

**Regeneration Of Crouchlands Farm  
Whole Farm Scheme  
Planning Application Ref: 22/01735/FULEIA**

**Technical Note  
Review of Highway and Transport Matters**

**Plaistow and Ifold Parish Council**

**July 2022**



## 1 INTRODUCTION

- 1.1 SW Transport Planning Ltd is instructed by Plaistow and Ifold Parish Council to provide advice in connection with the Crouchlands Whole Farm Scheme planning application submitted by Artimis Land and Agriculture Ltd. This note contains an initial review of the submitted planning application documents relating to transport matters and provides advice regarding the potential highway and transport implications for the parish.
- 1.2 The planning application is supported by three key transport documents, prepared by consultants Royal Haskoning DHV, as follows.

**Transport Assessment**  
**EIA Transport Chapter**  
**Framework Travel Plan**

- 1.3 Following a review of the above reports it is considered that there are a number of areas where insufficient information and analysis has been provided to fully assess the impacts of the development. In addition, some of the underlying assumptions used in the assessment of transport impacts are subjective and, in some cases, appear incorrect meaning that impacts are likely to be under reported.

## 2 TRANSPORT ASSESSMENT (TA)

### 2.1 Baseline Traffic Data

- 2.1.1 The TA is underpinned by a series of traffic surveys carried out in 2018 and 2021. The surveys cover both weekday peak periods and weekends and are detailed in section 3.5.2 of the TA.
- 2.1.2 In summary, a series of peak period Manual Classified Counts (MCC's) were undertaken at the following 6 junctions.
- Junction 1** – Site Access – Rickman's Lane / Crouchlands Farm
  - Junction 2** – Rickman's Lane / Plaistow Road / Foxbridge Lane
  - Junction 3** – The Street / Dunsfold Road / Loxwood Road
  - Junction 4** – Plaistow Road / Foxbridge Lane
  - Junction 5** – B1233 Vicarage Hill / Plaistow Road
  - Junction 6** – Plaistow Road / Kirdford Road
- 2.1.3 In addition, Automatic Traffic Count (ATC) surveys, to capture 24-hour daily flows, were also undertaken at the following locations.

**Rickman's Lane**  
**Foxbridge Lane**  
**Plaistow Road (Ifold)**

- 2.1.4 The surveys cover both pre and post Covid pandemic traffic conditions. This has enabled conversion factors to be calculated such that the 2021 survey results could be adjusted to reflect the higher pre-pandemic conditions.
- 2.1.5 The use of adjusted, pre-pandemic traffic forecasts for the assessment of 'highway capacity impacts' is considered reasonable but, in our view, the assessment of the 'environmental impacts' of traffic flow changes should be based on current, post-pandemic baseline conditions in the interests of robustness.

## 2.2 Trip Generation

- 2.2.1 The TA provides estimates of traffic generation for each of the following elements of the proposed development.

**Rural Enterprise Centre (Office and Light Industry)**

**Rural Food and Retail**

**Equestrian Centre**

**Glamping**

- 2.2.2 The refurbishment of the Farm Hub, livestock operation, is assumed to fall within the permitted use of the farm and its trip generation has not been considered further in the TA.
- 2.2.3 The traffic generation forecasting is incomplete in some areas, as follows.
- 2.2.4 There is insufficient detail about servicing for the various facilities. The office and light industry elements would require goods and materials to be brought into the site and for waste and recycling to be removed. Similar comments apply to the retail uses and café. The equestrian centre would require feed and straw etc but no information has been provided about this or how the removal of waste will be managed.
- 2.2.5 Glamping traffic forecasts focus mainly on changeover days. Guests are likely to make day trips to explore surrounding areas, including evenings out. The forecasts for these trips appear to be under estimated.
- 2.2.6 Trip generation for the Rural Enterprise Centre could be highly variable depending on end users. Only one possible scenario has been considered. There could be considerable fluctuation for this and other land uses on the site so some sensitivity testing is needed to properly appraise the likely impacts.
- 2.2.7 The use of Hardnip's Barn for weddings and events is briefly discussed in section 8.5 of the TA, with the expectation this would be linked to use of the Glamping rather than as a free-standing event venue. Such events are assumed by the applicant to be relatively infrequent and therefore the trips associated with the use of the barn have been excluded from the combined trip generation analysis within the TA.

- 2.2.8 The unrestricted use of the bar for events such as weddings, birthday parties and other gatherings could be relatively frequent, possibly with multiple events on the same day. The impacts for such events cannot be fully assessed without further information.
- 2.2.9 The Indicative Show Calendar for the Equestrian Centre (Table 7-1 of the TA) confirms that this element would be capable of hosting frequent and wide-ranging events. The trip forecasting for these events suggests that arrivals and departures would be spread evenly throughout the day whereas in practice there is likely to be a more concentrated arrival and departure pattern based around start and finish times. More detail is needed to enable the full impacts of these peak periods to be understood.
- 2.2.10 Major events such as Gala Evenings are expected to draw bigger crowds but are said to be very infrequent, with only one or two events per year and as such, they are not assessed in the TA. The TA states they would be controlled by Event Traffic Management. Further information is needed to assess the likely impacts of such events and how this would be managed in relation to other existing marshalled events such as cycle races and time trials.

#### **Trip Distribution**

- 2.2.11 The methodology for traffic distribution and assignment (i.e. the directional distribution and routes taken by traffic accessing the development) is set out in section 8.9 of the TA. The approach used has been to utilise the turning proportions from the various traffic counts at junctions within the study area.
- 2.2.12 Although this is a widely used methodology (and the principle has been agreed with WSCC during pre-application discussions), it represents a simplistic approach as it assumes existing turning proportions on the surrounding road network will remain constant over time. In practice, the provision of a new major traffic attractor at the site would draw traffic from a wide catchment area and result in changes in traffic patterns.
- 2.2.13 To account for this, some sensitivity testing of alternative distribution patterns, based on likely origins/destinations and route choice, should be carried out.

### **2.3 Proposed Site Access**

- 2.3.1 The applicant proposes a new site access junction on Rickman's Lane to the east of the current farm access. This is to ensure that improved visibility splays, compliant with required standards, can be achieved.

## 2.4 Parking Demand

2.4.1 The levels of on-site car parking have been determined from first principles having regard to the estimated arrival and departure profiles of the various proposed land uses. This enables the accumulated parking demand to be calculated and is shown in Tables 6-1 and 6-2 of the TA. Given the concerns outlined earlier that the trip generation forecasts for certain land uses could be higher than stated, the total parking demand could be greater than set out in the tables.

## 2.5 Committed Development

2.5.1 The TA considers the sites at Dunsfold Park (WA/2015/2395) and Land East of Plaistow (19/0086/FUL) but takes the view that the former is too remote from the site to have any material impacts and the latter is too small.

2.5.2 There is no consideration of the emerging Foxbridge proposals (at the former golf course site) as those proposals are speculative at this stage and not considered to be committed development.

## 2.6 Assessment of Traffic Impacts

2.6.1 The TA focusses on peak hour junction capacity assessments at the six junctions (listed in Section 2.1 above), although junctions 4 and 5 were excluded on the basis that they would experience fewer than 30 extra two-way vehicle movements per hour.

2.6.2 The modelling approach follows standard practice and utilises recognised modelling software. The results confirm that all of the junctions tested have sufficient spare capacity to accommodate the proposed development with minor impacts on queues and delays.

2.6.3 However, this simplistic conclusion overlooks the impacts that would be felt by pedestrians, cyclists and other vulnerable users using the lanes serving the site, who would notice a significant change in traffic levels. In addition, the increased numbers of horse boxes and trailers would be likely to create difficulties for vehicles passing one another on the narrower sections of the highway network and could lead to localised delays and damage to existing verges. These matters are more relevant for the EIA rather than the TA and are discussed further in Section 3 below.

# 3 EIA TRANSPORT CHAPTER

## 3.1 Overview

3.1.1 Chapter 8 of the EIA Report deals with Transport and Access.

## 3.2 Magnitude and Significance Criteria

- 3.2.1 The EIA process allows the authors to set their own magnitude and significance criteria for the assessment of impacts, although these should be based upon recognised guidance. In the case of highway impacts, that guidance is provided by the Institute of Environmental Assessment document "Guidelines for the Environmental Assessment of Road Traffic" (GEART). The leeway provided the EIA process means that wide ranging interpretations of the significance criteria are possible.
- 3.2.2 The Transport and Access chapter presents one version of impacts and concludes that these will be 'minor'. Further work is needed to test the robustness of this conclusion, by assessing the sensitivity of the results to alternative interpretations of magnitude and significance criteria. A further important consideration is that the concerns raised in Section 2 about trip generation and distribution will also directly affect the analyses within the EIA and could affect the conclusions.
- 3.2.3 In addition, it appears that the baseline traffic flows used in the EIA relate to the pre-pandemic conditions; the same approach as used in the TA and are based on Annual Average Daily Traffic (AADT) flows, meaning there is no difference between weekday and weekend flows in the analysis. Whilst the use of pre-pandemic flows provides a robust approach for the testing 'highway capacity' it is not considered appropriate for consideration of 'environmental impacts' as, in practice, the net change in traffic flows will be experienced relative to current (post-pandemic) conditions. Hence further analysis is needed to enable the full environmental impacts to be determined.
- 3.2.4 On the evidence currently available it appears the impacts of the proposals could be more significant than presently stated in the EIA. The impacts on vulnerable users will need to be re-evaluated once variations in trip generation and distribution and the EIA significance criteria have been reassessed.

## 4 FRAMEWORK TRAVEL PLAN

- 4.1 The preparation of Travel Plans is a standard requirement for most developments. The applicants' FTP sets out a strategy for promoting sustainable travel to and from the site, with emphasis on the aim of reducing the numbers of single occupancy car journeys.
- 4.2 In this case, the scope for adopting alternative travel modes is very limited. However, the aim of the FTP is to seek to influence travel choices, where possible and encourage car sharing or walking/cycling where practicable.
- 4.3 The FTP is a necessary component of the planning application but is not relied upon by the applicants' within the impact analyses in the TA or EIA.

## 5 POLICY CONSIDERATIONS

- 5.1 The key policy documents of relevance to the proposals are the National Planning Policy Framework (NPPF) and Adopted Chichester Local Plan (ACLP).
- 5.2 The NPPF encourages the promotion of sustainable development focussing on limiting the need to travel and offering a genuine choice of travel modes. The Framework highlights the need to locate developments in areas which are or can be made accessible by a range of travel modes, albeit noting this is more difficult in rural areas.
- 5.3 The Framework also contains guidance on supporting rural economies, which support farm diversification but places emphasis on sustainability and scale relative to meeting local needs.
- 5.4 Many of the policies of the ACLP follow the same principles as the NFFP, with a focus on promoting sustainable development. Policy 8 deals with Transport and Accessibility emphasising that developments should be well located to minimise the need for travel and encourage sustainable modes. Policy 25 covers Development in the North of the Plan area and refers to the provision of “*small scale development*”. Policy 30 dealing with tourism and leisure references the need for development in the countryside to be “*of a scale appropriate to the location*” and the need to “*maintain the tranquillity and character of the area*”.
- 5.5 As set out in the preceding sections of this note, further information and analysis is needed to fully quantify the transport and highway impacts of the development. The development proposals will then need to be tested against the above policy criteria to establish if any conflicts arise.

