

**The Ford Airfield Vision Group (FAVG) Final Submission Document (Aug 08)**  
**and**  
**the WSP Strategic Transport Assessment Report (Sep 08)**

**A Review of the Road Infrastructure and Traffic Congestion**

**Introduction**

1. The proposal to develop an Eco-Town at Ford fails to take proper account of the poor local road infrastructure and the impact of traffic congestion in the vicinity; now and in the future. The adjacent road network is already seriously congested, and is forecast to become even more so as time progresses.
2. The recent assertion in the FAVG Final Submission document (Aug 08), contrary to all previous statements from the FAVG, the FEH group and from WSP themselves, that the “*Ford Airfield Eco-Town is in no way dependent upon the [Arundel] bypass being in place*” is an astonishing last-minute reversal.
3. The justification, for what amounts to a complete volte-face concerning the Eco-Town’s dependency on the provision of an A27 Arundel Bypass, is constructed around misleading statements and missing facts as far as the transport-related problems of the Ford area are concerned. Evidence about traffic congestion is either ignored or minimised, thus leading to the false deduction that the additional traffic associated with an Eco-Town at Ford is unlikely to have a serious impact either on the immediately surrounding roads or the A27 trunk road in the vicinity of Arundel.
4. The Eco-Town site at Ford is located within an area that already suffers from traffic congestion at Arundel to the north and on the A259 road between Littlehampton and Bognor Regis to the south, as well as on the north-south local roads in between the two east-west routes, and PPS10 emphasises that any “*Plan should ... consider ... capacity of the transport infrastructure*”.
5. The purpose of this report is therefore to set out details of the current and projected congestion on the roads in and around Ford, as well as the details of the “story so far” in relation the road infrastructure and traffic implications of an Eco-Town at Ford as proposed by the FAVG and its transport consultants, WSP.

**Overall Traffic Congestion**

6. The evidence relating to traffic congestion in the Arundel/Ford area, particularly covering the A27, the A259 and the linking Ford Road, is reinforced by WSCC’s traffic modelling data which indicates that traffic in West Sussex is projected to increase by 16-18% by 2011 alone. However, this general statement does not specifically focus on the

area in question. There have however been several relevant studies; all of which confirm that there is significant traffic congestion in the vicinity of Ford now, and that it is expected to get very much worse, not least because of the HGV traffic associated with the sole W Sussex Materials Recycling Facility (MRF) which is being built on Ford Airfield.

### **Highway Agency South East Regional Network Report**

7. The Highway Agency South East Regional Network Report (July 2006) deals with trunk roads, and concentrates on the A27 in West Sussex. It states that “*congestion occurs regularly*” on the A27 in the County, and shows that Arundel is in the worst 15% of observed total delays and suffers from the worst 15% of observed accident rates in the SE Region. It also shows the current observed stress on the trunk road network, and in particular shows which roads are above or at capacity (which it defines as carrying at least the maximum sustainable traffic flow for the road type).

8. In the case of the A27 at Arundel, the stress factor was already greater than 100% in 2005, and it is forecast to get much worse by 2026. Indeed, when considering just the development postulated by the Draft SE Plan, the Network Report forecasts traffic growth on the A27 of 34% to the east of Arundel and 82% to the west of Arundel. There is therefore no question but that the A27 to the north of Ford is already congested, and that it is forecast to get even worse over the next 20 years. Thus, any traffic associated with an Eco-Town at Ford will exacerbate an already unacceptable situation.

### **Highway Agency Advice to the SE Plan EiP**

9. The latest Highway Agency assessment of the traffic conditions on the A27 trunk road in West Sussex is contained in the Highways Agency Advice to the SE Plan EiP in November 2006, which confirms that the single carriageway section of the A27 at Arundel is currently operating beyond its available capacity for some of the day. More importantly however it forecasts the future situation taking account of the current development proposals in the Draft SE Plan.

10. The paper provides an overall forecast, taking account of the extant housing allocations and background growth for the SE Plan’s Sussex Coast Sub-Region, and concludes that the section of the road network in the whole Sub-Region with the highest stress level is the single carriageway A27 at Arundel. In particular, it shows the Arundel stress levels as 100-120% in 2006, 120-150% in 2016, and >150% in 2026. However, the probability of the delivery of an engineering solution to the congestion on the A27 at Arundel is unlikely to occur before 2018, so the traffic associated with any new settlement at Ford before that date will simply add even more unacceptable congestion.

### **WSCC Structure Plan**

11. The issue of transport congestion in the Arundel and Ford area was addressed at the EiP into the WSCC Structure Plan in Nov/Dec 2002. Prior to the EiP, WSCC carried out a traffic review in September 2002 concerned specifically with the congestion on the A27

between Chichester and Arundel. As a result, the EiP Inspector agreed that the provision of an Arundel Bypass was an essential prerequisite for development in the Area of Search between the River Arun and the Chichester District boundary.

12. This was subsequently taken forward into the Structure Plan itself, which records that because of “*existing and future congestion and capacity problems*” on the A27, development “*in Arun District, west of the River Arun*” (which includes Ford) would not be permitted until the A27, particularly at Arundel, had been improved and upgraded. Thus the WSCC Structure Plan specifically restricts the building of additional housing in the Ford area because of traffic congestion and the lack of suitable transport infrastructure.

### **West Sussex Local Transport Plan**

13. Details of the congestion on the roads in the vicinity of Ford are also described in the West Sussex Local Transport Plan (March 2006). This says that the core of the County’s Strategic Road Network (which includes the A27 and the A259) “*is under pressure in some places*”. It also says that the A259 plays a key role ... in the light of current deficiencies on the A27 and “*we will be looking to reduce congestion*”. The specific congestion problem at Arundel is set out in the LTP, and confirms that “*there is rat running through settlements lying to the south of the A27 to avoid the congestion at Arundel*”. Once again, it shows that the roads in the Arundel and Ford area are already heavily congested.

### **Arun District Council Strategic Transport Study**

14. In August 2006 the Arun District Strategic Transport Study Report was published in support of the Council’s continuing LDF work. This Report sought to establish the baseline traffic growth through to 2026. It included planned and forecast housing growth, but without taking any account of building in strategic development locations in the Area of Search which includes Ford. The Report stated that “*the overall level of highway traffic in West Sussex as a whole is expected to increase by 18.5% between 2006 and 2026, and that this baseline growth will have an impact on the road network, as some sections of the roads become over capacity, meaning more areas of congestion and more delays*”. In particular, “*the main points of congestion forecast for the 2026 baseline were: [The] A259 and B2166 between Bognor Regis and Chichester; [the] A259 between Middleton and Littlehampton; [the] A27 at Arundel; and [the] A280 at Angmering*”.

15. The Report then reviewed a number of development scenarios (Ford was dealt with in Section 6), and concluded that “*all of the development scenarios examined would generate additional pressures on Arun’s road network. This is not surprising since the County Model predicts that by 2026 large sections of the highway network will be over capacity at peak times even in the baseline scenario*”. This research therefore indicates that the proposed Eco-Town at Ford will simply add to the congestion in the area.

## **Ford Road**

16. Ford Road between Clymping and Arundel, the northern end of which links directly with the town of Arundel, is already an HGV disaster area. A WSCC Report, published as Agenda Item No 11 of the Joint Downland Area Committee held on 19 May 2003, concluded that

*“The only truly effective solution to the [existing] traffic problems along Ford Road involves the construction of the proposed A27 Arundel Bypass”.*

The Report went on to describe the traffic problems on the Ford Road, and included the statements that:

*“The primary reason for the high proportion of HGV traffic movements along Ford Road is the location of industrial developments situated at the southern end of Ford Road”*

*Ford Road ...is clearly not a satisfactory route for HGVs to use”.*

Thus, it is clear that without an Arundel Bypass the development of an Eco-Town at Ford, which would invariably attract a significant number of additional car and HGV movements, would be unacceptable from a traffic impact point of view as far as Ford Road is concerned.

## **SE Regional Plan EiP Report**

17. The SE Plan EiP Panel’s Report (Aug 07) stated that:

*“We agree with the structure plan that development in this location [the Area of Search to the west of the river Arun] could help to support regeneration in Littlehampton and Bognor Regis though it would require major infrastructure and access improvements. In particular we acknowledge local concern that the ability of this search area to accommodate large-scale development is inhibited by capacity problems on the A27 particularly at Arundel”.*

## **FAVG Ford Eco-Town Brochure - “Our Vision for Ford/Yapton”**

18. The FAVG Eco-Town Bid Document (Aug 07) contains several references to the A27 Arundel Bypass, including:

*“The ... development also offers the potential to bring forward strategic infrastructure of regional significance, including the A27 bypass to Arundel.*

*The [development] will also act as a catalyst for the implementation of the much needed A27 Arundel Bypass.*

*The development ... will also increase the likelihood of the A27 Arundel Bypass being delivered”*

### **FEH Ford Eco-Town Proposal**

19. Ever since the production of the first FEH proposal about Ford in Oct 04 it has been a fundamental tenet that, if the development is to go ahead, then the provision of an A27 Arundel bypass is a given. Indeed, as at 13 Oct 08, the FEH website stated that:

*“If we are to seize the opportunities outlined in this concept there can be no doubt the provision of an Arundel Bypass is essential.*

*If we can demonstrate ... that we have a genuine long-term vision for the economic regeneration of our coastal towns, and that it cannot commence until we have an Arundel Bypass, then we add much weight to that argument.*

*A bypass at Arundel can become the gateway to regeneration in Bognor and Littlehampton and[the] FEH [concept] could become the key to unlocking government funding”.*

### **WSP Statement - 8 Feb 08**

20. In an E-Mail message from WSP Consultants to Arun District Council dated 8 February 2008, Mr Graham Brown - the WSP Technical Director - stated, in respect of his traffic modelling work, that:

*“Whilst the 5,000 residential units/mixed use development at Ford was considered, it only formed part of the testing which was undertaken, which also included an analysis of the scale of development that may be feasible prior to the completion of an Arundel Bypass.*

*The analysis work ... confirmed WSP’s advice to our Client that a 5,000 residential units/mixed use development at Ford would require an Arundel Bypass (or comparable improvement scheme for the A27 at Arundel)”.*

### **DCLG Initial Eco-Town Assessment Exercise**

21. In March 2008 the DCLG conducted an initial assessment of the 50 or so original Eco-Town bids at a “Cross-Government Review Meeting”. Each submission was graded as either A - no significant issues at this stage, or B - significant issues but can probably be addressed through conditions, studies, etc, or C - location where growth is possible but major issues - assurance needed, or D - high level constraints - reasons why growth in this location is unsustainable. In relation to Ford, the first assessment was “B?” but, as a result of the discussions at the Review Meeting, this was downgraded to “C” on transport

grounds.

### **DCLG Consultation Paper - “Eco-Towns: Living a Greener Future”**

22. The DCLG Eco-Town consultation paper (Apr 08) stated, in relation to “Transport”, that:

*“The major issue is the relationship of the [Ford] site to pressures on nearby trunk roads and particularly the A27”.*

### **ADC Ford Eco-Town Select Committee Inquiry**

23. The ADC Eco-Town Select Committee Inquiry considered the topic of roads and transportation on 28 May 2008 when, as recorded in the Committee’s Report, discussion focused on the question of the A27 Arundel by-pass. However, whilst the promoters argued that some development could take place within the proposed Eco-Town in advance of a by-pass being built - a phase of approximately 1,000 dwellings was suggested - they agreed that the A27 was required for the Eco-Town. The Report concluded that: *“There appeared to be unanimity therefore that a by-pass is a pre-requisite for the Eco-Town as a whole”.*

24. A second major aspect of the developers’ October 2007 brochure was the proposal to build an A259/A27 link road which would pass through the middle of the Eco-Town. This new road was forecast to take traffic (inc HGVs) from Bognor Regis and Littlehampton to and from the A27 at Arundel, as well as any traffic associated with the homes and businesses in the Eco-Town. However, it would not link directly with either the current A27 or even with the line of any new Arundel Bypass. It was envisaged simply to join the Ford Road just north of Ford station, and thus all the additional traffic would go up the Ford Road into the heart of Arundel until such time as the town was provided with a full bypass. It was therefore a relief to all that, when its details and drawbacks were debated at the Arun District Council Ford Eco-Town Select Committee Inquiry, the FAVG advised the Select Committee that their proposals have now been amended to abandon a direct spinal link road in favour of a more diffuse highway network.

### **Eco-Town Challenge Panel**

25. The Eco-Town Challenge Panel was clearly unhappy about the apparently essential link between the Ford Eco-Town proposal and the proposed A27 Arundel Bypass.

The DCLG’s report of the Notes of the Panel’s 1st Meeting records that:

*“Funding the proposed A27 Arundel bypass should be abandoned, as it is not consistent with sustainable principles”.*

In similar vein, the DCLG’s report of the Notes of the Panel’s 2nd Meeting records that:

*“If the Arundel bypass goes ahead independently of the scheme it will change the proportion of Ford’s residents likely to commute by car and undermine any attempt to make this development zero carbon”.*

26. Subsequent to the 2<sup>nd</sup> Challenge Panel Meeting, the FAVG’s astonishing volte-face took place concerning the relationship between the Ford Eco-Town development and the prior provision of an A27 Arundel Bypass. The real traffic congestion and transport infrastructure situation in and around Ford had not changed. Instead, the FAVG simply changed the words in the Ford Eco-Town proposal in order to facilitate its acceptability.

### **Ford Airfield Vision Group Final Submission**

27. In view of all the above information, it is surprising that the Final Submission document is almost bereft of information about the road infrastructure and traffic congestion in the Ford area, the only significant references being:

- a. Para 2.2. “The strategic and local highway network (A27 and A259) suffers some congestion at periods of peak demand”.
- b. Para 7.89. “Ford Airfield Eco-Town is in no way dependent upon the [Arundel] bypass being in place”.
- c. Para 7.91. “The Eco-Town at Ford will provide a new north-south highway link between the A259 and the A27 which would bridge the ... railway line close to the existing level crossing at Ford [which would then be closed]”.
- d. Para 7.109. “The development has a minimal impact on the A27 Arundel Bypass”.
- e. Page 69. “FAVG would however be prepared to provide contributions ... to support delivery of the [Arundel] bypass if required”.

28. Whilst the commitment to provide a bridge over the railway near to the current Ford station and then to close the adjacent level crossing is clear and unequivocal, albeit that there is apparently no link from its northern end to Ford Road, there is confusion over the apparently revived commitment to provide a new north-south highway link between the A259 and the A27. This is despite its earlier deletion from the FAVG proposal at the Arun District Council Ford Eco-Town Select Committee Inquiry on 28 May 2008, and its absence from any of the subsequent plans relating to the Ford Eco-Town. On the assumption that this is not an error, and whilst the proposal may appear to be superficially attractive, its delivery as a so-called “new north-south highway link between the A259 and the A27” is probably nigh on impossible. Indeed, traffic moving north-south between the A27 to the north of the Eco-Town and the A259 to the south of the Eco-Town would have to travel right through the Eco-Town itself.

29. The origin of this revised proposal, which is a most unsatisfactory element of the Final Submission, seems to be the WSP STA Report which says that “*No details are available for the new link road, other than the broad longitudinal alignment shown on the [original – Oct 2007] concept plan*”. Clearly, FAVG do not know what they want to do about this link road. On the one hand, it may give the impression of an attractive element of the overall proposal, but in practical terms it would be a singularly unsustainable element of the Eco-Town. At present some 10,000 vpd use the north-south Ford Road, and these would have to pass right through the middle of the Eco-Town. Also, some 5,000 vpd (inc 8% HGVs) use the east-west Ford Lane (which will disappear as part of the development), so forcing this traffic either to find its way through the Eco-Town’s streets or to transfer to the A27 or the A259, thus increasing their congestion at a stroke. The whole proposal is very badly thought-out.

### **WSP Strategic Transport Assessment Report**

30. Similarly, and perhaps even more surprising, the Strategic Transport Assessment Report itself includes relatively little information about the road infrastructure and traffic congestion in and around Ford area; the only significant references being:

- a. Summary (page 3). “Vehicle speeds on all vehicle access streets will be restricted to a maximum of 20 mph”.
- b. Summary (page 6). “Ford Airfield Eco-Town is in no way dependent upon the [A27 Arundel] bypass being in place”.
- c. Summary (page 6). “The A27 is already operating under stress and does not provide journey reliability”.
- d. Summary (page 6). “An Eco-Town at Ford Airfield will provide a new north-south highway link between the A259 and the A27 which would bridge the ... railway line close to the existing level crossing at Ford”.
- e. Summary (page 6). “Consideration is being given to implementing traffic signals on the new bridge or further north at the junction [of Ford Road] with the A27 where road widths are currently restricted through on-street parking”.
- f. Chapter 4 (para 4.2.1). “Ford Road is constrained by parked vehicles as it runs through the southern part of Arundel approaching the A27 roundabout”.
- g. Chapter 9 (para 9.2.9) “Vehicle travel through the site will undoubtedly occur at times, however this should be discouraged where possible by implementing low speed limits - [to] discourage utilization of roads by vehicles [and] winding vehicle routes – [the] roads should be ambiguous in direction and wind around so as not to encourage the use of roads as rat runs”.

h. Chapter 12 (para 12.2.7). “Some key junctions on the local highway network are already at or above capacity at periods of peak demand. In ... 2026, even without the Eco-Town development and without interventions on the network congestion will increase”.

i. Chapter 12 (para 12.2.9). “Capacity on the local highway network would be severely compromised before 2026. This will happen without the Eco-Town development at Ford Airfield”.

31. It is quite apparent that a number of aspects of the transport proposals being made by the FAVG and WSP in support of the aspiration to develop an Eco-Town at Ford are misleading. For instance:

a. The extant congestion on the local roads has been largely ignored, as has the evidence to that effect.

b. There is no apparent route for the new north-south highway link between the A259 and the A27. Instead, the traffic, much of which may be unconnected with the Eco-Town, will have to follow a slow and winding route through the Eco-Town itself (see para 29 above).

c. The new road bridge over the railway has no connection to the Ford Road.

d. The impact of the additional traffic on the Ford Road on the Arundel residents at its northern end is subject to an arbitrarily casual proposal.

e. The fact that the important east-west Ford Lane (with its high HGV loading) has apparently been eliminated has not even been mentioned.

f. The routes to be used through the Eco-Town by those who currently use Ford Station (81,000 passengers pa) have been neither mentioned nor considered.

g. It is not clear how much consideration has been given to the number of external domestic and business visitors to the Eco-Town.

h. It is also unclear how much consideration has been given to the amount of commercial traffic associated with the business that may be established in the Eco-town, other than the fact that the business will be subject to draconian parking policies; a factor which may discourage their location at Ford.

32. Thus, despite the fact that the Strategic Transport Assessment Report has been written by a respected Consultancy, the impression gained from this huge, difficult-to-read report is of a paper full of inconsistencies, redundant information and confusing statistics. Presumably the authors hope that the gaps in their arguments will not be noticed amongst the plethora of data in the 575-page Report. Clearly the aim has been to show that an Eco-Town at Ford will have minimal impact on the transport infrastructure

in the Ford area, albeit that it is already suffering from severe congestion which is scheduled to get worse as time passes, and especially to show that - in the developers' view - an A27 Bypass at Arundel is not now the over-riding constraint that all concerned have acknowledged up to now. In particular, this has been achieved by the forecast that less than 30% of all trips will be made by car, and that the percentage increase in traffic on the A27 and the A259 will only be between 4-7%; forecasts that have themselves been calculated as a result of using a very questionable attractiveness parameter in the 'Gravity Model' which equates the Ford Eco-Town with Chichester.

### **Conclusion**

33. There is no doubt that the acknowledged dependency of the Ford Eco-Town proposal on the provision of a fully off-line A27 Bypass at Arundel has, from the very start, been a very strong reason for rejecting the proposal. Such a Bypass, if it is ever to be built, is unlikely to be operational before 2020, and any house building at Ford before that time (either as a housing development per se - which is what the proposers actually want) or as an Eco-Town (which is the excuse for the current submission) would simply add to the already unacceptable congestion on the local roads, especially on the A27, the A259 and on Ford Road between Clymping and Arundel. As a result, and particularly as an attempt to show that they are following the advice of the Government's Eco-Town Challenge Panel, the developers have now changed their stance and seek to suggest that a new Eco-Town comprising some 5,000 houses, 12,000 people and 4,000 jobs would have a minimal impact on the Ford area.

34. In contrast, the road system surrounding Ford is already congested, and any additional traffic associated with the proposed Eco-Town, despite the fact that the latter might generate less traffic than a standard housing development, would simply increase this congestion. Additionally, no proper account has been taken of the traffic already using the existing roads in the immediate vicinity of Ford Airfield so that, despite the promise of a new north-south highway link between the A259 and the A27, which is more mirage than reality, the Eco-Town itself will actually become congested with road traffic, much of which will have no direct association with the Eco-Town. Thus, the proposal to develop an Eco-Town at Ford is seriously flawed in that it fails to take proper account of the impact of traffic in the vicinity; now and in the future. Also, the provision of the new strategic link road between the A259 and the A27, if it is a serious proposal, will do nothing to enhance the eco-credentials of any new Ford Eco-Town. On road transport infrastructure and traffic congestion grounds, Ford is therefore not a sustainable location for an Eco-Town.