



Our ref: #19216
Your ref: Chichester Local Plan 2021-2039

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**FAO: Tony Whitty
Planning Policy Divisional Manager
Chichester District Council**

16 March 2023

Dear Tony,

Publication of the proposed submission Chichester Local Plan 2021-2039 for consultation under Regulation 19 of the Town and Country Planning Regulations (Local Planning) (England) 2012.

Thank you for your formal notification email of 3rd February 2023 inviting National Highways to comment on the proposed submission Chichester Local Plan 2021-2039, as part of the consultation process, seeking a response no later than 17.00 on 17th March 2023.

Background

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN).

National Highways is responsible for operating, maintaining, and improving the Strategic Road Network (SRN) i.e., the Trunk Road and Motorway Network in England, as laid down in Department for Transport (DfT) Circular 01/2022 (Strategic Road Network and the delivery of sustainable development).

The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Our responses to Local Plan consultations are guided by relevant policy and guidance including the National Planning Policy Framework (2021) (NPPF):

- Transport issues should be considered from the earliest stages of plan-making and development proposals so that the potential impact of development on transport networks can be addressed (para 104).
- The planning system should actively manage patterns of growth such that significant development is focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. (para 105).
- Planning policies should be prepared with the active involvement of highways authorities and other transport infrastructure providers so that strategies and investments for supporting sustainable transport and development patterns are aligned. (para 106).
- In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. (para 111).
- Planning policies and decisions should support development that makes efficient use of land, taking into account the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use. (para 124).

In relation to the tests of soundness set out at paragraph 35 of the NPPF, in the context of transport, these are interpreted as meaning:

- a) Positively prepared - has the transport strategy been prepared with the active involvement of the highway authorities, other transport infrastructure providers and operators and neighbouring councils?
- b) Justified – Is the transport strategy based on a robust evidence base prepared with the agreement in partnership, or with the support of the highway authorities?
- c) Effective – Does the transport strategy and policy satisfy the transport needs of the plan and is it deliverable at a pace which provides for and accommodates the proposed progress and implementation of the plan?
- d) Consistent with national policy – Does the transport strategy support the economic, social, and environmental objectives of the Plan and the NPPF/NPPG?

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN; in this case, the A27 trunk road (Chichester Bypass and its junctions) which is the main access route in the Chichester area. We have particular interest in any allocation, policy or proposals which could have implications for the A27 and the wider SRN network. We are interested as to whether there would be any adverse

road safety or operational implications for the SRN. The latter would include a material increase in queueing or delay or reduction in journey time reliability during the construction or operation of the development set out in the plan.

National Highways is a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents.

In accordance with national planning and transport policy and our operating licence, we are entirely neutral on the principle of development as it is for the local planning authority to determine whether development should be allocated or permitted; albeit it must comply with national policy on locating development in locations that are or can be made sustainable. Therefore, while always seeking early and fulsome engagement with local plans and/or developers, we will simply be assessing the transport and related implications of plans or proposals and agreeing any necessary transport improvements and relevant development management policy.

In progressing Local Plans, we will seek to agree the following:

- Assessment tools and methodology
- Baseline Assessment i.e., to demonstrate that the assessment tool accurately reflects current transport conditions
- Comparator case assessment i.e., to forecast the transport conditions that would occur in the absence of the plan
- Forecast modelling i.e., to forecast the transport conditions that would arise with the plan in place, this will include an assessment at the end of the Plan period; and, if required, at full build out if that occurs after the end of the Plan period
- Outputs and outcomes of modelling, demonstrating, as appropriate, what transport infrastructure is necessary to support the plan
 - It should be noted that a suite of transport modelling tools may be required. This includes strategic modelling covering an area at least one major junction beyond the district boundary, localised network modelling where several links/junctions are close together and/or individual junction modelling
 - A DMRB (Design Manual for Roads and Bridges) compliancy assessment may also be required for certain highway features, such as Merge/Diverge assessment at Grade separated junctions, link capacity assessments, and others.
- The design of any necessary transport infrastructure, to an extent suitable for establishing deliverability during the plan period at the time that it becomes necessary for the purpose of ensuring that unacceptable road safety impacts or severe operational impacts do not arise as a result of development. This may be to at least General Arrangement design stage or preliminary design stage. Whichever degree of detail is agreed, the products must be in full compliance with the DMRB.
- Industry standard transport intervention costings.

- The delivery/funding mechanisms for necessary transport interventions. It should not be assumed that National Highways will have any responsibility to identify or deliver necessary transport interventions.
- If considered appropriate, a “Monitor & Manage” (M&M) framework, aimed at managing the pace of development in line with the pace of funding and delivery of necessary highway interventions in a manner which responds to the real-world impacts of development may be agreed for inclusion in the plan subject to the adequacy of risk control measures included therein. This can include the move from a ‘predict & provide’ style of delivery to ‘a vision & validate’ style.
 - Any M&M framework must be based on a “worst case scenario” whereby necessary mitigation is understood, as well as setting out the desired alternative scenario. It must set out details of responsibility, funding and governance of the framework together with the methodology for determining the timing for any mitigation delivery while remaining clear on the fallback position where identified mitigation or desired alternatives are not ultimately achievable. It must be translated into development management plan policy and policy relating to development allocations.

Further detail on the above can be provided by National Highways.

While ideally all the above should be agreed prior to the Submission of the Local Plan for examination, we recognise that this is not always possible. However, all parties should work towards all matters being agreed and reflected in a Statement of Common Ground (SoCG) by the start of the Local Plan Examination at the latest. Ideally the SoCG between the Council and National Highways would be prepared well in advance of plan submission in order to guide resource input and to track progress towards final agreement on all relevant matters starting from the earliest plan iterations until the final version is agreed.

It is acknowledged that Government policy places much emphasis on housing delivery as a means for ensuring economic growth and addressing the current national shortage of housing. The NPPF is very clear that:

“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.”

However, new DfT C1/22 and the NPPF are equally clear that any development, including housing delivery, must be tempered by the requirement to ensure that the associated transport demand can be accommodated without unacceptable impacts on the safety of the SRN or severe impacts on the operation of the SRN including reliability and congestion. Therefore, as necessary and appropriate, any plan and/or development must be accompanied by suitable mitigation in the right places at the right time, that is to the required design standards and is deliverable in terms of land availability, constructability and funding.

We would also draw your attention to the then Highways England document ‘*The Strategic Road Network, Planning for the Future: A guide to working with National Highways on planning matters*’ (September 2015). This document sets out how National Highways intends to work with local planning authorities and developers to support the preparation of sound documents which enable the delivery of sustainable development. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/461023/N150227_-_Highways_England_Planning_Document_FINAL-lo.pdf

Responses to Local Plan consultations are also guided by National Planning Policy Framework (NPPF) revised on 20 July 2021 which sets out the government’s planning policies for England and how these are expected to be applied.

Updated Circular (01/2022)

It should be noted that since the start of the Local Plan consultation process, on the 23 December 2022, the Department for Transport released a new circular on the ‘*Strategic road network and the delivery of sustainable development*’ (Circular 01/2022), which replaces all of the policies in Circular 02/2013 of the same name. These representations take account of the new circular and the requirements in terms of the Local Plan evidence base and process.

We request that the Local Plan is prepared in line with all aspects of the new circular. Particularly, the principles of sustainable development (paragraphs 11 to 17), new connections and capacity enhancements (paragraphs 18 to 25), and engagement with plan-making (paragraphs 26 to 38).

Regulation 18 submission

In our Regulation 18 submission we noted several matters including:

- The need to mitigate the adverse impacts of strategic development traffic to the A27 Chichester Bypass and its junctions at Portfield Roundabout, Bognor Road Roundabout, Whyke Roundabout, Stockbridge Roundabout and Fishbourne Roundabout and Oving junction.
- The need to identify a mechanism to calculate contributions towards the delivery of the previously agreed Local Plan A27 improvements
- The need to confirm the number of dwellings needed within the plan period
- The need to establish National Highways acceptance of the traffic model reference and future case scenarios
- The need to confirm costs, viability, and funding associated with mitigating the safety and congestion impacts of the development included within the plan.

Local Plan context

This Local Plan (Chichester Local Plan 2021 – 2039), prepared by the Local Planning Authority (LPA) Chichester District Council, sets out the vision for future development in the district and will be used to help decide on planning applications and other planning related decisions including shaping infrastructure investments.

The draft sets out how the district should be developed over the next 18-years to 2039 including for the full Plan period (1 April 2021 to 31 March 2039) the total supply of

- 10,359 dwellings
- 114,652 net additional sqm new floorspace

Minus the completions this is equivalent to around 530 dwellings and 6,150 sqm of floorspace a year.

National Highways Representations

To date National Highways have worked collaboratively with Chichester District Council (the Council) and West Sussex County Council (WSCC) and we will continue to work with the Council and other key stakeholders.

We have undertaken a review of the Chichester Local Plan 2021-2039 proposed submission version and accompanying evidence documents, our comments are set out in the tables below (following pages).

Our comments include issues to resolve, comments, requests for further information or detailed information, matters for discussion and recommendations.

Rep.	Local Plan Reference	National Highways Representation
1	<p>Vision and Strategic Objectives</p> <p>Para 2.12 Para 2.18 Para 2.29</p>	<p><u>Comment</u></p> <p>We note that households who did not have access to a car or van; are lower than county, regional and national averages (para 2.12) and that the majority of existing employment and business space are focused around Chichester city and the A27 corridor (para 2.18).</p> <p>The A27 is a key corridor although the area is severely congested. The bypass continues to suffer from high accident rates, daily congestion, and extensive queuing at most of the junctions along this 5km stretch of road. With traffic due to increase by 24% by 2035 this situation will consistently worsen if there is no intervention.</p> <p>We therefore support (para 2.29) the need:</p> <ul style="list-style-type: none"> - to reduce the need to travel, particularly by private car, supported by direct walking and cycling routes - for the Local Plan to provide local infrastructure to support new development and seek opportunities to address existing infrastructure problems, such as those relating to the A27 <p>We support the vision (para 2.37) that by 2039, the Chichester plan area will be a place where people can:</p>



		<ul style="list-style-type: none"> - get about easily, safely, and conveniently with less reliance on private cars –making use of the rail and bus network, and with more opportunities for active travel including walking and cycling.
2	Strategic Objectives Para 2.54)	<p><u>Comment</u> We also support</p> <ul style="list-style-type: none"> - Objective 1 (Climate change) (para 2.54) “new development will be in accessible locations, designed to reduce reliance on the private car with convenient walking and cycling routes and public transport to access local facilities and open spaces”. This objective helps to supports National Highways Net Zero objectives - Objective 4: (Employment and economy) “offering a good range of business and retail to serve local communities and reduce the need to travel”. This objective may help to reduce the need to travel long distances, increase community self-containment and support short walking and cycling trips - Objective 7: (Strategic Infrastructure) “A sustainable and integrated transport system will be achieved through improvements to walking and cycling networks and links to accessible public transport. Highway improvements will be delivered to mitigate congestion, including measures to mitigate potential impacts on the A27 through a monitor and manage process” and “Infrastructure requirements will be kept under review through the Infrastructure Delivery and Business Plans and development will be phased to align with provision of essential infrastructure”. This objective will help to reduce demand and reliance on the A27 especially in peak periods.
3	Policy S1 Spatial Development Strategy	<p><u>Comment</u> We acknowledge that the quantum and locations of development presented in the planning policies of the document are clear and understandable.</p>
4	Para 3.20	<p><u>Comment</u> We support that the Plan does not include any strategic allocations on the Manhood because all traffic from the peninsular ultimately joins or crosses the A27. The A27 is also the main route for tourism traffic to Bognor Regis. We will continue to work with WSCC on this highway matter.</p>

5	Para 3.25	<p><u>Comment</u> We acknowledge that the Plan has ruled out high growth in Kirdford, Wisborough Green and Plaistow and Ifold, but seek to understand the impacts and mitigation measures associated with the A27</p>
6	Policy NE15 Flood Risk and Water Management	<p><u>Comment</u> We request that reference is made to the SRN or National Highways within the Flood Risk policies.</p> <p>Development must not lead to any surface water flooding on the SRN carriageway. These points apply to the site operation and construction phases. National Highways should be contacted to discuss these points in detail as part of, or in advance of a planning application submission.</p>
7	Policy NE23 Noise	<p><u>Comment</u> For sites positioned close to the SRN carriageway and junctions, it will be necessary to ensure that the development proposals mitigate appropriately the potential for lighting, noise, and vibration impacts.</p> <p>In terms of noise, we would expect development masterplans to be designed to minimise the exposure to strategic traffic, for example a landscape buffer or sensitive screening to shield the environment and dwellings from A27 noise.</p> <p>In addition to noise impacts and in accordance with our policies which support that all noise fences, screening and other structures must be erected on the development land, and far enough within the developer's land to enable maintenance to take place without encroachment onto highway land. We would expect that these issues are considered as part of planning proposals.</p> <p>Impacts arising from any disruptions during construction, noise, vibration, traffic volume, composition or routing and transport infrastructure modification should be fully assessed and reported.</p>
8	Para 5.2	<p><u>Comment</u> We seek to understand the Council's approach, the impacts on the A27, and who would be responsible for funding and delivering transport related mitigation measures, if neighbouring and other authorities are</p>

		unable to meet Chichester's unmet needs (approx. 100 dwellings per annum in the southern plan area).
9	Policy H1 Meeting Housing Needs	<p><u>Comment</u> We note that 84% of the total Housing provision 2021-2039 (9,717 dwellings) is in the East-West Corridor (Chichester city, east of the city, west of the city) with the A27 running through this corridor. This reiterates the additional pressures on an already congested road.</p> <p>The evidence we have seen to date has a spatial focus on the A27. There is little evidence of locations away from the A27.</p>
10	Policy H2 Strategic Locations/ Allocations 2021 - 2039	<p><u>Comment</u> The proposed developments are dispersed along the A27 corridor from Hermitage to the west of the city through to Tangmere in the east.</p> <p>We note that this has the potential to put pressures and traffic impacts on multiple A27 junctions rather than just one or two locations.</p>
11	Para 5.12	<p><u>Comment</u> National Highways welcomes the opportunity to work with you to monitor future population, household growth, commuting patterns and any excessive in-commuting as part of the update of this Local Plan within the next five years.</p>
12	Policy H6 Custom and/or Self Build Homes	<p><u>Comment</u> New sites over 200 units which are allocated in the Local Plan will be required to provide self and custom build serviced plots (2% of units on strategic scale housing sites).</p> <p>We seek to understand if the Council will utilise Construction Environmental Management Plan (CEMP) to manage and coordinate the activities of individual self-build builders, especially during the construction phase, to avoid, minimise and/or mitigate effects on the road environment.</p>
13	Policy H7 Rural and First Homes Exception Sites	<p><u>Comment</u> With up to 30 dwellings per site across the region, we seek to understand how the Council plans to include such sites in an overarching monitor and manage policy which addresses the cumulative traffic impacts of these and other sites and manages their collective impact on the A27.</p>

14	Para 5.41 Para 5.42	<p><u>Comment</u> Those age groups 75 and over (Para 5.41) or with specialised mobility needs (Para 5.42) are less likely to use walking / cycling routes than younger persons.</p> <p>Department for Transport data suggests that there has been a 20-40% change (decrease) in bus vehicle miles across West Sussex since the pandemic. Bus networks are shrinking across the UK and services are being cut or rationalised.</p> <p>Considering these changes, and the typical inability of the aged to walk or cycle longer distances, we seek to understand how the Council will demonstrate that revenue funding can be secured to maintain the long-term viability of the public transport in proximity of the specialist accommodation for older people and those with specialist needs and how this may affect the viability of the overall sustainable transport package.</p> <p>Impacts arising from such developments and the funding of transport infrastructure modifications should be fully assessed at the planning application stage.</p>
15	Policy H8 Specialist accommodation for older people and those with specialised needs	<p><u>Comment</u> We seek to understand and resolve several matters including but not limited to:</p> <ul style="list-style-type: none"> - reliance on others e.g., service providers to provide the required services - how, when, and where additional revenue will be sought to cover the cost of services - how the Council will assess what would be realistic trip generation - which locations have been considered for specialist accommodation? - how many facilities have been considered? - How Over 55's accommodation has been distinguished from aged care accommodation - How residents in Over 55's accommodation in full-time employment (and still commuting to and from work) have been considered - what percentage of the population are anticipated to live in these facilities?

16	Policy H4 Affordable Housing	<p><u>Comment</u> Affordable housing is especially pertinent on the Manhood peninsula, where we note that caravan parks are seeking 365 days a year occupation. We seek to understand further information about the anticipated traffic generation associated with such changes.</p>
17	Policy H11 Meeting Gypsies, Travellers and Travelling Showpeoples' Needs	<p><u>Comment</u> This policy does not acknowledge or address Motor Homes, Caravans, Vans, converted Buses, Tiny Homes, or other forms of mobile housing in response to the housing crisis and low rental vacancy rates. Nor does this policy address the rise in nomadic and digital-nomad lifestyles. Both have the potential to generated large numbers of additional vehicle movements on the SRN and to create new impacts, for example van dwellers sleeping in road lay-bys.</p>
18	Para 6.3	<p><u>Comment</u> Achieving good design, particularly for larger scale proposals, requires early engagement with relevant statutory bodies (para 6.3).</p> <p>We welcome the opportunity be invited to be involved in the pre-application scoping stage and to review Sustainability Statements to reduce impacts associated with traffic.</p>
19	Policy P1 Design Principles	<p><u>Comment</u> Policy 6 does not cover signage. No reference is currently made to the SRN or National Highways.</p> <p>It is a requirement of the local planning authority to consult National Highways on the road safety aspects of advertisements proposed alongside the SRN, for example development advertisements.</p> <p>Advertisements that are likely to distract motorists are unlikely to be approved. Ordinarily we will need to consider location, if visible from the SRN, size, brightness/lighting (if any) and effect on public safety as well as the type of intended advertising.</p>
20	Policy P3 Density	<p><u>Comment</u> We support development proposals that make the most efficient use of land however, National Highways seek to understand how constraints, including traffic generation and network capacity will be assessed and reported for optimum density developments.</p>

		<p>We also seek to understand how ‘car-less’ and ‘car-free’ or ‘low car’ will be managed. Evidence from other UK councils suggests that residents of these developments, and their visitors, park in adjacent or nearby residential streets. When this occurs in close proximity to SRN junctions there is the potential to impact the SRN, for example:</p> <ul style="list-style-type: none"> - constraints to junction operations - safety implications - limitations to freight movements
21	Policy P4 Layout and Access	<p><u>Comment</u> Considerations should be given, and evidence provided, on how new active travel links will integrate with the wider network including the existing A27 pedestrian and cycle footbridges and active travel routes along/intersecting the A27 corridor and how new facilities will be funded, monitored, and maintained. This is an important measure to reduce demand on the A27.</p> <p>We seek clarity on how severance will be addressed and potential severance impacts.</p>
22	Policy P14 Green Infrastructure	<p><u>Comment</u> As Policy P4, proposals should maximise opportunities to link with the wider network including the existing A27 pedestrian and cycle footbridges and active travel routes along/intersecting the A27 corridor and how new facilities will be funded, monitored, and maintained.</p> <p>This is an important measure to reduce demand on the A27.</p>
23	Policy P16 Health and Well-being	<p><u>Comment</u> National Highways support proposals that are safe and connected to existing and future routes that are of the same standard of infrastructure, or better, to enable cycling and walking for local trips to reduce impacts on the A27. This is an important measure to reduce demand on the A27.</p>
24	Policy P17 New and Existing Local and Community Facilities including Local Shops	<p><u>Issues to resolve</u> We can’t assume that only housing and employment sites generate trips. Every trip has an origin and a destination. Furthermore, trip attractors and diversions to key destinations need to be considered.</p> <p>Community Facilities such as medical centres, social classes in community run facilities, community</p>

		<p>childcare venues e.g., creche/toddler groups and libraries are busy in the am and pm peak and the off-peak. Realistically people are typically unlikely to walk or cycle to a medical appointment or to a childcare group.</p> <p>We seek further information on how the Council intends to assess how new or improved community facilities will demonstrate they have no adverse traffic generation effects.</p>
25	Policy E2 Employment Development - Existing and New Employment Sites	<p><u>Comment</u></p> <p>We seek further information on how the Council will assess and determine ‘would not generate unacceptable levels of traffic movement’ and how this will be monitored and managed if unacceptable levels of traffic are generated.</p> <p>We seek further information on how the Council will monitor and manage the cumulative traffic generated from multi occupancy start-up and move-on businesses.</p>
26	Policy E4 Horticultural Development	<p><u>Comment</u></p> <p>National Highways welcomes the opportunity to work with you on large, and smaller scale, horticultural developments particularly heavy goods vehicles access onto the A27 and accommodating vehicle movements on the SRN without detriment to highway safety.</p> <p>To operate efficiently, the freight and logistics sector requires land for distribution and consolidation centres at multiple stages within supply chains including the need for welfare facilities for the drivers of commercial vehicles. For instance, some hubs serve regions and tend to be located out-of-town near the SRN, while others are ‘last-mile’ facilities that will support more sustainable freight alternatives in urban areas. The Future of Freight Plan sets out that a joined-up approach between the planning system, local authorities and industry can safeguard and prioritise the land needed for these uses, such that all parties should work together to identify the specific requirements in their area.</p>

		Impacts arising from such developments and the funding of transport infrastructure modifications should be fully assessed at the planning application stage.
27	Policy E5 Retail Strategy and New Development	<p><u>Comment</u> National Highways support retail development and expansion within the existing areas and re-occupation of vacant floorspace. This support NPPF (para 86) stating that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management, and adaptation.</p> <p>We seek further information on how servicing and customer traffic will be safely and conveniently accommodated by the surrounding road network will be monitored and if not safely and conveniently accommodated how the impacts will be managed and mitigated especially traffic generated in peak periods, for example weekends and Christmas.</p>
28	Policy E9 Caravan and Camping Sites	<p><u>Comment</u> We support the development proposals for new caravan and camping sites that provide for winter storage of touring caravans/other forms of touring units, because this helps to reduce the number of large and towing vehicles on the SRN.</p>
29	Policy T1 Transport Infrastructure	<p><u>Issues to resolve</u> As a reiteration of context, the Transport Study of Strategic Development Options and Sustainable Transport Measures (2013) identified an indicative package of coordinated measures for six junctions on the A27 Chichester Bypass with an estimated cost of more than £12.8 million to increase road capacity, reduce traffic congestion, improve safety, and improve access to Chichester city from surrounding areas.</p> <p>At the time these measures were identified as being sufficient to mitigate the impact of development then proposed in the Plan. This package was also deemed to be capable of being fully funded by the development included within the plan. The six junctions and current scheme status is set out below:</p> <ol style="list-style-type: none"> 1. A27 Portfield Roundabout - Agreed improvements being implemented as part of conditions relating to planning Application No. O/11/05283/OUT Land North Of Shopwhyke Road, Shopwhyke, West Sussex.

		<ol style="list-style-type: none"> 2. A27 Oving Cross Roads - Agreed improvements being implemented as part of conditions relating to planning Application No. O/11/05283/OUT Land North Of Shopwhyke Road, Shopwhyke, West Sussex. 3. A27 Bognor Road Roundabout - Scheme not fully funded via s278 contributions. 4. A27 Whyke Roundabout - Scheme not fully funded via s278 contributions. 5. A27 Stockbridge Roundabout - Scheme not fully funded via s278 contributions. 6. A27 Fishbourne Roundabout - Scheme not fully funded via s278 contributions. <p>Much of the abovementioned infrastructure (in the existing Plan) is undelivered and the new Plan will significantly increase travel demand. The A27, and its junctions, are already at capacity, the delivery mechanisms for the undelivered schemes is uncertain and it is clear that an alternative approach to new transport provision, that does not rely on the A27, is needed.</p> <p>National Highways supports the Councils need to enable and shape housing and employment growth, but risk, particularly increased road safety risk, needs to be robustly managed, especially as the A27 is the primary access corridor through and to Chichester.</p> <p>Road congestion is already a major concern for residents and businesses; particularly junctions on the A27 Chichester by-pass which in turn, leads to congestion on the local road network as drivers seek alternative routes, increasing traffic speed, flow and road safety risk on those alternative routes.</p> <p>The A27 road network is currently operating at or close to capacity and further improvement is necessary to increase capacity on the A27 to accommodate current traffic levels, committed development and development allocated in the current local plan.</p> <p>Without the delivery of the identified A27 improvements or as yet unidentified equivalent alternatives, the proposed allocations will further exacerbate current issues.</p>
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		<p>This Plan states that increasing the capacity of the transport network is key to supporting growth and this could be delivered through:</p> <ul style="list-style-type: none">- junction improvements- sustainable transport infrastructure- non-physical measures e.g., travel planning, sustainable travel choices. <p>We acknowledge that:</p> <ul style="list-style-type: none">- the West Sussex Transport Plan (2022-2036) has 17 objectives which includes reducing the need to travel by car and improving road network efficiency.- the district council have undertaken transport studies of proposed development sites, strategic housing numbers in Plan and greater quantum of development to understand impacts on the highway network.- the Chichester area transport strategy aims to improve the performance of the A27 through junction improvements at Chichester through the A27 Chichester bypass improvements project. <p>The A27 Chichester bypass improvements project is one of 32 pipeline schemes being considered for possible inclusion in National Highways third Road Investment Strategy (RIS3) covering 1 April 2025 to 31 March 2030. National Highways have facilitated Stakeholder Reference Groups (SRGs) and Council Member briefings which have acted as a 'regional voice' and helped communicate information. However, there is no current commitment by DfT to carry out these proposals and it will be the government, not National Highways, who will make any final decisions.</p> <p>On 9 March 2023 the UK Transport Secretary ensured record funding would be invested in the country's transport network, sustainably driving growth across the country while managing the pressures of inflation. The announcement cited the A27 Arundel Bypass inclusion in the development of RIS 3 (covering 2025-2030).</p> <p>Until the A27 Chichester bypass improvements project is published in the RIS3, consented and a decision to</p>
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		<p>invest is made it cannot be assumed to be a committed project.</p> <p>We note that the Plan does not address any uncertainty of delivery of the A27 Chichester bypass improvements project within land owned or under the control of the Councils or government agencies. Nor does it address that it may be necessary for the council to exercise its Compulsory Purchase powers to deliver the scheme.</p> <p>There cannot be any presumption that such infrastructure will be funded through a future RIS. We strongly recommend that there is either no reliance placed on RIS3 to realise capacity for growth in the Plan or that contingency measures are included to cover the eventuality that RIS3 funding is not forthcoming within the plan period.</p> <p>National Highways seeks to continue working with the Council and WSCC to progress coordinated and deliverable packages of interim mitigation measures and alternative transport measures while a long-term strategic solution is considered by government. This must however be in combination with a robust monitor and manage policy.</p> <p>We also recommend that the Council do all that they can to present the evidence for the series of scenarios that have been considered in previous years</p> <ul style="list-style-type: none"> - Scenario 1 – A27 Chichester bypass improvements funded and delivered through RIS3 - Scenario 2 – No commitment to fund or deliver the A27 Chichester bypass improvements through RIS3 and so alternatives are required <ul style="list-style-type: none"> o Scenario 2a – alternative funding to deliver A27 Chichester bypass improvements o Scenario 2b – seeks alternative solutions to A27 Chichester bypass improvements - Scenario 3 – Develop alternative solutions to A27 Chichester bypass improvements
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		<p>We support the principle of a 'monitor and manage' approach of:</p> <ul style="list-style-type: none"> - understanding what is required - identifying a package of highway and active/public transport improvements - identifying schemes through the development management process - implementation of improvements and schemes following a monitoring process that monitors actual demand on the network and the forecast requirement for the schemes. <p>This will require a robust 'monitor and manage' strategy and process that appropriately manages the risk of unacceptable road safety impacts resulting from new housing and other development over the Plan period.</p> <p>We have been in discussion with Chichester District Council regarding their proposed Monitor and Manage Strategy. At present, we do not consider the current strategy to be robust and we seek further information and detail especially on who, when and when monitoring and management will be undertaken.</p> <p>We agree that locations with suitable existing or committed alternatives to the car should be where development is directed first, and that development needs to be phased to align with future transport improvements that are committed or planned to support development.</p> <p>As iterated in our policy papers developments in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be a key consideration when planning for growth in all local authority areas because the RTP1 Research paper: The Location of Development (December 2021) found that walking times between new homes and a range of key amenities regularly exceeded 30 minutes, reinforcing car dependency.</p> <p>In the Plan (consultation documents provided) there is insufficient evidence that funding, partners, and relevant processes are in place to enable the delivery of infrastructure. Nor is there a realistic prospect that</p>
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		<p>longer term investment can be secured within the timescales required.</p> <p>We acknowledge that we (National Highways), the Council and WSCC have been working together on solutions, but this is not presented in the consultation documents of the Plan.</p> <p>The Plan states that the full estimated costs of the A27 junction improvements cannot be met through developer contributions alone and no additional or external funding sources have been identified. National Highways therefore seeks to understand.</p> <ul style="list-style-type: none"> - who will ultimately be responsible for funding and delivery of mitigation measures? - The Council's strategy if developer contributions are insufficient - The Councils' governance associated with collected contributions and their use - How developers will be charged if additional contributions are required <p>We note that the funder will only be National Highways if the scheme is confirmed in RIS3, consented, and has a decision to invest.</p> <p>We acknowledge the ongoing work to establish costs but we clarifications on estimated costs is not included in the consultation documents, including inflation and increased material costs. For example, there is a large variation in estimated costs:</p> <ul style="list-style-type: none"> - £19 - £30 million for Bognor Road Roundabout and Vinnetrow Road Link. - £57 - £82 million to deliver the Stockbridge Link Road <p>We note that there are concerns about deliverability of the Link Road</p> <p>Detailed, current costings have not been discussed in the Plan for some schemes such as the Stockbridge Roundabout and Whyke Roundabout.</p> <p>Junction modification measures to improve and enhance existing operations, such as bus priority or traffic signal technology have not been discussed or costed for this Plan.</p>
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		<p>When revised estimates are completed it is recommended that these are passed through the National Highways commercial team who will assist the Council by providing a cost range and recommendations on likely Quantitative Risk Assessments (QRAs) costs, associated with proposals.</p> <p>We support being part of the Traffic and Infrastructure Management Group (TIMG) set up of representatives from Chichester District Council, West Sussex County Council and National Highways. Again, we seek clarity on funding, remit, level of assessment the group will be permitted, roles, and responsibilities.</p> <p>We seek further information on how and when the Council and public transport operators/service providers plan to fund and deliver improvements to the accessibility of railway stations and improve bus services in and through the Plan area in the current economic climate dominated by falling patronage and tightened budgets.</p> <p>The Plan does not appropriately acknowledge that all housing and employment development, even smaller developments, generate patterns of demand for the movement of people and goods which may give rise to additional traffic impacts on the SRN. All developments have a responsibility to mitigate their own impacts. We seek to understand how developments will mitigate their own impacts</p> <p>We also seek further trajectory information and evidence of committed funded for local schemes, namely the various schemes in WSCC Local Transport Plan, schemes forthcoming during the Local Transport Plan period and travel demand management measures.</p> <p>Previous studies have identified a need to supplement physical highway improvements with sustainable transport initiatives.</p> <p>Such policies are not evidenced in the Plan and so assumptions and assessments cannot be made. Therefore, National Highways seeks.</p>
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		<p>a. evidence that the Council and WSCC through their transport strategies and development management have:</p> <ul style="list-style-type: none"> ○ an understanding of current and future pressures and constraints in the transport system ○ identified when and where there is spare capacity ○ strategies to redistribute demand to where there is spare capacity <p>b. to see, the Councils application of robust strategies, policies, and initiatives to</p> <ul style="list-style-type: none"> ○ manage travel demand more enduringly ○ mitigate the impact of additional traffic generation ○ ease recurring congestion ○ better deal with planned or unplanned special events and tourism seasons ○ support delivery of normal operations. <p>c. understand</p> <ul style="list-style-type: none"> ○ what initiatives would be most appropriate for proposed developments ○ when and where initiatives would be delivered ○ how they would be funded ○ who would ultimately be responsible for the delivery of initiatives <p>National Highways recommends that a travel demand management (TDM) approach should be evident, focussing on redistributing demand more efficiently and towards modes that are lower cost and have lower environmental and social impacts by enabling people to use</p> <ul style="list-style-type: none"> - re-mode journeys using alternative or different ways to travel (re-mode) - retime journeys to avoid peak or seasonal demands (re-time) - reroute journeys to less congested roads (re-route) - reduce the need to travel and unnecessary (reduce).
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30	A27 Mitigation contributions	<p>Comment</p> <p>We note that the contribution per dwelling for strategic development sites brought forward from the 2015 Plan bear no resemblance to current date costs (and cost increases associated with inflation and increased material costs) and that the calculations for mitigation contributions for all other developments are based upon the estimated cost of two schemes minus monies already collected and divided by the remaining supply.</p> <p>The proposed developments are all at various stages of realisation, some are not yet master planned. It is therefore unlikely that the Council will be able to sufficiently fund necessary mitigation measures.</p> <p>The Plan is unclear if growth will be controlled in pace with the availability of funding and the delivery of necessary transport intervention. We would expect this to be achieved through suitable Development Management policy.</p> <p>There is no one single development that is large enough to provide developer contributions to fund the required mitigations and so a change in direction will be required.</p> <p>All new housing and employment development increases the traffic on both the local and strategic highway networks. It may therefore be necessary for the Council to collect contributions from all new and smaller developments, even those with 10 or fewer dwellings, not just those included as specific allocations within the Plan.</p> <p>National Highways recommends that as a priority the Council:</p> <ul style="list-style-type: none"> - reviews the 'Planning Obligations & Affordable Housing Supplementary Planning Document' (SPD) which came into effect from February 2016 to reflect the proposed development in the Plan and the likely additional costs of construction associated with mitigation measures on the A27
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		<ul style="list-style-type: none"> - considers the methodology to calculate contributions in relation to current day costs - reviews process to enable collection of contributions from all sites, including from smaller developers. - increases the rate per dwelling so that the required infrastructure can be delivered and including covering the cost of monitoring. <p>We acknowledge the work that has been done, and is being done, and we seek to continue to work with the Council, but we do seek information on the longer-term measures.</p> <p>National Highways recommend:</p> <ul style="list-style-type: none"> - establishing what/which contributions could realistically come forward from developments. - identifying what mitigation measures could reasonably be delivered from <ul style="list-style-type: none"> o existing contributions o expected contributions - understanding the overall deficit - preparing a business case for any identified shortfalls
31	Policy T2 Transport and Development	<p><u>Matters to be addressed</u></p> <p>We agree that increasing the capacity of the transport network and reducing demand for road transport is key to supporting growth in the Local Plan and that development should alleviate pressure on the road network, improve highway safety and encourage sustainable travel behaviours. The focus for improving transport capacity should not however be placed on road traffic.</p> <p>The existing Transport Assessment and Travel Plan processes are robust but unlikely to be sufficient in the context of achieving net zero commitments, emissions reduction, and climate emergency nor for thousands of new homes, and new employment developments.</p> <p>For example, the National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these should be applied but it does not mandate Transport Assessment or Travel Plans.</p>

		<ul style="list-style-type: none"> - NPPF paragraph 113 states “<i>All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed</i>”. <p>Transport Assessments can however ‘hide’ or ‘disguise’ significant traffic impacts e.g., reducing commuter traffic by allocating a high % of trip to ‘work at home’ or including an assumption that say 80% of residents would work at home thus insignificant amounts of ‘peak hour commuter traffic’. It is likely in the developers ‘best interests’ to promote the ‘best case scenario’ rather than the ‘worst case scenario’.</p> <ul style="list-style-type: none"> - NPPF states “<i>a Travel plan is a long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and is regularly reviewed</i>”. <p>However, the regularity of review is not often defined, which is a problem for Councils in terms of monitoring. Since their inception and adoption in the UK in 1995, Travel Plans have typically been voluntary in nature and are not legally binding documents, enforceable by law. Many UK travel plans comprise of a single document outlining a developer’s or an organisation’s intended approach to reducing vehicle trips and promoting sustainable travel mode share.</p> <p>There are very few UK examples of legal enforcement, legal challenges, legal proceedings, or legal precedence in relation to Travel Plans. The problem therefore is that some developers do not treat Travel Plans with the same level of attention that they would with a legal contract or legally binding document. It is recommended that all new developments that could generate significant amounts of movements develop and deliver a Travel Plan, that is legally binding, and specifically designed to suit the requirements of the site and transport needs of residents/occupiers.</p>
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		<p>Some circumstances Travel Plans could be reviewed and approved by a planning officer without the appropriate transportation and travel plan expertise in:</p> <ul style="list-style-type: none"> - Transport assessment calculations. - Transport mode splits and mode shares distribution analysis. - Mitigation measures. <p>We recommended that where applicable the mitigation measures in Travel Plans are reviewed by National Highways</p> <p>At a site-specific level the issues are more complex:</p> <ul style="list-style-type: none"> - Travel Plan are often only prepared to seek planning approval, with little commitment thereafter. - Travel planning guidance is often tailored to existing workplaces and not always tailored to new developments. - Travel Plans of varying quality are submitted with planning applications and subsequently the 'acceptance' or 'approval' of poor planning sets a precedence for other developers and developments. - The type of development and/or end-user, especially for employment sites, is often unknown, making it difficult to develop an appropriate set of targets and monitoring measures for the travel plan. - The ability to effectively monitor and enforce travel plans is often hindered by insufficient resources within local government. - Some monitoring requirements are complex. For example, tracking Travel Plan monitoring fees or analysing complex traffic or bus patronage count data and some Local Authorities do not have the appropriate skills sets or available resources. <p>In seeking to move and transition to a 'Monitor and Manage' approach the above point are critical.</p> <p>Travel Plans will need to be developed and managed in co-ordination across the area (not a series of individual plans managed in isolated) and a 'carrot and</p>
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		<p>stick' approach will be required to mitigate impacts, enforced with financial penalties.</p> <p>Additional and or adapted processes and assessments will likely be required. We welcome the opportunity to provide recommendations from other regions and Councils we work with.</p> <p>We seek more information on the criteria which will be applied when considering the transport impacts of proposals for new development. However, we would recommend:</p> <ul style="list-style-type: none"> - Developing a process to understand what is required to support developments. For example, the Council needs to be able evidence how each residential and industrial land lot has been related to the infrastructure network and planning scheme element to allow the Council to plan, prepare for, and fund, population, residential and employment growth and to better plan for the associated trunk infrastructure requirements, using robust data and tested land-use scenarios and appropriate planning assumptions. - Planning applications need to be supported by a robust Transport Assessment which demonstrates that the individual and cumulative impacts will not unacceptably impact on the safe operation of the A27 trunk road or severely impact on congestion. As the council are aware, the A27 is already congested and therefore it should be ensured that the development proposals do not worsen the existing safety or operational situation. - Due to the proximity of developments to the A27 we would support Transport Assessment and Travel Plan thresholds that ensure case-by-case requirements/reviews ensuring that all developments are required to submit Transport Assessment and Travel Plans of a standard acceptable to the Highway Authorities (WSCC and National Highways). - As appropriate, National Highways would seek to be part of pre-planning scoping meetings or consultations to ensure that necessary highway
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		<p>and transport mitigation measures are properly considered before planning application phase.</p> <ul style="list-style-type: none"> - In all cases, National Highways would recommend planning conditions, the effect of which would be to ensure that unacceptable impacts on the safe operation of the A27 trunk road or severe impacts on congestion do not arise. It would be helpful if this was reflected through development management and/or allocation specific policy in the Local Plan. <p>Ongoing monitoring of Travel Plans is essential to ensure sites are meeting their targets, and that the appropriate mitigation measures are being implemented by the agreed dates with enforcement (prohibiting further development) if agreed measures are not implemented or unsuccessful. This should include:</p> <ul style="list-style-type: none"> - Phasing – phasing the delivery of new developments to align with the provision of new transport infrastructure and the outcomes of monitoring travel demand. - Trigger points - agreed for milestones for each phase of each development. - Monitoring – at each trigger point and annually at each site (traffic counts, surveys etc in mid-September/data analysed in undertaken in October each year) - Review - Review and determine whether targets have been met, and whether further action and/or enforcement is required. - Remedial measures - Where a site has failed to achieve its trigger points/targets, there will be a need to agree, fund and implement remedial action of an appropriate scale/nature to mitigate demand <p>We welcome the opportunity to be part of Transport Reference groups to help facilitate these monitoring activities and the delivery of mitigation measures.</p>
32	Policy T3 Active Travel - Walking and Cycling Provision	<p>Comment Proposals should maximise opportunities to link with the wider network including the existing A27 pedestrian and cycle footbridges and active travel routes along/intersecting the A27 corridor and how new facilities will be funded, monitored, and maintained.</p>

		This is especially important as demand increases on and for the use of the A27.
33	Policy I1 Infrastructure Provision	<u>Comment</u> The Plan should evidence who will fund, be responsible for and maintain improved accessibility to necessary facilities and services by sustainable travel modes from the outset as well as on an ongoing basis and into the future.
34	Chapter 10: Strategic and Area Based Policies	<u>Comment</u> We are aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot cater for unconstrained traffic growth generated by new developments, and we therefore encourage: <ul style="list-style-type: none"> - policies and proposals which incorporate measures to reduce traffic generation at source - more sustainable travel behaviour. - net zero, reduce emissions and act on the climate emergency
25	Policy A1 Chichester City Development Principles	<u>Comment</u> We support the preparation of supplementary planning document(s) or development plan document(s) as a framework for coordinated transport/traffic planning and identifying the required transport improvements.
36	Policy A7 Land at Shopwyke (Oving Parish)	<u>Comment</u> This proposal of 585 dwellings is carried forward from the 2015 Local Plan We agree that shielding residential properties from noise on the A27, needs to be taken into account in delivering this development. For sites positioned close to the SRN carriageway and junctions, it will be necessary to ensure that the development proposals mitigate appropriately the potential for lighting, noise, and vibration impacts. In terms of noise, we would expect development masterplans to be designed to minimise the exposure to strategic traffic, for example a landscape buffer or sensitive use of acoustic screening to shield the environment and dwellings from A27 noise. In addition to noise impacts and in accordance with the DfT Circular 01/2022 which states that all noise fences, screening and other structures must be erected on the developers' land, and far enough within the developer's

		<p>land to enable maintenance to take place without encroachment onto highway land. We would expect that these issues are considered as part of planning proposals.</p> <p>Impacts arising from any disruptions during construction, noise, vibration, traffic volume, composition or routing and transport infrastructure modification should also be fully assessed and reported</p> <p>In regard to the provision of a mitigation fund we would recommend considering multiple scenarios that we are already working with you to consider, including:</p> <ul style="list-style-type: none"> - improvements to access onto the A27 in combination with A27 improvement - improved access to the A27 and surrounding road improvements - reducing access to the A27 so that the SRN performs more efficiently - reducing access to the A27 to increase demand for sustainable trips <p>We seek further information regarding the provision of adequate mitigation for potential off-site traffic impacts on the A27, in particular for the Portfield and Oving Road junctions.</p> <p>Whilst we support</p> <ul style="list-style-type: none"> - improved cycle and pedestrian crossing at the A27/Oving Road junction - the provision of grade-separated walking and cycling footbridge across the A27 to Coach Road <p>both would enable people on foot and people on bicycles, especially vulnerable road users; children and the elderly, to cross the A27, we would require further information on:</p> <ul style="list-style-type: none"> - who would fund, maintain and be responsible for the proposed infrastructure? - land requirements for ramps and traffic signal apparatus - traffic impacts as a result of any changes to existing traffic signal operations - who would manage disruptions to normal traffic operations during the construction phase?
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		We note the importance of all key stakeholders understanding all future requirements.
37	Policy A6 Land West of Chichester	<p><u>Comment</u></p> <p>We understand that large developments like this, 1,600 carried forward from the 2015 Local Plan, can comprise of residential, commercial, retail, and industrial and/or a combination of these land-uses delivered by one individual developer or delivered cumulatively by multiple residential developers and/or employers. Where there are multiple developers and multiple development parcels complexities are often increased with the use of different base flows, traffic generation and forecasted impacts. We support measures to provide consistency for example,</p> <ul style="list-style-type: none"> - using one agreed set of trip rates and changing/appropriate trip rates over time - interlinkages of Transport Assessments and Travel Plans between different developers - the creation of consortiums or Transport Reference Groups to manage the impacts for the whole development - occupation and monitoring trigger points for the development as a whole <p>We support the provision of a mitigation fund for potential off-site traffic impacts through a package of measures in conformity with Policy T1 (Transport Infrastructure) and T2 (Transport and Development), including:</p> <ul style="list-style-type: none"> - improvements to access onto the A27 in combination with A27 improvement - improved access to the A27 and surrounding road improvements - reducing access to the A27 so that the SRN performs more efficiently - reducing access to the A27 to increase demand for sustainable trips
38	Policy A2 Chichester City	<p><u>Comment</u></p> <p>National Highways are a statutory consultee to the 'permission in principle' process and for local development orders, neighbourhood plans and associated neighbourhood development orders; all of which have the potential to impact on the SRN. Where applicable, we will collaborate with the relevant authorities and community groups in the development of their proposals.</p>

		<p>We will reinforce that a master planning process presents an opportunity for the Council, and early consultation/working with key stakeholders, to</p> <ul style="list-style-type: none"> - consider traffic associated with the developments using, accessing, and exiting the A27 - consider viable alternatives to the private car and the possible travel routes - understand future infrastructure requirements - develop a package of mitigation measures with detailed costing - utilise Travel Plan monitoring strategies triggered through phased development - collect appropriate mitigation funding
39	Policy A8 Land East of Chichester	<p><u>Comment</u> National Highways are a statutory consultee to the 'permission in principle' process and for local development orders, neighbourhood plans and associated neighbourhood development orders; all of which have the potential to impact on the SRN. Where applicable, we will collaborate with the relevant authorities and community groups in the development of their proposals.</p> <p>We will reinforce that a master planning process presents an opportunity for the Council, and early consultation/working with key stakeholders, to</p> <ul style="list-style-type: none"> - consider traffic associated with the developments using, accessing, and exiting the A27 - consider viable alternatives to the private car and the possible travel routes - understand future infrastructure requirements - develop a package of mitigation measures with detailed costing - utilise Travel Plan monitoring strategies triggered through phased development - collect appropriate mitigation funding
40	Policy A9 Land at Westhampnett/North East Chichester	<p><u>Comment</u> National Highways are a statutory consultee to the 'permission in principle' process and for local development orders, neighbourhood plans and associated neighbourhood development orders; all of which have the potential to impact on the SRN. Where applicable, we will collaborate with the relevant</p>

		<p>authorities and community groups in the development of their proposals.</p> <p>We will reinforce that a master planning process presents an opportunity for the Council, and early consultation/working with key stakeholders, to</p> <ul style="list-style-type: none"> - consider traffic associated with the developments using, accessing, and exiting the A27 - consider viable alternatives to the private car and the possible travel routes - understand future infrastructure requirements - develop a package of mitigation measures with detailed costing - utilise Travel Plan monitoring strategies triggered through phased development - collect appropriate mitigation funding
41	Policy A10 Land at Maudlin Farm	<p><u>Comment</u></p> <p>National Highways are a statutory consultee to the 'permission in principle' process and for local development orders, neighbourhood plans and associated neighbourhood development orders; all of which have the potential to impact on the SRN. Where applicable, we will collaborate with the relevant authorities and community groups in the development of their proposals.</p> <p>We will reinforce that a master planning process presents an opportunity for the Council, and early consultation/working with key stakeholders, to</p> <ul style="list-style-type: none"> - consider traffic associated with the developments using, accessing, and exiting the A27 - consider viable alternatives to the private car and the possible travel routes - understand future infrastructure requirements - develop a package of mitigation measures with detailed costing - utilise Travel Plan monitoring strategies triggered through phased development - collect appropriate mitigation funding
42	Policy A11 Highgrove Farm, Bosham	<p><u>Comment</u></p> <p>National Highways are a statutory consultee to the 'permission in principle' process and for local development orders, neighbourhood plans and associated neighbourhood development orders; all of</p>

		<p>which have the potential to impact on the SRN. Where applicable, we will collaborate with the relevant authorities and community groups in the development of their proposals.</p> <p>We will reinforce that a master planning process presents an opportunity for the Council, and early consultation/working with key stakeholders, to</p> <ul style="list-style-type: none"> - consider traffic associated with the developments using, accessing, and exiting the A27 - consider viable alternatives to the private car and the possible travel routes - understand future infrastructure requirements - develop a package of mitigation measures with detailed costing - utilise Travel Plan monitoring strategies triggered through phased development - collect appropriate mitigation funding
43	Policy A12 Chidham and Hambrook	<p><u>Comment</u></p> <p>National Highways are a statutory consultee to the ‘permission in principle’ process and for local development orders, neighbourhood plans and associated neighbourhood development orders; all of which have the potential to impact on the SRN. Where applicable, we will collaborate with the relevant authorities and community groups in the development of their proposals.</p> <p>We will reinforce that a master planning process presents an opportunity for the Council, and early consultation/working with key stakeholders, to</p> <ul style="list-style-type: none"> - consider traffic associated with the developments using, accessing, and exiting the A27 - consider viable alternatives to the private car and the possible travel routes - understand future infrastructure requirements - develop a package of mitigation measures with detailed costing - utilise Travel Plan monitoring strategies triggered through phased development - collect appropriate mitigation funding
44	Policy A13 Southbourne Broad	<p><u>Comment</u></p> <p>National Highways are a statutory consultee to the ‘permission in principle’ process and for local</p>

	Location for Development	<p>development orders, neighbourhood plans and associated neighbourhood development orders; all of which have the potential to impact on the SRN. Where applicable, we will collaborate with the relevant authorities and community groups in the development of their proposals.</p> <p>We will reinforce that a master planning process presents an opportunity for the Council, and early consultation/working with key stakeholders, to</p> <ul style="list-style-type: none"> - consider traffic associated with the developments using, accessing, and exiting the A27 - consider viable alternatives to the private car and the possible travel routes - understand future infrastructure requirements - develop a package of mitigation measures with detailed costing - utilise Travel Plan monitoring strategies triggered through phased development - collect appropriate mitigation funding
45	Policy A14 Land West of Tangmere	<p><u>Comment</u></p> <p>National Highways are a statutory consultee to the ‘permission in principle’ process and for local development orders, neighbourhood plans and associated neighbourhood development orders; all of which have the potential to impact on the SRN. Where applicable, we will collaborate with the relevant authorities and community groups in the development of their proposals.</p> <p>We will reinforce that a master planning process presents an opportunity for the Council, and early consultation/working with key stakeholders, to</p> <ul style="list-style-type: none"> - consider traffic associated with the developments using, accessing, and exiting the A27 - consider viable alternatives to the private car and the possible travel routes - understand future infrastructure requirements - develop a package of mitigation measures with detailed costing - utilise Travel Plan monitoring strategies triggered through phased development - collect appropriate mitigation funding

46	Policy A3 Southern Gateway Development Principles	<p><u>Comment</u> With the A27 already heavily congested we agree that this precinct should be designed to encourage and facilitate active travel and reduce car dependency with a requirement for connections from the proposed development to the existing active travel infrastructure adjacent to and across the A27 and link with National Cycle Route 2 and Route 88. Identifying a transport strategy that achieves these objectives will however be challenging.</p>
47	Policy A19 Land at Chichester Business Park, Tangmere	<p><u>Matter to be addressed</u> We draw your attention to the focus on Class B8 (Storage and Distribution) floorspace provision (para 7.13).</p> <p>Under a B8 land use, this could include Parcel Distribution development, which generate significantly more 24/7 traffic than a typical commercial warehouse. Trip rates and vehicle trip generation should take account of worst-case trip generation scenarios for any possible land uses that might occupy a site or be part of an intensification of an existing site. Given the proximity to these sites to the A27 it is anticipated that some of these end users are likely to be distribution type businesses. To assume ‘commercial warehouse’ trip rates, likely underestimates vehicle trip generation potential.</p> <p>Whilst we would not resist new development on the basis of ‘last mile’ impacts we do need to know and understand these impacts together with the related mitigation measures.</p> <p>We therefore ask that in these circumstances trip rates are submitted to National Highways for consideration and that once agreed, these are fed into the transport evidence base.</p>
48	A20 Employment Land South of Bognor Road	<p><u>Comment</u> The planning of this site is dependent on considering a number of site-specific issues including the need for realignment of Vinnetrow Road and works to Bognor Round roundabout as part of a package of A27 improvements. The A259 Bognor Road/ Vinnetrow Road Link is safeguarded (as shown in the Transport Study 2023) to ensure that the A27 improvements can</p>

		<p>be delivered, unless it can be demonstrated that they are no longer required.</p> <p>We seek to understand on what happens if this is not delivered or can't be funded.</p>
49	Policy A21 Land east of Rolls Royce	<p><u>Comment</u> We agree that any planning application for employment development will need to demonstrate that increased traffic generation is minimised and mitigated by the use of sustainable transport measures.</p> <p>We would expect a fully funded Travel Plan to be submitted for this development.</p>
50	Monitoring Policies T1 and T2	<p><u>Comment</u> We agree 'in principle' to the monitoring methods set out for policies T1 and T2. However, we reinforce our comments regarding the need for establishing monitoring processes and resources (manual or automated) to manage the monitoring regime.</p>
51	Monitoring Policy I1	<p><u>Comment</u> The monitoring for Policy I1 needs to include funding, notably how committed and completed schemes were funded and the percentage of funding from developer contributions, government agencies and/or Council prudential borrowing.</p> <p>It is critical that the Council, and other key stakeholders, can track how funding was gained (e.g., contributions, borrowing etc) and record this as part updating the IDP</p>
52	Local Plan evidence - Housing and Economic Development Needs Assessment (HEDNA) Final Report – April 2022	<p><u>Comment</u> The Executive Summary Para 13 states “The District has a notably older age structure than seen regionally or nationally, with 28% of the population estimated to be aged 65 and over in 2020 (compared to a national average of 19%). The Manhood Peninsula sub-area sees a particularly old population (33% aged 65+)”</p> <p>We seek clarity on how these demographics are addressed in the Plan and their transport needs managed.</p>
53	Local Plan evidence - Open space, sport facilities, recreation study and playing	<p><u>Comment</u> We note that these documents are from 2018 and have not been updated to address the changes in behaviours and increase in active transport</p>

	pitch strategy - June/July 2018	participation during and since the COVID-19 global pandemic.
54	Local Plan evidence - Chichester Transport Study (Local Plan Review Transport Assessment) - January 2023	<p><u>Comment</u> We agree that “potential sustainable mitigation measures should have priority over highway capacity mitigation and hence a need to shift away from a ‘Predict and Provide’ approach towards a ‘Monitor and Manage’ approach”.</p> <p>The study indicated that, the impact of the forecast development up to 2039, requires a significant mitigation package, the majority of which is focused on the A27.</p> <p>Chapter 6 provides considerations for mitigation, including:</p> <ul style="list-style-type: none"> - removal of city car park management or increased car parking charges - charging businesses for private car parking spaces - ‘Healthy Streets’ initiatives - Park and Ride schemes <p>These measures, whilst favourable, are unlikely to mitigate impacts on the A27 or its junctions.</p> <p>Since the 2018 review, construction costs have fluctuated considerably, but for consistency costs have been maintained for reporting purposes. All cost estimates are subject to future detailed site investigations, detailed design and real price increases.</p> <p>The report recommended that a Monitor and Manage approach is adopted to review the mitigation requirements going forward but does not provide any further details, actions, or recommendations to progress this.</p>
55	Local Plan evidence - Chichester Transport Study (Local Plan Review Transport Assessment) - Appendix B - Monitor and Manage - Provisional	<p><u>Matter to be addressed</u></p> <p>The proposed methodology focusses only on monitoring namely:</p> <ul style="list-style-type: none"> - traffic surveys - produce new forecast years using Tempro8 - produce LinSig/Transyt models of the junction or a micro sim model of the corridor

	Methodology – October 2022	The strategy does not include <ul style="list-style-type: none"> - monitoring individual developments - the ‘Manage’ approach
56	Annex A - District Wide Collision Review – January 2023 Para 7.1.4 – 7.1.7	<p>Comment</p> <p>The report notes:</p> <ul style="list-style-type: none"> - vulnerable road users (pedestrian and cyclists) accounted for 517 (28%) of the recorded collisions. - collision clusters at junction <p>We seek to understand</p> <ul style="list-style-type: none"> - how the Plan, which has a strong focus on walking and cycling will address vulnerable road users with increase travel demand - and how junction improvements will be funded <p>The report concludes:</p> <ul style="list-style-type: none"> - junctions where the local plan impacts will have a material impact, with respect to traffic flow change between 2026 and 2035, it is recommended that these locations are investigate further to understand to cause of the safety concern and mitigation schemes are development with the aim to improve the safety. <p>We seek an understanding about who and when this will be funded, particularly for locations near the A27 and its junctions.</p>
57	Annex B - Seasonal Impact Report – January 2023	<p>Comment</p> <p>The report concludes that for Bank Holiday and festivals days that bespoke dedicated traffic management would be put in place to manage the unique traffic conditions.</p> <p>We seek further information on these measures, especially those associated with the A27</p>
58	Infrastructure Delivery Plan – January 2023	<p>Comment</p> <p>As with our previous comments, National Highways therefore seeks to understand.</p> <ul style="list-style-type: none"> - the Council’s strategy if developer contributions are insufficient - the Councils’ governance associated with collected contributions and their use - how developers will be charged if additional contributions are required

Summary

We have reviewed the publicly available Local Plan documents and provided comments above in relation to the transport implications of the plan for the safety and operation of the SRN. We understand that other technical information is available, but this was not presented as part of this consultation.

Chichester, and the A27, are already heavily congested, infrastructure in the existing Local Plan remains undelivered and the growth set out in the new Plan will further increase travel demand.

As presented, satisfying the transport needs of the plan is clearly reliant on the delivery of the A27 Chichester bypass improvements project. The A27 Chichester bypass improvements project is one of 32 pipeline schemes being considered for possible inclusion in National Highways third Road Investment Strategy (RIS3) covering 1 April 2025 to 31 March 2030.

On 9 March 2023 the UK Transport Secretary ensured record funding would be invested in the country's transport network, sustainably driving growth across the country while managing the pressures of inflation. The announcement cited the A27 Arundel Bypass as being deferred from RIS2 to RIS 3 (covering 2025-2030). The transport secretary also identified a number of challenges to the delivery of the road investment strategy and cited the benefit of allowing extra time to ensure schemes are better planned and efficient schemes can be deployed more effectively.

At present, there is no commitment by DfT to carry out the A27 Chichester bypass improvements project. Until the A27 Chichester bypass improvements project is published in the RIS3, consented and a decision to invest is made it cannot be assumed to be a committed project.

We note that the Plan does not address any uncertainty of delivery of the A27 Chichester bypass improvements project and we strongly recommend that there is either no reliance placed on RIS3 to realise capacity for growth in the Plan or that contingency measures are included to cover the eventuality that RIS3 funding is not forthcoming within the plan period. It is not clear that the potential impact of development on transport networks can be addressed in the absence of the A27 Chichester bypass improvements project.

Achieving net zero, reducing emissions reduction, acting on climate, and supporting thousands of new homes and new employment developments will be problematic with existing processes. New, additional, and adapted processes and assessments will likely be required, especially in assessing Transport Assessments, mandating Travel Plans and monitoring traffic associated with new developments. We acknowledge that change is complex, expensive, and time-consuming, especially for smaller district level Councils. But the hard work will deliver benefits for the Council and residents in the longer-term.

National Highways seeks to continue working with the Council and WSCC to progress coordinated and deliverable packages of interim mitigation measures and alternative transport solutions while a long-term strategic solution is considered by government. This must however be in combination with a robust monitor and manage policy that

appropriately manages the risk of unacceptable road impacts resulting from new housing and other development over the Plan period.

We have been in discussion with Chichester District Council regarding their proposed Monitor and Manage Strategy. At present, we do not consider the current strategy to be robust and we seek further information and detail especially on who, when and when monitoring and management will be undertaken. Developments in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be a key consideration when planning for growth in all local authority areas.

Any M&M framework must be based on a “worst case scenario” whereby necessary transport mitigation is understood, as well as setting out the desired alternative scenario. It must set out details of responsibility, funding and governance of the framework together with the methodology for determining the timing for any mitigation delivery while remaining clear on the fallback position where identified mitigation or desired alternatives are not ultimately achievable. The M&M framework must set out that the alternative to mitigation not being delivered is that development does not proceed where that development would give rise to unacceptable road safety risk or severe cumulative impacts on the road network in the absence of that mitigation. The M&M framework must be translated into development management plan policy and policy relating to development allocations.

As we have reiterated throughout our comments, we welcome the opportunity to work with you to address these outstanding matters and we will continue to liaise over submitted Transport Assessment, Travel Plan policy and Monitor and Manage Policy to help to work towards a viable plan.

We hope our comments assist.

We look forward to continuing to participate in future consultations and discussions. Please do continue to consult us as the Plan progresses so that we can remain aware of, and comment as required on, its contents.

Once you have had the opportunity to digest all the representations received, we would welcome a meeting to run through all the transport related matters and agree how to progress any required evidence gathering or other work.

In the meantime, if you have any questions with regards to the comments made in this response, please do not hesitate to contact me via [REDACTED]

Yours sincerely

[REDACTED]

Marius Pieters
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Email [REDACTED]