

Chichester Local Plan 2021-2039

Hearing Statement on behalf of

Barratts

(Representor No. 6827)

Relating to Matter 4A
Transport

Issue: Would the Plan be effective in ensuring that any significant impacts from the development proposed on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Issue: Are the individual transport policies clear, justified and consistent with national policy and will they be effective?

Transport evidence

Q.20 The Chichester Area transport model was updated in 2018, and further analysis and surveys were undertaken in November 2023 in order to verify its outputs and to attempt to confirm that the evidence may be relied upon. Is the Plan underpinned by relevant and up-to-date transport modelling evidence? Is this evidence adequate and proportionate?

Response

1 In summary:

- 1.1 The evidence base is not up to date as it depends on a base date of 2014. The position now is fundamentally different to that 10 years ago. The later Transport Assessments have not remedied this flaw;
 - 1.2 There are numerous methodological issues in the Transport Assessments which invalidate their conclusions; and
 - 1.3 The transport work does not actually demonstrate that a cap of 535 dpa in the Southern Area is necessary and so has been misapplied by the Council in the development of the Plan.
- 2 In January 2023 Stantec prepared the 'Chichester Transport Study: Local Plan Review Transport Assessment' (Transport Assessment) to inform the transport evidence base for the Chichester Local Plan Review 2021-2039. The transport study was completed based on the current Local Plan proposals of 10,354 dwelling for the period 2021-2039. It is understood West Sussex County Council and National Highways have been consulted in the drafting of the report
 - 3 The base year for the model is 2014, which has been validated by Chichester District Council, West Sussex County Council and National Highways using 2014 counts and journey time data. The suitability of a 2014 base year however is questionable given the significant changes in traffic patterns which have occurred since 2014, largely as a result of the Covid-19 pandemic, but also the specific impacts of developments and mitigation delivered in that timeframe.
 - 4 Since Covid, many employers now offer flexible working, with many employees adopting a hybrid working approach incorporating working from the office and at home. The 2023 Transport Assessment modelling does not appear to take into account any of the changes which will impact existing and future peak time travel patterns. The Stantec Transport Assessment page 10 references the 'significant changes in travel behavior alongside technology advances [that] have been seen in recent times, and the Covid-19 pandemic has accelerated these changes with significantly more people working from at home and shopping online (virtual mobility)'.
 - 5 In addition, Section 10 of the Transport Assessment the report states that 'there is a reduced traffic growth [between TEMPro 7.2 and TEMPro 8.0] as a result of falling population... as a result there is a need to review and comment and define the possible difference in predicted changes in travel demand in the future... as the model may have overestimated the potential future impacts'. It continues 'the data indicates that the levels of traffic growth

expected within Chichester are lower in each of these scenarios than currently have been modelled' (Para 10.2.1).

- 6 The natural conclusion from the Stantec report is that where overly inflated traffic volumes have knowingly been used within the baseline models that are not an accurate reflection of the current situation, limited weight can be given to the modelling outputs and conclusions on limiting development to 535 dwellings per annum in the southern area. Additionally, the Transport Assessment 2023 appears to suggest that 700 dpa could be accommodated (in the southern plan area) by the mitigation proposed for the 535 dpa scenario with additional mitigation at the Portfield roundabout and Oving junction.
- 7 To evidence the above, an interrogation of the Department for Transport (DFT) traffic counts along the A27 Chichester Bypass Annual Average Daily Flow (AADT) has been undertaken. The review took 2019 and 2023 AADT's as a pre and post COVID-19 year to understand if the background growth that has been assumed within the Transport Assessment has occurred. Two sites, 36297 and 99154, used 2015 as the 2019 data was either an estimate or an automatic count and these were discounted to ensure the same methodology was used on all sites. All site showed a reduction in AADT flows (as shown within our addendum report).
- 8 Paragraph 7.14 within the Transport Background Paper recognises that "the model is inherently less reliable than when it was updated in 2018... and a new model is needed going forward to inform work... in informing the prioritisation and design of any mitigation schemes agreed as part of that process". CDC state that undertaking a new model would not have been feasible due to timescales.
- 9 CDC go on to say that they believe the outputs and analysis of the model are sufficiently robust to demonstrate the likely scale of impact of development growth set out within the plan. This is not agreed and has a significant impact on the level of growth in housing numbers that CDC are proposing in certain areas, such as 535 dpa, when they are relying on assumptions that are overly robust and out of date. This is also not in line with NPPF (December 2023) para 31 which states that "The preparation of and review of all policies should be underpinned by relevant and up-to-date evidence".
- 10 The mitigation schemes that have been identified have been designed to mitigate the impact of the growth, which are based on a scenario which has

been over inflated and is not robust. The over inflated assessment makes the level of contribution not in keeping with CIL tests.

- 11 CDC have produced an updated report Chichester Transport Study 2024. The base year for this updated transport study is still 2014. It is noted that new surveys were conducted in November 2023 along the A27 corridor and it is understood that additional localised surveys were programmed for June 2024, however it is not known if these were undertaken. These were carried out for comparative purposes and to validate against the previous traffic data. It is positive that CDC have recognised that this exercise needs to be complete, however the Local Plan Examination in October 2024 has not allowed sufficient time for the existing model to be updated with validated surveys. It is therefore considered that the Local Plan is being put to examination without robust and up to date evidence.
- 12 To base (and significantly restrict) the level of development on outcomes produced by a transport model that all parties, including CDC, West Sussex County Council, National Highways and Stantec, recognise as 'is reaching the end of it's useful life' is fundamentally flawed and should not be considered as a robust tool to support the Local Plan.
- 13 Within the TBP and the two CDC Transport Assessments, the justification for the 535dpa cap is due to higher scenarios (638dpa) showing a greater impact on junctions in the 2039 without mitigation scenario. The broad principle of this assumption is not disputed and it logically follows that additional growth will result in an increase in vehicular traffic/journey time/delay/queueing. However, from the information that is publicly available and conclusions within the TBP in paragraphs 7.20 to 7.23 and analysis in Section 8 of the Transport Assessment 2024 only provides outputs for the scenario of 638dpa, without mitigation. There does not appear to be any outputs or modelling scenarios publicly available that show anything other than 535dpa with mitigation.