**Chichester Local Plan Reg 19 Consultation – March 2023**

**West Sussex County Council: additional officer comments**

The following comments from education, minerals and waste, Adults Services and Health, highways & transport and public rights of way, do not affect the soundness of the Plan. However, Chichester District Council should take these into account and, where possible, make minor amendments to the Local Plan and/or evidence base studies before submission of the Local Plan for examination. Officers are happy to meet and discuss any of these comments, and proposed minor amendments to address these comments, ahead of submission:

1. **Education**

*Land West of Chichester*

Previous comments have been made requesting that the policy refers to ‘Phase 2 should include expansion of the primary school for the further 1FE of teaching accommodation with nursery and SEND provision’. While it is recognised that reference is made to this in the IDP this is a supporting document to the Local Plan and should not be solely relied on. It is requested that paragraph 10.19 is amended to read: ‘a local centre with retail, community and employment uses (minimum of approximately 2500 sqm E(g)(i) Use Class), two form entry (2FE) primary school and one form entry (1FE) teaching accommodation **with nursery and SEND**, informal and formal open space (including a country park), allotments,…’

This should also be included in the 3rd bullet point of Policy A6 or the wording of the policy should be drafted to reflect more recent policy requirements i.e. *Provide for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan.*

There are some inconsistencies with the wording of the strategic policies, not every policy includes the criterion ‘*Provide for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan.’* While this may be due to some policies being carried through from the adopted local plan it is inconsistent.

*Policy A8 Land East of Chichester*

As an education authority WSCC do not request 1FE schools in line with government guidance. As per our earlier comments and discussions we requested a 2 FE primary school for the site.

3rd bullet point of Policy A8 should be amended to read: ‘A neighbourhood centre incorporating local shops, a community centre, flexible space for employment/ small-scale leisure uses and a ~~one-form (expandable to two-form)~~ **two form** entry primary school with provision for early years/ childcare and special educational needs and disability…’

1. **Minerals and Waste**

The references to safeguarding minerals is inconsistent and it is suggested that the wording in the email sent to CDC (attached) in relation to Policy AL3 should be used in the policies for the other sites for consistency.  Reference to safeguarding minerals and waste infrastructure should also be included in some other policies as previously indicated:

* Policy A2 – needs to include reference to safeguarding minerals and waste infrastructure.
* Policy A7 – needs to include reference to safeguarding waste infrastructure.
* Policy A15 (Loxwood) – needs to include reference to minerals safeguarding as within the clay MSA.
* Policy A21 – needs to include reference to minerals safeguarding.

Also, the reference to the safeguarding guidance needs to be checked to ensure that it is worded correctly as ‘Minerals **and Waste** **Safeguarding** Guidance’.



1. **Older Person Housing**

It is noted that the plan refers to older person housing as specialist housing. WSCC strategy supports the provision of ‘extra care housing’ while this might be similar development it enables younger people to access the accommodation for whatever medical reason i.e. MS, strokes rather than limiting it to a certain age group. Officers are happy to meet and discuss this further.

1. **Highways and Transport**

*Public Transport Priority Infrastructure*

The Public Transport section of the main transport study report starting at paragraph 6.2.7 requires revisiting. There is reference to “an expansion of the bus priority lane system within Chichester City Centre” which does not match the existing bus provision in the City which does not provide bus priority lanes on street. It does have restrictions on motor traffic in the adjoining parts of South Street and West Street which provide for bus and cycle only access in both directions of travel plus access for essential goods vehicle loading in the westbound direction only. In addition, the suggestion in the following paragraph for “a time-based system where certain routes are restricted to public transport only during specific times” is not evidenced or developed and as such considered unlikely to be practical and enforceable at most locations used by bus routes in the City. More developed proposals for additional bus priority, improvements to bus passenger facilities or testing of specific locations for bus-only access would be welcomed as part of developing a costed sustainable transport mitigation package.

*Park and Ride*

The discussion of possible park and ride facilities for the City at paragraphs 6.2.9 to 6.2.16 of the main transport study should also acknowledge. An important part of making park and ride well used by motorists is increasing the price of city centre parking to provide a financial incentive to take up significantly cheaper park and ride charges for parking and travel. However, if park and ride sites are not provided accessible to all major approach routes to the city, such a charging strategy would not be seen to be equitable, whereas only a single site is proposed in the District Council’s emerging parking strategy and the report acknowledges at 6.2.11 that “locations for potential park and ride sites are also deemed to be limited”. The bullet at 6.2.15 “Cost of schemes compared to benefit are likely to be initially lower than highway schemes” may have been incorrectly worded given that this is listed as an issue rather than a benefit. The text may have been intended to say that the ratio of benefit to cost for park and ride schemes may be lower than for conventional highway schemes?

*A286 New Park Road / A286 St Pancras Road (Junction 7)*

This junction scheme includes pedestrian crossing facilities which are welcomed and also includes a length of advisory cycle lane starting in the middle of the junction for cyclists remaining on St Pancras. However, the approach to the junction on St Pancras from Eastgate Square remains intimidating to cyclists, so further measures would need to be added to make the layout cycle-friendly or the cycle facility is likely to be of limited benefit. This could include decreasing traffic speeds. Until this is done the conclusion at 8.4.4 of the main transport study; “The mitigation scheme includes improvements for pedestrians and cyclists which will lead to increased use of active travel modes and reduce the need for physical mitigation here” is only supported for pedestrians, not for cyclists.

*A259 Via Ravenna / A259 Cathedral Way Roundabout (Junction 8)*

It is stated at 7.3.8 of the main transport study that “the mitigation may be required to avoid queuing back towards the A27, as well as for capacity issues”. In light of this potential safety issue for the previous junction on Cathedral Way and for the A27 Fishbourne junction, the proposal at 7.3.6 that the scheme delivery should be tied to the monitor and manage regime to see if and when it is required is accepted. This is different to the approach for other junctions in the City because of the potential safety issue. This monitoring approach would be likely to follow after the A259 Cathedral Way / Fishbourne Road East / Terminus Road (as diverted) (Junction 10) improvement, which is to be brought forward as an integral part of the A27 Fishbourne roundabout mitigation scheme, but may allow for increased eastbound flows on Cathedral Way.

*A286 Northgate Gyratory*

An additional mitigation scheme is proposed at paragraph 7.3.134 of the main transport study for the A286 Northgate Gyratory along its southern arm from Oaklands Way to Orchard Street. The proposal to add traffic signals is welcomed in concept as it can help to control traffic speeds making the junction more friendly for cyclists and pedestrians. However, the layout shown at figure 7-8 does not maximise the opportunity to improve convenience and safety for pedestrians by providing a priority link to reach the central island, which contains employment space and the fire station, nor to assist crossing the exit towards Orchard Street. The scheme would benefit from further development to prioritise active travel movements and should also be fitted with transponders for bus priority.

*Fishbourne Road West / Appledram Lane South (Junction 11)*

At paragraphs 7.4.1 to 7.4.2 of the main transport study, the junction of Fishbourne Road West / Appledram Lane South (Junction 11) is considered. The proposal to mitigate impacts at this junction through delivery of the Stockbridge Link Road scheme is not considered deliverable, so the approach at this location requires re-thinking. The County Council would not support measures to increase capacity for through traffic on Appledram Lane South, the approach should be to reduce severance and improve safety and comfort for active travel on Appledram Lane by reducing vehicle speeds and as far as possible volume. This should consider the needs of pedestrians and cyclists both for local access and for users of the Salterns Way leisure cycling route.

*TEMPro Background Traffic Growth Comparisons*

At section 10.2 of the main transport study a comparison is made of the TEMPro 7.2 growth rates used in the study for external traffic with new TEMPro 8.0 growth rates since released by the Department for Transport, which notes that the TEMPro 8.0 rates are significantly lower, if these rates were used then the level of transport impacts could be lower. Unfortunately, a number of highways authorities in the Transport for the South East (TfSE) area including the County Council and Hampshire County Council have concerns that the planning assumptions used in TEMPro v8 core growth scenario underestimate the numbers of additional households forecasted compared to targets in adopted Local Plans for delivering new dwellings. TfSE are currently raising these collective concerns with DfT with a view to obtaining an early update to TEMPro 8 planning assumptions. Although for the purposes of this study TEMPro is not applied to trips produced in Chichester District, from the County Council’s analysis TEMPRo v8 core underestimates the increase in households per year in Arun District by over 50% and in Horsham District by 30% when compared with adopted development plans. On this basis it may be useful to instead compare TEMPro 7.2 with TEMPro 8.0 high growth scenario.

*North of District Spatial Scenarios Testing*

For the Northern Spatial Scenarios Test provided as an appendix to the main transport study, this had not been updated for the final preferred spatial strategy or in light of the County Council’s previous comments on the March 2022 issue to the District Council. The spatial strategy now is similar but not identical to the Scenario 4: Significant Growth 1 option in the reported tests, totalling 370 dwellings across the four northern parishes, compared to 410 in the test. In both cases the largest allocation is at Loxwood; 220 dwellings were proposed in the Scenario 4 as compared to 200 in this test. Some other tests proposed higher numbers.

The testing in the northern part of the district had used the same trip generation rates per dwelling as in the South of the District, but the County Council considers that in practice private motor vehicle trip generation per dwelling is likely to be higher due to the rural nature of the area, including a lack of local facilities and shops within walking distance of development, a very low level of public transport services and lack of surfaced cycle routes.

The level of development proposed is not at the level capable of delivering transformative transport improvements to match the trip making patterns around Chichester and the A259 corridor to Bosham and Southbourne. This may be offset in part by the lower total amount of development compared to the tested scenario 4. Nonetheless, it would be helpful to adjust the scenario for the spatial strategy now proposed and to provide information on additional traffic movements per peak hour from these parishes using the A272 at junctions at Wisborough Green and reaching the A272/A29 junction at Billingshurst and the A272/A283 junction at the north of Petworth.

*Neutral Month and Summer Month Comparison Technical Note*

The Neutral Month and Summer Month Comparison Technical Note in the main transport study treats July as a neutral month rather than a summer month. Paragraph 1.3.1 states “The flows were analysed by looking at traffic data for August 2019 this being considered to represent summer traffic. This was compared against traffic data from the neutral months of June, July, September and October also from 2019.” The County Council does not accept this methodology as school summer holidays start part way through July and education traffic is also affected by the formal exam period, whilst there is typically a high level of seasonal leisure traffic including summer outdoor events in this month. It is acceptable to use August alone as the summer comparator month. However, July traffic should be removed from the neutral months analysis and should be substituted with May traffic data from the same year of 2019, provided that sufficient data is available from that month.

1. **Public Rights of Way (PRoW)**

It is a positive step to see PRoW acknowledged as valued by communities and as part of the area’s green infrastructure. Whilst Policy P14 (Green Infrastructure) states that development proposals should not be detrimental to the network of public rights of way and bridleways (please note bridleways are Public Rights of Way), a more proactively positive approach that seeks enhancements to the network as mitigation, would be welcomed. The improvement, upgrading of existing PRoW and creation of new PRoW where possible, to allow for a greater number of users to access the network would be beneficial. This is somewhat addressed in Policy T1 which refers only to routes identified in the Local Transport Plan, Local Cycling and Walking Infrastructure Plan (LCWIP) and the Infrastructure Delivery Plan. Opportunities to these, should not be limited if they arise elsewhere.

It is surprising to see there is no mention of PRoW within Chapter 8 under Active Travel – Walking and Cycling. The PRoW network provides extensive walking and cycling opportunities, often off-road, and important links between places and non-PRoW routes.