WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	West Sussex County Council FAO: James Neave
FROM:	Stephen Gee WSCC - Highways Authority
DATE:	11 May 2021
LOCATION:	Ford Circular Technology Park, Ford Road, Ford BN18 0XL
SUBJECT:	WSCC/011/21 Demolition of existing buildings and structures and construction and operation of an energy recovery facility and a waste sorting and transfer facility for treatment of municipal, commercial and industrial wastes, including ancillary buildings, structures, parking, hardstanding, and landscape works.
DATE OF SITE VISIT:	n/a
RECOMMENDATION:	More Information
S106 CONTRIBUTION TOTAL:	TBC

Background
The site is located to the west of Ford Road and South of Ford Lane, Ford and currently benefits from two planning permissions the first for a part implemented permission which also includes an Energy from Waste facility (WSCC/096/13/F) and a second app ref: WSCC/027/18/F WSCC for a link road (Southern Link Road) that allows a total of 240 two-way HGV movements per day (120 in and 120 out) on weekdays and 120 two way HGV movements on Saturdays (60 in and 60 out).

The application is similar to that previously considered under ref (WSCC/036/20). The application was withdrawn in March 2021. At the point of withdrawal, further information was required on several highway issues.

Access
The proposed development would utilise the existing access onto Ford Road.
A stage 1 RSA has been provided which highlights 6 issues (the majority of which are existing maintenance issues) A word copy of the Designers Response should be provided for WSCC comments as the overseeing organisation.

Sustainable Transport
A Walking, Cycling and Horse-Riding Assessment Report (WCHAR) has been produced and details a number of footpaths to the north of the site that provide connections towards Yapton, Ford Road and Ford Lane. There are no dedicated cycling facilities within the study area however Ford Road and Church Lane have speed limits of 40mph.

The WCHAR concludes there are limited opportunities for the development to improve pedestrian and cycle access but could support wider opportunities to:

- Explore dedicated/ shared cycleway between the site and Ford Rail station and/or A259;
- Consideration of viability of connection between the site and Rollaston Park/Yapton Road. Noting there maybe some land ownership constraints and conflicts with 'The Landings' (F/4/20) application; and
- Improved provision of pedestrian/cyclist facilities from the site to Ford Road.

It is noted that proposals contained within the Ford residential (F/4/20) Planning application propose an off road route to Ford Station and an route to link to the A259 including proposals along Church Road south of Horsemere Green Lane should the Climping approved site (CM/1/17) not come forward

Within the previous applications response it was requested that the applicant should provide information on how they would support the opportunities identified. The latest application states in the WCHAR section 3.1:
"The proposed development will support such opportunities by engaging with a WSCC-led process, however it is noted that none of these opportunities are solely the responsibility of nor at the discretion of the proposed development. Therefore, a collaborative process of engagement within a WSCC-led process is the most effective way for the proposed development to support the opportunities identified"

To address the concerns it is recommended a proportionate contribution is secure to deliver these measures.

Trip Generation

Trip Generation information has been provided by the applicant and plant designers.

The transport assessment details the trip generation of the site for a normal day (6am to 8pm) and has been calculated as 293 two-way vehicle daily movements (139 in and 154 out) of which 21 two-way trips take place in the AM network peak and 5 two-way trips in the PM network peak. (appendix 7 shows a 24hr total of 316 two way trips)

No peak day assessment has been provided as within the original application, where the maximum consented HGV movements were included. Further information should be provided on the likely occurrence of these peak days.
For reference the numbers submitted with the previous application are below.

The peak day trips have been calculated as 465 two-way vehicle daily movements (232 in and 233 out) of which 25 two-way trips are in the AM network peak and 32 two-way trips in the PM network peak.

It is noted that the application would provide 22 fewer jobs and as such accounts for a reduction in the previously proposed calculations.

Construction
Construction trips have been provided for each of the 51 month build program and peak in Month 44 when the ERF is in the commissioning phase of construction and the WSTF is operational. This would result in a total of 79 AM peak two way trips and 59 PM peak trips and a total of 692 daily trips. (it is noted that there are flows of 164 two way trips between 7 & 8am and 150 two way trips between 4 and 5pm).

Trip Distribution / Assignment
Trips for staff and LGV trips have been distributed according to census journey to work data (10% north and 90% south) and HGV trips 100% to the south according to the existing HGV routing and then split 50/50% once reaching the A259.

Baseline traffic flows collected in 2018 have been sourced from the Ford Residential application and provide peak hour surveys for the local network, the applicant has amended the flows to take account of the southern link road.

TEMPRO growth figures have been applied to factor up the traffic counts to 2025 and 2026 scenarios. This factor takes into account the level of planned growth in the area and would include sites such as the strategic developments at Ford, Yapton and Climping. The applicant has also provided a review of local sites and their inclusion/exclusion from the assessment to which the conclusions are accepted.

Junction Modelling
Site Access
The application has PICADY modelling which indicates the site access would work well within capacity during the peak construction phase (2025) and with the development operational (2026).

A sensitivity test has been provided to assess the impact of the peak construction vehicles and the Ford Market proposals currently being assessed under app ref F/5/20 by Arun District Council. This test utilises the peak construction traffic (7-8am) and peak Ford market traffic (9-10) and assumes all 2,000 spaces (the markets parking cap) are being utilised.
The results identify that should these issues all arise then the junction would be significantly over capacity.
In assessing this sensitivity test the following considerations are made

- Should the 9-10 construction flow from the application site be used only 27 two way trips would be utilised and modelling not required (as opposed to 164 in the 7-8am scenario);
- Thursday morning only issue;
- Considers the peak of both operations although they are very unlikely to clash;
- Considers Ford market at peak capacity.

The TA indicates that if the Ford Market Car Boot proposals are permitted that it would be prudent to engage to identify peak Thursdays and identify contingency plans to stagger arrivals/departures. This could be secured via construction management plan and delivery service management plan.

A259/Church Lane
The junction is identified for improvements within the Arun Local Plan Transport and a larger mitigation scheme has been secured via CM/1/17/OUT.

The development is anticipated to generate 21 AM and 5 PM peak trips through the junction in the peak period during operation and as such would not result in a severe impact on the junction.

The impact of the construction stage on the junction in a 2025 scenario was requested within the comments on the previous application has now been provided. The development is anticipated to generate a total of 73 AM peak and 53 PM peak trips through the junction.

The assessment indicates that the junction is over capacity in the peak period and would suffer from significant delay, however, I would identify that the baseline traffic (via Tempro) includes a number of proposed/approved developments such as Ford and Climping but not the improvements that are secured via the Climping application nor promoted within the local plan transport study.

Possible way forward to consider the impacts at the junction are:

- Removal of Climping development from TEMPRO growth and rerunning the model;
- Testing of Climping development mitigation; (noting this would not address my concerns if the development were implemented in advance of the improvements. However, a Grampian condition could be utilised. https://www.arun.gov.uk/climping-strategic-site/ identifies initial works to deliver the permission are being undertaken).
- Identify further measures to reduce peak hour journeys during the construction phase to a similar level of the operational flows to be secured via the CMP.

HGV flows

The predicted HGV flows would remain under the limit set by the existing condition and as such the impact of the flows on the local network has been accepted. The 'normal operating day scenario would generate 218 HGV under the cap of the existing approval of 240. Whilst the level of HGV flows may increase of what the site currently produces and decrease the perception of safety of Non-Motorised Users of Ford Road and Church Lane the levels would operate within the approved limit of SLR and as such would not result in a safety concern for the highway authority.

Concerns has been raised by third parties over the potential size of HGVS in delivering a higher tonnage to the site, however, all vehicles would be within legal limits and not require abnormal load permission. In order to address the third party comments it would also be beneficial to supply vehicle tracking information for the largest anticipated vehicles at the Church Lane junction.

The TA does highlight that "on the vast majority of days (normal days) the number of HGV's will be… within the cap. However, by exception…. may meet or slightly exceed the cap. Information is requested to the anticipated number of days the cap would be exceeded and any further mitigating action to be taken.

A monitoring regime of the HGV traffic would be secured via the Delivery and Servicing Plan.

Personal Injury Accidents

Personal Injury Accident (PIA) information has been supplied within the application which shows no PIA have occurred at the site access. No PIA involving NMU along the links of Ford Road and Church Lane south of the site access have been recorded.

The current application does not include any details on PIA south of Horsemere Green Lane. These were included and considered within my response to the previous application:
A total of 11 PIA have occurred at the A259/Church Lane Rbt since 2015 including 7 involving cyclists, however I would note cycle facilities at the junction have been upgraded as part of the A259 Bognor to Littlehampton cycle route improvements. Further improvements to the junction have also been secured via CM/1/17/OUT to include off road cycle routes and a signalised crossing across the A259 west of the junction.

Delivery and Servicing Plan
A plan to monitor HGV movements along the SLR and HGV movements external to the site adhere to the operational HGV route has been provided with the application. The plan and measures will be monitored by a Travel Plan Coordinator. A yellow and red card disciplinary system would apply to staff and third parties who do not follow the delivery and service plan.

It is recommended that further updates would include Liaison with Ford Market (if consented) to identify Market peak days and identify remedial measures.

Construction and Environmental Management Plan (CEMP)
A Construction Traffic Management Plan has been provided and would be a necessary pre commencement condition. Whilst not a formal consideration within the application, the peak construction period should not align with the implementation of improvements to the A259/Church Lane roundabout associated with planning application ref CM/1/17/OUT

Parking
The development proposes a total of 70 car parking spaces and 1 minibus/ coach space. The level of parking has been calculated to provide sufficient capacity at the shift turn over time.
100% of the staff and visitor parking spaces will be electric charging enabled.
32 covered and secure cycle parking spaces in the form of Sheffield stands would also be provided.
Whilst plan have been provided no numerical details of the HGV parking / bays have been provided and should be done so

Travel Plan
A workplace travel plan would be required to be secured via condition.

Conclusion
Further Information is requested:

- Provision of a word copy of the designers response.
- Further information on the occurrence of peak days;
- Church Lane construction impacts – consideration of the various options proposed;
- Church Lane provide vehicle tracking to address third party comments; and
- Confirmation of HGV parking levels.

Stephen Gee
West Sussex County Council – Planning Services