

**WEST SUSSEX COUNTY COUNCIL
STRATEGIC PLANNING CONSULTATION**

DATE: 20th 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
Objection**

X

**Modification
No Objection**

**More Information
Refusal**

S106 contribution total (see below for breakdown): £20,000 (foot/cycle accessibility improvements)

This is the fifth WSCC highways and transport response to the planning application. It follows a meeting with the applicant and assessment of additional information provided by the applicant's highway consultant (revised Designer's Response to Stage 1 Road Safety Audit and associated drawings (020.0259.004 and 020.0259.005)) prepared by Paul Basham Associates (PBA) to Tim Townsend WSCC Highway Authority (CHA).

Summary position of WSCC as Highway Authority.

No highway objection is raised to the proposal subject to suitable planning conditions being attached to any consent granted and a suitable S106 Agreement to secure a financial contribution towards accessibility improvements in the locality (footpaths/footways and bus service). This position follows further discussion with the applicants and their agents.

Proposal.

The proposed development is for a new food packing and preparation house, offices and associated parking, turning and loading bays. Full details can be found in the submitted planning application submission and comments contained in previous Highway Authority reports.

Response to latest information from meeting with applicants and their agents.

To reiterate the Highway Authority's (CHA) previous 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.

Replies and agreed actions.

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

Accesses (vehicular and pedestrian) - Turning to suitability of the access and road safety considerations thereof, The CHA, Road Safety Report and Stage 1 Road Safety Audit all identified shortcomings with the vehicular and pedestrian accesses to the site. Following production of drawings 020.0259.004 and 020.0259.005 and further assessment of the Road Safety Audit recommendations, the Highway Authority is satisfied with the information now shown – i.e. that improvements can be made to both to improve visibility at both access points to the site. For all areas under the control of the applicants, they should maintain the visibility. For areas deemed to be highway, it is recommended that the applicant also maintains using a 'licence to maintain', obtainable from the Highway Authority which permits an appropriately qualified contractor to do the work on the applicant's behalf subject to appropriate traffic management and other health and safety requirements. The Area Highway Engineer should be approached to secure this licence.

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 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 Wight's 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 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), CHA arrives at the following:

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

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 now secured, off-site improvements to aid walking and cycling to and from the site, have also been discussed further with the applicants. The CHA has concluded (with agreement from the applicant) that a financial contribution be provided to the CHA in order that it be used to improve pedestrian and cycling links in the locality. This could be used on the surrounding road or Public Rights of Way (PRoW) network. Any contribution could be used alongside anything that might be secured as part of other nearby planning applications where they might require similar improvements.

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, the applicant has explained that for health and safety reasons for users, that this could not be provided on the land in question. WSCC is, of course, disappointed with this response but accepts it for the reasons given. If at some future stage this could be reviewed, WSCC would welcome further discussion about it as 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 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. Likewise, WSCC would welcome the opportunity to work with the applicant to look at 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 following standard PRoW 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. Any document should include commitment to both the commercial and mini-bus services.

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 Sefton 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.

In addition to the existing public service provided by the 600 and the private minibus, the applicant 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 for 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%. Further information about it has now been provided and states that users will be charged to use it. 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. However, through discussion with the applicant the CHA accepts that it is in their interest to provide a choice of travel opportunities/options for staff to travel to-and-from the site.

Mini-bus – The applicant has confirmed that this is an ongoing service that has run (and will continue to do so) in the long-term. As for the public service, the applicant is mindful of the need to ensure that staff have choice of access to and from the site and if this isn't provided, this reduces attractiveness of the staff as a place of employment. Therefore, they are committed to continuing this.

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 also assists sustainable access and best endeavours to continue (and where possible, enhance this) should be made. Reference to both should be included in any Travel Plan secured.

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%).

Following further discussion with the applicant and their agents, it is proposed to provide a car parking large enough to cater for 215 spaces but left unmarked for informality given the rural setting. However, if it appears that this parking is not being used to good effect, then the applicant is agreeable to marking-out the spaces to maximise numbers. An obligation should be included in the final Travel Plan to secure this.

The following should also be provided (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 too.

S106/highways contributions.

A suitable S106 Agreement is required to secure a financial contribution of £20,000 towards accessibility improvements to and from the site (walking and cycling).

Conclusion.

No highway objection is raised in response to the proposal subject to an appropriate S106 Agreement toward accessibility improvements (amount quoted in previous paragraph) and the following conditions:

1. **Vehicular and pedestrian access to development site (Pagham Road)** – The development, hereby permitted, shall not be occupied until the vehicular and pedestrian accesses have been improved as per Drawing No. 020.0259.004 and 020.0259.005 and in-compliance with the recommendations of the approved Safety Audit. When complete, both shall thereafter be maintained to provide the visibility splays shown.

Reason – To ensure fit-for-purpose accesses to and from the site constructed to a suitable standard and in-compliance with Road Safety recommendations.

2. **Car parking spaces (details required)** - No part of the development shall be first occupied until the car parking requirements have been provided in accordance with plans and details to be submitted to and approved by the Local Planning Authority after consultation with the County Highway Authority. These spaces shall thereafter be retained at all times for their designated use.

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

3. **Lorry parking spaces (details required)** - No part of the development shall be first occupied until the lorry parking requirements have been provided in accordance with plans and details to be submitted to and approved by the Local Planning Authority after consultation with the County Highway Authority. These spaces shall thereafter be retained at all times for their designated use.

Reason - To provide lorry parking spaces for the use.

4. **Motorcycle parking (details required)** - No part of the development shall be first occupied until secure and covered motorcycle parking spaces have been provided in accordance with plans and details submitted to and approved by the Local Planning Authority after consultation with the County Highway Authority.

Reason - To provide adequate parking for motorcycles for the use.

5. **Cycle parking (details required)** - No part of the development shall be first occupied until secure and covered cycle parking spaces have been provided in accordance with plans and details submitted to and approved by the Local Planning Authority after consultation with the County Highway Authority.

Reason - To provide adequate parking for cycles and to promote alternative travel options to the use of the car in accordance with current sustainable transport policies.

6. **Travel Plan (to be approved)** - No part of the development shall be first occupied until a Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan once approved shall thereafter be implemented as specified within the approved document. The Travel Plan shall be completed in accordance with the latest guidance and good practice documentation as published by the Department for Transport or as advised by the Highway Authority.

Reason - To encourage and promote sustainable transport.

7. **Construction management plan (details required)** - Prior to development commencing, a Construction Management Plan shall be submitted to and be approved in writing by the Local Planning Authority after consultation with the Highway Authority. This shall require the applicant and contractors to minimise disturbance during demolition and construction and will include (but not be limited to) details of the following information for approval:

- the phased programme of construction works;
- the means of access and road routing for all construction traffic associated with the development;
- provision of wheel washing facilities and details of their operation and location;
- Details of street sweeping;
- construction working times including delivery times;
- details of a means of suppressing dust arising from the development;
- details of all proposed external lighting to be used during construction;
- details of areas for the loading, unloading, parking and turning of vehicles associated with the construction of the development;
- details of areas to be used for the storage of plant and materials associated with the development;
- details of the temporary construction site enclosure to be used throughout the course of construction (including access gates).
- Contact details for the site contractor, site foreman and CDM co-ordinator (including out-of-hours contact details).
- Evidence of consultation with neighbours prior to works commencing.
- Details of any temporary traffic management that may be required to facilitate the development including Chapter 8 traffic signage;
- A Section 59 Agreement (only if HGV construction vehicle numbers exceed 20 per-day throughout course of development).

Details of how measures will be put in place to address any environmental problems arising from any of the above shall be provided. A named person shall be appointed by the applicant to deal with complaints, shall be available on site and their availability made known to all relevant parties.

Reason - To ensure safe and neighbourly construction in the interests of amenity and road safety.

Informatives.

Informative – Licence to maintain – The applicant should contact West Sussex County Council Local Area Highways Manager to obtain necessary consent to maintain vegetation on highway land for visibility purposes (both vehicular and pedestrian access points).

Informative – S59 Agreement – The applicant should contact West Sussex County Council Legal Services to obtain necessary information to enter into the Section 59 Agreement under the Highways Act 1980 as referred to in condition 5 above. This Agreement is required due to the extraordinary traffic that would be generated during the construction works and to provide a means of making good the public highway following the cessation of construction traffic and building work on the site.

Informative – Public Rights of Way (PRoW) – The applicant should contact West Sussex County Council Legal Services Team in order to establish the appropriate procedure for any diversion or Stopping Up of PRoW if so required. No works (including obstructions/closure etc.) should be commenced to/on the highway until appropriate permissions are received to do so.

Tim Townsend
Strategic Planning