
Local Plan Review – Highways Representations

Project No: ITB14672
Project Title: Land East of Southbourne
Title: Local Plan Review
Ref: ITB14672-017 TN
Date: 10 March 2023

SECTION 1 Introduction

1.1 This note provides a transport response to the Chichester Local Plan 2021-2039: Proposed Submission. It has been prepared on behalf of Wates Developments in respect to their emerging allocation of 1,050 homes in Southbourne (*ref: Policy A13*).

1.2 The note focusses on:

- a The transport work that underpins the emerging Local Plan has been used to constrain housing numbers below the objectively assessed need¹. However, that work:
 - Uses an out-of-date model, which will not reflect post-COVID traffic conditions with lower levels of peak hour traffic.
 - Over-estimates background traffic growth.
 - Uses traffic generation parameters that lack ambition in terms of what can be achieved with the effective implementation of sustainable transport strategies, and therefore over-estimates traffic impacts.
 - Lacks ambition in terms of seeking other funding sources for transport improvements.

¹ The emerging Local Plan proposes 535 dwellings per annum (dpa) set against an objectively assessed need of 638dpa.

- Does not provide modelling data of the proposed mitigation package with the constrained level of housing delivery proposed by the local plan. It is expected that such work would identify a material net benefit between the 'do minimum' and 'with local plan' scenarios, i.e. the local plan more than mitigates its impact and there is headroom for additional growth and/or the transport mitigation package could be reduced (although the former is preferable).
- b The proposed transport contribution of £7,826 per dwelling towards improvement works on the A27 (*ref: paragraph 8.21*):
 - The costs of works used by CDC are significantly greater than those produced by Stantec and National Highways and may be significant over-estimates.
 - A greater level of development delivery is achievable (see a. above) and will bring the contribution-per-dwelling down to a more acceptable/deliverable level.
 - The transport package is likely to go beyond mitigating the impact of the planned growth and therefore results in an unnecessary financial burden on development to resolve existing transport issues.

SECTION 2 The traffic modelling work is unduly onerous and should not constrain housing delivery unnecessarily

2.1 Introduction

2.1.1 The emerging local plan restricts housing delivery to an average of 535 dwellings per annum (dpa) until 2039², with transport identified as being the main constraint for delivery of housing (in particular the operational capacity of the A27 Chichester by-pass).

2.1.2 The Local Plan Review Transport Assessment has informed this decision. For the reasons set out below, the transport work has much greater headroom and should enable housing delivery to be much higher than the 'plan-to-fail' numbers in the emerging Local Plan.

² Ref: paragraph 5.2

The parameters used in the traffic modelling provide an overly worst case

2.1.3 The traffic model is derived from a 'base' year of 2014. This is several years out of date and pre-dates significant behavioural changes that have arisen as a result of the COVID-19 pandemic, notably a substantial shift towards hybrid working.

2.1.4 The DfT's own National Road Traffic Projections of 2022 are now based on the assumption that car traffic will be 5% lower than it would have been without COVID-19. No adjustments have been made for this.

The traffic growth factors used are too high

2.1.5 Growth factors are derived from a dated version of the DfT's growth forecasting software³, which assumes higher levels of growth than is now expected to occur. This is acknowledged in the LPRPA (*ref: paragraph 10.4.4*) and contradicts the Local Plan's assertion that congestion on the A27 constrains housing delivery:

"growth is likely to be lower than is currently predicted within the models. The outcome of this is that the mitigation identified may not actually be required within the future."

Vehicular trip rates are too high and assume too modest a level of mode shift

2.1.6 The residential trip generation of the Local Plan development is based on a trip rate of 0.47 trips per dwelling. This is in line with typical historic residential trip generation and fails to allow for a shift to sustainable travel that the 'monitor and manage' approach to trip forecasting, advocated by the Local Plan, should inherently allow for.

2.1.7 No allowance is made for internalisation of trips between homes and facilities on site that can be expected at strategic sites, which will reduce trips off site. The approach has been accepted elsewhere in West Sussex, for example the Mid Sussex Transport Study (Stage 4, July 2022). An exceptionally modest allowance of 10% for internalisation would equate to nearly 50 two-way movements when applied to the emerging 1,050 home allocation at Southbourne. On a network that is sensitive to additional traffic, this will materially affect modelling results.

2.1.8 Whilst a 5% allowance has been made for modal shift at strategic sites, this is at odds with WSCC's own Travel Plan guidance, which seeks a reduction of 10%. This allowance should be made for all development sites in excess of 80 homes, in line with WSCC's guidance. This would reduce the traffic generation for the Southbourne site by a further 25 vehicles per hour during peak hours.

³ TEMPRO version 7.2 rather than 8.0, released December 2022, was used in the LPRTA.

- 2.1.9 Local Plan modelling in neighbouring Arun (*ref: Enterprise Bognor Regis – Transport Review 2017, Table 4*) is based on a lower trip rate of 0.35. This agreed lower trip rate would reduce the number of trips associated with the Southbourne allocation of 1,050 homes by over 125 two-way movements, which will materially change modelling results in a sensitive network. Under a ‘monitor and manage’ approach, trip rates of this level are perfectly plausible⁴.
- 2.1.10 The overall approach is a significant ‘step back’ to layering worst case parameters upon worst case parameters. It is disappointing that such an approach has been taken given we are in more enlightened times, e.g. than when WSCC undertook the traffic modelling for the Arun Local Plan. The approach taken for the emerging Local Plan is based on an outdated ‘Predict and Provide’ approach, i.e. one that over-estimates the volume of traffic generated and provides capacity improvements to alleviate both the resulting impact of development and, (in some places) deal with long-standing congestion issues.
- 2.1.11 This contrasts poorly with an approach taken by other authorities where there is significant investment to enhance to sustainable transport and manage traffic demands⁵. This is a missed opportunity particularly for the larger allocations, whose scale provide greater opportunities for the delivery of sustainable transport measures for the benefit of both new and existing residents.

The results of the modelling suggest that greater levels of development can be achieved without an unacceptable impact

- 2.1.12 With these worst case⁶ parameters, the modelling ‘with mitigation’ shows a substantial improvement in network performance. The ‘with mitigation’ scenario assumes all of the following highway improvements:

⁴ Taking the trip rate of 0.47 and applying a 10% reduction in trip rate for internalisation and a 10% reduction for modal shift, yields a trip rate of 0.38. These are modest assumptions.

⁵ E.g. Oxfordshire County Council who are investing in ‘Smart Corridors’ including high quality Park and Ride, strategic cycle improvements, high quality bus corridors and town centre management (e.g. car parking charges, emission zone charging) as a means of addressing traffic impacts.

⁶ Worst case – i.e. not robust. They are too high.

Table 2.1: Highway Mitigation Schemes

A27 Chichester Bypass	Chichester City	Wider Chichester	Neighbouring Authorities
Fishbourne Roundabout	A286 New Park / St Pancras	Fishbourne Road West / Appledram Lane South	A259 / B2132 Comet Corner
<i>Stockbridge Roundabout</i>	A259 Via Ravenna / Cathedral Way		
<i>Whyke Roundabout</i>	A259 Cathedral Way / Fishbourne Road East		
Bognor Road Roundabout	A286 / B2178 Churchside		
Portfield Roundabout			
Oving Junction			

2.1.13 The modelled improvement schemes at the Stockbridge and Whyke roundabouts (*italics* above) have been omitted from the final strategy. The modelling should be updated (using more appropriate parameters as set out already) to include the mitigation schemes that are actually proposed.

2.1.14 Notwithstanding this, the modelling shows a clear net benefit between ‘do minimum’ and ‘with 535dpa’ scenarios. The residual cumulative impact is therefore beneficial and so falls a long way short of the ‘severe impact test’⁷.

2.1.15 The LPRTA shows that this remains the case if the Local Plan planned for circa 700dpa, a level of housing delivery above the objectively assessed need:

“The network performance outputs analysed comprising V/C%, Delays, and Queues suggest that generally the proposed SRN mitigation identified for the Core Scenario can accommodate in the most part, additional increase in development to 700dpa.” (ref: LPRTA paragraph 5.6.3).

The Local Plan should allow for other funding sources for A27 improvements

2.1.16 As set out above, the Local Plan seeks to constrain housing delivery based on unevidenced assertions regarding traffic constraints, i.e. the modelling does not show that housing numbers should be constrained. Even then, the modelling uses overly worst case parameters – more reasonable and appropriate parameters would yield similar/better modelling results with a level of housing delivery in line with the objectively assessed need.

⁷ Ref: paragraph 111 of the NPPF

- 2.1.17 Ostensibly the Council's approach is that the improvements at the Whyke and Stockbridge roundabouts are unaffordable and therefore development delivery should be constrained. This scenario has not been tested using reasonable parameters or otherwise.
- 2.1.18 It is a significant lack of ambition within the Local Plan that other routes to delivering strategic A27 improvements have not been considered and are not referred to.
- 2.1.19 The A27 Chichester by-pass improvements are included within National Highways' current RIS 3 funding review. This process will conclude in 2023/24, i.e. within the lifetime of the local plan. Allocated funding would unlock significant additional growth, e.g. the 700dpa sensitivity test shows that at least an additional 165 dpa can be achieved with the delivery of the full LPRTA mitigation package.
- 2.1.20 Funding of circa £100m was identified previously towards improvement of the Chichester by-pass. Whilst this fell away because of a lack of consensus by the various authorities, it is reasonable to plan for potential a funding award – the issues were significant enough to justify a funding award previously.
- 2.1.21 It is redolent of the Local Plan's *planning-to-fail* approach that this potential delivery route to A27 improvements is not considered. Similarly, the Council has not explored other funding sources.

SECTION 3 Lack of Evidence to Support Cost Increase

3.1 The costs of the mitigation schemes may have been over-stated

- 3.1.1 The emerging Local Plan proposes to improve two of the junctions on the A27 – the Fishbourne roundabout and the Bognor roundabout, at an estimated cost to developers of £27m⁸.
- 3.1.2 The LPRTA provides a cost estimate for all junctions on the A27 to be improved at £89m to £134m. These are based on costings provided by CDC / WSCC (*ref: LPRTA Table 9-3*).
- 3.1.3 It is unclear why the cost is so much greater than the range previously provided by Stantec, at £49m to £64m) (*ref: LPRTA Table 9-3*).
- 3.1.4 Stantec has extensive experience of delivering large scale infrastructure projects including public sector works. They produced their costings with input from National Highways (NH), who are responsible for the proposed junctions (*ref: LPRTA paragraph 9.5.3*). NH are experienced in delivering works to the strategic highway network. The evidence to support such a substantial increase (and why Stantec and NH have got it wrong) has not been provided.

⁸ The higher cost of works to the two junctions where mitigation is planned minus funding already secured.

3.1.5 As set out above, the Local Plan rules out funding under the RIS 3 funding review, scheduled to be completed in 2023 / 24 (i.e. prior to likely adoption of the Local Plan). The A27 at Chichester is a strong candidate for funding and previously benefitted from an award of RIS 2 funds. The Local Plan should acknowledge that an award of funds is perfectly plausible. If it did happen, the need for contributions will be substantially reduced or even eliminated.

3.2 **Delivery of housing in line with the objectively assessed need would reduce the contribution per dwelling**

3.2.1 The proposed level of contribution at £7,826 per dwelling is a significant cost in delivering the much-needed new homes.

3.2.2 For the reasons set out in Section 2 of this note, there is no sound reason for constraining housing delivery to 535dpa. The level of housing delivery should be in line with the objectively assessed need.

3.2.3 This would bring the contribution-per-dwelling down to a more acceptable/deliverable level.

3.3 **A reduced transport package may be more appropriate and/or other sources should be used to deal with existing issues**

3.3.1 As set out in Section 2, the transport package is likely to go beyond mitigating impacts. It results in a net improvement in the operation of the highway network.

3.3.2 The planned development should deal with its impacts, but it is not the role of development to resolve existing issues. The approach of the emerging Local Plan (which shows a betterment in the operation of the highway network) results in an unnecessary financial burden on development, which is being expected to do more than 'wash its own face'. This does not comply with the relevant CIL tests.

SECTION 4 Summary

4.1 The local plan should plan to meet the objectively assessed need. The modelling that seeks to demonstrate that only 535dpa can be achieved:

- i Does not reflect post-COVID traffic conditions with lower 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 consider properly 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.
- 4.2 There is no sound reason for constraining development delivery to 535dpa. This is not evidenced by the LPRTA.
- 4.3 The available evidence suggests that the local plan more than mitigates its impact. There is headroom for additional growth (preferable) and/or the transport mitigation package could be reduced. In any event, more appropriate parameters – i.e., in line with the purported 'monitor and manage' approach in the Local Plan – would yield greater levels of development and should enable the objectively assessed need to be met.
- 4.4 A greater level of housing delivery is appropriate and has the knock-on benefit of reducing the (very high) transport burden⁹ currently proposed by the Local Plan. This transport burden would be further reduced if:
- i The Stantec/National Highways cost estimates are used. The use of the materially higher WSCC/CDC estimates is not evidenced or explained properly.
 - ii The mitigation package mitigates the additional burden of the planned development rather than delivering a net benefit.

⁹ i.e. £7,826 per dwelling

