

Examination of the Chichester Local Plan 2021-2039
Response to Matter 4A: Transport

Matter 4: The presumption in favour of sustainable development

Issue: Would the adverse impacts of the Plan providing for objectively assessed needs for housing and other uses significantly and demonstrably outweigh the benefits of doing so, when assessed against the policies in the National Planning Policy Framework taken as a whole? In order to consider this issue, we pose questions on specific topics, namely transport, housing, and employment and economy.

- The strictures placed on CDC by the South Downs National Park occupying a significant belt in the centre of the district and the economic and social centre of the district being at the lower end of the district are considerable however this does not make development in the north east area sustainable; the inherent unsustainability of both strategic and, especially, non-strategic development is inherent.

Matter 4A: Transport

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?

No comments.

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 6 severe with a level of housing development in the southern plan area with a level of housing provision over 535 dpa?

No comments.

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?

No comments.

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'.

- Wisborough Green Parish Council (WGPC) is concerned that little apparent consideration has been given to the impact of increased development and car use in the north east area. The proposed housing allocation will not only increase car use on rural roads, but the northeast area parishes are also impacted by substantial housing allocations in Billingshurst (Horsham District) and in neighbouring Surrey. Horsham District and Waverley Borough raised this concern in their response to CDC, although the full response was not provided. Reference: [5.2.31 page 17 of the Sustainability Appraisal](#).
- Policy T1 does not apply to housing in Wisborough Green (WG). Sustainable travel behaviours are not available in the north east area, car use is essential. The nearest train station (Billingshurst) is >3 miles away, with no footpath, cycle path or bus service. (140 words)

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?

- See above. No evidence has been offered of any transport measures being developed, integrated or otherwise for the north east area.

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

- There is no certainty at all with regard to the north east area.

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?

- It should be noted that there are no ‘potential transport mitigation schemes’ for the north east area parishes; sustainable transport behaviours cannot be achieved.

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

- WG is a dormitory with many residents who travel and work in London, Horsham District and Surrey; sustainable travel isn’t viable, even with cross boundary schemes.

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?

- Given that the failure to upgrade/mitigate the A27 is the primary driver of unsustainable development in the north east plan area it is highly surprising that this critical infrastructure is relegated to an explanatory note. Further should CDC consider the use of Grampian conditions, granting consents that cannot be

implemented until the A27 upgrade/mitigation has occurred, the route to funding should carry a detailed explanation.

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?

- It should be noted that this is, as highlighted by WGPC elsewhere in CDC's proposals, wholly Chichester-centric and lends credence to WGPC's assertion that the north east area is a dumping ground for additional development that cannot, currently, be located where required: in the south of the district.
There are no potential transport mitigation schemes for the north east area parishes. Sustainable transport behaviour cannot be achieved.

Q.31 Are the suggested MMs necessary for soundness?

- No comments.