

## Chichester Local Plan 2021-2039 Examination

### Hampshire County Council response

#### ID05 Inspectors' Matters, Issues and Questions (MIQs)

#### **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?**

The County Council response:

1. Analysis of the impacts of the Chichester local plan on the A259 were considered in the Chichester District Council Local Plan Transport Assessment Transport Assessment Technical Note (Ref TA03.10 Appendix I Impacts on A259 in Hampshire). Hampshire County Council sent a response to the Technical Note on 1 May 2024 (attached as Appendix 1 and to be included in the local plan Examination Library). To date the County Council has not had a reply to the questions raised regarding the evidence base and its suitability for establishing the impact of the local plan development in Hampshire therefore this issue remains unresolved.
2. Whilst the Chichester Area transport model was updated in November 2023, this update only used new data for the A27 corridor. The A259 corridor including the section within Hampshire was not updated with new traffic surveys. Similarly, whilst the model was updated in 2018 this still utilised 2014 data as part of the validation process. This data at 10 years old is considered

outdated and it has not been demonstrated that the model is thereby compliant with the Department for Transport, “Transport Analysis Guidance” (TAG). The Transport Study 2024 in para 7.14 (ref TA03.10 Appendix I) recognises that the 2018 model is now aging and that a new model is needed. Therefore, it is the County Councils’ view that there is a lack of up-to-date transport modelling evidence to show the scale of impact at the more local level along the western section of the A259 corridor including on the A259/North Street roundabout in Emsworth and the A259/A27 Warblington interchange in Hampshire.

3. It is the County Council’s view that the submitted transport modelling evidence cannot be relied upon, because it is not adequate and proportionate to establish cross boundary impacts into Hampshire.
4. The County Council requests a Main modification to Policy A13 Southbourne Broad Location for Development to add a new policy requirement that the scope of site-specific Transport Assessment must include cross boundary modelling of the transport impact on the A259 in Hampshire (including the junctions with North Street Emsworth and with the A27 at Warblington) and appropriate mitigation measures identified to deliver overall trip reduction westbound along the A259 into Hampshire.

### **Policy T1: Transport Infrastructure**

The Plan proposes a shift away from a ‘predict and provide’ to a ‘monitor and manage’ approach to mitigating the impacts of new development on the transport network. Policy T1 sets out that ‘Integrated transport measures will be developed to mitigate the impact of planned development on the highways network, improve highway safety and air quality, promote more sustainable travel patterns and encourage increased use of sustainable modes of travel, such as public transport, cycling and walking’.

**Q.25 Policy T1 refers to integrated transport measures ‘being developed’, rather than setting out any specific measures. Does Policy T1 set out an effective overall strategy for the pattern, scale and design quality of places, and make sufficient provision for infrastructure for transport as per NPPF 20?**

The County Council Response:

1. The shift to a ‘monitor and manage’ approach can only successfully be achieved within the context of a strong strategic approach. Otherwise, the danger is that monitor and manage may translate in managing on the hoof

when planning proposals come forward. In the absence of a clearly defined strategy, the risk is that the mitigation measures will form an incomplete and piecemeal approach to addressing identified impact. To address this issue T1 policy should require the development of a clear strategy that can provide a framework for identifying effective mitigation measures.

**Q.26 Is there sufficient certainty regarding the effectiveness of the proposed transport mitigation measures to conclude that the Plan is sound?**

The County Council Response:

1. As stated in the answer to Q25, in the absence of a clear and overarching strategic framework approach to transport mitigation, there is no certainty that the transport mitigation measures to be developed in the future can be effective.

**Q.28 How would the monitor and manage approach be implemented? How would cross boundary schemes and / or funding be dealt with?**

The County Council response:

1. The County Council welcomes and supports the principle of the 'provisional monitor and manage' approach, managed through the proposed Transport and Infrastructure Management Group (TIMG). The County Council requires that the draft terms of reference of the TIMG (ref TA03.20 Monitor and Manage Provisional Methodology) are amended to include the County Council in the Tier 1 core membership of the group. This will ensure that cross boundary impacts, mitigation schemes and funding are considered properly and can be dealt with adequately.
2. It is noted that TIMG provisional Action Plan set out in the Monitor and Manage report (ref TA03.20) proposes an **interim** action to update the current transport model and create a new working platform to generate localised models for non A27 junctions. This interim update should include roads on the A259 corridor in Hampshire to create localised refinement for the cross-boundary junctions (specifically the A259/North Street, Emsworth roundabout and the A259/A27 Warblington Interchange).
3. It is noted that after the interim update the TIMG provisional Action Plan for year 1 is to scope out and commission a **new** model. This new model and monitoring strategy should include data collection sites on the A259 in Hampshire including the A259/North Street, Emsworth roundabout and A259/A27 Warblington Interchange to provide a detailed and up to date picture of the performance of the highway network in Hampshire.

4. To date the 2024 Transport Study (ref TA03.01) and Infrastructure Delivery Plan (ref IN01) have not identified transport mitigation measures on the local highway network in Hampshire. It is expected that through the monitor and manage process future transport studies and the Infrastructure Delivery Plan will identify transport measures on the A259 corridor in Hampshire. The mitigation will include those measures in Hampshire required as part of the site-specific Transport Assessment for policy A13 Southbourne development.
5. Further evidence is required to demonstrate that any necessary transport infrastructure in Hampshire will be delivered through the TIMG in the plan period.

**Q.30 What is the evidence that sufficient transport mitigation measures can be delivered to ensure that any significant impacts arising from the level of 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?**

The County Council response:

1. The Technical Note (TA03.10 Impacts on A259 in Hampshire) refers to a modelling scenario of Local Plan development with mitigation packages which include the A27 Fishbourne and Bognor Road roundabouts. The County Council has had several officer meetings with CDC ([see attached minutes for meeting on 8 January 2024](#)) to discuss the impact of local plan development on the A259 in Hampshire when it has been acknowledged by all parties present that the A27 Fishbourne and Bognor Road Roundabouts were not considered by National Highways as committed or with any agreed funding or timescales for their implementation. Instead, the delivery of mitigation measures will be determined by the Transport Infrastructure Management Group (TIMG) in the monitor and manage process. This means there is no certainty that either of the A27 junction mitigation schemes will be delivered in the plan period.
2. The TIMG might identify alternative mitigation measures to the A27 Fishbourne roundabout, but to date these measures are not identified or listed. As described above (Q28), these measures should be set out in future transport studies or in the Infrastructure Delivery Plan (ref IN01). A mitigation scenario without the Fishbourne roundabout and with alternative mitigation has not been modelled therefore any cross-boundary impacts have not been assessed or mitigation schemes identified.

3. It is the County Council's view that there is insufficient evidence to establish the impact on the Hampshire network and specifically on the A259/North Street Emsworth roundabout and the A259/A27 Warblington interchange. Consequently, no transport mitigation has been identified within Hampshire.

## **Policy T2 Transport and Development**

**Q.32 Is Policy T2 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals in respect of the following:**

**a. What is meant by 'transport mitigation plan' in 1.j?**

The County Council response:

1. The County Council is not aware of a 'transport mitigation plan' and cannot comment on whether it includes any necessary schemes within Hampshire.
2. The County Council seeks an addition to policy ij as follows  
"Provide site-specific transport mitigation measures outlined in the Local Plan transport mitigation plan, Local Plan site allocation policies or neighbourhood plan policies, or as required by neighbouring authorities where cross-boundary impacts are evidenced".