

Chichester Local Plan Examination – Hearing Statement

Matter 4A: Transport

Questions 20 - 35

September 2024

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Matter 1 – Procedural/ legal requirements

This hearing statement has been produced as part of the examination of the Chichester Local Plan. It answers the Inspectors' questions 20 – 35, relating to **Matter 4a: Transport**.

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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

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?

- 1.1 Yes. As set out in para 4.1 of the Transport Background Paper (BP14), in 2018, Chichester District Council (CDC), National Highways (NH) and West Sussex County Council (WSSCC) agreed that following the 2018 update it would be suitable to use the Chichester Area Transport Model (CATM) to inform the Local Plan Review, now the Chichester Local Plan (2021-2039): Proposed Submission (SD01).
- 1.2 The data collected through further surveys in November 2023 was used to support an exercise to show, as far as possible, that the model was behaving as expected and that the impacts shown within the model could be relied upon. This was reported within the Transport Study 2024 – Appendix B Model Verification Technical Note (TA03.03).
- 1.3 The two main conclusions from the evidence provided within the note are:
 - A very high-level approach to growth in the Local Plan has indicated that the 2031 model is a good proxy for the end of the plan period.
 - The approach to the provision of new evidence should be taken with the knowledge that there is a commitment to update the model following examination and that the 2031 model is a suitable tool for providing evidence at this time to provide further evidence as to the outcomes of the Transport Assessment work and to support the Local Plan.
- 1.4 Whilst the conclusion of this work was agreed by West Sussex County Council as Local Highway Authority – further surveys were suggested by NH to further confirm the reliability of the model. The council considers the November 2023 verification exercise to provide sufficient confidence in the model, as do WSSCC. Nonetheless, whilst the council do not consider additional surveys are required in order that the model be relied upon in

assessing the impact of the Local Plan, it recognises the comments of NH that further surveys would assist in demonstrating the reliability of the CATM. The council therefore undertook further surveys in June/July 2024 to inform the work of the Transport Infrastructure Management Group (TIMG) and it is anticipated that these surveys will provide part of the evidence base for the creation of a further model to inform the work of that group in assessing the most appropriate mitigation proposals to support the Monitor and Manage (M&M) process.

- 1.5 In addition to the CATM, the council recognises that a new model will be required to inform the work of the TIMG, including more up to date evidence and a more detailed modelling approach. This is included within the TIMG/M&M process set out within the plan and evidenced through Section 9 of the Chichester Transport Study 2024 (CTS) (TA03.01) and the Monitor and manage Provisional Methodology (June 2024) (TA03.20).
- 1.6 However, whilst the council recognises the need for a new model to inform future work, including a future Local Plan Review, this is not considered to be necessary at this stage, and would not be a proportionate response given the significant delay to the Local Plan that would result, whilst a further, more detailed model, is formed. The CATM (supported by the 2018 update and the 2023/24 validation work) is a tool that performs adequately in assessing the impacts of the plan on the Strategic Road Network (SRN) and Local Highway Network (LHN), and provides for proportionate evidence that is fit for purpose for the Submitted Local Plan.

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?

- 1.7 The proposed employment sites are included within the transport modelling, to support the transport assessment, is as shown in Table 2-1 of the CTS. The impact of these sites on the SRN and LHN has therefore been assessed using the CATM and included in the conclusions of the Transport Study. When revised modelling is undertaken ahead of the future Local Plan Review, employment allocations (and commitments) will be included alongside residential growth in the development of future forecast models and incorporated into the work of the TIMG.
- 1.8 In terms of other employment growth within the Plan Period, this is discussed in paras 7.7 & 7.8 of the Transport Background Paper (BP14). The trip rates used include trip rates for all purposes (including commuting, education, retail) and for all modes for specific time periods e.g. AM and PM peaks. It should be noted that many leisure/retail trips will take place outside of these hours.

- 1.9 This is an approach that has been previously agreed with both WSCC and NH throughout the inception of the modelling process and has been used elsewhere, including recently for the Horsham District Local Plan and the Crawley Borough Local Plan, the latter of which has recently been examined and no concern was raised with the approach.

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?

- 1.10 The council has gone to considerable efforts to investigate ways in which it could meet its 'local housing need' (LHN) and beyond. The Transport Background Paper rehearses this in detail, but essentially to achieve a delivery of full LHN requires the full mitigation package, set out in section 11.2 of the CTS, to be delivered. The cost of delivering the remainder of the junction improvements required would cost a minimum of £86m (as set out in Table 11-13 of the CTS), far more than that which the plan can bear without rendering the majority of development unviable (the council's Stage 2 Viability Assessment (IN02.02) found that average contributions of £8,000 per dwelling for A27 mitigation would be broadly viable for most typologies tested, but only if all other development contributions and policy costs were minimised). The council has exhausted other avenues for funding these works and cannot rely upon any funding for the proposed A27 improvements as part of the Road Infrastructure Strategy 4 (RIS4) at this time.
- 1.11 In the absence of funding for the delivery of this mitigation package, the CTS demonstrates that there would be a severe impact on the A27 Chichester Bypass (and parts of the LHN) as a result, and NH has previously made it clear through its Regulation 18 response to the Preferred Approach Local Plan, that it would not support a local plan without the full mitigation package, but which was nevertheless based upon delivering full LHN.
- 1.12 As a result, the council sought to establish whether a higher level of housing than the LHN (a level sufficiently high to fund the full package of improvements) would still be adequately mitigated by those improvements) It should be noted that little additional capacity beyond the proposals set out in 11.2 of the CTS could be achieved through additional A27 improvements short of grade separation and so further A27 improvements, beyond those proposed in paragraph 11.2 of the CTS, were not considered at that time. This approach is set out in detail in paras 5.39 to 5.46 of the Transport Background Paper. Analysis of the CATM outputs through a sensitivity test (Appendix H to the 2023 Chichester Transport Study (TA04.02) demonstrated that 700 dwellings per annum (dpa) would be the extent of housing delivery that would

still be adequately mitigated by the proposed A27 junction improvements. However, the additional financial contributions that could be secured as a result of the increased housing numbers remained significantly short of the required overall level of funding to deliver the remaining A27 junction improvements.

- 1.13 The only reasonable option left to the council was to consider what level of housing could be achieved by prioritising delivery of only part of the overall A27 Chichester Bypass junction improvements; in other words, to match the planned level of housing growth to the level of infrastructure improvements that it was possible to fund. Following a series of meetings (set out in paras 5.20 and 5.23 of the Transport Background Paper) it was agreed with NH that a level of delivery not exceeding the average over the previous 5 years at that time (2015/16 – 2019/20) would not be objected to, if this was used as an average over the next 5 years. However, this level of housing delivery would still result in a severe impact on the A27 Chichester Bypass without the measures set out in the mitigation package. Therefore, further work was required to investigate what mitigation could be achieved, how it would be prioritised and whether there were opportunities through a monitor and manage process to assist with mitigation delivery.
- 1.14 The outcome of this work, informed by the Chichester Local Plan Review: Short Term Review Transport Modelling (TA03.16), was that even with mitigation limited to what could be affordable over the lifetime of the Plan (Fishbourne and Bognor Junction improvements only), there was still need for further mitigation by 2026. However, it was recognised that, since much of the development was already committed through planning permissions and/or allocation in the Chichester Local Plan 2014-2029 and given the age and strategic nature of the model, there may be opportunity for further and/or alternative mitigation through a monitor and manage process, that could take account of additional evidence at the time of implementation.
- 1.15 This process of on-going engagement and iterative evidence work has been lengthy and has delayed the progress of the Local Plan, but it has yielded positive results. The council has avoided a 'no-growth' local plan and has agreed a process with the Highway Authorities to manage the mitigation of planned growth through a monitor and manage process, rather than predict and provide, that will allow for an average of 535 dwellings per year in the southern plan area to proceed. However, given the uncertainty around the impact of growth higher than 535 per annum, a new and more detailed transport model is required to ensure that growth beyond this level does not have a severe impact on the A27 Chichester Bypass and associated LHN. This is a pragmatic but precautionary approach, based on proportionate evidence and on-going engagement, that allows for housing delivery to continue in a planned way. It is also an approach that can be immediately

reviewed in the event that updated evidence through the TIMG and the new transport model suggests that an alternative approach is required.

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?

1.16 Paras 7.20 to 7.23 of the Transport Background Paper set out in further detail the material difference in impact between the modelled scenarios of 535 dpa and 638 dpa. Section 8 of the CTS evidences these impacts and the following table (Table 8-1 - taken from the CTS) evidences the impacts in delay time and length of queues between 535 and 638 dpa.

Junction	Time Period (Peak Hour)	Link	Delay (MM: SS)			Queues (metres per lane)			Comments
			Ref Case	535dpa	638dpa	Ref Case	535dpa	638dpa	
Fishbourne Junction	AM	A27W arm	04:08	05:59	07:28	451	650	776	638 dpa significantly/exponentially increases delays over 535 dpa as well as shows a significant increase in queues. It demonstrates unsustainable high delays and queues.
Stockbridge Junction	AM	Stockbridge Road (S)	08:35	08:20	08:22	580	580	580	These figures indicate capacity issues from the Reference Case and getting worse with 535 dpa scenario and worse still with the 638 dpa scenario. No change in queue length with 638 dpa and 'unstable/static' delay in comparison to 535 dpa on Stockbridge (S) suggests this arm is at capacity and hence 638 dpa cannot be accommodated on the arm and likely results in reassignment to adjacent Whyke Junction. Side roads are key to realising sustainable travel/PT opportunities and 638 dpa will adversely impact these more than 535 dpa.
	PM	Stockbridge Road (N)	13:15	14:06	15:34	161	201	230	
	PM	Stockbridge Road (S)	05:12	08:05	08:00	350	581	581	
	PM	A27 W	01:41	02:44	03:39	184	325	446	
Whyke Junction	AM	Whyke Road (S)	08:39	09:17	09:52	587	719	765	This clearly demonstrates worsening conditions from the Reference Case which continue to get significantly worse between 535 dpa and 638 dpa scenarios. Increase in delays on Whyke Road (S) as well as queues with 638 dpa compared to 535 dpa. This is worse in the PM peak for both delays and queues. Side roads key to sustainable travel/PT and 638 dpa will adversely impact these more than 535 dpa.
	PM	Whyke Road (N)	12:38	13:42	15:26	282	276	288	
	PM	Whyke Road (S)	02:34	05:50	06:26	224	529	587	
Bognor Road Junction	AM	A27 (N)	07:52	10:14	12:24	498	633	736	Demonstrating the unsustainable high delays and queues which worsen from the Reference Case through 535 dpa and worse still to 638 dpa. Generally, shows worsening of conditions with 638 dpa compared to 535 dpa. Bognor Road key to sustainable travel/PT and 638 dpa will adversely impact these more than 535 dpa.
	AM	Bognor Road E	08:55	11:08	11:02	492	610	635	
	PM	A27N	05:22	06:54	07:41	371	474	520	
Portfield Junction	PM	Chichester Bypass	11:08	12:48	14:59	147	181	216	Demonstrating the unsustainable high delays and queues which worsen from the Reference Case through 535 dpa and worse still to 638 dpa. Significant delay increases with 638 dpa compared to 535 dpa.

1.17 The conclusion of the CTS is that the delays caused by 638 dpa represent a severe impact on the A27 Chichester Bypass (and associated LHN arms of junctions), articulated in the table above. It demonstrates that the A27 junctions are predicted to experience unsustainable high levels of delays and in some cases exceptionally long queues, with 638 dpa showing increased adverse impacts compared to 535 dpa. This includes worsening impacts on side roads with consequent adverse implications for sustainable modes including public transport delays. Side roads interfacing with the SRN, such as A259 Fishbourne Road, A286 Stockbridge Road, B2145 Whyke Road, and A259 Bognor Road are vital bus routes and the increased worse conditions with 638 dpa compared to 535 dpa would have severe impacts on public transport which in turn impacts the attractiveness and convenience of that mode of travel.

- 1.18 Para 8.2.6 of the CTS also highlights a significant safety issue with 638 dpa at the Fishbourne Junction, whereby queueing as a result of 638 dpa during the AM peak period leads to blocking back onto the Fishbourne Roundabout from Cathedral Way, potentially as far as the Fishbourne Junction itself.
- 1.19 Because of the ability for traffic to use alternative LHN routes to bypass the A27 itself, many of the impacts of higher levels of growth, which lead to saturation of the A27 Chichester Bypass, result in significantly greater adverse impact on the wider LHN through trip reassignment. The impact of growth at 638 dpa on the LHN is set out in paras 8.2.7 to 8.2.10 of the CTS. This demonstrates the resultant significant and severe impact on the key areas of the LHN which are susceptible to rat running as a result of trip reassignment from the saturated SRN. It will be noted from the CTS that some parts of the LHN see a 34.8 percent increase in PCUs when increasing the housing number from 535 dpa to 638dpa. These impacts exponentially increase as a result of the increasing traffic impacts caused by higher levels of housing growth.

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?

- 1.20 The answers given to question 23 sets out the severe impacts that arise from planned housing growth of an average level of 638 dpa. These answers are considered to justify an approach that plans for 535 dpa rather than 638 dpa. In addition to this, as set out in Section 8 of the CTS and para 7.20 to 7.24 of the Transport Background Paper, a higher number of planned dwellings, above 535 dpa would increase adverse impacts on sustainable modes of transport. In particular, the nature of additional trip reassignment (including both local and strategic traffic) to the north and west of Chichester, would impact on reliability of public transport services (particularly Route 700). Moving traffic from the SRN to the LHN as the SRN becomes more saturated, creates a level of congestion on the LHN that exponentially increases as the level of planned housing growth rises above 535 dpa. For active travel modes, this leads to a more dangerous and polluted environment for walking and cycling, which in turn will likely make these modes less attractive and convenient and lead to a suppression in modal shift. Other forms of sustainable transport, such as busses become ensnared in the same delays as private motor vehicles, which leads to less reliability in service and lower uptake. Only trains are relatively unaffected by the increases in congestion on the LHN, but given the dispersed nature of much of the built up area in the district, many existing residents rely upon other forms of transport to travel between homes, work and train stations.

- 1.21 The degradation in the quality and convenience of existing active travel and sustainable transport facilities and the suppression of the potential for future modal shift that arises as a result of 638 dpa, as opposed to 535 dpa has been a key consideration for the council. These consequential outcomes would run contrary to the provisions of Circular 1/22, which emphasises the need to promote alternative forms of transport to the private motor vehicle within local plans.

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?

- 1.22 Yes. Policy T1 provides the framework for a monitor and manage process as set out in Section 9 of the CTS (TA03.01) and carried forward into the Monitor and Manage provisional Methodology (TA03.20). It sets out a strategy that seeks to alleviate pressure on the road network, improve highway safety, encourage sustainable travel behaviours and help improve air quality through four key objectives. Development proposals are required to demonstrate support of these objectives by adhering to 7 criteria, set out in the policy.
- 1.23 Criterion 7 (further emphasised by the council's proposed modifications) provides the mechanism with which to provide a coordinated package of infrastructure measures as set out in the CTS and the Monitor and Manage Provisional Methodology. These two associated documents provide for a wide range of strategic mitigation proposals that support the strategy and objectives of Policy T1 by striking an appropriate balance between highway capacity interventions and sustainable transport schemes, but with a focus on the latter, wherever practicable, balancing the issues of capacity, safety and national policy, and seeking to secure a positive modal shift that will reduce pressure on the A27. The proposals within the Monitor and Manage Provisional Methodology will be taken forward by the constituted Transport Infrastructure Management Group and implemented upon the basis of up to date evidence at the time of delivery, in accordance with a move away from previous and outdated predict and provide methodology.

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

1.24 Yes. The Transport Background Paper details the significant efforts that the council have gone to in order to ensure it has followed the transport evidence at every turn. Whilst the full suite of junction improvements to the A27 Chichester Bypass are not achievable within this plan period, the council has (through the substantial evidence it has amassed, culminating in the CTS) demonstrated that Fishbourne and Bognor Junctions are deliverable. It has also been demonstrated that, by the end of the Plan Period, the approach proposed in Policy T1 would mitigate the impact of development on the A27 Chichester Bypass to a degree whereby the impact would not be considered 'severe'. However, through the Monitor and Manage process, the council will explore alternative mitigation solutions, including variations on the A27 mitigation measures set out in the adopted 2014-2029 Local Plan (CD01), or other less significant direct improvements to the SRN alongside sustainable transport and active travel measures that would lead to a modal shift away from the private motor vehicle. It may be possible that, through the provision of up to date evidence derived through monitoring and further modelling, alternative sustainable transport and active travel measures are demonstrated to have insufficient effectiveness in the mitigation of the impact of development arising from the Local Plan. In light of such evidence the TIMG may decide to focus on delivery of Bognor and Fishbourne A27 junction improvements, which have been demonstrated to provide effective mitigation, as set out within the CTS.

1.25 It is therefore the case that the evidence base underpinning the Local Plan has demonstrated with some certainty that at least one viable and effective mitigation package can be taken forward, which allows the council to conclude that the Local Plan is sound.

Q.27 A number of potential transport mitigation schemes are described in the evidence base. What is the evidence that these schemes are feasible and could be delivered in the plan period?

1.26 The potential A27 junction improvement schemes have been the subject of preliminary design work and there are no identified physical barriers to implementation. The sustainable transport and active travel schemes have been worked up to varying levels, by both West Sussex County Council (as part of the Local Transport Plan) and Chichester District Council (through the Monitor and Manage process). The feasibility and deliverability of these mitigation works, and the stage to which these have progressed is set out in the Monitor and Manage Provisional Methodology.

1.27 The TIMG and its constituent authorities will be responsible for scheduling the design, programming and implementation of any mitigation proposals. Some schemes are already well advanced in the planning and preparation stage, being part of the Local Transport Plan, whilst others are at their infancy and will require further investigation and planning by the group. However, none are of a scale that should prevent them coming forward within the plan period.

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

1.28 The Monitor and Manage Provisional Methodology sets out in detail the constitution of the TIMG and its role, including heads of terms. The role of the group is to advise on prioritisation of potential mitigation schemes and the development of those schemes through the collection of further necessary evidence to inform that process. The core membership of the group consists of representatives from Chichester District Council, Arun District Council, West Sussex and Hampshire County Councils (as LHAs) and National Highways. Cross boundary issues will be established and resolved through that forum.

1.29 The Adopted Arun Local Plan has a mechanism for collecting contributions towards A27 mitigation and that the junction improvements for which funding is being collected (Bognor and Whyke) are the subject of on-going discussions with Arun District Council both inside and outside of the TIMG. Similarly, cross boundary mitigation proposals developed through the TIMG and Monitor and Manage process identified in partnership with Hampshire County Council will be considered and potentially taken forward through the Monitor and Manager process.

Q.29 Policy T1 includes that 'Developer contributions from new development will also be sought from all new housing development that is not yet subject to planning permission, in accordance with the per dwelling contribution as set out in paragraphs 8.20 to 8.21'. Given that the approach to A27 mitigation contributions is set out in explanatory text and not the strategic policy, is the Plan clearly written and unambiguous, so it is evident how a decision maker should react to development proposals in this regard?

1.30 The policy is relatively complex and the council has sought to land on the right balance around clarity. The council's proposed modifications build upon this. Criterion 7 in the policy is clear as to what development proposals need to do achieve, that is to deliver a coordinated package of infrastructure improvements. The supporting text provides more clarity on how this may be achieved. However, if the Inspector has concerns in this regard, then the council would have no objection to redrafting the policy (including proposed

modifications) in order to bring the relevant table into the main body of the policy.

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?

1.31 The contributions toward a coordinated package of infrastructure improvements have been carefully costed to achieve a Fishbourne and Bognor first junction improvements. The average of £8,000 per dwelling has been achieved by reducing other policy costs, and as a result maximises the level of contribution that can be viably sought from development proposals. This level of contribution would secure some £43M overall, which would fund in its entirety the upper estimate of providing Fishbourne and Bognor Junction improvements. This would also delivery the A27 improvements schemes set out as part of the adopted Local Plan. The certainty of reaching this level of funding is reinforced by the revised A27 SPD which is proposed to be adopted by the Council on 1 October 2024. Should the Monitor and Manage process (through the TIMG) identify a preference for alternative sustainable transport schemes to deliver the mitigations required, in part or in full, many of these schemes would have alternative sources of funding, in part.

1.32 Given the above, there is sufficient certainty that appropriate transport mitigation measures can be delivered to ensure that any significant impacts arising from the level of development proposed on the transport network, to mitigate the impact of development within the plan, to an acceptable degree.

Q.31 Are the suggested MMs necessary for soundness?

1.33 Yes. The approach to the policy, the way in which transport impacts may be mitigated, and the method of securing contributions toward a coordinated package of measures has changed in response to the regulation 19 consultation. As a result, the councils suggested modification CM253 is required to make the Plan sound.

1.34 Modifications CM254, CM255, CM256, CM257 & CM258 are necessary for soundness because they provide further clarity and increase effectiveness.

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?

- 1.35 Following consideration of the question, it is clear that the reference to 'transport mitigation plan' is erroneous and is not relevant in this context. The council has therefore suggested an additional modification (see Council's suggested modification schedule, Version 2 (CDC 15.01), ref CAM429 and below). This modification would address the issue by deleting the erroneous reference.

Additional suggested modification CAM429:

"Provide site-specific transport mitigation measures outlined in the ~~Local Plan transport mitigation plan~~, Local Plan site allocation policies or neighbourhood plan policies."

b. What is meant by LCWIP in part 2 of the Policy?

- 1.36 LCWIP refers to the Local Cycling and Walking Infrastructure Plan (January 2021, TRA03). This is referenced in full in criterion 3 of Policy T1.

Q.33 Are the suggested MMs necessary for soundness?

- 1.37 Yes, the modifications CM259, CM260, CM261, CM262 are necessary for soundness because they provide further clarity and increase effectiveness.

Policy T3 Active Travel – Walking and Cycling Provision

Q.34 Policy T3 refers to 'including the safeguarding delivery of current and planned cycle and walking routes as identified in the Chichester City Local Cycling and Walking Infrastructure Plan, the West Sussex Transport Plan 2022-2036, the West Sussex Walking and Cycling Strategy 2016- 2026 and the Chichester Area Sustainable Transport Package (including future updates/LCWIPs)'. Given that such schemes are not contained within the development plan, is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

- 1.38 The documents referred to at criteria 1 of Policy T3 include key planned cycle and walking routes that form part of the evidence base that informs this policy within the new Local Plan. Criteria 1 clearly sets out that new development proposals will only be permitted if the delivery of the routes identified in these key documents is safeguarded providing precise and explicit direction to the decision maker of a development proposal.

Q.35 Are the suggested MMs necessary for soundness?

- 1.39 No, modification CM263 is a minor modification considered necessary for the purpose of clarity.