

Examination of Chichester Local Plan

Vail Williams LLP Hearing Statement obo Deerhyde Ltd

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.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?

Policy T1

Policy T1 (transport infrastructure) is specifically aimed at ensuring that integrated transport measures will be developed to mitigate the impact of planned development on the highway network, improve highway safety and air quality, promote more sustainable travel patterns and encourage increased use of sustainable motor travel, such as public transport, cycling and walking.

The Council will work with National Highways, WSCC, other transport and service providers and developers to provide a better integrated transport network and improve accessibility to key services and facilities. The Statement of Common Ground does not appear to comment on this agreement to deliver a better integrated transport network, particularly with regards the necessary upgrades to the A27.

The policy lists seven ways in which the key objectives of reducing the need to travel by car, enabling access to sustainable means of travel, including public transport, walking and cycling; managing travel demands; and mitigating the impacts of travelling by car can be achieved.

Whilst it is not intended to go through all of these in this statement it is noted that all parties are expected to support the four objectives by working with relevant providers to improve accessibility to key services and facilities which would be relevant to Selsey (see below).

The policy is also aimed at planning to achieve a timely delivery of transport infrastructure on the A27 and elsewhere on the network which is needed to support new housing, employment and other development identified in this plan. The phasing of delivery of new development to align with provision of new transport infrastructure such as improvements to the A27 and elsewhere on the highway network, will be key to managing impacts on the highway. This has since proven to be a significant stumbling block to the delivery of strategic housing sites promoted by the draft plan.

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This is yet another impediment to the delivery of a strategic allocations and larger scale development which would, by their very nature, generate a higher highway impact on the transport network than carefully planned smaller developments which could satisfy a much more localised need and cause less impact on the strategic road network. The tariff proposals outlined at paragraph 8.20 only covers part of West of Chichester and Tangmere SDLs and not the other strategic sites outlined at Policy H2.

Critically it is also understood that Highways England has withdrawn funding for the improvements to the A27 improvements. On this basis it is unclear how further funding would be secured at this time unless it is through developer contributions which would be piecemeal by its very nature and therefore the full works would not be able to be undertaken until a number of developments had been granted planning consent and commenced, meaning that the monies had been received by the County Council.

The lack of soundness to the approach of significant reliance on strategic sites, due to the current lack of capacity of the A27, is evident in the text that accompanies the policy which states that opportunities to secure funding to implement this package of improvements will be maximised by working proactively with Government agencies, other public sector organisations and private investors. Developer contributions from new development will also be sought. It is clear that smaller scale developments which would have a significantly lesser impact on the highway network could deliver housing quicker and with fewer constraints to implementation. It is for these reasons that smaller sites should be allocated, particularly in the Manhood Peninsula, for development.

On the basis of the doubt of the delivery of improvements to the strategic road network it is considered that Policy T1 is **unjustified** and **not effective**. It is therefore **unsound** and therefore contrary to Paragraph 16 a), b) and d).

Policy T2

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

The content of Policy T2 (transport development) is *largely* supported and considered sound save for the fact that it does not seem to cover the improvement of local transport routes, particularly those that would assist in improving the circulation of traffic around smaller settlements. The policy should be amended to specifically relate to local transport improvements which are locally important to aid traffic circulation and reduce congestion.

The Plan makes very little provision for local transport improvements. Deerhyde has proposed significant highway improvements to Selsey, to reduce well known traffic issues.

Our clients wish to promote a potential highway improvement scheme for Selsey which has been developed about given their extensive historic knowledge of the town and experience of significant congestion along Selsey High Street as a result of an over-reliance of this route by traffic using the caravan parks. It would be a common-sense alternative route (to using High Street) which will

alleviate congestion along Selsey High Street/School Lane / Paddock Lane / Warners Lane, particularly during the summer months.

The local plan focusses its attention on the need to improve the strategic highway network (and necessarily so) but this proposal would provide a significant benefit at a local level in Selsey. As per the attached plan, our clients propose to widen Golf Links Lane from its junction with the B2145 Chichester Road to its junction with Paddock Lane, then widen Paddock Lane and make it up to adoptable standard to enable delivery of holiday traffic to the point where it meets the north eastern corner of White Horse Caravan Park, from which point the road has been made up to carry holiday traffic. At the moment, the northern section of Paddock Lane is just a rough track which is not suitable for ordinary road traffic. It is envisaged that, in conjunction with the owner of the largest caravan parks, Warner's Lane will also be improved. It is currently a tarmac road in poor condition with no footways and one section is too narrow to allow two vehicles to pass each other. This is not satisfactory for the major access route to the largest caravan parks.

The content of Policy T2 (transport development) is largely supported and considered sound save for the important fact that it does not seem to cover the improvement of local transport routes, which is likely to be important for facilitating development, particularly those that would assist in improving the circulation of traffic around smaller settlements. The policy should be amended or extended to specifically relate to local transport improvements which are locally important to aid traffic circulation and reduce congestion.

It is unclear whether the Transport Mitigation Plan is an existing or future document. Either way, once the housing strategy is confirmed, the Council should consult on the Transport Mitigation Plan so that developers and land promoters can influence it to ensure that it is suitable to accommodate their developments. This is important for both allocated and windfall sites and should extend beneath the strategic road network to local roads where appropriate.

With the questions above and those raised by the Inspector, it is clear that the policies are, in places, ambiguous. Proposed transport schemes are unconfirmed and perhaps undeliverable and therefore more work is required before agreement can be reached to provide sufficient infrastructure for new development.

The aim to ensure that new development is well located to minimise the need to travel as set out in policies T1 and T2 is supported and the comments above reflect this.

Policy T1 is therefore not **justified** or **effective**. In summary, it is considered that the proposed transport policies are not '**Consistent with national policy**' (current or emerging) as the proposed provision does not enable the delivery of sustainable development. It is considered that the proposed plan is contrary to the NPPF paragraph 16a, 16b, 16c, 16d and paragraph 20b. Policy T2's lack of clarity is contrary to paragraph 16b of the NPPF.