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# Land at Southbourne: A27 Contribution SPD Review

Ref: JCB/MS/ITB14672-018A TN  
Date: 2 November 2023

## SECTION 1 Introduction

- 1.1 This note responds to the consultation on the A27 Chichester Bypass Mitigation SPD. It is produced on behalf of Wates Developments Ltd, who are promoting land at Southbourne for 1,250 homes in CDC's emerging (Regulation 19) Local Plan Review (*ref: Policy A13*).
- 1.2 The SPD seeks Section 106 contributions of £3,049 per bedroom to fund two remaining junction improvement schemes on the A27<sup>1</sup>. The following charge per dwelling are proposed:
- One bedroom house: £3,049.
  - Two bedroom house: £6,098.
  - Three bedroom house: £9,147.
  - Four bedroom house: £12,197.

## SECTION 2 The flaws with the evidence base

### Introduction

- 2.1 The traffic modelling evidence base used to determine the highway improvement schemes, and the development that it will enable, is set out in the Local Plan Review Transport Assessment (LRPTA).

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<sup>1</sup> The Bognor and the Fishbourne roundabouts. They are costed at £43m. Allowing for £16m collected from earlier developments, this leaves £27m to collect.

2.2 i-Transport has previously assisted with local plan representations identifying that the local plan is capable of meeting (at least) its objectively assessed need<sup>2</sup> without having an unacceptable highways impact.

**The 535 dpa 'cap' on development is not supported by the LPRTA Modelling – the contribution per dwelling could be reduced**

- 2.3 The local plan modelling does not support a cap of 535 dpa (*ref: i-Transport's LPR reps*) because it:
- i Does not reflect post-COVID traffic conditions, which has levels of peak hour traffic.
  - ii Uses out-of-date traffic growth parameters and thus over-estimates background traffic growth.
  - iii Uses traffic generation parameters that do not allow for the effective implementation of sustainable transport strategies (which has been allowed for in WSCC modelling of other local plans) and therefore over-estimates traffic impacts.
  - iv Follows an outdated 'predict and provide' approach and does not properly consider what might be deliverable with effective sustainable transport measures and demand management.
  - v Does not identify a material difference between 535dpa and 700dpa.
  - vi Does not provide modelling data of the proposed mitigation package with the constrained level of housing delivery proposed by the local plan.
  - vii Does not allow for other potential delivery mechanisms, e.g. RIS 3, that plausibly might deliver strategic improvements to the A27 Chichester bypass.
- 2.4 The modelling evidence base shows that (at least) 700 dpa can be achieved<sup>3</sup> even with the unduly and unnecessarily robust parameters used.
- 2.5 Updated modelling should take account of the following and should push the achievable housing numbers even higher.
- 1 The base year should post-date the COVID-19 pandemic, which has significantly altered travel habits (the DfT expects travel to remain 5% lower than had the pandemic not happened).
  - 2 The DfT's latest growth factors, which are lower than those in the modelling, should be applied.

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<sup>2</sup> i.e. 638 dwellings per annum

<sup>3</sup>It showed a clear net benefit (far short of the NPPF's 'severe impact' test) with 535 between the 'do minimum' and 'with mitigation'. This remains the case with 700 dpa (and perhaps with more homes).

- 3 Lower trip rates making allowances for levels of internalisation, or modal shift (consistent with other strategic models in West Sussex) should be applied.

2.6 A greater number of dwellings would reduce the contribution per dwelling and avoid jeopardising the delivery of homes and sustainable transport measures.

**A home's traffic attraction is not proportionate to its number of bedrooms – the contributions should be recast accordingly**

2.7 The contribution per bedroom policy is fundamentally flawed. A four-bedroom house does not generate twice as much traffic as a two-bedroom house. This is verified by Census data for Chichester District (at **Appendix A**) which demonstrates that

- 1 A two bed homes has 1.23 times more occupants than a one bed (not twice as many)
- 2 A three bed home has 1.46 times more occupants than a one bed (not three times).
- 3 A four bed home has 1.62 times more occupants than a one-bed home (far short of four times).

2.8 This will be exacerbated disproportionality by many of the occupants of larger houses being children and therefore not car drivers.

**The approach to charging does not accord with the NPPF**

2.9 The contribution therefore fails the mandatory tests of paragraph 57 of the NPPF, especially in terms of:

- i The mitigation sought goes beyond what is necessary to mitigate the impacts of development (*ref: bullet a*).
- ii The contributions are not proportionate in scale – a 4 bed dwelling does not generate 4 times the volume of traffic of a one bedroom dwelling and should not pay 4 times the contribution. (*ref: bullet c*).

## **APPENDIX A. DWELLING OCCUPANCY**

## DC4405EW - Tenure by household size by number of bedrooms

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population All households  
 units Households  
 date 2011  
 area type local authorities: district / unitary (prior to April 2015)  
 area name Chichester  
 tenure All categories: Tenure

Household size	All categories:					
	Number of bedrooms	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5 or more bedrooms
All categories: Household size	49,848	4,776	13,954	18,945	8,686	3,487
1 person in household	15,948	3,563	5,787	4,840	1,360	398
2 people in household	18,859	1,057	5,775	7,497	3,330	1,200
3 people in household	6,551	120	1,561	2,923	1,369	578
4 people in household	5,836	28	682	2,741	1,761	624
5 people in household	1,951	5	122	730	671	423
6 or more people in household	703	3	27	214	195	264
Households with X bedrooms	99,696	9,552	27,908	37,890	17,372	6,974

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.  
 Private rented: Other private rented or living rent free' includes the groups 'Private rented: Other' and 'Living rent free'.

'Owned: Owned with a mortgage or loan or shared ownership' includes 'Owned: Owned with a mortgage or loan' and 'Shared ownership (part owned and part rented)'.  
 '1 bedroom' includes households who indicated '0 bedrooms' and '1 bedroom'. This is because all households where someone usually lives must have at least one room used as a bedroom.

People in households

Household size	All categories:					
	Number of bedrooms	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5 or more bedrooms
All categories: Household size	49,848	4,776	13,954	18,945	8,686	3,487
1 person in household	15,948	3,563	5,787	4,840	1,360	398
2 people in household	37,718	2,114	11,550	14,994	6,660	2,400
3 people in household	19,653	360	4,683	8,769	4,107	1,734
4 people in household	23,344	112	2,728	10,964	7,044	2,496
5 people in household	9,755	25	610	3,650	3,355	2,115
6 or more people in household	4,218	18	162	1,284	1,170	1,584
Persons in home with X bedrooms	160,484	10,968	39,474	63,446	32,382	14,214
Persons per bedroom		1.15	1.41	1.67	1.86	2.04

a b c d e

Multiples of travel demand

	1.23	1.46	1.62	1.78
b/a	c/a	d/a	e/a	