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1. INTRODUCTION

1.1 This Technical Note (TN) has been prepared by Paul Basham Associates on behalf of Metis Homes to assess the Regulation 19 Chichester District Local Plan review from a highways perspective in support of their proposed development site at Harris Scrapyard and Oaks Farm and the wider draft Policy A13 Southbourne Broad Location for Development.

1.2 Chichester District Council (CDC) are currently consulting the public on the emerging Local Plan (2021-2039) (Local Plan) between 3rd February and 17th March 2023. CDC have published a Proposed Submission document as part of the Regulation 19 submission.

1.3 Within the emerging Local Plan, Policy A13 relates to Southbourne which has been identified as an area which can provide a mixed-use development including up to 1,050 homes. The Policy contains a number of requirements which need to be met for sites within the Broad Location, and the following relate to transport and highways:

- *Provide a suitable means of access to the site(s), securing necessary off-site improvements (including highways) in conformity with the Policy T1 (Transport Infrastructure) and T2 (Transport and Development) to promote sustainable transport options;*
- *Provide any required mitigation to ensure there is no adverse impact on the safety of existing or planned railway crossings;*
- *Ensure adequate provision of supporting infrastructure including education provision, community facilities and transport in accordance with the most up to date Infrastructure Delivery Plan;*

1.4 Chapter 8 of the CDC emerging Local Plan relates to Transport and Accessibility and has also been considered.

2. POLICY A13 SOUTHBOURNE BROAD LOCATION FOR DEVELOPMENT

- 2.1 A planning application has been submitted for 103 dwellings and a children’s nursery for 70 children on land at Harris Scrapyard and Oaks Farm, Southbourne (ref: 22/01283/FULEIA), which sits within the broad area of Policy A13.
- 2.2 The site is located within Southbourne c.8.7km to the west of Chichester and c.6.2km to the east of Havant. The site currently comprises a car breakers yard and two private properties with associated curtilage. The site is bordered by a railway line to the north, agricultural land and properties to the east, Main Road (A259) to the south and vacant land to the west. The site’s location and context are demonstrated in **Figure 1**.



Figure 1: Site Location

Site Accessibility

- 2.3 The availability of facilities and services within walking and cycling distance of the site has been assessed within the Transport Assessment associated with the application, along with the quality of the route and infrastructure linking to those facilities. Distances have been taken from the approximate centre of the site. The time to walk and cycle to these services

and facilities has been calculated based on a walking speed of 80m per minute and a cycling speed of 240m per minute. The site affords a good level of accessibility to local amenities, such as a bus stop, a medical centre, a primary school and a railway station as outlined in **Table 1**.

Service	Distance from site (m/km)	Travel time (minutes)	
		Walking (based on a speed of 80m per minute)	Cycling (based on a speed of 240m per minute)
Eatery (MAMAWU)	300m	4	1
Bus Stop (ID: Farm Lane)	315m	4	1
Petrol Station (Esso)	450m	6	2
Medical Centre (Southbourne Surgery)	700m	9	3
Public House (The Traveller's Joy)	800m	10	3
Farm Shop	950m	12	4
Pharmacy (Boots)	1.0km	13	4
Church (Southbourne St John the Evangelist)	1.1km	14	5
Primary School (Southbourne Infant and Junior School)	1.1km	14	5
Convenience Store (The Co-operative)	1.2km	15	5
Post Office	1.2km	15	5
Nursery (Loveders Nursery School)	1.2km	15	5
Railway Station (Southbourne)	1.4km	18	6
Library (Southbourne Library)	1.4km	18	6
Eatery (Golden Chopstick)	1.4km	18	6
Secondary School (Bourne Community College)	2.0km	25	8
Gym (Bourne Community Leisure Centre)	2.0km	25	8

Table 1: Distance to Local Amenities

- 2.4 As demonstrated in **Table 2**, the site provides a good opportunity to promote sustainable travel within Southbourne, with the vast majority of local services and amenities accessible within an 18-minute walk or six-minute cycle.
- 2.5 Walking and cycling isochrone maps are attached as **Appendix A**, demonstrating that the site affords a good level of accessibility.
- 2.6 The nearest bus stops to the site are situated on Main Road (A259) and are served by two bus services including a frequent service on the 700 Stagecoach bus throughout the day. The

bus stops are located approximately 315-360m from the centre of the site and are accessible within a four-five-minute walk.

- 2.7 Southbourne Railway Station is located approximately 1.4km to the northwest of the centre of the site and is accessible via an 18-minute walk or six-minute cycle.
- 2.8 WSCC state in their response dated 6th October 2022 that *'the Local Highway Authority considered that the location is in an accessible location.'*

Proposed Access

- 2.9 The proposed access is in the form of a priority bellmouth junction to the west of the existing access, with a right turn lane provided on the A259 Main Road. Improvements would be provided to pedestrian infrastructure in the form of dropped crossing points with tactile paving across the junction, and a new uncontrolled pedestrian crossing island to the west of the access to allow pedestrians from the site and local area to safely cross the A259. West Sussex County Council, as the highway authority, have agreed to the access in principle, which is attached as Appendix B.

Highway Impact

- 2.10 The impact of the proposed development at the site access local junctions has been assessed to support the live planning application. It was concluded by WSCC highways that the impact of the development can be accommodated by the aforementioned junctions and no junction mitigation is required.
- 2.11 A financial contribution of £1,803 per dwelling has been sought by National Highways to mitigate the impact of the development on the A27 corridor which Metis Homes have accepted to be included within the Section 106 agreement.

3. POLICY T1, T2, T3 AND T4

- 3.1 Within Chapter 8: Transport and Accessibility, there are four main transport policies which are:
- T1 Transport Infrastructure
 - T2 Transport and Development
 - T3 Active Travel – Walking and Cycling Provision

- T4 Parking Provision

T1 Transport Infrastructure

- 3.2 This policy sets out the requirement for development to demonstrate how it support four key objectives set by CDC to ‘alleviate pressure on the road network, improve highway safety, encourage sustainable travel behaviours and help improve air quality’.
- 3.3 As highlighted within Section 2 of this report, there are extensive facilities and amenities within a suitable distance of the development site which can be accessed by sustainable travel modes and not rely on the use of private car. This is confirmed by WSCC who state that *‘the Local Highway Authority considered that the location is in an accessible location’* (6th October 2022).
- 3.4 A Framework Travel Plan has been submitted to support the application which would be secured by CDC to reduce the reliance on private car use. The Travel Plan would support future residents into making sustainable travel choices to reduce the over reliance of the local road network.
- 3.5 A contribution of £1,803 per dwelling is being offered from this development towards improvements along the A27 corridor. This will be secured through a Section 106 legal agreement and paid *‘prior to 56 dwellings [or 50% as the number of units have dropped]’* as per National Highways response dated 1st July 2022, for payment to ensure timely delivery of transport infrastructure. This has been accepted by National Highways and WSCC.
- 3.6 The planning application therefore meets Policy T1 within the emerging Local Plan.

T2 Transport and Development

- 3.7 WSCC have offered no objection to the proposals submitted with the current live planning application. The proposals include assessing the off-site highway impacts, internal site layout review and new proposed access.
- 3.8 To support the planning application, a Transport Assessment, Transport Assessment Addendum, Framework Travel Plan and Environmental Statement, with subsequent Air Quality chapter, were submitted.

3.9 It is therefore concluded that the planning application meets Policy T2 within the emerging Local Plan.

T3 Active Travel – Walking and Cycling Provision

3.10 A feasibility document for a proposed Chichester to Emsworth Cycle Route was published by National Highways in 2021. Since this publication and initial engagement period with the public, there have been no further details released regarding this proposal. Despite this, if the plans were to be brought forward, the proposed site and access arrangements would not prejudice the deliverability of a cycle route which WSCC have agreed.

3.11 The access, as shown in **Appendix B**, provides a pedestrian crossing point west of the proposed access across the A259. This crossing point will be equipped with dropped kerbs, tactile paving and a pedestrian refuge island. In addition to the proposed western pedestrian crossing point, a second pedestrian crossing point has been proposed across the site access junction. This crossing point will be equipped with dropped kerbs and tactile paving. The designs have been subject to an independent Stage 1 Road Safety Audit and WSCC have accepted the design as suitable for the quantum of development proposed.

3.12 The development proposes that adequate cycle storage would be provided in line with the recommended standards for each dwelling, within rear gardens or garages for houses or a shared cycle store for the flats.

3.13 The planning application therefore accords with Policy T3 within the emerging Local Plan.

T4 Parking Provision

3.14 This policy sets out that all development should demonstrate that it meets the West Sussex Parking Standards Guidance (2020) or subsequent standards adopted by CDC or WSCC.

3.15 The application is providing 250 car parking spaces with 23 visitor spaces for the residential element of the development which is over the prescribed quantum set out in the aforementioned parking standards.

3.16 WSCC do not provide parking standards for day nurseries (E - Commercial, Business and Service) and as such parking provision is provided on the basis of a site-specific assessment based on travel plan needs. Therefore, the proposed development will provide 17 car parking spaces for the nursery.

- 3.17 The above levels of parking have been accepted by WSCC and therefore the planning application conforms with Policy T4.

Summary

- 3.18 Having regard to the above, it has been shown that the live planning application 103 dwellings and a children's nursery for 70 children on land at Harris Scrapyard and Oaks Farm, Southbourne (ref: 22/01283/FULEIA), does not prejudice the delivery of Southbourne Broad Location allocation within the Local Plan and could form part of the allocation itself. It has been shown that the proposed development meets the policies and aims set out within the emerging CDC Local Plan.

4. CHAPTER 8: TRANSPORT AND ACCESSIBILITY

- 4.1 This section of the TN will review Chapter 8: Transport and Accessibility, as currently drafted within the emerging Local Plan.
- 4.2 Paragraphs 8.3 and 8.4 relate to existing capacity on the road network within the Chichester authority, including *"congestion around the junctions of the A27 Chichester by-pass which in turn, leads to congestion on the local road network as drivers seek alternative routes, increasing traffic speed and flow on those alternative routes... The Local Plan Transport Study shows that in many parts of the plan area, the road network is operating at or close to designed capacity."*
- 4.3 In January 2023 Stantec prepared the '*Chichester Transport Study: Local Plan Review Transport Assessment*' (Transport Assessment) to inform the transport evidence base for the Chichester Local Plan Review 2021-2039. The transport study was completed based on the current local plan proposals of 10,354 dwelling for the period 2021-2039. It is understood West Sussex County Council and National Highways have been consulted in the drafting of this report.
- 4.4 The base year for the model is 2014, which has been validated by Chichester District Council, West Sussex County Council and National Highways using 2014 count and journey time data. The suitability of a 2014 base year however is questionable given the time between 2014 and 2023 and the significant changes in traffic patterns which have occurred in the interim, largely as a result of the Covid-19 pandemic.
- 4.5 Since Covid, many employers now offer flexible working, with many employees adopting a hybrid working approach incorporating working from the office and at home. The current

2023 Transport Assessment does not appear to take into account any of the change which will impact existing and future peak time travel patterns. Of note, the Stantec Transport Assessment page 10 references the *'significant changes in travel behaviour alongside technology advances [that] have been seen in recent times, and the Covid-19 pandemic has accelerate these changes with significantly more people working from at home and shopping online (virtual mobility)'*.

- 4.6 In addition, Section 10 of the Transport Assessment the report states that *'there is a reduced traffic growth [between TEMPro 7.2 and TEMPro 8.0] as a result of falling population... as a result there is a need to review and comment and define the possible difference in predicted changes in travel demand in the future... as the model may have overestimated the potential future impacts'*. It continues *'the data indicates that the levels of traffic growth expected within Chichester are lower in each of these scenarios than currently have been modelled'* (Para 10.2.1).
- 4.7 The natural conclusion from the Stantec report is that where overly inflated traffic volumes have knowingly been used within the baseline models that are not an accurate reflection of the current situation, limited weight can be given to the modelling outputs.
- 4.8 8.12 confirms CDC's approach to traffic assessment is altering from the traditional 'Predict and Provide' methodology for 'Monitor and Manage'. However, the Stantec Transport Assessment is prepared a wholly 'Predict and Provide' methodology, with no consideration to behavioural change opportunities and how that might affect the local and strategic road network in Chichester.
- 4.9 Paragraph 8.5 within the emerging Local Plan states that National Highways confirmed that the A27 Chichester By-Pass major improvement scheme is included within Road Investment Strategy Pipeline for 2025-2030, however it's funding and inclusion is not guaranteed. Therefore CDC state they will continue to progress interim measures (i.e. pooling of developer contributions) which will enable development to take place while a long-term strategic solution is progressed.
- 4.10 Having identified a series of mitigation packages to the A27, and provided associated costings, Paragraphs 8.20 and 8.21 set out a requirement for a sum to be met for 'all other housing development' (which Southbourne Broad Location for Development would fall into) towards the mitigation schemes at the Fishbourne Roundabout and the Bognor Road Roundabout. This is calculated by the upper estimate costs of the two mitigation packages

(£43,320,000), minus the already accrued S106 monies (£15,877,407), and presumes no match funding by local authorities or financial input by National Highways despite the two junctions being identified as ‘priorities’ by CDC monitor and manage approach set out in paragraph 8.11 and 8.12 of the Local Plan.

- 4.11 As a result, CDC identify a mitigation cost of £7,728 per household (through dividing the total outstanding cost of the higher value estimate by the additional 3551 homes identified in the latest plan). This is a substantial increase of £5,925 per dwelling compared to the current SPD value of £1,803 per dwelling, and the following paragraphs outline multiple concerns with the approach and values identified.

Failure to consider development site relationship to the A27

- 4.12 As per agreed vehicular distribution for both 18/03145/OUT ‘Land North of Cooks Lane, Southbourne’ and 22/01283/FULEIA Harris Scrap Yard and Oaks Farm, which has derived from Census 2011 Journey to Work data, only 13% of vehicles from the Southbourne Middle Super Output Area would travel as far as the A27/A259 (Fishbourne) roundabout. Of these 13%, 3% would travel east on the A27 and through to the Bognor Road roundabout.

- 4.13 The proposed approach within the emerging Local Plan does not account for a proportional impact from each development site. It is questioned whether this would pass the tests for planning obligations set out in the Community Infrastructure Levy (2010) regulations, in particular 122 in respect to being:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

- 4.14 Sites contained within the existing Chichester Local Plan (2014-2029) and other speculative development sites have been required to pay a contribution towards improvement which was based on A27 Chichester Bypass – Developer Contribution Analysis for Strategic Development Options and Sustainable Transport Measures (October 2015). This report set out the individual impact of allocated developments and calculated a proportional impact for each site, in effect sites which added more traffic through the identified junctions for mitigation, were required to pay a higher contribution. For example:

- 20/03125/OUT – Land South of Clappers Lane - £3,248 per dwelling
- 18/03145/OUT – Land North of Cooks Lane - £1,803 per dwelling
- Strategic site in Tangmere - £5,914 per dwelling

Failure to acknowledge brownfield development

- 4.15 The emerging Local Plan fails to make any allowances for brownfield residential development in respect to the A27 contribution. Development of brownfield sites will often result in a reduced impact of residential sites due to existing vehicular trips being already on the local road network originating from the existing land use. There are significant costs with making brownfield sites developable (including Harris Scrapyard) which may give rise to land becoming unviable to develop or require reductions in mitigation for other policy areas, such as affordable housing. It is inconceivable and illogical that should a new residential development proposal generate less vehicular traffic than the current brownfield use on the site, there would still be a requirement to make contributions in accordance with the proposed value per dwelling.

Failure to acknowledge non-residential land uses

- 4.16 At present there is no policy requirement for any other form of development beyond residential to provide a specific level of contribution to the Fishbourne Roundabout and Bognor Road Roundabout, including the potential allocation of Policy A20 South of Bognor Road for at least 28,000sqm of employment floorspace. Traffic generated by such allocations must surely have been factored into the modelling assessment, but the burden of mitigation cost placed wholly on residential development.

Ambiguity in assignment of contributions

- 4.17 Paragraph 8.22 sets out that *'Contributions secured will be used either towards the identified junction infrastructure improvements, and/or other highway capacity improvements identified through the Monitor and Manage process'*. Chichester District Council's Community Infrastructure Levy Charging Schedule does allow for CIL Payments in Kind, although it is not clear that this would be subject to this policy. It should not be for a development in one area e.g. Southbourne, to provide S106 monies to mitigate a development site in Tangmere or vice versa as this would not be CIL compliant. It also provides no benefit to the residents of developments which could otherwise be used on mitigating or improving infrastructure directly related to the site.

Sustainable modes of travel

- 4.18 Based on the above and despite the four transport policies T1, T2, T3 and T4, the direction and priorities of the emerging Local Plan appear to be significantly weighted to providing additional capacity for vehicular traffic, coming at significant costs for development sites within the emerging Local Plan. This is contrary to the direction of national and other local policies which is moving away from capacity-led schemes to provide greater emphasis on sustainable development and transport opportunities. This is also stated within the Stantec Transport Assessment which states *'At a broader level, it is generally now considered that potential sustainable mitigation measures should have priority over highway capacity mitigation (page 10).'*
- 4.19 The Transport Assessment includes an overall 5% reduction has been assumed within the Strategic Local Plan locations to represent a result of development specific travel planning and behaviour change. Section 6 of the Transport Assessment highlights *'Consideration of Sustainable Mitigation Measures'* which present a number of sustainable mitigation options; Car park management, office space charging, walking and cycling, public transport and park and ride. However, these are not modelled within the Transport Assessment. It has not been robustly assessed that these changes could offer significant reductions in private car use and provide more cost-efficient ways to mitigate the impact of additional development allocations within the Local Plan.
- 4.20 To provide the greatest opportunity for sustainable travel modes to be utilised, CDC are choosing locations for developments as per paragraph 8.6 which states *'In the first instance, development will be directed to the most sustainable locations where the need to travel is reduced or there are suitable alternatives to the car.'* This is not carried through the contributions methodology, providing a singular figure that does not reduce for locations which are considered sustainable and would have less impact on the junctions identified for mitigation within the Transport Assessment.
- 4.21 The significant cost per dwelling as proposed at £7,728 may limit a development sites opportunity to provide improvements to existing sustainable transport infrastructure and provide new infrastructure to support future growth and therefore would not be able to maximise the opportunities for modal shift to sustainable transport.
- 4.22 In addition to the above, the Transport Assessment aim was not to address Chichester's current transport issues but seek not to exacerbate them as a result of proposed Local Plan developments. Whilst this is not an uncommon approach for individual development, it

seems to be underwhelming on a strategic level for Chichester to not look to significantly alter travel habits which would in turn, reduce trips on the local and strategic road network.

Summary

- 4.23 Having regard to the above it is concluded that the Chichester Local Plan (2021-2039) has not provided a robust evidence base to justify the £7,728 per dwelling contribution towards improvements at the Fishbourne and Bognor Road roundabouts.
- 4.24 Mitigating circumstances for proposed development allocations have not been considered such as; location of development, actual impact on the aforementioned junctions and whether the site has existing use and is considered brownfield (i.e. net traffic impact).
- 4.25 Chapter 8: Transport and Accessibility seems to be weighted heavily on providing significant road capacity improvements which is not in line with the national policy shift towards providing new and improvements to sustainable transport infrastructure.