

Chichester Local Plan 2021-2039 Regulation 19 Consultation

Representations on behalf of CEG and the Landowners (D C Heaver and Eurequity Limited) – March 2023

Policy H1

Introduction

1. On behalf of CEG and the Landowners (D C Heaver and Eurequity Limited), please find enclosed representations to the Chichester Local Plan 2021-2039 (“the Plan”) Regulation 19 consultation. These representations are made in relation to Policy H1 with separate representations made in relation to Policy A17 and paragraph 4.49.
2. CEG and the Landowners (D C Heaver and Eurequity Limited) have an interest in all strategic and non-strategic matters informing the Plan. These representations are made in the context of Land within the Westhampnett / North East Chichester SDL (subject to Housing and Economic Land Availability Assessment (“HELAA”) site reference HWH001b).

Housing need in Chichester District

3. Paragraph 61 of the National Planning Policy Framework (“the Framework”) is clear that the minimum number of new homes needed is determined by Local Housing Need (“LHN”) calculated under the standard method as outlined by Planning Practice Guidance¹ (“PPG”).
4. In accordance with the standard method, the LHN for Chichester District (using a 2023 base-date for identifying average annual household growth) is as follows:

Standard Method Stages	Calculation	Output	Commentary
Step 1 – Setting the baseline (using ONS household growth projections)	$(60,790 - 55,335) / 10$	545.5	Average annual household growth over the period 2023-2033
Step 2 – Applying an affordability adjustment	$((14.61 - 4) / 4) \times 0.25 + 1$	1.663125	Utilising the latest (2021) ONS Ratio of median house price to median gross annual workplace-based earning and applying it

¹ Paragraph ref. ID 2a-004-20201216

Standard Method Stages	Calculation	Output	Commentary
			within the formula set out in the PPG.
Capping the level of increase	545.5 x 1.4	763.7	<p>The adopted Chichester District Local Plan housing requirement is out-of-date (having been set in 2015²), therefore the LHN figure is capped at 40% above the highest of:</p> <ul style="list-style-type: none"> - The household growth projection; or - The average annual housing figure set out in the most recently adopted strategic policy. <p>The affordability adjustment is higher than both of the above scenarios so a cap is applied. Given that the 40% uplift on the household projections is greater than the 40% uplift on the adopted Local Plan housing requirement for Chichester (which, as discussed later in these representations, was suppressed), the cap is applied at 40% above the projected household growth figure.</p>
Local Housing Need = 764			Rounded up to the nearest whole dwelling

5. Over the 18-year Plan period, this equates to a minimum housing requirement of 13,752 dwellings.
6. The Plan anticipates that 125 new homes per annum will be delivered on land in Chichester District that is covered by the South Downs National Park Authority (“SDNPA”) (albeit that this is a figure which we dispute as set out later in these representations). This would result in a minimum LHN for Chichester District Council’s administrative area of **639dpa (or 11,502 dwellings over the Plan period)**.
7. Notwithstanding the above, it is also pertinent to consider the ‘actual’ housing need figure for Chichester District, which is the level of housing required to prevent its affordability issues from worsening further i.e. the non-capped housing figure. Whilst it is accepted that the standard method does allow for the application of a cap in

² Policy 4 of the adopted Chichester District Local Plan

circumstances such as those in Chichester District (to help ensure that the LHN figure is as deliverable as possible), it is important to note that the cap does not of course mean that need has been reduced. The PPG³ is clear that:

“The cap reduces the minimum number generated by the standard method, but does not reduce housing need itself. Therefore strategic policies adopted with a cap applied may require an early review and updating to ensure that any housing need above the capped level is planned for as soon as is reasonably possible.

“Where the minimum annual local housing need figure is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered. This may help prevent authorities from having to undertake an early review of the relevant policies.”

8. The ‘actual’ housing need for Chichester District is 908 dwellings per annum (“dpa”)⁴, or 16,344 over the 18-year Plan period⁵. Based on the Council’s assumption of 125 dpa being delivered by the SDNPA this reduces to **783dpa (14,094 over the Plan period)**.
9. As explained by the PPG⁶, the affordability adjustment (subject to the cap) is applied to ensure that the LHN responds to price signals and to start to address the affordability of homes. Accordingly, that ‘actual’ housing need is the level of housing that is required if the Plan sought to prevent a worsening of housing affordability within Chichester District.
10. It should be noted that these figures do not have regard to the need to accommodate a proportionate amount of unmet needs from the SDNPA or neighbouring authorities.

Approach taken in the adopted Local Plan

11. Paragraph 7.3 of the Chichester Local Plan: Key Policies 2014-2029 (“the adopted Local Plan”) outlines that the objectively assessed housing requirement at that time was 560-575 homes per year.
12. However, due to constraints – notably wastewater treatment capacity, A27 capacity, the SDNP and the Chichester Harbour Area of Outstanding Natural Beauty – the adopted Local Plan set a housing target of 7,388 dwellings over its 17-year plan-period, or ‘approximately’ 435 dpa⁷. The examining Inspector only endorsed the adopted Local Plan on the basis of the Council committing to an early review.
13. The adopted Local Plan therefore represented an under-delivery against objectively assessed need of at least 70 dpa, or 560 homes in the eight years since it was adopted⁸.
14. Moreover, it is notable that the Council did not fulfil its commitment to undertaking an early review. As a consequence, the standard method for calculating LHN came into force, further worsening the under-delivery of housing.

³ Paragraph ref. ID: 2a-007-20190220

⁴ LHN Step 1 x Step 2 (Average household projections (545.5) x affordability uplift (1.663125))

⁵ Deducting an anticipated delivery of 125dpa by the SDNP Authority reduces this to 783dpa (14,094)

⁶ Paragraph ref. ID: 2a-006-20190220

⁷ Paragraph 7.10

⁸ Not challenging the purported 70dpa to be delivered by the SDNP Authority

Implications of Supressed Housing Delivery Since 2015

15. The below table⁹ outlines the changing position in terms of housing affordability in Chichester District since 2015, when the suppressed housing target in the existing Local Plan was adopted:

Median House Price			Median Earning			Affordability Ratio		
2015	2021	% Change	2015	2021	% Change	2015	2021	% Change
£311,000	£410,000	31.83	£25,133	£28,066	11.67	12.38	14.61	18.01

16. This demonstrates that increases in house prices have significantly outstripped increases in earnings in Chichester District between 2015 and 2021, which has resulted in a significant worsening in the affordability ratio. This clearly demonstrates that the suppression of the housing requirement through the adopted Local Plan has resulted in the worsening of housing affordability within Chichester District.
17. As a consequence, Chichester District is now the twelfth least affordable district in England outside of London.

Approach being taken by the Plan

18. Policy H1 of the Plan identifies a housing target of at least 10,350 dwellings to be delivered over the period 2021-2039. This equates to an average of 575 dpa (with no provision to meet any unmet needs arising from the SDNPA).
19. This represents an under-delivery against the LHN figure (even assuming that 125dpa are provided in the SDNPA) of 64dpa – 1,152 dwellings over the Plan period.
20. Furthermore, the under-delivery against the ‘actual’ housing need is even more stark – 208dpa, or a total of 3,744 dwellings over the Plan period.
21. The housing target in the Plan is not based upon accommodating any unmet needs from the SDNPA despite the adopted Local Plan housing target including provision of an additional 55-70dpa from this area.
22. In summary, the housing shortfall resulting from the Plan’s proposed housing requirement is significant compared to the LHN figure. The shortfall becomes even more severe when the ‘actual’ housing need (to address housing affordability) is considered. As evidenced by the implications of the adopted Local Plan’s suppressed housing target, this prejudices the delivery of sustainable development¹⁰.

Level of need anticipated to be delivered by the South Downs National Park Authority

23. The Council has calculated its LHN figure based on an assumption that the SDNPA will accept / can reasonably accommodate a requirement of 125dpa within its area¹¹. In fact, we note that this figure has been taken from a Housing and Economic Development Needs Assessment (“HEDNA”) for the SDNPA that was issued as long ago as September 2017 i.e. it does not reflect an up-to-date position.
24. The 125dpa figure informed an overall housing need figure of 447dpa to be delivered by the SDNPA. Proportionately, the provision from Chichester District amounted to approximately 28% of the housing

⁹ ONS Ratio of House Price to Work Based Earnings

¹⁰ Having particular regard to the social dimension at paragraph 8 of the Framework

¹¹ Paragraph 20 of the Chichester Housing and Economic Development Needs Assessment (2022 Update) April 2022)

requirement identified by the SDNPA HEDNA, with the remaining 72% delivered from the other 11 local authorities that the SDNP covers.

25. However, the SDNP Local Plan 2014-2033 (adopted July 2019) makes provision for just 250dpa – a shortfall of 197 homes compared to the need outlined in the HEDNA. Based on the 28% of the SDNPA’s housing need arising from Chichester District, the proportionate delivery from Chichester District towards the SDNPA’s adopted housing provision (250dpa) is 69.9dpa (rounded up to 70dpa).
26. On this basis, and notwithstanding that the Plan should aim to address its ‘actual’ housing need, the minimum LHN for the Plan is **694dpa¹² (12,492 dwellings over the Plan period)**.
27. In summary, we consider the housing needs of Chichester District to be as follows:

	Consideration	Figure
A	Local Housing Need (calculated using the standard method)	764dpa
B	Proportionate contribution to the SDNPA’s housing requirement	70dpa
C	Local Housing Need – Proportionate contribution to the SDNPA’s housing requirement	694dpa
D	Actual Housing Need (calculated using the standard method – without applying the cap)	908dpa
E	Proportionate contribution to the SDNPA’s housing requirement	70dpa
F	Actual Housing Need – Proportionate contribution to the SDNPA’s housing requirement	838dpa

Chichester District Council’s Rationale for the Continued Suppression of Housing Delivery

28. Nevertheless, the Plan identifies a minimum housing requirement of 10,350 over the Plan period (575dpa). This is below the minimum LHN figure even based upon a deduction of 125dpa from the SDNPA.
29. The Plan explains at paragraph 5.2 that this continued under-provision of housing is due to constraints, “particularly the capacity of the A27”.
30. A Transport Note prepared by EVOKE is included at **Appendix 1** of these representations. This undertakes a review of the transport and highways-related evidence provided in support of the Plan.
31. In summary, the Transport Note identifies the following key failings of the Council’s approach to reviewing the A27 capacity:

¹² LHN figure – proportionate housing requirement for the SDNPA (764dpa-70dpa)

- i. The highways modelling exercise takes a conservative approach that fails to take into account behavioural change – notably the change in working arrangements since the COVID 19 pandemic – and regional trends – reduced growth in the South East of England lead that is resulting in reduced increases in background traffic growth;
 - ii. The highways modelling exercise is based on the TEMPro v7.2 database, as opposed to the latest TEMPro database (v8.0), in relation to background traffic growth. The latest database identifies a lower level of background traffic growth than was predicted by the previous version of the model. Indeed, the Transport Study acknowledges that *“the model may have overestimated the potential future impacts”* (paragraph 10.2.1);
 - iii. A flat 5% reduction in trips applied across all sites to account for sustainable travel modes, which does not take into account the greater appeal for non-car travel in sustainable locations (i.e. adjacent to larger settlements – which is the focus of the Plan). Moreover, this figure is based on the assessment that informed the adopted Local Plan (Transport Study dated 2013) which is not reflective of the latest planning policy requirements, technological changes and travel behaviour changes; and
 - iv. The highways evidence is inconsistent with the West Sussex Transport Plan 2022-2026, which advocates that Local Planning Authorities place emphasis on providing infrastructure to support travel by a range of transport modes rather than designing to cater for forecast traffic demand; and
 - v. The Transport Assessment concludes that 700dpa could generally be accommodated in the southern plan area with the mitigation proposed (and additional mitigation at Portfield and Oving) (paragraph 5.6.5).
32. In light of the above, the transport and highways evidence that underpins the approach taken to restricting the Plan’s minimum housing requirement is flawed. We consider that if the latest data was utilised and a more ambitious approach to sustainable travel was adopted (in line with current planning policy requirements and reflecting the net zero carbon ambitions of the Government and the Council), the evidence would demonstrate that the minimum housing requirement can be supported in highway capacity terms.
33. It is notable that the Sustainability Appraisal (“SA”) prepared to support / inform the Plan does not assess a housing target of more than 535dpa in the southern part of the Plan area (defined by paragraph 2.2.2 of the SA as *“land to the south of the SDNP”*) based on the resolution with National Highways that the A27 does not have capacity to accommodate any more than this. It also dismisses addressing the shortfall in the north-eastern part of the Plan area (defined by paragraph 2.2.2 of the SA to be *“land to the north-east of the SDNP”*) due to its rurality and water resource zone constraints¹³. It further confirms that meeting some of these needs in adjoining authorities is not possible as no suitable sites have been identified through Duty to Cooperate discussions¹⁴.
34. Paragraph 5.2.13 of the SA explains that higher growth scenarios were assessed at the Preferred Options consultation stage. However, this was based upon evidence from 2018 so is not an up-to-date position. Given that paragraph 31 of the Framework outlines that preparation of planning policies must be underpinned by *“relevant and up-to-date evidence”*, a SA prepared in 2018 cannot be relied upon to justify that the Plan cannot accommodate higher levels of growth as such an approach would conflict with the Framework and would not be sound.
35. Notwithstanding the above, paragraph 5.2.14 of the SA is clear that a housing requirement of 638dpa (the LHN figure identified by the Plan) *“cannot be ruled out as unreasonable at this stage in the process”*. However, this is not considered within the Reasonable Alternative Growth Scenarios (SA Table 5.3) with the most ambitious scenario only considering a housing provision of 566 dpa. Therefore, the most ambitious growth scenario tested by the SA is still considerably below the LHN indicated by the SA (let alone the correct LHN figure and the ‘actual’ housing requirement).

¹³ The ‘Southern’ and ‘North-Eastern’ parts of the Plan area are clearly identified at Map 1.1 within the Plan

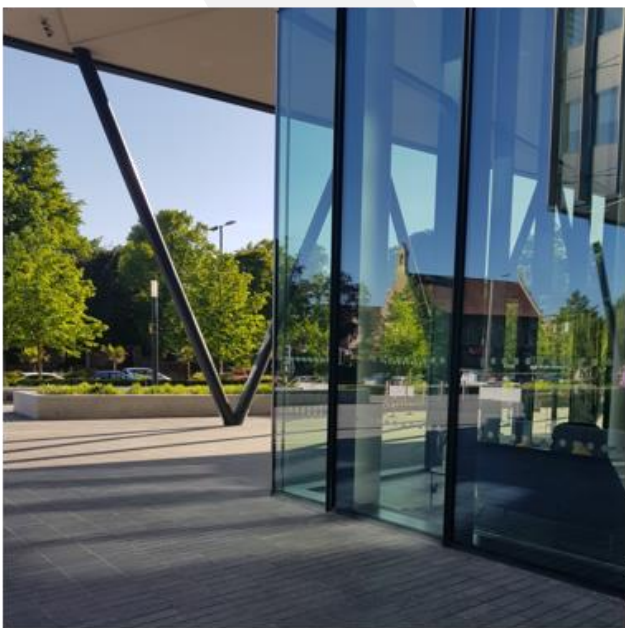
¹⁴ Bullet points under paragraph 5.2.11

36. Given that the highways and transport evidence indicates that 700dpa could be supported in the southern plan area, it is imperative that the SA higher housing growth scenarios including meeting the minimum LHN figure (minus the 70dpa being delivered by the SDNPA) – 694dpa – in full.
37. In summary, the continued suppression of the housing requirement through the Plan is not justified and, accordingly, is inconsistent paragraph 35b of the Framework.

Required Modifications

38. In order to address this soundness issue, the following amendments are required:
 - i. The introductory text and the first line within the table under Policy H1 to identify a minimum housing requirement of 12,492 dwellings
 - ii. Additional site allocations identified to meet the housing requirement.
39. In accordance with paragraph 105 of the Framework, the site selection process should seek to focus new allocations at the most sustainable locations within Chichester District in accordance with the spatial strategy identified at Policy SP1.

Appendix 1: Transport Note



**LAND AT WESTHAMPNETT/NORTH
EAST CHICHESTER – LOCAL PLAN
TRANSPORT REPS**

TRANSPORT NOTE

07 March 2023



LAND AT WESTHAMPNETT/NORTH EAST CHICHESTER – LOCAL PLAN TRANSPORT REPS

TRANSPORT NOTE

PROJECT DETAILS	
Project Name:	Land at Westhampnett/North East Chichester – Local Plan Transport Reps
Client:	CEG / D C Heaver and Eurequity Limited
Document Type:	Transport Note
Document Reference:	R-23-0029-TN-02A
Date:	07 March 2023

Evoke Transport
R+ Building,
2 Blagrove St,
Reading,
RG1 1AZ

T: 0118 380 0182
E: info@evoketransport.co.uk
W: www.evoketransport.co.uk
[Linkedin.com/company/evoke-transport](https://www.linkedin.com/company/evoke-transport)

APPROVAL					
Number:	Name:		Position:	Date:	Modifications:
01	Author:	Jon Williams	Principal Consultant	28/02/2023	
	Checked:	Richard Stacey	Managing Director	28/02/2023	
	Approved:	Richard Stacey	Managing Director	07/03/2023	

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1. Introduction

1.1. Context

1.1.1. Evoke Transport Planning Consultants Ltd (Evoke) has been commissioned by CEG / D C Heaver and Eurequity Limited (the landowners) to submit Reps based on a review of the transport and highways related evidence submitted in support of the emerging Chichester District Council (CDC) Local Plan 2021-2039.

1.2. Local Plan Evidence

1.2.1. To inform the transport evidence base for the CDC Local Plan Review 2021 – 2039, Stantec were commissioned on behalf of CDC to undertake a review of the anticipated development levels created by the Local Plan within Chichester District which includes 10,354 dwellings to be delivered within the plan period 2021 to 2039. Specifically, this includes the following documents:

- Chichester Transport Study (Local Plan Review Transport Assessment);
- Transport Study 2023 – Appendices;
- Annex A – District Wide Collision Review;
- Annex B – Seasonal Impact Report;
- Annex C – 2026 and 2031 Interim Year Review;
- Annex D – Air Quality Assessment.

1.2.2. In addition to the evidence base outlined above, a review of other key policy documents including West Sussex County Council's (WSCC) Transport Plan (April 2022) has been reviewed to provide further context for the CDC evidence base. Whilst the A27 is managed and maintained by National Highways (NH), WSCC as the Local Highway Authority (LHA) provide a useful assessment of current approaches to highways modelling and mitigation within their Transport Plan, including a clear emphasis on the need to take a vision led approach with regards to transport infrastructure and assessments, emphasising the role of place-shaping and creating liveable neighbourhoods with infrastructure to support travel by a range of modes of transport rather than designing to cater for forecast traffic demand.

1.3. Report Purpose

1.3.1. CDC have interpreted the transport evidence base, particularly the Chichester Transport Study and strategic modelling as justification for limiting further housing growth within Chichester District. This report reviews the evidence base and background material to assess the soundness of these conclusions and whether a higher housing requirement can be delivered by the emerging Local Plan.

2. Chichester Transport Study (January 2023)

2.1. Context

2.1.1. This section of the report provides a summary of the key transport and highways related items within the Chichester Transport Study which undertaken by Stantec on behalf of CDC in January 2023.

2.2. Modelling Assessment

2.2.1. The production of a Local Plan strategic model provides the opportunity to test and assess the impact of Local Plan allocations across the set period and where required, identify specific transport mitigation packages to address any development related impacts. However, as stated within the Chichester Transport Study (Paragraph 6.1.1), the modelling exercise undertaken provides a 'conservative' approach in respect of vehicle trips and background traffic growth, one that does not provide due weight to:

- **Behavioural Change:** This makes assumptions on issues such as future way of working and develops further the impacts that have been seen during the COVID pandemic, with home working becoming more prominent. It is assumed that this trend will continue in the future.
- **Regional:** This assumes that there will be a tendency for reduced levels of growth away from London, the South East and the East and more in the North and West.

2.2.2. This is noted within the Chichester Transport Study and identified as a constraint of the current modelling exercise concluding that both of these scenarios would result in lower levels of traffic growth, should they be realised. With regards to regional / background growth, the modelling assessment utilised the TEMPro v7.2 database, however Department for Transport have since released TEMPro v8.0 which identifies a lower level of background growth to that assessed in the model. The Transport Study notes that 'the model may have overestimated the potential future impacts' whilst also stating that 'the mitigation identified [in relation to the A27] may not actually be required within the future' (Paragraph 10.2.1).

2.2.3. Whilst the exact extent of traffic growth up to 2039 is not yet known, the model provides limited, if any, weight to the plausible alternative scenarios that are currently being explored at a national and regional level. Whilst a generic 5% reduction has been applied to development trips, there are no modelling assessments based on reduced levels of background growth or travel behaviour change. Further to this, whilst an opportunity to further validate the model and understand observed traffic growth would be to undertake local traffic surveys (outside of COVID-19), the model utilises traffic survey data from 2014 to form the 2039 reference case. Growth forecasts have been added to the base data, however no further validation has been undertaken with more recent survey counts to justify the credibility of the outputs.

2.2.4. In order to provide a robust evidence base, and to more accurately assess the quantum of development that could be delivered, further modelling assessments which utilise up-to-date forecast data are required to account for other plausible scenarios. Without such assessments, CDC have not considered all options within the LP and are drawing a conclusion based on what is acknowledged as a 'conservative' assessment. Consequently, the risk of limiting the opportunity for sustainable-led schemes from being allocated and delivered, in favour of highway capacity improvements, contrary to WSCC's Climate Change Strategy and wider national climate change agendas are increased.

2.2.5. The main (core test) modelling assessment is based on the delivery of 535 dwellings per annum (dpa) with a sensitivity assessment of 700 dpa presented. It is suggested in the draft LP that the 535 dpa was agreed with National Highways for the southern part of the region, albeit there is no specific reference in the Stantec report to this number being agreed.

- 2.2.6. The higher, 700dpa (southern plan area) figure has been tested within the model and the conclusion has been drawn (see para 5.6.5) that the additional demands can generally be accommodated by the mitigation proposed for the 535 dpa core test, albeit with additional mitigation being required at Oving junction and the Portfield roundabout.
- 2.2.7. Within this conclusion it is evident that additional housing allocations could be accommodated on the A27, SRN and yet this higher housing number has not been taken forward in the LP

2.3. Sustainable Development

- 2.3.1. The emerging CDC Local Plan provides an opportunity to demonstrate a commitment to tackling key national and local policy agendas, such as the climate emergency as well as overall health and well-being agenda. WSCC as the LHA are supportive of this approach, stating within their Transport Plan that:
 - *A 'predict and provide' approach (i.e. building road capacity to cater for or exceed forecast traffic growth) could exacerbate other challenges (e.g. air quality, health and well-being, and reaching net zero carbon/climate change mitigation). Instead, WSCC would like to see LPAs and developers taking a 'vision led' approach to development and improvement of the transport network. This approach should place emphasis on place-shaping and creating liveable neighbourhoods with infrastructure to support travel by a range of modes of transport rather than designing to cater for forecast traffic demand".*
- 2.3.2. However, this position and ambition to tackle the climate emergency through promoting sustainable led development in appropriate and accessible locations is not fully reflected within the Transport Study. Whilst the model assumes a set 5% reduction in trips across all sites to account for development-specific travel planning and behavioural change, it provides little evidence to suggest that those sites that are located within more accessible areas of the District, for example adjacent to existing urban areas and recently established developments to the east of the City, would generate different levels of trip generation than those located in more rural and inaccessible locations. Further to this, the 5% reduction in trips was retained from the adopted Local Plan, some five years ago, and is not reflective of latest planning policy, technology changes and broader lifestyle and travel behaviour changes. As such, sustainable travel is likely to play a more significant role in the mid to long term than the site specific 5% car trip reduction assumed in the modelling.
- 2.3.3. The position is further supported by WSCC through their Climate Change Strategy 2020 which aims for County Council operations and services to reach net zero carbon emissions by 2030. Within their Transport Plan (2022), WSCC raise concern with overproviding highway capacity which could lead to unmanaged network growth and note their preferred approach which is to mitigate impacts on their network through sustainable mitigation with less reliance on physical mitigation. Planned development, in appropriate and accessible locations, present opportunities to change and embed more sustainable travel behaviour and contribute funding towards transport network improvements (including resilience improvements) which will benefit existing users.
- 2.3.4. The modelling assessment provides limited weight to the varying degree of sustainability that could be achieved by sites and instead utilises a set vehicular trip rate for all residential dwellings regardless of development size, location, access to amenities and initiatives towards sustainable travel behaviour. The two-way vehicle trip rates used equate to 0.472 during the AM peak and 0.477 during the PM peak, both significantly higher than the trip rates used for the recently consented development for 165 dwellings within the Land at Westhampnett / North East Chichester Strategic Development Location. It should be noted that smaller allocation sites, or pockets of development which are located in highly accessible locations adjacent to existing urban areas, employment and retail centres will have a reduced traffic impact and less reliance on the private car; an approach which was acknowledged and accepted

within the current Local Plan. Such sites, that are less reliant on the private car will clearly have a reduced impact on the A27.

- 2.3.5. The location of site allocations is therefore considered to be a key opportunity for the emerging Local Plan, providing the right site allocations in appropriate locations and to develop a sustainable access strategy and mitigation approach which is compliant with overall policy approaches. By allocating sites in this way, development will have a reduced traffic impact (including on the A27) by being less reliant on the private car, in accordance with the goals in the climate emergency and overall policy aspirations. Where larger sites are allocated, they can be designed and developed to achieve a high level of internalisation of trips, further reducing their impact on the strategic road network and achieve Garden Village travel and modal split targets. However, the overall blanket approach to reduced housing numbers, and assessment of all residential developments using the same trip rates, prevents this opportunity from being achieved here. Further assessment work, examining the individual sustainable credentials of development sites should be considered before a limit on housing growth is imposed.
- 2.3.6. It is of note that any developer-led A27 contribution mechanism will need to be balanced against contributions to local sustainable transport improvements with priority given to the latter. However, by preventing further development within the plan period, CDC would in turn be reducing the opportunity for contributions towards meaningful and targeted sustainable transport initiatives and measures from being brought forward. Whilst the Transport Study notes potential alternative scenarios, it does not provide sufficient evidence to demonstrate that these plausible alternative scenarios cannot be achieved within the plan period. Further assessments of these scenarios are required which take into account the merits of each sites, its overall accessibility, location and proximity to Chichester as well as the sustainable mitigation packages it can provide, before concluding whether further development can be achieved or not.

2.4. West Sussex Transport Plan 2022 to 2036

- 2.4.1. The West Sussex Transport Plan places a clear emphasis on the need to invest and promote more sustainable patterns of travel behaviour, rather than solely providing infrastructure projects to cater for highway capacity:
- *“A ‘predict and provide’ approach (i.e. building road capacity to cater for or exceed forecast traffic growth) could exacerbate other challenges (e.g. air quality, health and well-being, and reaching net zero carbon/climate change mitigation). Therefore, the challenge is to enable and accelerate the shift to more sustainable patterns of travel behaviour. To do this and deliver the priorities in Our Council Plan, improvements to the transport network will need to address all of our economic, social and environmental objectives and facilitate a more sustainable transport system and patterns of travel behaviour over time”.*
- 2.4.2. With regards to working with developers, WSCC *“would like to see LPAs and developers taking a ‘vision led’ approach to development and improvement of the transport network. This approach should place emphasis on place-shaping and creating liveable neighbourhoods with infrastructure to support travel by a range of modes of transport rather than designing to cater for forecast traffic demand”.*
- 2.4.3. It is evident that WSCC are prioritising sustainable transport measures within the strategy, as opposed to more traditional highway capacity improvements. With regards to additional development opportunities, the Strategy states:
- *“planned development presents opportunities to change and embed more sustainable travel behaviour and contribute funding towards transport network improvements (including resilience improvements) which will benefit existing users, as well as mitigate the transport and environmental impacts of development. While a number of major schemes and junction*

improvements are planned to mitigate development, developer-led highway mitigation schemes are not intended to resolve pre-existing issues. This can result in gaps between development-led mitigation and those required to address cumulative impacts and/or pre-existing issues. There is also a challenge to ensure that these schemes do not overprovide capacity which could lead to unmanaged traffic growth.”

- 2.4.4. Whilst the capacity constraints on the A27 network are acknowledged (although the Stantec modelling demonstrates that the higher 700 dpa could be accommodated with some additional mitigation), albeit potentially inflated through the Chichester Transport Study, the issues are not solely linked to development related traffic as the A27 continues to serve as a key strategic route for east to west movements across the Chichester District. Development opportunities that can positively contribute towards funding sustainable travel behaviour changes should not be prevented due to existing constraints on the strategic highway network, particularly as the background growth that underpins these constraints is considered to be overinflated and not representative of current traffic conditions.
- 2.4.5. The Local Plan provides an opportunity to demonstrate a commitment by CDC in tackling key national and local agendas, such as the climate emergency as well as overall health and well-being agenda. Specifically, the Local Plan should outline the allocation of residential development in the most appropriate and accessible locations, to encourage development that supports the use of active modes of travel and reduces reliance on the private car. In line with WSCC’s Transport Plan, this should be seen as an opportunity to direct development to more sustainable locations whilst also providing an opportunity to collate develop contributions to improve access to sustainable travel for all. This should be seen as an opportunity through the Local Plan for CDC to meet with national and regional policy agendas and not as a constraint as it is portrayed within the Chichester Transport Study.
- 2.4.6. It is noted that the Stantec modelling sensitivity tested a higher level of housing delivery than has been taken forward into the LP (700dpa compared with 535dpa). This testing demonstrated that the additional demands could be accommodated with some additional mitigation at the Oving junction and Portfield roundabout. The LP could be progressed on the basis of the higher number without detriment to the A27.
- 2.4.7. Overall, concerns over highway capacity constraints, albeit over inflated (and ignoring the ability to accommodate the higher 700dpa in the southern area), should not be used as a reason to restrict the delivery of housing. The actual constraints of the A27 network should be the reason for CDC to engage with WSCC and plan the correct level of housing in sustainable and accessible locations in order to promote travel behaviour change through their Local Plan policies. Whilst WSCC may have been consulted on the proposed methodology for the Chichester Transport Study, the Transport Study and supporting modelling needs to be re-assessed to align the allocation of sites with WSCC’s overall transport aspirations to promote sustainable-led development.

3. Summary

- 3.1.1. Evoke Transport Planning Consultants Ltd (Evoke) has been commissioned by CEG / D C Heaver and Eurequity Limited (the landowners) to submit Reps based on a review of the transport and highways related evidence submitted in support of the emerging Chichester District Council (CDC) Local Plan 2021-2039. In particular, this has included a review of the Chichester Transport Study and associated appendices, as well as other adopted strategies such as WSCC's Transport Plan (2022).
- 3.1.2. Despite growing support by transport practitioners and the development of plausible scenarios at a regional and national scale, the Chichester Transport Study and the associated modelling exercise which underpins the key conclusions fails to address the 'Decide and Provide' approach to transport planning. Instead, the Transport Study outlines a more traditional 'Predict and Provide' approach, one that has been based on outdated base traffic data and overinflated growth rates with a key focus on developing mitigation schemes to provide additional highway capacity as opposed to tackling barriers to sustainable travel and promoting schemes which are supportive of the wider climate change agenda.
- 3.1.3. This report has identified that additional scenario testing is required in order to provide a more representative view of the quantum of sustainable-led development that could be achieved within the plan period. Without such development, CDC are limiting the opportunities for developer-led contributions to come forward to fund these sustainable travel mitigation measures and increase the opportunity to make these alternative and plausible scenarios a reality within Chichester District. Opportunities to steer the right quantum of development, in appropriate and accessible locations, should be prioritised throughout this Transport Study. However, the shortcomings of the Transport Study limits this opportunity within the local plan period.
- 3.1.4. The Local Plan provides an opportunity to demonstrate a commitment by CDC in tackling key national and local agendas, such as the climate emergency as well as overall health and well-being agenda. Whilst WSCC as the LHA are actively encouraging development growth that incorporates these agendas, the application of set vehicular trip rates and the use of the 5% trip reduction from the previous Local Plan by CDC, further limits the potential for development to come forward to tackle the climate emergency.
- 3.1.5. The Transport Study does outline a range of mitigation measures targeted towards the A27; however, it is noted that the extent of the issues are not solely linked to development related traffic and instead through traffic growth travelling east to west across the wider A27 network. Whilst this growth is inflated above observed and realistic levels, the Local Plan should promote the development of sites which are located in accessible locations away from the key A27 corridors to further reduce vehicle demand travelling to and from the strategic road network. There appears to be limited evidence to suggest that WSCC, as the LHA, are in agreement with the restrictive measures on housing numbers before the A27 mitigation scheme can be delivered. Instead, CDC should work with WSCC to identify potential development opportunities that can be delivered within the local plan period which by their location and design, limit the impact on the A27 and provide mitigation contributions to deliver a more sustainable package of measures.
- 3.1.6. It is noteworthy that CDC are progressing their emerging LP based on a lower housing delivery (535dpa) for the southern area than has been modelled (700dpa, as a sensitivity test), the latter testing was able to still demonstrate that the additional demands could be accommodated on the A27 with some additional mitigation at the Oving junction and Portfield roundabout. There is no indication that this additional mitigation could not be provided.
- 3.1.7. Notwithstanding the above point regarding the taking forward of the 535dpa only, concerns over highway capacity constraints, albeit over inflated, should not be used as a reason to restrict the delivery

of housing. The actual constraints of the A27 network, should be the reason for CDC to engage with WSCC and plan the correct level of housing in sustainable and accessible locations in order to promote travel behaviour change through their Local Plan policies.