



**Kirdford Parish Council
Matter 4A – Transport**

ISSUE – Are the individual transport policies clear, justified and consistent with national policy and will they be effective?

Policy T3 Active Travel - Walking and Cycling Provision

Q34. 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?

KPC Response:

1. Reference to cycling and walking, and transport plans and strategies outside of the development plan is common practice and should not necessarily lead to ambiguity, although those strategies and objectives that form part of any walking, cycling and transport plan that have a spatial implication (e.g. aspirational active travel or public transport routes or nodes) or direct implications to development opportunities should be incorporated in the policies map, to ensure that these are safeguarded and their spatial implications are considered in the making of the development plan and the decision making phase. Furthermore, Policy T3 should set out a higher bar to the adopted plans mentioned in the text of the policy and add its own active travel and transport routes to the Local Plan above these other plans, to ensure that the development expected to come forward as part of the implementation of the Local Plan comes accompanied with the necessary infrastructure.
2. Policy T3 is ineffective in securing that communities will have access to active travel infrastructure, and particularly those in the North of the Plan Area (e.g. Kirdford), where the Sustainability Appraisal admits that *“there is undoubtedly limited potential to travel by walking / cycling or public transport in comparison to the southern plan area”*. In this scenario, where the Sustainability Appraisal admits the limited potential for active travel and public transport on the North of the Plan Area, how is that the Local Plan does not specify in its policy text and maps

additional active transport measures, especially where the Local Plan expects new development, which could contribute towards this infrastructure.

3. To summarise, Policy T3 is not effective in delivering planned/unplanned active travel routes given that these: a) are not included in the Local Plan; b) they are not directly linked to any area/allocation/Parish/dwellings number; and c) the policy does not include new routes that respond to the additional housing need and associated transport needs (not contemplated in the transport, cycling and walking plans mentioned in the text of the policy: i.e. 50 new dwellings in Kirdford). The lack of a direct policy connection between number of dwellings/allocations and new/improved active travel infrastructure, would impede contributions towards the implementation of active travel measures in the area and therefore, a missed opportunity to deliver active travel routes through development, and to comply with objectives 1, 5 and 7 of the Local Plan.

Q.35 Are the suggested MMs necessary for soundness?

KPC Response:

4. The proposed MMs only relate to the objectives of the Local Plan, and they do not materially change policies or the policies map, therefore MMs would have very limited effect, if any.
5. Objective 1's amendment refers to "*new development will be in accessible locations with local access at the core of the design, linked by high quality active travel, walking and cycle routes that also link to bus stops*", however, in the absence of sufficient policy, policies map and number of dwellings/location of development located in areas where sustainable transport can actually be achieved, objective 1 would not be effective. In the case of Kirdford, there is limited potential to travel by walking / cycling or public transport, therefore objective 1 falls short, in the absence of effective policies that develop from this objective.
6. Objective 7 should be worded so it embeds active travel in the Local Plan not only considering it as an element of infrastructure, but as an approach to the spatial strategy, allocations for development, design and public realm in general. This would facilitate that objectives are later better translated into policies and ultimately, policies into effective decisions.