

**Foxbridge Golf Club Site
Proposed Leisure Development
Planning Application Ref: 22/02346/OUT**

Review of Highway and Transport Matters

**Plaistow and Ifold Parish Council
October 2022**



1 INTRODUCTION

- 1.1 SW Transport Planning Ltd is instructed by Plaistow and Ifold Parish Council to provide advice in connection with the proposed redevelopment of the former Foxbridge Golf Club site in Foxbridge Lane. A planning application submitted by The Substantia Group proposes a leisure development including 121 holiday units, a 50 bedroom spa hotel, farm shop, restaurant and outdoor recreation facilities.
- 1.2 This report contains a review of the submitted planning application documents relating to transport matters and provides advice regarding the potential highway and transport implications for the parish.
- 1.3 The planning application is supported by a Transport Assessment report and a Travel Plan, prepared by Evoke transport consultants.
- 1.4 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, a number of the underlying assumptions used in the assessment of transport impacts are subjective and, in some cases, appear incorrect meaning that impacts of the development are likely to be under reported.

2 TRANSPORT ASSESSMENT (TA)

2.1 Baseline Traffic Data

- 2.1.1 The TA is supported by a series of traffic surveys carried out between March and June 2022. The surveys cover both weekday peak periods and weekends and include Manual Classified Counts (MCC's) at two junctions, plus an Automatic Traffic Count (ATC) survey in Foxbridge Lane.
- 2.1.2 The classified turning counts were carried out on Thursday 16th and Saturday 18th June 2022, at the following junctions.
- Plaistow Road / Foxbridge Lane; and
B1233 Vicarage Hill / Plaistow Road.**
- 2.1.3 The ATC survey in Foxbridge Lane was carried out over a 7-day period from 26th March and 1st April 2022.
- 2.1.4 The surveys therefore cover only post Covid pandemic traffic conditions and do not reflect the higher, pre-pandemic conditions.

2.2 Trip Generation and Mode Share

Trip Rates

2.2.1 The TA uses the TRICS database to obtain traffic generation rates for each of the following elements of the proposed development.

Holiday Units

Hotel and Spa

Farm Shop

Restaurant

2.2.2 Having derived trip rates for each of the land uses individually, the TA then seeks to discount a proportion of the trips to allow for internal linked trips between the separate elements (i.e. people using one facility then moving to another without creating an extra trip on the road network) and to account for some pass-by trips (i.e. trips made by people passing the site and deciding to call in whilst on-route to another destination). Whilst this is reasonable in principle, the assumptions used in the TA are unsubstantiated and appear optimistic.

2.2.3 For example, the TA assumes 50% of trips to the farm shop will come directly from the holiday accommodation. The same 50% linked trips assumption has been applied to the restaurant trips. In addition, a further 20% of farm shop traffic is assumed to be pass-by trips from traffic using Foxbridge Lane. These estimates are arbitrary and appear high, particularly the pass-by assumption, given that Foxbridge Lane is not a major thoroughfare for through traffic.

2.2.4 In practice the farm shop and restaurant are likely to be destinations in their own right, with only a relatively small proportion of trips generated from the holiday accommodation; and with virtually no pass-by trips.

2.2.5 In view of this, it is likely that the total external traffic generation forecasts in the TA are under estimated.

Delivery and Servicing Trips

2.2.6 No information has been provided in relation to the numbers, types or timing of deliveries and other service vehicles to the various components of the proposed development. Section 4.4 of the TA discusses the movement of food, luggage and waste within the site by electric buggies but no details of external service vehicle trips are provided.

2.2.7 The farm shop, hotel and restaurant will require frequent deliveries of goods and the removal of waste/recycling; and the holiday accommodation will also generate a need for servicing trips.

2.2.8 Such trips are embedded within the TRICS trip rates, but only 'all vehicle' trip generation estimates have been presented in the TA, so it is not possible to determine the numbers or types of service vehicles that will be generated.



Mode Share

- 2.2.9 Table 7 of the TA sets out expected mode shares for staff based on Census data for the 'Chichester 002' Mid-level Super Output Areas (MSOA). This dataset covers the local area including Ifold, Plaistow, Afold, Kirdford and Wisborough Green. There are errors in the table meaning that claimed levels of sustainable travel are over stated. The applicant also includes rail travel within the assumed sustainable modes, ignoring the fact that such trips also require a car journey to and from the rail station.
- 2.2.10 Table 8 of the TA sets out visitor mode shares based on National Travel Survey data and argues that the resulting mode share would apply to visitors once they have arrived at the site; i.e. for travel during their stay rather than their method of travel to and from the site at the beginning and end of their stay. Once again, there are some small errors in the table meaning that sustainable travel modes are over stated.
- 2.2.11 The NTS data used in the analysis covers the whole of England, including all major towns and cities, so has limited relevance to a rural location like Ifold where public transport options are limited.

Trip Distribution

- 2.2.12 The TA assumes that all traffic will arrive and depart towards the north and east, via the Foxbridge Lane / Plaistow Road junction and the B2133 (Vicarage Hill). Whilst this is likely to be the most attractive route for the majority of trips, there will also be a proportion of traffic traveling via the south and west using other routes. The impacts of these trips through Plaistow and Kirdford have not been assessed.

2.3 Car and Cycle Parking

Car Parking

- 2.3.1 Section 4.6 of the TA sets out proposed levels of car parking for each of the proposed land uses. It acknowledges there is some uncertainty as to the parking demand for the holiday units, hotel and health club, which will share the same car park. Estimates for the combined parking demand for these three uses range from 171 - 311 spaces and the applicant proposes to provide 191 spaces.
- 2.3.2 However, Table 11 of the TA shows that the holiday units alone could generate a demand for 2 spaces per unit, which would give rise to 242 spaces just for the holiday accommodation. It therefore appears that the proposed level of parking is insufficient.
- 2.3.3 With regard to the farm shop and restaurant, the applicant assesses the demand could range from 41 to 292 spaces but proposes a 63 space car park. This again suggests a risk of under provision.



2.3.4 Further work is needed by the applicant to justify the proposed levels of parking and to identify areas where additional parking could be provided within the site if needed.

Cycle Parking

2.3.5 Section 4.7 of the TA states that cycle parking for staff and visitors will be provided in accordance with WSCC cycle parking standards but no calculations are provided and the Site Masterplan in Appendix A of the TA shows no areas where such cycle parking could or will be located. Paragraph 4.7.4 of the TA proposes that this will be dealt with at the Reserved matters stage.

2.3.6 As cycle parking is a mandatory requirement and cycling is claimed to be a key component of the development, the matter needs to be addressed at this stage and not deferred until after any permission has been granted.

2.4 Proposed Site Access

2.4.1 The TA states that the existing site access from Foxbridge Lane will be retained to serve the proposed farm shop and restaurant and a new separate access will be constructed, approximately 120m to the south, for the hotel and holiday accommodation. However, it is not clear from the drawings at TA Appendix E how the new access will connect to the proposed leisure car park. In addition, it appears it would be possible to access both car parks from either access point unless a gate is provided (a proposed 'emergency gate' is indicated on the Drawing R-21-0138-002).

2.4.2 Further information is required regarding the design of the access routes and how control of the emergency gate will be managed and secured.

2.5 Off-Site Highway Mitigation (Passing Bays)

2.5.1 The TA proposes localised carriageway widening on Foxbridge Lane near the junction with Plaistow Road, plus the creation of 6 passing bays between the site and Plaistow Road. These are shown on Drawing R-21/0138-010 in Appendix F of the TA.

2.5.2 The drawings show indicative designs based on two-dimensional OS mapping rather than a three-dimensional topographical survey. The impacts of these construction works on adjoining trees and highway ditches has not been assessed. Further work is needed to establish the practical feasibility of carrying out the construction works and their visual and landscape impacts.

2.5.3 Similar measures were proposed in relation to the 2017 Crouchlands Farm Biogas proposals where the Inspector found that such works would not materially improve traffic flow but would cause a degree of harm to the rural character of the lane; which contributed to the dismissal of the Appeal.

2.6 Committed and Proposed Development

- 2.6.1 The TA contains no references to, or analysis of, committed or proposed developments in the area.
- 2.6.2 Whilst there are no significant committed developments in the local area, the recent planning application for the redevelopment of Crouchlands Farm (Ref 22/01735/FULEIA), which contains many similar land uses, is a material consideration. The close proximity of the site and its reliance on the same access routes means that the combined effects of both proposals will be significant.
- 2.6.3 This is a key area of concern and further work is needed to enable the cumulative impacts to be assessed.

2.7 Assessment of Traffic Impacts

- 2.7.1 The TA focusses on peak hour junction capacity assessments at the two site access junctions and at two off-site T junctions – Foxbridge Lane / Plaistow Road and Plaistow Road / B2133.
- 2.7.2 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.
- 2.7.3 However, as noted above, no account has been taken of the cumulative impacts associated with the Crouchlands Farm redevelopment proposals, therefore further analysis is needed to test the combined impacts.
- 2.7.4 Beyond the junction capacity assessments mentioned above, no consideration has been given to the impacts that would be felt by pedestrians, cyclists and other vulnerable users using the lanes serving the site. These road users would notice a significant change in traffic levels in a location where there are no footways or street lighting.
- 2.7.5 Unlike the nearby Crouchlands Farm planning application, the current Foxbridge Golf Club site application has not triggered the need for a formal Environmental Impact Assessment (EIA). However, that does not mean that the proposals will not create adverse environmental impacts that will be experienced by local residents and non-motorised road users.
- 2.7.6 Table 24 of the TA shows that the development will generate 887 vehicle movements per day on weekdays and 979 per day at weekends. These are discounted down to 667 per day on weekdays and 737 at weekends if the applicant's assumptions about linked trips and pass-by trips are taken into account. These compare with current baseline flows of around 913 on weekdays, 535 on Saturdays and 465 on Sundays (TA Table 6). Thus indicating at least a 73% increase in traffic flows on Foxbridge Lane on weekdays and a more than doubling of traffic at weekends.



- 2.7.7 Figure 8 of the TA shows that the current baseline flow on Foxbridge Lane between 1pm and 2pm is approximately 70 vehicles per hour compared with a predicted development flow of approximately 90. Again, indicating a more than doubling of traffic during the development's peak period. Figure 9 shows that for the same time period at weekends, the development is expected to add around 120 vehicle movements per hour to Foxbridge lane compared with a current baseline flow of around 50 vehicles per hour. This represents a 140% increase.
- 2.7.8 This indicates that the development will generate significant increases in traffic flows that would be likely to result in adverse environmental impacts.

2.8 Transport Sustainability

- 2.8.1 Options for access to the site by public transport are limited. The nearest bus stops, on Rickman's Lane, are some 830m walk distance from the centre of the site (not 550m as incorrectly stated in the TA). The two bus services (64/69) operating from these stops only run once per day on certain weekdays (the 64 runs Mon to Thu and the 69 on Tue and Fri only). The next nearest stops are at Plaistow Road (a 1.2km walking distance) from the site where the 42 bus operates once per day from Mon to Fri. The nearest rail station is 11.2km away at Billingshurst.
- 2.8.2 In addition, there are no footways, street lighting or cycle infrastructure on the lanes serving the site. As a consequence, the predominant mode of travel to the site will be by private car.
- 2.8.3 The TA refers to the provision of a staff minibus but with multiple possible pick-up / drop-off locations and variable staff working patterns it seems unlikely this would materially reduce car-based staff trips.
- 2.8.4 The TA also mentions the possible use of the mini bus as a shuttle service to Billingshurst rail station for visitors. However, this would still generate a vehicle trip for each drop-off and collection. The suggested pre-booking system for visitors would potentially take the minibus out of service for staff use. Therefore, the benefits of the minibus in terms of overall vehicle trip reductions would be minimal.
- 2.8.5 The issue of transport sustainability was an important consideration in the dismissed appeal for 10 houses at the site in 2019 (APP/L3815/W/18/3206819). The Inspector concluded (at para 18 of the decision) "*Occupiers would be heavily reliant on private cars as the site would not be close to public transport and there are no footways along Foxbridge Lane. It would not amount to sustainable development*". The current proposals include a different range of land uses but the absence of footways and remoteness from public transport are unchanged.

3 TRAVEL PLAN

- 3.1 The applicant's Travel Plan sets out a strategy for promoting sustainable travel to and from the site during the first five years of occupation of the development. The primary aim of the Plan is to reduce the numbers of single occupancy car journeys by staff. There are no proposals for targets to reduce vehicle trips by visitors or guests.
- 3.2 As noted earlier in this report, the scope for adopting alternative travel to and from the site is very limited. However, the aim of the Travel Plan is to seek to influence travel choices, where possible, through the provision of a staff minibus and by encouraging car sharing.
- 3.3 The Travel Plan is a necessary component of the planning application but its targets are not relied upon by the applicant within the impact analyses in the TA.

4 POLICY CONSIDERATIONS

- 4.1 The key policy documents of relevance to the proposals are the National Planning Policy Framework (NPPF) and Adopted Chichester Local Plan (ACLP).
- 4.2 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.
- 4.3 The Framework also contains guidance on supporting rural economies, including supporting sustainable rural tourism and leisure developments.
- 4.4 Many of the policies of the ACLP follow the same principles as the NPPF, 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*".
- 4.5 As set out in the preceding sections of this report, 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.