



## National Highways Planning Response (NHPR 21-09) Formal Recommendation to an Application for Planning Permission

From: Regional Director, South East,  
Operations Directorate  
South East Region  
National Highways  
[PlanningSE@nationalhighways.co.uk](mailto:PlanningSE@nationalhighways.co.uk)

To: Chichester District Council – FAO (case Officer Mr Steve Harris)  
[dcplanning@chichester.gov.uk](mailto:dcplanning@chichester.gov.uk)

CC: [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk)  
[spatialplanning@nationalhighways.co.uk](mailto:spatialplanning@nationalhighways.co.uk)

**Council's Reference:** 22/01485/OUTEIA

**Location:** Land to the West of Centurion Way; Land at Bishop Luffa School; Land at and adjoining Westgate and Land to The North-East of Old Broyle Road and St Pauls Road Chichester West Sussex.

**Proposal:** Outline planning application with all matters except Access reserved for the second phase of development of the West of Chichester Strategic Development Location (SDL) for 850 homes and employment land with vehicular, pedestrian and cycle access from Westgate and via phase 1, extensions to approved phase 1 community facility and primary school, informal and formal open space (including northern Country Park), playing pitches and associated landscaping, utilities and drainage infrastructure. Associated demolition of existing agricultural buildings on site. Closure of Clay Lane vehicular access.

**National Highways' Ref:** 95418 #17222 (SB497)

Referring to the consultation on a planning application dated 30 June 2022 referenced above, in the vicinity of the A27 Chichester Bypass, Chichester that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~

**c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**

~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is/is not relevant to this application.<sup>1</sup>

This represents National Highways formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk) and may not determine the application until the consultation process is complete.

**Signature:**



**Date:** 26 October 2022

**Name:** Kevin Bown

**Position:** Spatial Planning Manager

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<sup>1</sup> Where relevant, further information will be provided within Annex A.

## **Annex A** National Highways' assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

### **Recommend: Planning permission not be granted for a specified period**

#### **Reasons:**

We will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A27 Chichester Bypass. We require further information to be provided by the applicant on this application in order that an informed decision can be made in relation to the potential impacts of the development on the strategic road network. In particular, the following comments should be passed onto the applicant:

#### **Baseline Traffic Conditions**

The extent of the SRN assessed by the applicant is acceptable.

#### **Year 2021 Baseline Traffic.**

The TA suggests that agreement was reached with the LHA that observed 2014 AM and PM peak vehicle turning movements used as part of the Vectos TA (for the consented phase 1 development) will be used as a base to inform the capacity assessment. This data is 8 years old.

TAG guidance did recommend that traffic surveys being used for modelling purposes should be no more than 6 years' old. Whilst this guidance has been relaxed in recent years, the data still needs to be analysed in order to ensure it is fit for purpose. The applicant has used a permanent ATC to compare the difference in flow between 2014 and 2019, however, this isn't robust as one site is unlikely to be representative of the whole study area. In addition, there is a considerable difference between the AM and PM peak variation which has not been explored (2% increase in traffic in the AM peak and 12% reduction in the PM peak). In order to satisfy us that the 2014 traffic flows are valid, further exploration is required.

**ACTION: Applicant to undertake further analysis to justify the use of 2014 survey data.**

## Year 2035 Baseline Traffic

We require that the applicant contact the LPA to ensure that the list of committed developments is up to date. Should the list be updated, it needs to be submitted to us for review and approval.

**ACTION: Applicant to contact LPA to ensure the list of committed developments is up to date. Any updates to the list must be submitted to us for approval.**

As part of scoping discussions with WSCC, it was agreed to exclude TEMPro growth factors from the assessment to be consistent with the previous TA. The TA states that this was due to the fact that it is considered unlikely that there will be any background traffic growth and baseline traffic flows would in fact reduce as a result of behavioural changes resulting from the COVID19 pandemic and a rise in working from home. However, we require further justification.

**ACTION: Further justification for the cited TEMPro approach is required. Whilst the TA references a DfT document suggesting that traffic decreased by 17.8% during the COVID19 pandemic to 2000 traffic levels, this is/was a national trend, and no local data is made available to validate these claims.**

The TA notes that as part of the Local Transport Plan, WSCC has developed an integrated package of measures and initiatives to promote behaviour change and mode shift in favour of sustainable transport options, thereby reducing future travel demand arising from housing and economic growth in Chichester. To reflect this, the Phase 1 Vectos TA adopted a 7% reduction in baseline traffic. It is stated that this approach was consistent with the strategy modelling undertaken by Chichester District Council and WSCC and was considered appropriate by the LHA for trips to/from Chichester city centre by 2031.

A similar approach has been adopted for the purposes of this study. The forecast 2021 baseline traffic has been adjusted to account for the 7% reduction in vehicle movements. This methodology needs to be substantiated, as per the action point below.

**ACTION: Whilst consistent with the previous TA, there is no evidence to substantiate the 7% reduction in trips. Further evidence is required to substantiate this reduction as it is unclear from the TA how the adjustment has been made. For instance, longer distance trips (using the SRN) are less likely to transfer to sustainable transport options.**

## **Development Traffic Forecast**

We consider that there are limitations to the use of TRICS Decide and Provide guidance due to the limited volume of data that exists within the TRICS database.

## **Traffic Generation**

### **Residential Use**

We have undertaken an independent assessment in TRICS and have found that the number of TRICS surveys used by the applicant is low (3 surveys) using only East Anglia and Warwickshire as proxy sites. The choice appears very selective and goes against TRICS guidance (TRICS Good Practice Guide 2021) which states:

*“it is not considered good practice to exclude survey sites within the TRICS® database on the sole basis of such sites being located within any particular region. We consider that a more robust use of the TRICS® filtering process takes place on a case-by-case basis, taking into account the numerous factors that can influence trip generation, with the TRICS® location type being at the forefront of these.”*

**ACTION: Taking into account the comments above, undertake further TRICS analysis to verify the residential trip rates presented.**

### **Employment Use**

The trip generation forecast presented for the employment uses is solely reliant on historic trip rates. This is not acceptable and up to date TRICS analysis is required.

**ACTION: For the employment uses, an up-to-date trip generation forecast is required using the latest available version of TRICS.**

### **Other Land Uses**

The other uses comprise an extension of the approved community centre and primary school plus a pre-school day-care nursery.

For the community centre and primary school extension, there will be some external trips, for example relating to staff. Accordingly, appropriate evidence needs to be provided.

**ACTION: Considering staff trips, information regarding the degree of external trips relating to the extension of the approved community centre and primary school are required.**

The applicant's analysis assumes that 30% of trips pertaining to the pre-school daycare nursery will be external to the site. This requires justification.

**ACTION: The proportion of trips relating to the pre-school day-care nursery that will be external to the site needs to be justified.**

### **Trip Internalisation**

Further clarification is required with regards to employment trips as 10% of the total trips have been removed and not 10% of the employment trips identified from the National Travel Survey. This approach removes a significant number of external trips from the network and needs to be clarified.

**ACTION: Clarify approach taken to employment-related trips as the methodology is different for other journey purposes.**

### **Trip Distribution and Assignment**

The TA sets out that traffic has been distributed proportionally in accordance with the agreed Vectos TA for the Phase 1 development.

However, this analysis needs to be updated in line with the most recent data available, including evidence-based analysis relating to trip assignment – as this may have now changed.

**ACTION: Analysis relating to trip distribution/assignment needs to be updated in line with the most recent data available, including evidence based analysis relating to trip assignment.**

### **Highway Safety**

We acknowledge that highway safety analysis has been undertaken for a five-year period between 1 April 2015 and 31 March 2020. However, before a substantive review of this information can be undertaken, the applicant needs to confirm that this relates to the *latest* 5-year period for which accident data is available.

**ACTION: In relation to highway safety, the applicant needs to confirm whether the data relates to the latest 5-year period for which accident data is available.**

### **Framework Travel Plan**

Due to the mixed-use nature of the site, which may fall under different ownership / management, it is not clear if separate Travel Plans will be produced for each land use or whether there will be a single estate management team who will be responsible for Travel Plan Coordination activities. More detail is required.

Whilst a degree of reduction in trips as a consequence of internalisation, home working and travel planning measures is considered reasonable, there is no discussion in the TA around the impact of double counting between these factors.

**ACTION:** It is not clear if separate Travel Plans will be produced for each land use or whether there will be a single estate management team who will be responsible for Travel Plan Coordination activities. More detail is required.

**ACTION:** The TA sets out a series of rationales reducing the number of vehicular trips. However, the double counting of reductions needs to be explored and explained further.

### **Construction Management Plan**

We welcome the applicants' confirmation that a Construction Management Plan (CMP) will be produced prior to construction work taking place.

We will require a Construction Management Plan (CMP) or equivalent document to be produced for the proposed development, and for this document to be approved prior to commencement of any construction activities on-site. Thereafter the approved CMP shall be adhered to throughout the construction period. It is expected that a draft CMP will be submitted as part of an application documents package. Should this not be the case, we are minded to recommend a suitable condition to be attached to any planning consent which may be granted. Condition wording below:

***'Condition:*** *No works shall commence on the site hereby permitted (including site clearance or preparation) until the details of a Construction Management Plan have been submitted to and approved in writing by the local planning authority (who shall consult with National Highways). Thereafter the construction of the development shall proceed in strict accordance with the approved Construction Management Plan unless otherwise agreed in writing by the local planning authority (who shall consult National Highways).*

***Reason:*** *To ensure that the A27 Trunk Road continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.*

***Informative:*** *The CMP shall include details (text, maps, and drawings as appropriate) of the scale, timing and mitigation of all construction related aspects of the development. It will include but is not limited to: site hours of operation; numbers, frequency, routing and type of vehicles visiting the site (including measures to limit delivery journeys on the SRN during highway peak hours such as the use vehicle booking systems etc); measures to ensure that HGV loads are adequately secured, travel plan and guided access/egress and parking arrangements for site workers,*

*visitors and deliveries; plus sheeting of loose loads and wheel washing and other facilities to prevent dust, dirt, detritus etc from entering the public highway (and means to remove if it occurs).'*

**ACTION: A Construction Management Plan will be required to support the planning application.**

### **Junction Capacity Assessment**

Percentage impacts at the 5 junctions on the SRN along the A27 have been calculated. Percentage impact calculations are not an accepted means of assessing the significance/implications of development traffic on the SRN. Furthermore, the degree of traffic impact on the SRN is not currently agreed.

**ACTION: At such time development impacts on the SRN are agreed, it will be possible to advise the applicant as to our detailed assessment requirements, which must be in accordance with DfT Circular 02/2013.**

The above represents a number of initial matters for the applicant to address. Other requirements may arise as the analysis progresses.

### **Conclusion**

Given the above, it is currently not possible to determine whether the application would have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN (the tests set out in DfT Circular 02/2013 [particularly paras 8 to 11] and MHCLG NPPF2021 [particularly paras 110 to 113]). This response details the steps that need to be taken in order to resolve this issue.

**In light of the above, National Highways currently recommends that planning permission not be granted (other than a refusal if the Council so wishes) for a period of three months from the date of this response ending on the 26 January 2023 to allow the applicant to resolve the outstanding matters.**

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.