



**STATEMENT OF
REPRESENTATIONS – A27
MITIGATION
CONTRIBUTIONS**

**CHICHESTER LOCAL PLAN
2021-2039
PROPOSED SUBMISSION**

On behalf of
Beechcroft Developments Limited

ITR//MT/5882/SR.5

March 2023



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1 INTRODUCTION

1.1 Bellamy Roberts has been instructed by Beechcroft Developments Ltd to submit a Statement of Representations on the emerging Chichester Local Plan 2021-2039, with specific regard to the suggested A27 mitigation contributions as set out in Chapter 8 of the emerging Local Plan (LP).

1.2 Policy T1 of the emerging Local Plan states that applicants are expected to support Chichester District Council's (CDC) four key objectives (avoiding need to travel by car; enabling access to sustainable travel; managing travel demand; and mitigating the impacts of travelling by car) by:

“delivering a coordinated package of infrastructure improvements to junctions on the A27 Chichester Bypass along with other small-scale junction improvements within the city and elsewhere”.

1.3 Policy T1 further states that:

“The Community Infrastructure Levy may be used to contribute towards the cost of improvements to the local transport network”.

1.4 The Local Plan is seeking a financial contribution of £7,728 per dwelling to fund the identified mitigation measures on the A27 Chichester by-pass..

1.5 We fundamentally object to the principal of this financial contribution being required for the following reasons:

- **Section 2** - The requested financial contribution is for improvements on the SRN. The A27 (Trunk Road) is the responsibility of National Highways and funding should be received from the Department for Transport (i.e., central government).
- **Section 3** - If the Inspector finds that a financial contribution is required, this objection also relates to the method by which the contribution has been calculated which are considered flawed.

1.6 The above matters have been considered in further detail in this Report.

2 CONTRIBUTIONS TO IMPROVEMENTS ON THE STRATEGIC ROAD NETWORK

2.1 The Strategic Road Network (SRN) is the responsibility of National Highways who have a duty to *“manage and improve England’s motorways and A roads, helping our customers have safer, smoother and more reliable journeys”* [from National Highways website ‘About Us’].

2.2 To facilitate improvements to the SRN, National Highways receive funding from the Department for Transport (i.e., central government) in five-year cycles called Road Investment Periods. The current Investment Period runs from 2020 to 2025. The next Investment Period will run from 2025 to 2030. There are no planned SRN improvements planned for this section of the A27.

2.3 The Chichester Transport Study (2023), prepared by Stantec on behalf of Chichester District Council, has analysed all 6 junctions along the A27 SRN south of Chichester and has given each a ‘ranking’ in priority of requiring mitigation to accommodate further development traffic. The 6 junctions are listed below and a plan showing their locations is provided at Figure 1:

- 1) Fishbourne Roundabout
- 2) Bognor Road Roundabout
- 3) Portfield Roundabout
- 4) Oving Junction
- 5) Stockbridge Roundabout
- 6) Whyke Roundabout

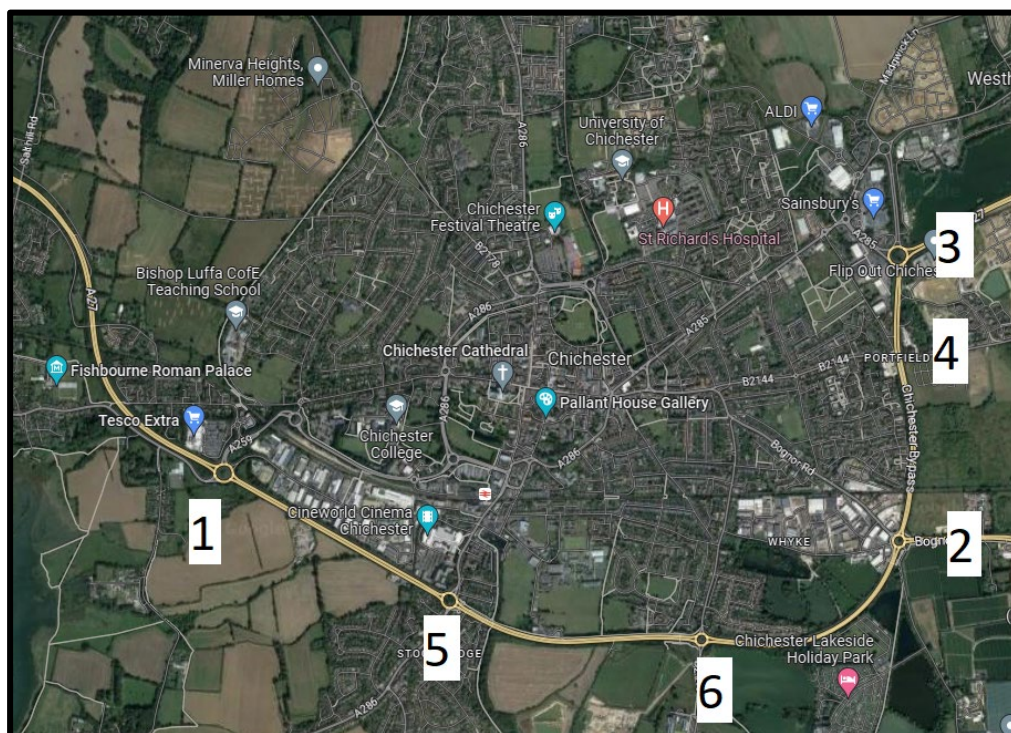


Figure 1: Location of A27 Chichester By-Pass Junctions

- 2.4** Paragraphs 8.10 and 8.11 from Chapter 8 of the emerging Local Plan state that a number of potential highway improvements will be required to mitigate the impact of the developments planned in the emerging Local Plan.
- 2.5** The schemes recommended to be provided within the Local Plan period and to be funded by residential development contributions are as follows:
- Fishbourne Roundabout; and
 - Bognor Road Roundabout.
- 2.6** The intention as set out in the Stantec Report is to review the ranking (para 2.3) after each junction mitigation scheme is completed, as their changes may have a material impact on the ranking.
- 2.7** Despite being included in the current CDC Local Plan and emerging Local Plan, National Highways (NH) confirmed by email on 8th February 2023 that the A27 Chichester bypass is one of 32 schemes being *considered* for potential inclusion in the third Road Investment Period (2025 to 2030). See [Appendix 1](#).



2.8 At this stage, NH are considering potential options for improving the bypass, which range from upgrading the existing road and junctions, to building new sections of carriageway. No current schemes exist and it is not confirmed yet whether the A27 Chichester Bypass will be included in the next Investment Period.

2.9 Notwithstanding this uncertainty, the LPA are seeking a financial contribution of £7,728 per new dwelling in the southern plan area to fund improvements to the Fishbourne and Bognor Road roundabouts.

2.10 Furthermore, it is stated at Policy T1 of the emerging Local Plan that the *“Community Infrastructure Levy may be used to contribute towards the cost of improvements to the local transport network”*.

2.11 Despite the LPA asserting in the emerging LP that CIL payments may be used to fund these schemes, such payments are collected by the LPA for the area to help LPAs in delivering the infrastructure needed to support development in the area, they are not collected by National Highways to fund improvements to the SRN, as these are funded by the Department for Transport.

Summary

2.12 For the reasons set out in this section it is considered wrong for the LPA to seek contributions within the emerging Local Plan to fund improvement schemes which are part of the SRN as:

- a) The SRN is the responsibility of National Highways and are funded by the Department for Transport, not through CIL; and
- b) No schemes have yet been identified by the overseeing authority.

3 CALCULATED A27 MITIGATION CONTRIBUTION

Background & Cost of Improvements

- 3.1** The impact of the emerging LP development on the SRN was assessed by Stantec using an industry standard mathematically based computer model called SATURN. The analysis has focussed on the more congested AM and PM peak periods. It should be noted that the existing network is congested at peak times and will continue to be so without Local Plan Development. Capacity improvements are therefore required in any event, and should not be funded by the landowners of future allocated sites.
- 3.2** As set out previously, the Stantec Report ranks each junction on the A27 (1-6) and using the results of the SATURN modelling outputs has ranked the improvements to the Fishbourne and Bognor Road roundabouts as 1st and 2nd respectively in priority of construction.
- 3.3** The improvements to the Fishbourne roundabout include the modification of this junction into a 5-arm ‘hamburger’ and provision of a new link road to the A286 Birdham Road, south west of Stockbridge. The improvements to the Bognor Road roundabout include the modification of the junction to a 4-arm ‘hamburger’ signalised junction and the removal of the Vinnetrow Road link.
- 3.4** It should be noted that capacity improvement schemes tend to encourage additional traffic during the peak hour periods. One form of promoting sustainable travel is to provide reduced capacity at junctions, such as additional green time for pedestrian and cyclists.
- 3.5** The cost of the improvement schemes at the Fishbourne and Bognor Road roundabouts is quoted as being between £9.5m and £12.9m for the Fishbourne roundabout and between £19.4m and £30.4m for the Bognor Road Roundabout improvements.
- 3.6** The costing exercise for the A27 improvement schemes set out above was originally prepared for the 2018 Transport Study for the current Local Plan and undertaken by PBA (now Stantec). It is stated in the 2018 Transport Study that the

cost estimate review incorporated a high-level analysis of the Jacobs CDC Local Plan Costs (dated 2013) and National Highways A27 improvements costs (dated 2016).

- 3.7** No site specific investigation has been carried out into specific land ownership details, the location details and/or cost of moving utility apparatus or a design assessment to ascertain the deliverability of the proposals. For example, new link road from the Fishbourne roundabout to the A286 Birdham Road crosses third party land and no assessment of its deliverability has been presented.

Per Dwelling Contribution

- 3.8** Notwithstanding these identified issues, the emerging LP has calculated the per dwelling contribution of £7,728 for the improvement schemes at the Fishbourne and Bognor Road roundabouts. This figure is based on an estimated cost of works totalling £27,442,593 (higher cost of works £43,332,000 less the receipts from committed developments £15,877,407) divided by the supply of new dwellings in the south of the plan area up to 2039 being 3,551.
- 3.9** No justification for the 3,551 dwellings has been provided within either the emerging LP or the Chichester Transport Study. Indeed, the Chichester Transport Study states the LP review is planned to deliver 9,630 dwellings in the southern plan area.
- 3.10** When one considers the strategic development sites carried forward from the current Local Plan (and not yet granted planning permission), this totals 1,850 dwellings, set out below:
- West of Chichester Strategic Development Location (Phase 2) – 850 units.
 - Tangmere Strategic Development Location – 1,000 units.
- 3.11** This gives a remaining supply in the southern plan area of 7,780 units and not the 3,551 stated in the emerging Local Plan.
- 3.12** We therefore fundamentally object to the method of calculating the required contributions per dwelling as it is based on an odd and unjustified number of units.

3.13 The requested contribution only considers allocated sites with no consideration of unallocated or brownfield sites, which should reduce the requested contribution per dwelling.

3.14 Furthermore, no consideration has been given for the type, size and location of the proposed dwellings and the resultant level of traffic generation:

- Sheltered accommodation generates significantly fewer traffic movements during the peak hour periods than general housing.
- A one-bedroom flat would generate significantly fewer traffic movements than say a 5-bedroom house.
- A dwelling located in a highly accessible location (i.e., centre of Chichester) would generate significantly fewer traffic movements than a similar dwellings on the Manhood Peninsular, for example.

Other Uses

3.15 It is not only housing sites that generate traffic movements; however, no consideration has been given to other use types such as industrial; retail; leisure; education etc. which all generate traffic movements during the network peak hour periods but do not appear in the assessment. If there is a contribution to be made to fund these improvements, other forms of development should contribute also.

SATURN Model

3.16 The SATURN model from which the impacts on the SRN of the emerging Local Plan development traffic has been assessed, considered the following scenarios:

- 2014 Base Year.
- 2039 Reference Case.
- 2039 + Local Plan without Mitigation.
- 2039 + Local Plan with Mitigation.

3.17 Background traffic growth (2014 Base year to 2039 Reference Case) has been obtained from the Department for Transport's (DfT) National Trip End Model (NTEM – version 7.2) has been extracted using a programmed called TEMPro.

3.18 Background growth comes from trips travelling to/from and through the modelled area and are separate from the LP development traffic. The NTEM version 7.2 Guidance Note advises that dwelling projections are obtained from either Local

Authority Monitoring Reports, Strategic Household Land Availability Assessments, or Local Plan information.

- 3.19** Given the 2014 Base Year has been growthed to 2039, and then Local Plan traffic has been added, there is a risk that developments included within the growth data have been double counted when adding Local Plan traffic in addition to this.
- 3.20** When the SATURN modelling was undertaken, NTEM version 7.2 was utilised, however the DfT formally released version 8.0 in December 2022, which has lower levels of background growth.
- 3.21** This is an important point because the Chichester Transport Study (2023) states in Section 9 that at the Fishbourne and Bognor Road roundabouts, Chichester development would contribute only 28% of the growth at these junctions between 2014 and 2038.
- 3.22** Background growth would therefore account for 72% of the traffic flows at these junctions. The Chichester Transport Study (2023) states that with the proposed mitigation in place, the network conditions will be comparable to those in the baseline i.e., the proposed improvements will mitigate background growth and Local Plan growth.
- 3.23** However, as background growth accounts for a larger proportion of the traffic flows at these junctions, any reduction in the forecast level of background growth would have a significant impact on the operation of these junctions, and the nature of any future improvement schemes.
- 3.24** It is stated in Section 10 of the Chichester Transport Study (2023) that given the uncertainty with future growth, a ‘monitor and manage’ approach will be adopted. This will “*monitor network performance in the future with a view to informing whether and when mitigation schemes should be implemented*” (my emphasis).
- 3.25** Furthermore, it is also stated in the Chichester Transport Study (2023) that given forecast growth is likely to be lower than currently predicted within the model, the mitigation identified “*may not actually be required in the future*”.

3.26 Given this uncertainty, the SATURN modelling outputs cannot be relied upon to determine the impact of LP development traffic on the SRN and the nature of any improvements that may or may not be required at these junctions.

A27 Chichester By-Pass Capacity

3.27 The emerging Local Plan states in section 5 'Housing' that capacity constraints on the A27 have led the Council to plan for a housing requirement of 535 dwellings per annum (dpa) in the southern plan area. This is below the need derived from the standard method.

3.28 The SATURN modelling has considered a 'Core Scenario' of 535 dpa which would result in 9,630 additional dwellings in the southern plan area over the course of the Local Plan period.

3.29 The SATURN outputs demonstrate that the identified mitigation measures will mitigate the impacts of the emerging Local Plan development traffic. In other words, with mitigation in place, the network conditions on the SRN are comparable to those in the baseline). Notwithstanding this, the Portfield and Oving junctions on the SRN show some worsening with mitigation in place.

3.30 Nevertheless, the Stantec Report states there is an opportunity to reduce/omit the impact at the Portfield and Oving junctions through better linking of the signals, or metering flows at the Bognor Road junction, which will need to be considered in more detailed analysis.

3.31 A sensitivity test based on 700 dpa in the southern plan area has been undertaken which would provide 12,600 additional homes over the course of the Local Plan period. The outcome of this assessment is that the additional traffic demands from this scenario can generally be accommodated on the SRN by the mitigation identified for the 535 dpa scenario.

3.32 As with the 535 dpa scenario, capacity issues get worse at the Portfield and Oving junctions and would require additional mitigation, as stated above. It should be noted however, that the arm performing over capacity at the Oving junction is on the local highway network (B2144) whereas the SRN arms operate better than the reference case. West Sussex County Council as Highway Authority has indicated

their preference to mitigating capacity impacts on their network is through sustainable mitigation, rather than physical mitigation.

3.33 The emerging Local Plan seeks to constrain the amount of development over the plan period because of capacity constraints on the A27 Chichester by-pass. However, the modelling data provided in the Stantec Report does not provide any justification for CDC to impose such a limit. No justification for how the figure of 535 dpa was arrived at has been provided, and the SATURN modelling clearly shows that a figure of 700 dpa can generally be accommodated on the SRN.

3.34 Furthermore, and given the previously identified issues with the forecast background growth, it may be the case that further dwellings, over and above the 700 dpa sensitivity test, could be accommodated on the SRN in the southern plan area with the mitigation proposed. Further SATURN modelling should be undertaken using the most recent DfT growth figures to determine an appropriate housing figure.

Summary

3.35 For the reasons set out in this section, the method by which the requested financial contribution to fund the identified works at the Fishbourne and Bognor Road roundabouts is considered wrong for the following reasons:

- a) No site specific analysis has been undertaken to determine the viability of the mitigation schemes. Issues such as land ownership constraints, particular at the Fishbourne roundabout, have not been explored.
- b) No justification for the number of new homes to be provided in the southern plan area (3,551) has been given.
- c) No consideration has been made for unallocated or brownfield sites, nor the type/size/location of the proposed dwellings.
- d) No contributions have been sought for other uses such as industrial, retail, leisure, education etc. all of which generate traffic during the peak hour periods.
- e) The 2014 Base Year has been growthed to 2039, and then Local Plan traffic has been added, there is a risk that developments included within the growth data have been double counted when adding Local Plan traffic separately.



- f) When the SATURN modelling was undertaken, NTEM version 7.2 was utilised, however the DfT formally released version 8.0 in December 2022, which has lower levels of background growth.
- g) Background growth accounts for a larger proportion of the traffic flows at the identified junctions, any reduction in the forecast level of background growth would have a significant impact on the operation of these junctions, and the nature of any future improvement schemes.
- h) No justification for the imposed limit of 535 dpa has been provided and it may be the case that further dwellings, over and above the 700 dpa sensitivity test, could be accommodated on the SRN with the mitigation proposed



4 CONCLUSION

4.1 For the reasons set out in this Statement, we fundamentally object to the principal of the financial contribution being requested for the following reasons:

- The requested financial contributions are for improvements on the SRN which is the responsibility of National Highways and funding is received from the Department for Transport (i.e., central government).
- The method by which the financial contributions have been calculated is flawed.

APPENDICES

APPENDIX 1

National Highways Correspondence

Matt Twinberrow

Subject: FW: National Highways response – Your enquiry about the A27 Chichester Bypass project – ref 22555448 CRM:0946020

From: A27 Chichester <A27Chichester@nationalhighways.co.uk>

Sent: 08 February 2023 17:04

To: Mozes Baji

Subject: National Highways response – Your enquiry about the A27 Chichester Bypass project – ref 22555448 CRM:0946020

Dear Mr Baji

Thank you for your email of 1 February, regarding plans and information in relation to the A27 Chichester bypass project.

I've raised your enquiry with the project team, and I've been advised that the A27 Chichester bypass is one of 32 schemes being considered for potential inclusion in the third Road Investment Strategy (RIS3). All projects within the RIS3 pipeline remain uncommitted, and it's ultimately for the Department for Transport (DfT) to decide which schemes are taken forward. Our early work will help the DfT to shape a balanced portfolio of future schemes based on the investment available.

At this early stage, our work has focussed on identifying potential options for improving the bypass. These range from upgrading the existing road and junctions, to building new sections of carriageway. We have re-evaluated options considered previously and we're also looking at potential new options.

Because this project is at an early stage, we don't have more detailed plans or information available to share at present. This information would become available at a future public consultation. I'm currently unable to advise on when a consultation might take place, as the timescales for this are dependent on the results of ongoing reviews being undertaken by the DfT. As soon as we have an update to share on this, we'll be sure to update stakeholders and other interested parties.

I'm sorry that I'm unable to provide further details at this time.

Thank you for taking the time to contact us. If you have any further questions or concerns, please don't hesitate to get in touch on 0300 123 5000 or email A27Chichester@nationalhighways.co.uk.

Kind regards

Matthew Daborn

Correspondence Officer

National Highways | Woodlands | Manton Lane | Bedford | MK41 7LW

Web: www.nationalhighways.co.uk

We'd love to get your feedback about our reply to you today, simply click [here](#) to complete our short survey.



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