

**WEST SUSSEX COUNTY COUNCIL
STRATEGIC PLANNING CONSULTATION**

DATE: 13th January 2017

**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	☐	Modification	☐	More Information	☐
Objection	☒	No Objection	☐	Refusal	☐

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

This is the fourth WSCC highways and transport response to the planning application. It follows assessment of additional information provided by the applicant's highway consultant in email – Beth Wilson (Paul Basham Associates - PBA) to Tim Townsend (WSCC Highway Authority - CHA) reference 020.0259/TN/3 dated 9th December 2016.

Summary position of WSCC as Highway Authority.

In its previous response of 18th November 2016, the Highway Authority raised an objection on highway safety, sustainability and parking grounds - reason being that insufficient information had been provided to demonstrate the suitability of the development in highway terms. Following review of the latest information referred to above, concerns still remain about certain elements of the proposal; namely - 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)) and access to local communities and access by bus.

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. The Highway Authority will respond to this later on in this report.

Response to latest information from Paul Basham Associates (PBA).

To reiterate the Highway Authority's (CHA) concerns:

1. the increased use of the vehicular and pedestrian accesses to the site (and suitability thereof) and traffic impact;
2. the lack of consideration of sustainable access (walking, cycling and bus) to and from the site from the wider surrounding road network (i.e. footway and Public footpath (PRoW)) and access to local communities;
3. lack of suitable public transport access; and,
4. lack of suitable parking provision.

1. Increased use of the vehicular and pedestrian accesses to the site (and suitability thereof) and traffic impact.

In its response of 9th December 2016, the Highway Consultant states in paragraph 2.10 that certain information has been agreed by the Highway Authority. Two bullet points are offered:

- Vehicular access to the site to remain as existing, taken directly from Pagham Road via a private access road running into the site; and,
- Peak traffic flow times being September (given harvesting etc.).

Taking the first statement; Although vehicular access in and out of the site is via the E-W private access road, both the CHA and independent Road Safety Audit recommend that it be improved with regard to visibility at the point it joins Pagham Road. Therefore, to say it will be as *existing* is not correct.

The second statement is not challenged by the CHA.

Accesses (vehicular and pedestrian) - Turning to suitability of the access and road safety considerations thereof, 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.

In the previous Highway Consultant's reply, they 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 (and repeating CHA comments from earlier reports), the applicant will firstly need to demonstrate what is required to meet the recommendations in the Stage 1 Road Safety Audit. If plans are then agreed, it would be appropriate for the applicants to remove hedgerow/planting on their land. If hedgerow/planting is required to be removed on land forming part of the highway but *not* in the applicant's control, the Highway Authority can serve notice on the appropriate landowner to remove it.

Traffic impact – Previously, only a short snap-shot of traffic entering and leaving the site associated with the existing activities taken in mid-late September 2015 and a TRICS assessment was carried out by the applicant. At that time, the applicant concluded that traffic flow and parking numbers were 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.

The applicant's previous TA suggested that any increase brought-about by the new development would only increase these movements marginally. However, this was poorly evidenced. WSCC then asked for examples of similar operations so comparisons could be made. Some TRICS information was provided. However, by their own admission, the applicant stated that the sites used did not

represent the operations proposed at the application site nor were they representative of the location because of the areas the other two operations are in (Cornwall and Norfolk).

The CHA's interpretation of traffic impact based on the information provided so far (not TRICS) suggested that if staff numbers are proposed to increase by approximately 30, as stated, 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 (although the latest information from PB suggests that vans and LGVs are not envisaged to use the new facility). In addition, further information about traffic associated with other consented schemes on the site (but not yet built) has now been provided. This information considers that proposed under planning references P/68/15 (glasshouse, storage pond, ancillary staff facilities etc.) and P/7/05 (farm building extensions and replacement offices). Both applications suggested low amounts of additional traffic on a daily basis – 18 and 9 two-way trips respectively.

New traffic analysis provided by PBA.

Paragraph 4.6 of the new information is based upon traffic data taken from two nearby planning applications:

- Natures Way Foods (Merston site), horticultural packhouse, ancillary offices etc. – Chichester planning application 14/02300/FUL
- Wights Salads, Chichester Food Park, Chichester – Chichester planning application 16/0241/FUL

For the Natures Way application, the TA provided with the planning application estimates 90 staff working each 12-hour shift (so 90 in the morning and 90 in the evening) – equating to 360 trips. The TA then estimates that due to car sharing (approximately 3 persons per-car on average), this would reduce the trips to 120 from the packing facility. Added to this would be the office traffic, it was estimated that this would amount to a further 42 two-way daily trips during peak hours (30 of which by car). **Therefore, the worst-case total trips estimated to result would be 402 daily trips or best-case assuming good take-up of car sharing – 150.**

For Wights Salads, this estimated an additional 150 pack-house and 15 office staff (165). Anticipated shift patterns, again using car sharing of 3 persons per-car, then assumes a peak period generation of 50 vehicle trips for the packing house. For the office use, 146 car-based trips were estimated. **Total trips being 212-214 daily two-way.**

Both sites also include additional HGV traffic –

- Natures Way – 8 trips per-day
- Wights Salads – 16-18 two-way daily movements

Therefore, total traffic estimated for both of the above site (cars and HGVs) –

- Natures Way (worst-case) – 410 trips; (best-case) – 158 trips
- Wights Salads – (worst-case) – 232 trips; (best-case) – 228 trips

In their new assessment of the trip generation and trip rate for the Barfoots site, PBA has come up with the following trip rate figures based on the assessment of the comparison sites referred to above. They estimate the following:

- Trip rate per square metre ranging between 0.0159 and 0.538.

Applying these figures to the floor areas proposed as part of this planning application, gives the following scenarios:

- Best-case – 123 daily trips
- Worst-case – 416 daily trips

PBA has then explored this further, taking into account the applicant's envisaged shift patterns and number of new staff. They have used the car-share ratio of 3 persons per car (which is not accepted by the CHA for the Barfoot's application based on the census data showing car-share take-up of 1.75 persons per car) – giving rise to 20 additional movements for the proposed packing house. They still suggest 2 additional HGV movements per-day.

For the office use, PBA suggest using Barfoots and TRICS data that there could be 267 trips generated. However, because Barfoot's state that they envisage only 30 additional staff that the expected trip rate would be far lower.

Therefore, concluding this matter using the new PBA data (and assuming a car share ratio of 1.75), WSCC arrives at the following:

- **Worst-case – 237 additional two-way daily trips**
- **Best-case – 70 additional two-way daily trips**

Therefore, in an attempt to conclude the matters raised in the Road Safety Audit (RSA), the applicant should review their response made in the Designer's Response (DR) to the RSA and provide clear plans showing appropriate visibility improvements to both the vehicular and pedestrian access points as recommended in the RSA in order to accommodate the additional vehicular impact. At that stage, the CHA will review these and comment on whether they are suitable. For avoidance of doubt, the plans (CEP or PBA) do not show what is required.

2. The lack of consideration of sustainable access (walking, cycling and bus) to and from the site from the wider surrounding road network (i.e. footway and Public footpath (PRoW)) and access to local communities.

Alongside these recommended improvements at the vehicular and pedestrian accesses, off-site improvements to aid walking and cycling to and from the site, should also be provided. Although discussed and suggested improvements shown but discounted in the latest submission, no further work is proposed by the applicant to satisfy this part of the application as they consider that the impact of the development using the bus improvements offered (see later in this report) appropriately address the sustainability issues raised. Given that further staff are proposed to use the site as part of this application and that there are already access deficiencies identified for those already travelling on-foot trying to reach the site, the CHA disagree with the current conclusions reached by PBA that nothing be done (other than public bus service provision).

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 (WSCC note that the applicant says it has 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.

As well as addressing 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 suitable walking/equestrian/cycle link to then join BW129 to South Mundham off road, as well as providing a suitable 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.

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.

The applicant suggests that the additional numbers of staff associated with the proposal are set to be low. TRICS data would suggest otherwise with regard to trips etc. As such, the CHA recommends the following:

The CHA still consider access by sustainable means is an important component of the planning application. The PRow improvements appear to be within the gift of the applicant, whereas anything external to the site is not. Therefore, WSCC ask that the previous response rejecting the PRow improvements be re-considered by the applicant.

With regard to improvements to assist with walking to and from the site in and around the Sefton Road/Pagham Road area, the CHA is prepared to consider a financial contribution to be pooled alongside other contributions secured (and to be secured) from other nearby developments to be used towards improving pedestrian accessibility to and from the site. Applicant to consider this and reply, please.

3. Lack of suitable public transport access.

Commercial 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.

PBA has considered possible ways to improve access to these but for the reasons given in the TA (mainly safety), they have discounted them. Instead, they state that the proposed public bus and minibus services should adequately cater for access in and out of the site.

In addition to the existing public service provided by the 600 and the private minibus, 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 months). 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. PBA does state that buses will enter the site. With regard to frequencies and where services run, this is also now provided in paragraphs 3.17 – 3.26 of the new Technical Note supplied by PBA.

The assumption made by the applicant is that if the bus is available to 69% of employees, this creates the potential for over 290 users – far more than the existing bus service. However, if the current paid-for service is underused by staff then the figure quoted is unsubstantiated. The CHA accept that if a service runs into the site it has the potential to provide a service better-suited to those working at/visiting the site who might want to choose working there. However, given the costs proposed to travel, the very limited time proposed to run the service, it relies heavily on large-scale take-up by employees and other local people.

Mini-bus – this probably has more chance of success if it can be secured for the long-term. However, to do this it would have to be provided directly by the applicant or a private operator and paid-for by the applicant in the long-term and free-of-charge for staff and travel around a prescribed and convenient route to pick up staff from several locations.

Concluding this section, the long-term viability of the public service is not known. The details of the service do, however, show commitment by the applicant to try to achieve improvements to access by this mode of transport. The mini-bus could assist sustainable access but would have to be provided free-of-charge and regularly and to places where staff live on a regular and long-term basis. Access to other public services remains limited.

In an attempt to conclude this matter, the applicant should provide further information to demonstrate long-term robustness of a mini-bus service based on the criteria set out in the main text above.

4. Lack of suitable parking provision.

In an attempt to examine this further, the CHA has looked again at the assumptions it made using the data supplied previously. Assuming the applicant's estimates for *existing* car sharing amounted to a ratio of approximately 2.4 persons per vehicle, based on 400 existing staff, this suggests ratio figure equates to the car park accommodating approximately 170 cars. The previous Transport Assessment (TA) provided by the applicant then quoted 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 overall for the entire site (existing and proposed), 245 vehicles would require access to the site. If the applicant's ratio of 2.4 is used, the resultant figure is approximately 180. The CHA advocates the use of the 1.75 ratio resulting in the higher figure (245).

Existing and proposed parking and turning for cars is shown in one location east of the new building. This will need to be moved because of the location 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. PBA's assessment of the situation suggests the following:

- Main car park – 175 spaces
- Main reception – 30 spaces
- Current main office – 5 spaces
- AD Plant – 5 spaces

Total: 215. This concurs with the previous consultant's assessment.

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, although traffic generation is stated to be low for the two proposals referred to earlier in this report) 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.

PBA's assessment suggests that if the car park is formally marked-out, it could accommodate a total provision of 215 spaces. If one was to apply a 10% Travel Plan reduction to the car parking demand suggested by the CHA, this brings possible demand for parking down to 224 (249 - 10%).

Conclusion - if the application is approved, the CHA would expect the car parking to be marked-out to accommodate a minimum of 215 spaces as this is very close to the 224.

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 the car parking, cycle, motorcycle and lorry parking (and turning for the latter) on-site must be secured by appropriate planning condition. The applicant's planning consultant has previously stated that this is acceptable. Therefore, the CHA recommend that in the event the application is permitted, this be a condition of any consent granted.

S106/highways contributions.

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

Conclusion.

The CHA is still of the view that further information is required to demonstrate the suitability of the development in highway terms. Therefore, the Highway Authority continues to raise an objection on highway safety and sustainability grounds (and parking grounds if the number of spaces recommended elsewhere in this report are not agreed to by the applicant). 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.

In its consideration of the proposal and in-line with good planning practice, County officers continue to engage with the applicant's Planning Consultant and Transport Consultants 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 still 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 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