as Highway Authority.

The Highway Authority raises an objection on highway safety, sustainability and parking grounds. Insufficient information has been provided to demonstrate the suitability of the development in highway terms. Concerns remain about the increased use of the vehicular and pedestrian accesses to the site; the lack of consideration of access to and from the site from the wider surrounding road network (i.e. footway and Public footpath (PRoW) accesses to local communities and public transport access); lack of clear information about potential traffic generation and comparisons with similar facilities to fully inform traffic impact on the surrounding road network; lack of information informing number of car parking spaces to be provided.

Proposal.

The proposed development is for a new food packing and preparation house, offices and associated parking, turning and loading bays. The application form states the following:

- Office facility – 1,857sqm (although 2,160sqm is quoted on Drg. No. P102 Rev. 12 provided by Curtis Leeves Technical Ltd.)
- Pack House – 5,887sqm (although 5,400sqm is quoted on Drg. No. P102 Rev. 12)
- **Total roof area of new buildings – 7,744sqm (7,560sqm if using the figures quoted from Drg. No. P102 Rev. 12)**

The applicant's agent, in his letter of 26th September 2016, has explained that the floorspace figures quoted on the application form are the correct ones to use. Therefore, the Highway Authority's consideration of the application is based on the overall figure of **7,744sqm** (1,857 office facility and 5,887sqm pack-house).

As part of the proposal, the applicant states that 30 new staff members will be employed taking the overall staff presence on site from 400 to 430. In his letter of 26th September, the applicant's planning

consultant has stated that the underlying trend is for improved efficiency at the site through mechanisation and, therefore, the staff numbers will not materially increase.

Access.

Access is shown taken directly from Pagham Road (B2166) via a private access road running east-west into the site.

Traffic impact.

Alongside a short snap-shot of traffic entering and leaving the site associated with the existing activities taken in mid-late September 2015, a further assessment (using TRICS) has been carried out by the applicant. The applicant concludes that traffic flow and parking numbers have been arrived at from experience of likely demand and new more-automated ways of working, including sustainable modes of transport that they consider will minimise vehicular impact. In its previous comments, the Highway Authority was unclear whether the time period assessed was the peak time for existing traffic entering and leaving the site. This has now been explained further by the applicant's planning consultant who states that September is a peak time given harvest times etc.

Based on the *on-site* assessment, it suggests the following:

Summary of All Modes of Transport						
	Mon	Tue	Wed	Thu	Fri	Sat
00:00 - 01:00	0	0	2		1	1
01:00 - 02:00	0	0	1		0	0
02:00 - 03:00	0	0	0		12	0
03:00 - 04:00	0	0	0		1	1
04:00 - 05:00	1	0	0		1	0
05:00 - 06:00	5	3	6		9	17
06:00 - 07:00	18	24	17		14	9
07:00 - 08:00	15	17	23		9	5
08:00 - 09:00	11	13	11		16	5
09:00 - 10:00	10	15	18		11	10
10:00 - 11:00	9	12	17		25	16
11:00 - 12:00	8	9	13		18	15
12:00 - 13:00	19	26	23		27	29
13:00 - 14:00	21	26	28	2	23	27
14:00 - 15:00	14	18	19	13	21	19
15:00 - 16:00	17	21	22	12	17	27
16:00 - 17:00	21	32	38	37	35	57
17:00 - 18:00	87	80	78	58	78	59
18:00 - 19:00	65	77	85	39	41	35
19:00 - 20:00	5	18	23	24	17	16
20:00 - 21:00	0	11	10	4	13	14
21:00 - 22:00	1	4	4	10	11	9
22:00 - 23:00	0	3	5	6	1	1
23:00 - 00:00	4	2	3	6	2	0
Total Daily	331	411	446	211	403	372

Figure 1: All modes of transport summary (traffic movements)

Summary of All Goods / Heavy Vehicles						
	Mon	Tue	Wed	Thu	Fri	Sat
00:00 - 01:00	0	0	0		0	0
01:00 - 02:00	0	0	0		0	0
02:00 - 03:00	0	0	0		0	0
03:00 - 04:00	0	0	0		0	0
04:00 - 05:00	0	0	0		1	0
05:00 - 06:00	1	0	0		0	1
06:00 - 07:00	4	8	4		10	3
07:00 - 08:00	8	9	9		4	3
08:00 - 09:00	2	3	4		7	4
09:00 - 10:00	6	9	12		7	3
10:00 - 11:00	8	10	14		15	9
11:00 - 12:00	4	5	7		13	9
12:00 - 13:00	10	12	12		11	9
13:00 - 14:00	5	7	8	1	9	11
14:00 - 15:00	5	10	11	5	6	9
15:00 - 16:00	15	14	13	3	8	7
16:00 - 17:00	8	13	14	9	10	8
17:00 - 18:00	4	5	7	4	10	13
18:00 - 19:00	5	11	15	3	5	8
19:00 - 20:00	2	6	6	7	6	7
20:00 - 21:00	0	4	3	3	12	11
21:00 - 22:00	0	0	0	4	1	5
22:00 - 23:00	0	2	2	2	1	1
23:00 - 00:00	1	2	2	3	1	0
Total Daily	88	130	143	44	137	121

Figure 2: Goods vehicles summary (vehicle movements)

The applicant's TA suggests that any increase brought-about by the new development would only increase these movements marginally. However, this is not evidenced in any way. WSCC previously asked for examples of similar operations so comparisons could be made. Some TRICS information has now been provided. However, by their own admission, the applicant states that the sites used do not represent the operations proposed at the application site nor are they representative of the location because of the areas the other two operations are in (Cornwall and Norfolk). As such, the final impact traffic-wise of the development is not known.

Using the information provided so far (not TRICS), if staff numbers are proposed to increase by approximately 30, as stated in the TA, then this would amount to an additional 34 vehicular trips over a normal working day (figure arrived at by use of 1.75 car-share ratio) and 12 new HGVs, amounting to 24 HGV movements. This amounts to an additional 58 traffic movements per day (combined cars and HGVs). Vans and LGVs still do not appear to be included so movements might be additional to the figures quoted above. Again, the applicant was asked to provide additional information but this has not been forthcoming. That further information should also include traffic figures associated with any other consented schemes for the site not yet built.

In its previous consideration of the proposal and turning to the specific information set out in Section 4 of the TA, it was not clear what year the census data had been taken from (2001 or 2011). This has now been clarified with the planning consultant stating 2011.

The TA (in paragraph 4.6.4 states that car sharing is *anticipated* to be relatively high among employees).

In an attempt to qualify this, the applicant has stated that car sharing amounts to a ratio of approximately 2.4 persons per vehicle, based on 400 existing staff. The suggestion by the applicant (via his planning consultant) is that this ratio figure then equates to the car park accommodating approximately 170 cars. The Transport Assessment (TA) provided by the applicant then quotes a car sharing ratio of 1.75, based on the 2011 census data for the region. If one were to add the 30 additional staff the applicant suggests will be new to the site, the resultant number of staff would amount to 430. Using the ratio of 1.75, this would suggest that 245 vehicles would require access to the site. If the applicant's ratio of 2.4 is used, the resultant figure is approximately 180.

Finally, in previous CHA comments, the question was asked whether produce processed on-site is solely that grown on-site or brought in from other sites. The applicant has said that Barfoots currently store some produce on remote sites given absence of space at Seftor. No specific details are provided. In any event, the CHA assessment has had to focus on the scenario currently presented and not what the applicant suggests might happen outside of this planning application.

Parking.

Both existing and proposed parking and turning for cars is shown in one location east of the new building. Parking and turning for HGVs and/or delivery vehicles is shown to the rear (west) of the building. Although the applicant states that the uses proposed are sui generis, if B1 (office) and B8 (storage and distribution) planning uses are used, using the WSCC Parking Guidance document as a guide, suggests that the number of additional spaces should be as follows:

- Office use (1 space per 40m² + 5% for disabled/mobility impaired drivers) – 46 (+2 of these for disabled/mobility impaired drivers) – based on 1,857sqm floor space
- Pack House (B8 storage and distribution has been used at 1 space per 100sqm + 5% for disabled/mobility impaired drivers) – 58 (+1 of these for disabled/mobility impaired drivers) - based on 5,887sqm floor space

From both on-site observation and scrutiny of 'Google Streetview', the existing car park currently provides about 130 car parking spaces and appears to be already well-used. The applicant's planning consultant suggests that 170 spaces are available, albeit unmarked on a gravel surface. He goes on to say that if the spaces are marked-out, approximately 215 spaces could be provided.

Scrutiny of the submitted plans shows the location of the proposed building and the car parking moved eastwards. The applicant states that the existing provision will be adequate for the new proposal. If it is assumed that the figure of 170 is adequate for the current operations (note that this does not include anything previously approved and not yet built – applicant has not provided further information about this) and then one adds a further requirement for the new buildings based on parking guidance, this would suggest that an additional 104 spaces are required, bringing the total amount required to 274.

If one then assesses parking requirements for the new packing house using the aforementioned parking ratio of 1.75 (but leaving the offices at the WSCC guide figure of 1 space per 40sqm), the resultant figure would be for 79 additional spaces – therefore bringing the total to 170 + 79 = 249. The applicant suggests that 215 marked spaces could be provided on-site. This would amount to a shortfall of approximately 34 spaces which expressed as a percentage, is approximately 13% less than guidance, it should be noted that the figures quoted do not appear to take into account anything proposed under any as-yet-to-be constructed developments on the site. Therefore, the number of spaces on-site might need to increase further. Previously, the applicant was asked to do this. However, additional information has not been provided.

The following should also be considered (again based on floor areas and using WSCC parking guidance):

- Cycle parking (1 space per 500m² for staff + 1 space per 1000m² for visitors) – 22
- Motorcycle parking (1 space + 1 per 10 car parking spaces) – based on 130 spaces - 14
- Lorry parking – 1 minimum + 1 space per 500m² – 12 spaces

Turning to the Transport Assessment (TA) provided by the applicant, this states that parking will be provided as follows:

- Car parking – Applicant states (in paragraph 7.2.1) that car parking will have the same capacity as existing given the likely take-up of the new bus service
- Cycle parking – No number quoted
- Motorcycle parking – No number quoted
- Lorry parking - No number quoted but large loading/unloading areas shown to rear of proposed building.

In addition to any final figure arrived at for car parking, the applicant would be expected to provide adequate cycle, motorcycle and lorry parking on-site. The applicant's planning consultant has stated that a planning condition could be used to secure the cycle and motorcycle parking. The CHA recommend that in the event the application is permitted, a further condition should be added to secure adequate parking and turning for the additional HGVs proposed.

Sustainable provision (including Travel Plan).

Walking – Access on foot to the site is limited and provided in the form of a narrow private footpath within the site boundary leading from the site and emerging to Pagham Road almost opposite its junction with Sefter Road. It is not known whether this path is a recent addition. However, it is not a formal Public Right of Way (PRoW). From site observation, the path is narrow and unmade. Also, visibility at the point it joins Pagham Road for both users and drivers on Pagham Road is very limited. Although it has the potential to be used, it does need to be improved.

Suitable access routes to and from the site for pedestrians, cyclists etc. avoiding the carriageways of Pagham Road, Sefter Road and the B2166, has also not been demonstrated - particularly given both the identified existing access shortcomings of the site and its surroundings and the increased activity brought about by this application. Any new routes and changes to existing ones would have to be considered within a Stage 1 Road Safety Audit and appropriate Design Check/Report.

Cycling – Access provided between Bognor Regis and the site is possible using the local road network if cyclists are so minded to do so. However, both Pagham Road and Sefter Road in the vicinity of the site are subject to a 60mph speed limit, are unlit and rural in nature and as such, might discourage some people from cycling to and from the site. Again, this is an area the applicant should look at alongside this application. With regards cycle parking, this should be located in a secure, overlooked and covered area, with showers provided for staff on-site. The use of 'Sheffield' Stands (or similar) is recommended. A 'Cycle to Work' Scheme is welcomed and should be secured in the Travel Plan required for this site. A Travel Plan should be secured by planning condition if permission is granted.

Bus provision – The 600 service by Stagecoach PLC provides for 20 minute frequency Monday-Saturday (other than evening when frequency reduces to hourly, finishing at 21:00pm). Services on Sunday are also hourly during shopping hours. The service runs between Bognor and Chichester. A southbound bus stop can be found just south of the junction of Sefter Road and Pagham Road – about a 6-7 minute walk from the centre of the site using the aforementioned footpath, approximately 400m from the centre of the site. However, it requires users to step into Pagham Road where no footway exists, is unlit and at a point where visibility is very limited. Also, the bus stop does not have a shelter nor footway or hardstanding for users, requiring them to walk either in the road or on verge. For northbound users, a bus stop (again with no shelter but with footway in-part) can be found about 1km south of the entrance to Sefter Farm along Pagham Road opposite the junction with Hook Lane. Like the southbound one, it requires those on-foot to walk within the carriageway of Pagham Road from the site where it is unlit and subject to a 60mph speed limit. A further southbound stop is found opposite the northbound one. Consideration of ways to improve access to these is still required to be put forward by the applicant.

In addition to the public service, the TA states that a new bus service is currently being discussed with Stagecoach PLC, operating between Chichester and Bognor Regis, operating between 05:30am to 17:00pm. The applicant proposes to subsidise this, albeit only for a very short period of time (6 weeks). After that, they have assumed that the service will then be self-funding and that its impact would result in an anticipated take-up by staff of 50%. Although further information has now been provided and notwithstanding the very short timescale the applicant proposes to subsidise it, it states that users will be charged to use it. Therefore, reliance on such a service cannot be guaranteed. It is also not known where buses will stop. Furthermore, the use of mini-buses is referred to but no information about frequencies and where services run is given.

Travel Plan – A Travel Plan should be provided for the entire development site (for both existing and proposed activities on-site). A planning condition should be attached to any planning consent to secure this if permission is granted.

Road Safety.

Interrogation of latest 5-years of personal injury (PIA) accident records shows that four (4) accidents have occurred close to the site. No PIAs appear to have occurred at the site entrance. Examining the access in detail, the access to Pagham Road provides visibility for traffic emerging looking in the leading traffic direction (i.e. looking south from the entrance). Looking in the trailing direction (north), again visibility is provided for emerging traffic. Dimensions are quoted on Civil Engineering Practice Drawing No. 6, suggesting that sight lines of 2.4m 'x' distance by 215m 'y' distances can be provided. However, existing hedgerow on the eastern side of Pagham Road currently obscures the sight line in

the trailing traffic direction and for forward visibility for drivers travelling southbound. The now-submitted 'Road Safety Assessment' (not a Road Safety Audit that accords with Highway Directive 19/15) also picks this up, including further concerns about pedestrian visibility further south from the access opposite Sefter Road at a pedestrian entrance to the site. The report recommends visibility be improved by regular hedge cutting for both the vehicular and pedestrian accesses.

Given the identified shortcomings of the access and the associated increase in traffic movements, the CHA previously requested that a Stage 1 Road Safety Audit be provided giving consideration to both of these. This has now been provided. Previously, just the aforementioned 'Road Safety Assessment' (produced by GM Consultants – September 2016) was provided, which was *not* a Road Safety Audit.

CHA policy setting out when Safety Audits are required is clear – namely:

“For all ‘major’ planning applications that include any of the following:

- *Alteration to an existing highway,*
- *Intensification of use of an existing access. Intensification is generally defined as 50 or more vehicle movements per day. However, it is recommended that clarification is sought from WSCC where a proposal involves the intensification of an existing access as other issues such as collision data and geometry need to be considered,*
- *Formation of a new access,*
- *Off-site improvements,*
- *New residential estate roads where a through-route is created, where a bus route is created or where the road serves a school or other major community or retail facility.”*

The CHA, Road Safety Report and now the recently submitted Road Safety Audit all identify shortcomings with the entrance and the nearby pedestrian access to the site. As such, alongside these recommended improvements, off-site improvements to aid walking and cycling further to and from the site, should also be provided.

In their reply, the applicant's Highway Consultant has stated that as the identified visibility obstructions are located on land within the public highway, it should be the Highway Authority who removes vegetation and maintain such requirements. However, investigation of historic legal records reveals that hedges were planted on highway land as part of accommodation works alongside land acquisitions for road improvements in 2000. As such, the obligation and responsibility to remove the hedges falls to the landowners and *not* the Highway Authority on this occasion. WSCC has powers to make landowners do this under Section 154 of the Highways Act 1980. Clearly though, the applicant will firstly need to demonstrate what is required to meet the recommendations in the Stage 1 Road Safety Audit and - if plans are agreed - the Highway Authority could be approached to consider serving notice. Please note that although this might overcome part of the objections raised in this report, it would not overcome all issues raised in this report.

Fire and Rescue Service (F&RS) response (information originally sent to planning officer on 3rd August 2016).

The plans have been reviewed and access to water is sufficient as the building is surrounded by two very large reservoirs and there is a hydrant at the entrance to the site (see plan below). Although this is above the commercial distance specification of 90m, it would suffice whilst pumping from the reservoirs is set up. Access for the fire appliances is acceptable.



Public Rights of Way (PRoW) response (previous comments sent to planning officer in email dated 3rd August 2016).

Whilst the main part of the application does not directly impact on the bridleway known as BW129, there is the reed bed and wetland mitigation which is very close to the southern boundary to the bridleway.

This particular area does get very wet especially during the winter months. The bridleway also drains downhill to this area (corner of the field to the Pagham Rife). The creation of the wetland area and reed bed could be of great benefit to hold water and provide good wildlife habitat, it also could improve the drainage in the area which would benefit the bridleway. Previously, comments from the PRoW officer said that before WSCC could offer support to this application, further clarification as to how the wetland area is to be constructed should be provided and if there is any opportunity to take some of the surface water from the bridleway into the wetland area to therefore improve the bridleway drainage at this point. WSCC would also ask for further assurances that this will not make the bridleway any wetter.

The applicant's has responded to this regarding the wetland area being a closed system. They are proposing a 10m margin between the wetland and the ditch on the southern boundary of the bridleway which WSCC PRoW team will accept on this occasion. The PRoW team is also happy with the assurance that the bridleway drainage will not be affected by the wetland system. In any event, if there is any problem with the drainage from the wetland to the bridleway going into the future this will be covered by legislation.

However, with regard to the applicant's response to consideration of a bridleway link parallel to Pagham Road north of the access road leading up to Public Bridleway 129, WSCC is disappointed with the response. A connection running along the inside of the hedge would be of great value and benefit to staff and visitors (we note they have a cycle/walk to work policy) and the wider local community. This would provide a safe means of linking the Barfoots site to BW129 which would take users over to the quieter roads of South Mundham which can then be used to go on to Chichester via the PRoW network to Marsh Lane and Vinnetrow Rd, thereby minimising use of the busy B2166 and Pagham Road. The applicant has not replied further on this point in the latest information.

Notwithstanding the shortcomings of the access identified elsewhere in this report where this path connects to Pagham Road and links thereto, the applicant should also consider up-grading the unofficial path used by Barfoots employees which runs parallel to the Pagham Road along with the further addition of a bridleway route going north from the access to Barfoots to join the bridleway known as BW129. Bridleway status would also enable cycle use which would be of great benefit to both the community and Barfoots employees in providing a safe walking/equestrian/cycle link to then join BW129 to South Mundham off road, as well as providing a safe walking/equestrian/cycle route off-road away from Pagham Road of which part is the B2166, subject to appropriate design and safety criteria being met. The Public Rights of Way section has previously stated that it would be happy to help and advise accordingly.

The following standard advice will also apply:

- The granting of planning permission does not authorise obstruction of, interference to or moving of any Public Right of Way (PROW); this can only be done with the prior consent of West Sussex County Council (WSCC), as highway authority, through a legal process.
- Safe & convenient public access is to be available at all times across the full width of the PROW, which may be wider than the available route – advice on the width can be provided by WSCC Public Rights of Way (PROW) Team. The path is not to be obstructed by vehicles, plant, scaffolding or the temporary storage of materials and/or chemicals during any works.
- Any down pipes or soakaways associated with the development should discharge into an existing or new drainage system and away from the surface of the PROW. No drainage system is to be installed through the surface of the path without the prior consent of WSCC's RoW team.
- Any alteration to, or replacement of, the existing boundary with the PROW or the erection of new fence lines, must be done in consultation with WSCC's PROW Team to ensure the legal width of the path is maintained and there is no unlawful encroachment.
- Access along the PROW by contractor's vehicles, deliveries or plant is only lawful if the applicant can prove they have a vehicular right. If the path surface is considered damaged as a result of the development then the applicant will be required to make good the surface to a standard satisfactory to WSCC's PROW Team.

S106/highways contributions.

To be determined depending on outcomes of further highways information and discussions.

Other information.

If not done so already, the Planning Case Officer should consult Highways England (HE) given the proximity of the site and possible traffic impact of the development on the A27 Trunk Road.

Conclusion.

Insufficient information has been provided to demonstrate the suitability of the development in highway terms. Therefore, the Highway Authority raises an objection on highway safety, sustainability and parking grounds. Concerns remain about the increased use of the vehicular and pedestrian accesses to the site; the lack of consideration of access to and from the site from the wider surrounding road network (i.e. footway and footpath accesses to local communities and public transport access) by sustainable modes – i.e. walking and cycling etc; lack of clear information about potential traffic generation and comparisons with similar facilities to fully inform traffic impact on the surrounding road network and lack of information informing number of car parking spaces to be provided.

In its consideration of the proposal and in-line with good planning practice, County officers have engaged with the applicant's Planning Consultant and Transport Consultant in an attempt to give them the opportunity to provide sufficient information and demonstrate suitable improvements as required to overcome the issues identified by the Highway Authority. Although additional information has been provided, it does not provide sufficient reassurance nor demonstrate how the site and its associated impacts on the highway network could be made acceptable to the Highway Authority.

In the absence of suitable information, the Highway Authority considers the impact of the development on the local highway network should be considered severe when assessed alongside the NPPF and local policy.

As such, the following highway objection is raised:

“Adequate information has not been submitted to satisfy the Local Highway Authority that the proposal is acceptable in terms of access (vehicular and pedestrian), visibility splays, traffic generation, off-street parking and sustainable access, thereby giving rise to increased hazards for highway users resulting in a severe impact to highway safety, contrary to paragraph’s 32 and 35 of the NPPF and paragraph’s 1.2.1 and 1.4.9 of the WSCC Local Transport Plan 2011-26.”

Tim Townsend
Strategic Planning