

Home Builders Federation

Matter 4a

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?

From discussions with our members HBF are concerned that the transport evidence is overly pessimistic and appears to consider the worst-case scenario. One example of these concerns is in relation to the trip rates used within the study. The most recent update for example uses a trip rate agreed between WSCC and NH which are set out in table 6-2 and show total trip rates of 0.472 for the AM and 0.477 for the PM. These are higher than recent evidence published by TRICs in 2022 which notes that for the mixed housing developments category used in the Councils' TA is 0.422 for the AM peak and 0.414 for the PM peak. We are also aware of evidence submitted by some of our members that highlight that other areas in Sussex are using lower trip rates compared to those used in Chichester and the council will need to provide strong

evidence as to why they have chosen to use higher trip rates than others in the same area.

What is also notable from this research is that the peak trips have been reducing overtime with the average trip rate reducing by 5.4% between 2001-2011 period and the 2011 to 2021 period. HBF are concerned that similar behavioural changes that will have taken place in Chichester may not be accounted for due to the TA using a 2014 baseline for its data. The TA states that the 2014 and 2023 are comparable thus supporting the 2014 model. However, this would appear to be undermined by the TA itself which highlights in Appendix B Figure 7 not insignificant reductions in flows between 2014 and 2023 at the Fishbourne and Stockbridge roundabout

Whilst there will be local circumstances to take into account it would appear that the Council have used a relatively high trip rate. Over the life time of this plan, it is likely that trip rates will be lower as more of the population works from home reducing peak hour travel further. In addition, increased flexibility with working hours and the growth of home delivery will also change travel patterns with fewer peak hour journeys. The Council have recognised this to some extent with a 5% reduction on strategic sites to take account of development specific travel planning and behavioural change packages but wider reductions from more general trends does not appear to have been considered.

In addition, Figure 3.1 indicates an internalisation of 5% and we could not find the justification for this figure. For larger sites the level of internalisation could be higher and HBF suggest that evidence must be presented as to why it is assumed to be 5%.

Given that the Council are not able to meet their housing needs and that there are significant shortfalls in housing across West Sussex, HBF would have expected the Council to undertake sensitive testing with regard to trip generation to examine the impact of lower trip rates that are likely to be more reflective of change travel patterns. HBF consider insufficient modelling has been undertaken to examine whether a higher level of housing could have been achieved and as such the housing requirement is not justified.

Q.21 How has the employment growth set out in the Plan (as set out in Policies E1 and E3) been considered in the transport assessment and what if any part would it play in the monitor and manage approach?

No comment.

The spatial distribution of housing to the southern plan area

Q.22 The broad spatial distribution of housing proposed in the Plan is for 535 dwellings per annum (dpa) in the southern plan area. In transport terms, what is the justification for the 535 dpa 'cap' on new homes in the southern plan area?

This is broadly for the Council to answer but HBF would suggest that any decision to cap housing growth will require further work to consider lower trip rates that are more reflective of current and future travel patterns.

Q.23 What is the evidence that there would be unacceptable impacts on highway safety, and/or the residual cumulative impacts on the road network would be severe with a level of housing development in the southern plan area with a level of housing provision over 535 dpa?

This is broadly for Council. However, HBF would refer you to our response to Q20 that the trip rates appear to be too high and that the potential impact of new development on the congestion and safety may be over stated. Further work is needed to understand the potential impact of lower trip rates that reflect the changing travel patterns that taking place and that are likely to continue across the plan period.

Q.24 What is the specific evidence that new housing development over 535 dpa in the southern plan area over the plan period should be prevented on highways grounds?

For council.

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