**Planning Policy Team**

Chichester District Council

East Pallant House

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PO19 1TY

17th March 2023

By e-mail: **planningpolicy@chichester.gov.uk**

Dear Sirs,

**Chichester District Local Plan 2039 – Pre-Submission (Regulation 19) Consultation**

1. **Introductory Comments**

Stagecoach South is the main commercial public transport operator across Chichester District. The Company has headquarters in the city, which is also the principal public transport hub for the District and it’s rather wider travel-to-work area encompassing much of the Arun District. Our services extend throughout and beyond the District boundaries, as far as Littlehampton, Midhurst, Havant and Portsmouth. The vast majority of services operate on a commercial basis – that is to say, sustained by passenger use and fare revenue, including concessionary reimbursement.

While the role of the railway is significant in much of the District, especially the east-west Coastway line, yet bus services account for more boardings locally than the railway, with Chichester depot services carrying over 3.5m passengers each year.

Unlike bus services in other parts of the country, the local network has recovered strongly after the pandemic with fare-paying passenger numbers over 95% of 2019 levels, albeit with concession patronage somewhat lower. This has helped secure not only a stable but growing bus network even during this period of rapidly rising operational costs, avoiding the need for the service contractions seen in other regions. Indeed, during the second quarter of 2023 Stagecoach will invest £5.5m in brand-new vehicles for high-profile coastal Service 700 – one of the largest vehicle investments for Stagecoach Group this year.

Our services are therefore critical to existing and future local connectivity. As the Plan acknowledges, mobility demands do not respect planning authority boundaries. The role of our services is especially high to settlements in the broad A27 corridor, within the District and beyond. This includes major settlements in Arun District such as Pagham and suburban Bognor Regis, where bus is the only mass public transport option. As the Council is well aware, there is an even higher level and rate of committed development envisaged in these locations in the Arun District Local Plan than in Chichester.

It is already evident to the planning authorities, West Sussex County Council and National Highways, as proprietor of the A27 Trunk Road, that accommodating growing mobility demands across Chichester District and especially around Chichester itself, is becoming increasingly challenging to the point of being seriously problematic.

Stagecoach has a particular interest in this Plan arising from:

* The already clear and highly deleterious impact of congestion affecting our operations and their reliability and attractiveness to the public. The effects of these on the approaches to Chichester, and around the A27 bypass are especially severe. If public transport is to retain its existing role – even before the needs of any meaningful growth both in Chichester and neighbouring authorities is considered, are considered – the Council and the Highways Authority need to arrive at clearly-defined measures to protect buses from chronic delay and the damaging impacts arising from the lack of bus network resilience and customer journey times.
* In connection with the above, the need to properly consider the predictable impacts of committed development in Arun District on the transport network and in particular the operation of bus services. The duty to cooperate on cross-border strategic matters is not limited merely to accommodating housing requirements.
* The fact that our entire business premises and operational base at Chichester is the subject of allocation for redevelopment within the Plan period. Specifically, this includes our Head Office, the Bus Station as the operational hub of the network and the key interchange for passenger journeys – including those that involve the railway – and the bus depot required to support the entire operation. Notwithstanding many years of discussions, there is as yet no agreed deliverable strategy to replace these facilities either in the Draft Plan or elsewhere.

Stagecoach broadly supports the vision and priorities of the draft plan. In most respects, Stagecoach supports strongly the spatial strategy and the identified site allocations that flow from it, and the evidence.

However, it has serious concerns about the soundness of the plan as proposed for submission, for important regards outlined in this response. These are made in the light of requirements set by the National Planning Policy Framework (NPPF), in particular at paragraphs 15 and 16; 35, 105-109 inclusive and having due regard to the need for allocations to satisfy 110-112 inclusive in due course as development permission is sought; and paragraph 174.

Paragraph 16c) of NPPF makes plain that strategic plans and policies should *“be shaped by* ***early, proportionate and effective engagement*** *between plan-makers and communities, local organisations, businesses,* ***infrastructure providers and operators*** *and statutory consultees” (our emphasis)*. This makes plain that collaborative and ongoing involvement of public transport operators is both necessary, and separate and in addition to the engagement with statutory consultees. This has not taken place.

Para 1.25 of the draft plan states that “*the council has engaged constructively, actively and on an ongoing basis with other local authorities and organisations to address key strategic matters.”* Despite the requirements in NPPF and contrary to the statement made, Stagecoach has not been approached or involved in a meaningful, collaborative or ongoing way in the preparation of the Plan.

Our main concerns centre around the fact that the plan strategy is neither backed by sufficient transport evidence. Even more importantly, the plan relies on a wholly car-based transport mitigation strategy despite policy stating that this is not the case, and the track record of the existing Local Plan, based on a very similar strategy, that has failed to bring forward meaningful mitigations to date to prevent traffic conditions substantially worsening. There is no support in policy for the achievement of the Strategic Objectives in the Plan. Nor is there definition of any measures in the 2023 Transport Study to make provision for sustainable transport infrastructure or services – much less materially improve them.

Finally, to the extent that updated transport evidence has been provided in the form of the 2023 Chichester Transport Study, arising from updated traffic modelling, it does not support the contention that highways capacity constraints on and around the A27 justify not meeting the objectively-assessed development needs of the area, as the draft plan contends.

1. **Vision and Strategic Objectives**
	1. ***Issues and Opportunities***

Stagecoach **Objects** because the Plan:

* does not comply with the duty to cooperate
* is unsound as it does not conform to the National Planning Policy Framework
* is not effective
* is unsound because it is not based on relevant, proportionate and up to date evidence

Stagecoach recognises the important role of the West Sussex and Greater Brighton Strategic Planning Board which agreed a Local Strategic Statement (LSS2) in early 2016 to identify spatial planning issues across the wider area. This established strategic priorities and policies to guide longer term strategic growth in a coordinated and well considered matter. This institutional framework and the purpose of the LSS is a highly significant one and is at the heart of efforts to properly fulfil the statutory Duty to Co-operate, including with regard to strategic infrastructure issues, as NPPF requires.

Given the long period of time elapsed since the 2018 Reg 18 consultation and the already very clear constraints on strategic infrastructure capacity, it is of great concern to Stagecoach that the LSS2 has not been updated to reflect emerging issues in the intervening period. A review and update of the LSS2 has only just commenced. This includes a study of projected housing and employment needs, transport impact, infrastructure and spatial options to deliver the required development in the period after 2030. This Chichester District draft plan covers a period extending to 2039 – therefore well beyond 2030 and the nominal currency of LSS2.

However, infrastructure needs are pressing ***today***. Stagecoach is presented with severe highway operational problems on a near-daily basis. During the winter of 2022-23 we have, for example, seen key road links impacted for many weeks by acute disruption arising from flood events. Unpredictable, but seemingly more-frequent, exogenous events expose a lack of resilience in the highway network around Chichester and its travel-to-work area. However, serious, chronic, unpredictable delay has been normalised over recent years, with peak-time congestion having quickly returned after the pandemic. The existing development strategy has failed to bring forward measures having any impact on this to date, and key commitments – notably at west of Chichester Phase 2 and at Tangmere – have yet to commence to further aggravate the issue.

We have no confidence in the transport mitigations proposed in the existing Local Plan and LSS2 being sufficiently effective, even if deliverable at all. Indeed, the existing adopted Local Plan does little more than make vague speculations about the sustainable transport measures that might be achievable. The draft local plan review is no different. It has no ambitions at all for sustainable modes and thus, makes no meaningful provision to meet them.

This is especially relevant in light of the fact that the approach to resolving issues on the A27 around Chichester that were anticipated in 2015-16 have fallen away. LSS2 is thus currently inadequate to act as a part of an up-to-date, proportionate, and relevant evidence base for the Plan.

An update of a traffic model lies at the heart of a 2023 Chichester Transport Study. This talks no account of the existing role of non-car modes, nor can it do so. It is unable to properly evaluate the nature of problems or solutions that involve public transport, or for that matter, other sustainable modes.

**Therefore, we consider that the combination of committed and additional development needs that must be accommodated over the whole plan period between 2022 and 2039, in both the Chichester and Arun Districts, require a “first principles” review. This must be based on a refreshed transport evidence baseline of no earlier than 2022 – given that the effects of COVID distort 2020-22 – and the transport infrastructure and service requirements to sustainably support those needs.**

Key issues – including substantial changes with regards to transport issues and challenges, as well as potential solutions – thus do not form part of the evidence base that steers this plan. Given long term changes in travel patterns, and mode share that took place during COVID, as well as a local and national policy context that seeks to radically reduce and then eliminate transport-related carbon emissions, this is especially problematic.

The specific problems of congestion and network resilience that are evident on the A27 and the approaches to Chichester remain a set of especially difficult problems that disproportionately affect the efficiency, reliability and attractiveness of the bus network, that evidently demand larger-scale strategic responses involving multiple stakeholders, including bus operators.

Where the effects of development on the national Strategic Roads Network (SRN) are concerned, the approach of National Highways to addressing and responding to the mobility needs of development has now substantially changed following the promulgation of the DfT Written Ministerial Statement LTN01/22. This makes it clear that adding highways capacity is no longer the first or only strategy that should be pursued, but one subordinate this to maximising the potential of non-car modes and sustainable travel.

*“Effective and ongoing collaboration”* on transport matters has not led to solutions being agreed and published for public scrutiny as part of the plan evidence base. Whatever the approach to modelling and “highways improvements” that may be agreed or pending agreement with the County Highways Authority and National Highways, Stagecoach is neither participant or sighted. This is despite the clear requirements set out in NPPF Para 106 b) that *“Planning* ***policies should … be prepared with the active involvement of*** *local highways authorities, other* ***transport infrastructure providers and operators*** *and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned.”* (our emphasis).

We therefore consider that the Council has failed to comply with the requirements of NPPF paragraph 25 and 26 that *“relevant bodies”* are involved in plan-making, especially with regard to addressing the needs for infrastructure. Public transport services and the infrastructure that supports its operation and use clearly fall within matters relevant to plan-making. This is explicit in NPPF Chapter 9 and indeed within the plan itself – for example reference to public transport and sustainable modes in the Vision for the plan.

It should be stressed that the Regulation 18 “Preferred Approach” consultation took place in December 2018 – over 4 years ago and prior to COVID, based on LSS2. The inordinate length of time that has elapsed between the Regulation 18 and Regulation 19 stages greatly challenges the LSS2 and other parts of the evidence base, especially as the pause straddles the COVID epidemic. That would include the transport modelling baseline, and key assumptions in any traffic modelling that took place prior to mid-2022, which is a point at which a reasonable “new normal” post-COVID might be considered to have become established. In that period, Arun District has also adopted its own Local Plan development strategy that accommodates an unprecedented quantum of development immediately east and south-east of the District Boundary – creating additional substantial transport impacts directly affecting the A27 and multiple major approaches to Chichester crossing it.

**The established mechanism to fulfil the Duty to Co-operate has thus not operated effectively.**

**The Plan is not founded on a relevant, proportionate and up-to date evidence base and is thus inadequately justified.**

* 1. ***Spatial Portrait***

The spatial portrait is generally succinct and accurate. However, it makes no mention of road-based public transport, the role of the City as a public transport hub, or the range of bus services that provide local connectivity (Section 2.4 and 2.5). The complete concentration of post-16 education in the City itself *as just one example* of the peculiarities of transport demands in the area, is not highlighted, though this has a profound influence on peak time travel demands affecting the most congested parts of the highway network. Among other things, the role of bus services in supporting the educational system of the plan area is very great indeed.

The **potential role of bus in addressing the already-severe transport problems of the plan area and beyond seems entirely overlooked**. The spatial portrait is thus clearly inadequate and incomplete.

* 1. ***Strategic Objectives***

Stagecoach **Objects** because the Plan:

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

Chapter 9 of NPPF and paragraphs 104 and 105 in particular require that plans should:

*“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

*a) the potential impacts of development on transport networks can be addressed;*

*b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*

*c) opportunities to promote walking, cycling and public transport use are identified and pursued;*

*d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains;…*

*…****The planning system should actively manage patterns of growth in support of these objectives****. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health…”*

The Strategic Objectives do not conform with NPPF in these foundational requirements adequately, to transparently steer the plan strategy. They should therefore be amended to read:

*“Plan to provide local infrastructure to support new development and ~~seek opportunities~~ to address existing* ***identifiable*** *infrastructure ~~problems~~* ***deficits****, ~~such as~~* ***in particular*** *those relating to the A27* ***and its junctions*** *and wastewater treatment.”*

Paragraph 2.36 states, in the context of the Climate Emergency and the National Trajectory to “Net Zero” that *“The council will enable the delivery of infrastructure, jobs, accessible local services and housing for future generations while protecting, conserving and enhancing the historic and natural environment.”*

Naturally, we support this intent.

However, there is no acknowledgement of the role current patterns of transport use contribute to carbon emissions, nor that substantial mode shift is necessary to address sustainably an acute lack of capacity on the local network and the SRN, especially around Chichester. This is especially concerning as the basic conceptual link is not made between the fact that the greatest such problems lie on the A27 corridor and around Chichester, while these are also at the same time present many of the most sustainable locations for development, and where the opportunities to secure much greater use of sustainable modes also exists.

Strategic Objective 7 “Strategic Infrastructure” includes the following statement:

*“To work with infrastructure providers to ensure the timely delivery of key infrastructure to support delivery of new development. New development will be supported by sufficient provision of infrastructure to enable the sustainable delivery of the development strategy for the plan area. Key infrastructure to support the Local Plan will include improvements to transport, …*

*A sustainable and integrated transport system will be achieved through improvements to walking and cycling networks and links to accessible public transport. Highway improvements will be delivered to mitigate congestion, including measures to mitigate potential impacts on the A27 through a monitor and manage process.”*

**The latest transport evidence in the Chichester Transport Study makes no pretence to define much less to deliver a *“sustainable or integrated”* transport system.** It is wholly devoted to sustaining current levels of car use across the District, to and through Chichester area.

It is no more than the lightest of touches to the approach taken to supporting the adopted Local Plan, an approach that is already almost 10 years beyond the date of its gestation but has yet to deliver any significant capacity improvement schemes, much less any measures that sustain even current levels of public transport journey times and reliability in the face of increasing congestion – much less any betterment.

Of the six key junctions on the A27 around Chichester, recognised to require significant mitigation given they are saturated for extended periods, five accommodate regular bus services - indeed frequent ones at least every 20 minutes in several cases. The sixth at Oving Road, relates directly to a key corridor where bus services are needed to support strategic growth currently being delivered at Shopwhyke, as well as substantial further growth West of Tangmere (proposed allocation A14) and “East of Chichester” (A8), south of Shopwhyke Road.

As stated at p12 of the Study Summary***“The modelling shows that all the junctions on the A27 Chichester bypass are well over capacity, even before adding in the Local Plan development*** *and with the exception of Portfield Roundabout are actually shown to be over capacity in the base model year (2014) in one or both peaks”.* This much has indeed been evident for years from delay and periodic even more severe disruption arising to Stagecoach services from the lack of network resilience.

The reassignment of through and local traffic through Chichester to avoid the A27 bypass is an especially serious issue for bus services that penetrate the city. This is leading to consequential saturation of a range of junctions used by buses. Rising delay and unpredictable running times are at the root of our decision to sever the long-established Portsmouth to Littlehampton service in 2023, which will in future no longer run across Chichester, but terminate to provide additional dwell time to mitigate the impacts of congestion.

While this congestion affects all road users including businesses and freight traffic, the effect on scheduled bus services is greatly higher, as such services cannot reassign route to ‘beat the queue’. Traffic congestion often encourages greater car use for this reason, in tandem that people are happier to sit for extended periods in their own vehicle on a seamless door-to-door journey than wait at the roadside for a delayed bus making slower progress in lengthy queues.

As the Study admits at para. 1.3.2 *“Although, there have been works at the Portfield Roundabout in this timeline, no other mitigation schemes have been completed along the A27 corridor, as such the mitigation schemes defined in this report will also be required to consider the development from this plan period.”*

**In other words, in the 8 years since the current Local Plan was adopted in 2015, there has been minimal progress is delivering the traffic mitigations. There is no clarity at all when any such mitigations will be brought forward. It is hardly surprising then, that traffic conditions have deteriorated. The “predict and provide” transport strategy supporting the current plan has failed.**

**Despite this, the Draft Local Plan Review proposed to “double down” on exactly this strategy.** It represents, like the rest of the evidence base, a “rolling forward” of the current car-based strategy by 9 years, with the lightest of touches to attempt to accommodate car trip demands from a relatively modest additional development quantum.

Nevertheless, the Study requires a global 5% reduction in trip demands arising from unspecified “*credible”* (paragraph 4.1.2) sustainable transport and travel planning measures. It is unclear why use of non-car modes will see disproportionate growth when no measures are in place to make them more attractive. This 5% increase in use translates to a doubling in the modal share of bus services. There is no evidence nationally, anywhere, that simple ignorance of alternatives to the car is the main barrier to uptake.

The outputs of the 2023 Chichester Area Traffic (SATURN) model are set out at Table 5.1 (am peak) and 5.2 (pm peak) without mitigation. These betray just how seriously compromised the whole network around Chichester is, and will be in future, even with implementation of a mitigation partake to increase traffic capacity that is understood to cost between £92m and £164m – and which **the Study and the draft plan acknowledge cannot be delivered through developer funding sources alone. Unspecified external funding presumably from HM Treasury through DfT is required**.

Even if this provided and the schemes are delivered, Tables 8.1 and 8.2 indicate these will provide minimal relief. The final columns suggest key junctions, including Portfield, Fishbourne Road and Cathedral Way East will remain at well over 100% ratio of flow to capacity (90% is considered the point at which saturation is approached, with the onset of increasing delay above that figure). RFCs in tables 8.1 and 8.2 are some of the highest we have ever seen in a local transport evidence base for a post-mitigation scenario. While the serious potential risk of reassignment across Chichester City is greatly reduced, which is important and welcome given its impact on bus services, Tables 8.1 and 8.2 show the extent of post-mitigation saturation is also egregious, covering a very large number of key links and junctions.

**On every measure and criterion, then, including cost deliverability and effectiveness,** **the revised Transport Strategy falls well short of evidence to suggest the transport impacts of the plan can be properly addressed by this means.**

Despite the repeated statements about sustainable modes throughout the draft plan and Chichester Transport Study, only 2 paragraphs at Section 6.2 within the Study are devoted to public transport:

*“6.2.7 The funds generated from the parking management schemes, local/nation funding schemes and developer contributions could also be utilised to fund potential public transport enhancements within the city centre including an expansion of the bus priority lane system within Chichester City Centre. This could reduce reliance on the car in the longer term towards sustainable public transport. A park and ride scheme could be incorporated within a bus priority lane network in the future depending on the uptake and successfulness of early bus priority trials.*

*6.2.8 Chichester City centre has a constrained existing public highway network. Therefore, any proposed dedicated public transport or light transit corridors that could be implemented would be at the expense of existing highway. This could be managed through a time-based system where certain routes are restricted to public transport only during specific times. E.g., peak hours.”*

There is some very high-level consideration of Park and Ride following this section. None can be considered a serious practical evaluation of consolidating car-borne trips onto bus services, including existing ones, for example local mobility hubs, more frequent bus corridors, delivery of specific bus priorities.

**None of the discussion of alternatives to “predicting and providing” for unconstrained traffic growth is rooted in a deliverable evidence base, or proper evaluation of options and specific projects.**

To take just one aspect of the few specifics that can be picked out, a workplace parking levy is hypothesised. This would apply only to “offices”, in Chichester city centre (para 6.2.3), without consideration given as to how this could be practically achieved or even that a meaningful amount of office based employment would qualify. Much less is any consideration given to how far focusing a strategy only on office-based workers would actually deliver a particularly significant effect, apart from to create a strong incentive to relocate offices out of the city centre to places out of reach by public transport.

Looking at the Chichester Transport Study 2023 and the draft plan together, there is insufficient evidence that the traffic capacity increase proposed in the 2023 Transport Study is any more affordable or technically deliverable, or likely to be sufficiently effective, than those in the past strategy. The evidence more strongly points to the fact that no highways improvements are identifiable or economically deliverable to meet even short term increases in demand for car-borne mobility on most of the network around Chichester.

There are no published strategies or schemes clearly supporting the contention that the objective of improving sustainable modes is technically achievable or deliverable either. The plan makes generalised assertions that such strategies will be devised and implemented only after serious problems emerge from a shortfall in the car-borne transport strategy.

The reference to *“monitor and manage”* is undefined and unsubstantiated. There are no outcomes stated, no mechanisms specified and no timescales for action.

Our experience today is that network conditions have reached unacceptable and prejudicial levels of severe unpredictable delay. The saturation of the network is already evident well outside the traditional peaks on key sections of highway and at key junctions. External shocks such as the effects of severe weather are becoming more common, leading to delays so extreme as to justify the description of “gridlock”. The plan does not identify a strategy to effectively address this, in particular by consolidating passenger car trips onto more efficient public transport vehicles. This is unacceptable to Stagecoach.

* 1. ***Local Plan Vision***

Stagecoach **Objects** because the Plan:

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

Stagecoach supports the broad approach in Plan Vision and in particular that by 2039, the Plan will support and enable greater use of sustainable modes. However, there is no link made between reducing the use of private cars, and the need for a step change in the use of sustainable modes. Without a published transport evidence base it is impossible to establish a suitable sustainable transport strategy to support both carbon reduction and alleviation of the problems arising from acute congestion. Even on a very crude basis, to achieve a meaning mode shift on key approaches to the A27 Chichester Bypass will require more than 20% of existing peak car-borne journeys to transfer to other modes. A 10 percentage point transfer to bus (about half this shift) would imply more than doubling peak hour bus passenger boardings.

The Vision is nothing more than an aspiration, that needs to more definitively aim at key outcomes, for the plan to be effective. The Vision should thus be altered to read:

*“Get about easily, safely and conveniently ~~with less reliance on private cars~~ –making* ***the greatest possible*** *use of the rail and* ***enhanced*** *bus network, and with more opportunities for active travel including walking and cycling;* ***to materially reduce dependence on private car use.”***

Underpinning the Plan’s spatial strategy, the Vision section goes into more specific detail about key localities in the Plan area.

Regarding Chichester, Paragraph 2.39 states: *“The emphasis will be upon consolidating and enhancing the role of Chichester city as the plan area’s main centre, whilst also developing the role of key settlements to its east and west. The focus will be upon creating communities with good access to a range of employment opportunities and affordable housing for young people and families to balance the ageing population.”*

This is clearly the appropriate focus for meeting the District’s development needs in a sustainable manner. The city and key settlements to the east and west, are those places already able to make use of relevant public transport services, both rail and bus. Especially within and near the City, walking and cycling can credibly present highly relevant choices. This emphasis clear can be expected to address the requirements of sustainable development set out in NPPF and their local application set out in the Plans Strategic Objectives.

However, this needs a robust transport strategy, to avoid a further concentration of development and its traffic impacts occurring on or near some of the most chronically congested parts of the highway network. To date, the absence of intervention has strangled the bus network through further marked deterioration in traffic conditions. This by consequence increases the risk of bus delay or cancellation, lengthens journey time and reduces customer confidence in bus as an attractive alternative mode of travel.

In April 2023, Stagecoach is making significant timetables changes to improve operational resilience in and around Chichester. The biggest such change is the severance of the Portsmouth to Littlehampton section of service 700, at Chichester, with buses operating independently to the east and to the west and ending cross-city links. This is planned to reduce the probability of delay but at the cost of additional vehicle resource (circa £200,000 per annum) which could be better spent providing new or enhanced services. We anticipate a small loss of custom as a direct consequence of the change, but have little choice other than to take negative action so as to fulfil our statutory punctuality obligations.

**If the Strategic Objectives of the Plan and its Vision are to be achieved, in the way required by NPPF paragraphs 104-105, a properly-evidenced transport mitigation strategy needs to create the conditions where bus journeys are more reliable than car journeys** and thus mobility demand switches as far as can be realistically achieved away from car use, to bus use and other more sustainable modes.

Beyond Chichester, the Plan Vision focuses on key localities beyond to the east and west.

To the west of Chichester a focus on growth at Southbourne is justified at paragraph 2.43: *“…the aim is to take advantage of the village’s good transport links and existing facilities to deliver significant new residential-led development within the broad location for development which will further enhance local facilities and* ***offer opportunities to reinforce and supplement existing public transport, including bus routes.****”*

**We agree this is a very significant opportunity**. However, if the requirements of NPPF paragraphs 104-105 are to be met, **this demands that effective bus priority is delivered on the A259 corridor, especially eastbound at Fishbourne and westbound approaching Emsworth**. Without such measures, the growth committed and planned will serve only to further undermine bus journey time and decrease punctuality on the existing 700 service, entirely contrary to the aims of the Vision.

The emphasis on the A259 corridor served by Stagecoach 700 west of Chichester is reinforced at paragraph 2.45 stating that *“Between Chichester and Southbourne, the Plan provides for more moderate levels of growth within the parishes of Fishbourne, Bosham and Chidham & Hambrook, …* *with opportunities to support and expand existing facilities and for increased use of public transport options”.* We strongly support the principle, but the Plan must follow through with specific public transport priority measures that facilitate rather than prejudice such an outcome.

East of Chichester the focus is at Tangmere, where the existing allocation for about 1000 dwellings is being uplifted by 300. Paragraph 2.44 justifies this among other things recognising the scope for *“…improved and additional bus services and cycleways will provide better connections to Chichester city and east to Barnham and the ‘Five Villages’ area in Arun District.” W*e unequivocally endorse this conclusion. Realising a “game-changing” level of bus service quality, reliability and frequency east of the city, also serving committed and planned development north and south of Oving Road at Shopwhyke, is equally essential, given that all SRN links and junctions are approaching equal saturation.

The National Bus Strategy has given new focus on partnership with West Sussex County Council to discuss and deliver a significant new bus service between Chichester, Shopwhyke, Tangmere, Eastergate and Barnham, supporting committed development and acting as an initial phase of what ought to be a more ambitious longer-term strategy to support growth beyond 2025 in both Chichester and Arun Districts. **For these improved bus services to be both deliverable and effective, robust bus prioritisation is unavoidable**. No such measures are proposed in the Plan or its evidence base and we therefore suggest inclusion of plans to facilitate safe and efficient bus operation between Tangmere and Nyton/Eastergate, ideally avoiding the need to join A27 through-traffic entirely.

We welcome the clear recognition that these localities identified for growth, benefit from existing relevant public transport services. The Vision also sets an expectation that bus services in particular should be *“enhanced”* and *“reinforced*”.

**We entirely agree that these opportunities exist, across the broad strategy and strategic allocation proposed by the draft Local Plan. Securing them will be crucial to achieving national and local policy objectives, including the Strategic Objectives. However, to our continuing very great dismay, the Plan goes no further to defining how this will be achieved. As such the Vision is not demonstrable achievable or deliverable.**

Accordingly **the Plan cannot be considered effective**, in the sense of NPPF.

**Remedying this, demands specific measures to protect bus services from congestion in the following corridors:**

* A259 East of Emsworth
* A259 Fishbourne
* A 259 Via Ravenna/Cathedral Way
* A286 Stockbridge Road north and south of A27
* B2145 Whyke Road/Hunston Road
* A259 Bognor Road, east and west of A27 and extending to the District Boundary
* B2144 Oving Road/Shopwhyke Road east and west of the A27
* A 285 Westhampnett Road/Portfield Way/Stane Street, potentially involving a mode filter at the west end of Stane Street

These must be defined to a sufficient level of detail to assess their effectiveness and deliverability, including costs.

This would then allow West Sussex County Council and Local Transport and Highways Authority, ourselves as the principal bus operator, and where appropriate other organisations that would be directly tasked with delivering the mitigation package, to agree service levels and standards necessary to deliver specified outcomes, including journey times, frequencies, capacity and hours of operation on the network, and also in respect of the strategic allocations and Strategic Locations for Growth.

**The agreed mitigations strategy should be set out in an up-to-date Infrastructure Delivery Plan backed by clear funding commitments, including a funding strategy to justify necessary developer contributions**.

Where necessary to support evidence of effectiveness and deliverability, clear statements of support, which might include **Statements of Common Ground between the LPA, LTA, National Highways and Stagecoach**, could be provided.

1. **Spatial Strategy**

Stagecoach **Supports**

Stagecoach well recognises the constraints outlined in the explanatory narrative at the start of Chapter 3.

In particular we strongly endorse that strategy in that it reflects that the best opportunities to meet housing and employment development requirements sustainably clearly exist in and close to Chichester and on the key east-west movement corridor where – subject to effective measures being delivered to make these modes more attractive, efficient and relevant – sustainable modes can credibly provide for a much higher proportion of movement demands, mitigating most effectively the potential traffic impacts of development.

We agree that the Manhood Peninsula suffers serious environmental constraints, but, added to these, public transport and other sustainable modes cannot provide such attractive alternatives, and significant further development risks merely reinforcing already high levels of car use, aggravated by the carbon impacts of the distances involved – something the plan does very little to evaluate, and makes no reference to.

We endorse the conclusion in paragraph 3.24 that significant development in the part of the District north of the National Park is inappropriate. The rationale is principally on landscape and visual character. This exposes a fundamentally biased approach to plan making that has consistently underplays transport accessibility and carbon issues. In fact, the lack of local services and the extended distances that need to be travelled to fully participate in society in this area, with no realistic prospect of public transport offering relevant choices, ought to rule such a strategy out of play on a far less aesthetic and interpretational basis.

* 1. ***Policy S1 Spatial Development Strategy***

Stagecoach **Supports**

The Spatial Strategy flows clearly and logically from the Spatial Portrait, and the opportunities and constraints identifiable across the Plan area. It represents a logical and justified continuation of the existing Local Plan strategy. In particular the spatial strategy maximises the potential for sustainable modes to contribute to meeting a much higher proportion of all the District’s mobility and accessibility needs.

* 1. ***Policy S2 Settlement Hierarchy***

Stagecoach **Supports**

The settlement hierarchy clearly reflects the service endowment and potential self-containment of the settlements in the District. In particular, the second tier of settlement hubs includes secondary schools, which are major peak trip generating uses. Service villages, in the main, also benefit from bus services running at least hourly, which can be expected to provide for a degree of mobility for the higher number of trip purposes that cannot be satisfied by walking or cycling within the immediate locality. Thus, a level of development to meet local needs in this tier is relatively sustainable.

There is a quite broad range of settlements in this category. We have concerns that, north of the National Park, the Service Villages have no realistic public transport choice. These include Plaistow/Ifold, Kirdford, Loxwood, and Wisborough Green. Such as exists is typically a 1/bus per day off-peak shoppers service offering up to 90 minutes in Horsham or Guildford and as such any development here even to meet local needs requires each adult to own a car. This contrasts strongly with Service Villages to the south of the National Park, which are greatly more sustainable.

1. **Climate Change and the Natural Environment**

Stagecoach **Objects** because the Plan:

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

This section of the plan is extensive and wide ranging, as should be expected.

**However, remarkably, there is no acknowledgement whatever of the role of transport in mitigating climate change or its effects, not of the importance of sustainable movement and access being facilitated across the plan area in addressing anthropogenic impacts on the natural world at a more local level**.

This exposes very clearly a troubling level of indifference to transport matters in the production of the Plan, which, while nationally quite common, is neither appropriate nor acceptable. The mitigation of transport impacts is not merely a matter speaking to the social and economic aspects of sustainable development. It is crucial to address the **causes and effects of climate change** that arise from transport, and personal mobility.

This is now well understood and at the centre of national policy, including the National Decarbonisation Strategy for Transport (July 2021) which at Section 5 commits the government to aligning land use planning and transport strategy much more tightly and effectively to mitigate the carbon emissions associated with the current dependence on cars, and the mode mix; but also to reduce travel distances, both increasing the potential relevance and effectiveness of all sustainable modes, and reducing average journey lengths for residual motorised journeys of all kinds.

National statistics show that well over a third of all domestic carbon emissions arise from land-based transport and of these, the vast majority arise from trips of over 10km – outside the range of large scale use of cycling. In fact, the **potential of the plan to materially support** **carbon emissions reduction from within the plan area lies more in the realm of transport than any other policy theme** – including emissions mitigation from buildings, which is in any event an aspatial matter and covered by nationally-binding building regulations. By 2025 something like 40% of all the emissions within the plan-area will be transport related.

There is **no evidence supplied to support the plan that addresses the transport carbon impacts of the spatial development strategy** in a clear manner.

There is **no evidence supplied that sets out the effects of potential worsening of congestion on air quality within the plan area**, arising entirely from the excess of passenger car movement demands over available and credibly deliverable highway capacity. This is despite the evidence set out and acknowledged in the explanatory memorandum at paragraph 4.130:

*“4.130. The council’s Air Quality Action Plan and the West Sussex Transport Plan 2022-2036 both refer to the air quality issues faced by Chichester. There is currently one Air Quality Management Area (AQMA) in the plan area, located at St Pancras, Chichester. AQMAs are designated where air quality exceeds, or is likely to exceed, national air quality standards and objectives. Development within or impacting these areas, or that likely to cause the declaration of any further AQMAs, will be subject to an air quality assessment by the applicant.”*

**This is a retroactive approach** – it is not “planning”, based on evidence.

We are well aware that air quality issues in and of themselves can render allocated sites to be undeliverable: a good example is in the Vale of White Horse, Oxfordshire, where strategic allocations on the A338 and A420 corridors have been held up for years by air quality issues at Marcham and Frilford, in large measure because agreed transport interventions were considered inadequate or undeliverable a very short time after the Plan was examined and adopted.

There is **no evidence that shows how the development strategy can effectively mitigate these impacts** as well as the further potential impacts that arise from the development strategy. This is exasperating, as there is clear evidence that could be drawn upon to show that that very substantial opportunities exist to:

* Speed buses up and make them more reliable by the delivery of bus priority on most of the key main corridors. Most of these even today operate relatively frequently
* Improve service frequencies and extend hours of operation.
* Secure significant background mode shift to bus as a result, damping pressure on key links and junctions, by consolidating demands on direct more reliable and more frequent bus services.

**The spatial development strategy as submitted is in fact, likely to well conform to such additional evidence.**

**The allocations require substantial additional transport related work and evidence to demonstrate that the opportunities for sustainable transport have been identified and taken up as required by NPPF paragraphs 104-105.**

**With regards to specific policy, Policy NE22 should be modified to read:**

*“Development proposals will be permitted where it can be demonstrated that all the following criteria have been addressed:*

*1. Development is located and designed to minimise traffic generation and congestion*

*~~through access to~~* ***by maximising the relevance and attractiveness of sustainable transport modes****, including ~~maximising~~ provision* ***of specific demonstrably effective measures to make*** *pedestrian and cycle* ***and public transport routes and*** *networks* ***more direct, more safe, faster and more reliable;****…***”**

1. **Housing**
	1. ***Policy H1 Meeting Housing Needs***

Stagecoach **Objects** because the Plan:

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

The presumption of the planning system is that local planning authorities should seek to meet their objectively assessed development requirements in full. These needs are assessed by a defined Standard Methodology set out in Planning Practice Guidance and elsewhere, that has explicit regard to ensuring that the economic and social effects associated with housing are properly provided for, to avoid exacerbating serious problems that arise from inadequate housing supply.

As a significant local service provider and employer, Stagecoach is concerned that existing issues with housing availability and affordable housing supply are not exacerbated. This has a direct bearing on staff recruitment and retention. It also has an indirect bearing on our cost base.

The existing problems with housing affordability have developed over many decades of undersupply. It should be emphasised that the significant boost to the supply of housing that has been sought by governments over the last 15 years, has only begun to take effect relatively recently in this District. Tackling the problem will require years of consistent attention.

Stagecoach notes that the Council is no longer proposing to meet its identified housing needs in full. Rather than 638/annum the Council is allocating a total that implies an annual delivery rate of 535/annum.

While a number of matters evidently present challenges to the Council in identifying a sustainable development strategy. Paragraph 5.2 indicates that “*constraints,* ***particularly the capacity of the A27*** *has led to the council planning for a housing requirement below the need derived from the standard method…”*  The blame for being unable to meet housing requirements is thus laid squarely at the door of transport infrastructure and systems.

This conclusion in no way follows from the evidence in the Chichester Transport Study. This, rather, makes the statement that when a higher annualised quantum of 700 dwellings per annum was tested, in the majority of cases the traffic capacity improvement package would perform little differently. To quote the Study:

**“5.6.3 The network performance outputs analysed comprising V/C%, Delays (seconds) and Queues (PCU’s) suggest that generally the proposed SRN mitigation identified for the Core Scenario, can accommodate in the most part, additional increase in development to 700dpa.”**

Whether the rest of the local road network is similarly protects is moot.

Irrespective of these results, even if the contention made in the draft plan were true, unlike many other constraints, this is amenable to a suitable effective strategy to address the constraints identified being collaboratively conceived. This is what NPPF expects, as set out in paragraphs 104-106.

Where the A27 is concerned, as part of the SRN, National Highways is now working to a substantially revised approach than that in force at the time to current Local Plan was prepared, or LSS2, or reflected in the Chichester Transport Study. This is set out in DfT WMS 01/22. This document is the policy of the Secretary of State for Transport in relation to the SRN which should be read in conjunction with the National Planning Policy Framework (NPPF). It replaces the policies in the Department for Transport Circular 02/2013 of the same title.

It makes plain that to accommodate additional demands arising from development, National Highways (NHC) expects to meet the requirements of its statutory license in a substantially different manner. With respect to development NHC LTN 01/22 continues to address the tensions between national policy for the environment and carbon mitigation, the ongoing need to substantially boost the supply of housing as well as maintain national economic competitiveness and protect the safety of the public. However, in future, the approach will be to seek first to maximise the impact of demand management measures (reducing the need to travel), and then to accommodate residual additional demands first though maximising the use of sustainable modes, rather than accommodating assumptions about current levels of car dependency and use.

LTN 01/22 much more closely and explicitly aligns with the language of NPPF Chapter 9 paragraphs 104-106. Paragraph 12 states: *“New development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable….* *Developments in the right* ***places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be a key consideration when planning for growth in all local authority areas***.” (our emphasis).

It continues at paragraph 13*: “where developments are located, how they are designed and* ***how well delivery and public transport services are integrated has a huge impact on people’s mode of travel for short journeys.*** *The company will therefore expect strategic policy-making authorities and community groups responsible for preparing local and neighbourhood plans to only promote development at locations that are or can be made sustainable [footnote 8****] and where opportunities to maximise walking, wheeling, cycling, public transport and shared travel have been identified.”*** (again, our emphasis)

Stagecoach readily confirms that the **draft Plan development strategy conforms well to the first limb of this expectation**, in terms of the location of development.

Stagecoach considers that the plan and its evidence base **conforms poorly to the second in that the specific opportunities to maximise walking, cycling wheeling and public transport are not clearly identified, and defined**, and proven to be effective and deliverable.

The current mitigation strategy for the A27 Chichester area, supporting the adopted Local Plan and for which proportionate developer contributions have and continue to be sought, reflects now-superseded DfT Circular 02/2013. As a direct result, it failed completely to identify any significant effective bus priority measures, despite the fact that frequent services already exist on the key corridor concerned, and that one bus journey can remove, fully seated between 72 and 80 single occupancy car journeys from congested links and across key junctions on the A27. Rather, it sought to implement targeted measures to increase the throughflow of general traffic.

We recognise the realisation that this approach, which was already reliant on some tenuous logic, is simply not technically viable, especially where further development needs are anticipated.

National Highways will form now pursue an approach with the planning system that *“includes* ***moving away from transport planning based on predicting future demand to provide capacity (****‘predict and provide’) to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (vision-led approaches including ‘vision and validate,’ ‘decide and provide’ or ‘monitor and manage’). The company will support local authorities in achieving this aim through its engagement with their plan-making and decision-taking stages*.” (paragraph 15).

Paragraph 23 is at the fulcrum of assessing and defining transport mitigations to accommodate growth on and near the SRN *“Capacity enhancements such as modifications to existing junctions or road widening to facilitate development should be determined on a case-by-case basis. The general principle should be accepted where* ***proposals would include measures to improve community connectivity and public transport accessibility****, and this will be weighed against any negative safety, traffic flow, environmental and deliverability considerations, impacts on the permeability and attractiveness of local walking, wheeling and cycling routes,* ***and alternative options to manage down the traffic impact of planned development or improve the local road network as a first preference.”***  (our emphasis).

**However, no material work has been done that seeks to identify if a bold robustly conceived and suitable judiciously-prepared strategy that seeks to consolidate flows on already densely travelled corridor onto improved bus services**, driving mode shift through insulating these services preferentially from already serious queuing. This would be likely to have very substantial impacts on all the key junctions on the A27, and potentially, on the A27 itself. The need for an integrated approach between Shoreham and Emsworth within West Sussex paying particular regard to development requirements in both Arun and Chichester Districts naturally lies at the heart of this, and we would expect to be picked up by the LSS3 Review among other things.

However, the locus of the problems and its causes and effects are obviously well enough known to start work on defining solutions within the plan area today. We would expect that this work will be essential if National Highways are to support the Plan, especially now given the terms of Circular 01/2022.

Such work could ***and should*** start from a “policy off” position: in other words that **the Plan should fully accommodate its needs unless it can be proved that a mitigation strategy for the A27 that is compliant with DfT WMS 01/2022 cannot credibly accommodate resulting capacity demands without unacceptable impacts on the safety and efficient operation of the SRN.**

**This evidence does not exist. In fact the Chichester Transport Strategy 2023, on which the Council solely relies as its transport evidence base, indicates the opposite at para 5.6.3.**  This is the case before meaningful measures to secure damping of traffic demands through mode reassignment are even considered.

The **exception to this is Portfield and Oving Road**, which are among the most problematic areas after mitigation even at the Council’s chosen 535 dwelling/annum scenario (para 5.6.4.-5). The costly capacity mitigation simply cannot deliver enough benefit. It is admitted that WSCC has indicated that it would prefer a solution that places greater reliance on sustainable modes damping car-borne demand. This is entirely the strategy required by NHC to follow LTN 01/22, of course. Despite the fact that “predict and provide has “run out of road” **no attempt has been made to examine what such a solution set credibly could looks like. This is unsatisfactory and deeply troubling.**

At paragraph 5.4 the draft plan points back again at the West Sussex and Greater Brighton Strategic Planning Board and the future work that has been commissioned, but has barely begun, to update the Local Strategic Statement. This work is to inform the preparation of plans that have horizons beyond the end date of the current LSS in 2030 and properly to meet the Duty to Cooperate. As we said in our response to section 1 of the Plan we fully endorse the conclusion that this is the right mechanism to look at these issues. However, the mechanism has not been effectively applied to the production of this plan. Therefore, the specific evidence that capacity on the A27 in and of itself supports accommodating a lower housing requirement does not exist.

**The Plan thus does not conform to NPPF, is not adequately justified and is not effective.**

**The Plan does not properly meet the statutory Duty to Cooperate.**

**We will return to this matter in specific representations to Section 7 of the draft plan.**

* 1. ***Policy H2 Strategic Locations/Allocations 2021-2039***

Stagecoach **Supports**

Policy H1 makes plain that the plan, as far as it identifies locations for development has done so in locations that conform with its spatial strategy. All of the strategic allocations to a greater or lesser extend offer clear opportunities to make use of sustainable modes, by virtue of their location. That is not to say that the opportunities to take up these opportunities, and maximise the role of sustainable modes, has been identified, defined and translated properly into the rest of the plan policy suite or Infrastructure Delivery Plan.

As our remaining representations make clear, **we support the locations thus far identified as being those that offer the best** **opportunities** to reduce the need to travel, reduce travel distances, and create high quality attractive sustainable travel choices, for both existing residents as well as new ones.

However, the transport impacts of the allocation will individually and cumulatively likely to lead to increasingly severe impacts on the transport network, and on bus services.

Perversely, because these opportunities are not properly identified and secured through the plan and its supporting transport strategy, the opportunities presented by the allocations to secure a substantially more sustainable and lower carbon pattern of movement will not only risk being squandered but may aggravate the wider problems.

* 1. ***Policy H3 Non-strategic Parish Housing Requirements***

Stagecoach **Supports**

The approach is consistent with the plan’s spatial strategy. It generally avoids a dispersal of development to locations likely to be highly car dependent. There is a clear focus on meeting housing needs in the far north-east of the District at the largest and most sustainable settlements, such as Loxwood, Kirdford and Wisborough Green. However, it must be pointed out that public transport availability in this area, provided by the County Council through services it procures, is minimal. These settlements in practice require each adult and child of secondary school age to have access to motorised transport to fully participate in society. This might justify significant measures to secure a boost in the frequency of bus services between Guildford and Billingshurst, passing through these settlements.

Otherwise, existing commitments in the plan area already make provision to meet for local needs. To the degree that there is an unmet local requirement for affordable housing of a small scale – for example to support the rural economy – this could be met through neighbourhood plans or through Rural Exception Sites.

1. **Place-making, Health and Wellbeing**
	1. ***Policy P1 Design principles***

Stagecoach **Objects** because the Plan:

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

NPPF requires that proposals should consider transport issues from the earliest possible stage. Designing to properly facilitate safe and efficient access, focusing first on sustainable modes, should be at the heart of development design. Too often it is still an afterthought, notwithstanding this.

**Policy P1 must include an additional statement to be compliant and effective with NPPF paragraph 104-105 and 112 a):**

 ***“Development will be designed to make access and movement using walking, cycling and public transport the natural first choice, and demonstrate through the Design and Access Statement how such modes are afforded the most direct, safe, reliable and efficient routes within to and from the proposals, especially when compared with car use.”***

* 1. ***Policy P4 Layout and Access***

Stagecoach **Objects** because the Plan:

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

A number of proposals in the plan involve large-scale development. It is essential that where appropriate buses can access and circulate efficiently through development at a suitably early stage. There is no acknowledgement of this anywhere in the policy, contrary to NPPF paragraph 112.

Large-scale development which buses cannot access in an efficient or timely manner, or at all, strongly contributes to high levels of car-dependency. Evidence for this is referred to among other places, in DfT Circular 01/2022. **To be compliant with NPPF and properly pursue its strategic Objectives, Policy P4 needs to be modified to address this point:**

***“1. Provide safe, direct and attractive conditions for inclusive access, egress and active travel between all locations and providing as ~~good~~ direct high quality links to integrated public transport, and where appropriate efficient access and circulation to bus services, unimpeded by excessive parking, at a suitably early point in the development phasing;***

1. **Transport and Accessibility**

Stagecoach **Objects** because the Plan:

• does not comply with the duty to cooperate

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

**The issues related to transport are fundamental to the soundness of the Plan. In particular, the constraints presented by the capacity on the A27 around Chichester and its key junctions, are the paramount reasons why the Council does not consider it can meet its objectively-assessed development needs in full.** Thus, the transport issues and potential solutions available and what these mean for the ability of development needs to be accommodated, are matters that go to the heart of the soundness of the Plan.

Paragraph 8.3 sets out the approach taken to date succinctly:

*“Increasing the capacity of the road network is key to supporting growth in the Local Plan. However, there is also a need to reduce demand for road transport to achieve net zero in greenhouse gas emissions by 2050 as highlighted in the council’s Climate Emergency Action Plan and Strategic Objective 1. In aiming to achieve the ambitions of the action plan, all development is expected to demonstrate how it will support four key objectives to create an integrated transport network which will alleviate pressure on the road network, improve highway safety, encourage sustainable travel behaviours and help reduce transport related impact on air quality, by:*

*1. Avoiding or reducing the need to travel by car;*

*2. Enabling access to sustainable means of travel, including public transport, walking and cycling;*

*3. Managing travel demand; and*

*4. Mitigating the impacts of travel by car.”*

However, this approach is unambitious and “lightweight” as it assumes, as does the existing Chichester Transport Strategy on which the current adopted plan relies, that the focus of investment should be, **wholly,** in highways capacity improvement.

Sustainable modes explicitly are expected to play a greater role to “alleviate pressure” on the local road network, as part of this strategy. To emphasise: **to avoid exacerbating congestion, the strategy will have to both remove a significant proportion of existing demands from the network on multiple key approaches to Chichester; and then ensure that travel demands from committed and further new development allocated in the plan does not simply replace these journeys, or, worse, create even greater demands.**

This will demand very significant behaviour change. Only by making sustainable modes substantially more attractive, both absolutely, and relative to the same journey made by car, can this be expected to occur. However, the explanatory memorandum as well as the wider policy suite and IDP, well expresses a fundamental unwillingness to taking specific, defined measures to achieve this reduction in car use and material promotion of sustainable modes. It makes plain that sustainable modes, including bus services, will offer a lesser role to which “access will be provided”.

Such a vague and weakly defined mechanism will have no effect, at all, on current behaviour and car dependency if the relevance of those choices as a credible alternative to car use, is not substantially boosted. This includes a 5% reduction in trip demand assumed by the Traffic Model at the heart of the Chichester Transport Study 2023.

For this reason. the transport strategy behind the current adopted plan is demonstrably ineffective, as the updated model makes plain. It has not yet been delivered and is yet unclear when or (in the absence of committed funding) even if it can be. **It is ineffective to “roll forward” this strategy to support a higher level of planned growth.**

We note that a scheme for addressing congestion on the A27 at Chichester has been included in Roads Investment Period 3 (2025-2030) – well within the horizon of this Plan. However, recent history provides compelling evidence that off-line improvement to the north is not politically supported and arguably even technically or economically deliverable. It is not funded, nor at this stage can it be hypothesised if an economically deliverable scheme is achievable sufficient to warrant the necessary investment.

An on-line improvement of the A27, including junction improvements, is likely to favour longer distance east-west though movements, which are of greater significance to the national economy, at the expense of local movements crossing the SRN- a conundrum that largely sums up the dilemma that is faced by NHC and the County as Highways and Transport Authority. It is one that is played out in many places, but rarely is the tension so stark as at Chichester.

Every local route crossing the A27 at grade around Chichester accommodates a regular bus service - or shortly will do (Oving Road area is expected to follow in 2023, though bus services are likely to not use the modified crossroads but to use the left-in-left-out facilities provided as part of the Shopwhyke Lakes development). The impact of these issues on the entire bus operation are serious and increasingly severe.

By the same token, **boosting the relevance and reliability of each of these services substantially consolidating as much demand as possible onto a much smaller number of vehicles, is clearly a strategy that ought to support the effective capacity of each of these junctions being greatly augmented, at the same time as reducing equally substantially, the energy- and carbon intensity of mobility in the plan area. Addressing the A27 should not be considered some kind of “zero-sum” game.**

Furthermore, the approach of National Highways in its dealings with development and the planning system now reflect a substantial change in Government Policy set out in DfT Circular 01/2022, which we separately cover in these representations, that entirely aligns with an approach that seeks to appropriately invest in more active and rational management of scarce highways capacity, on both the SRN and local roads.

For environmental, economic and social reasons – including public health, **the issues presented by the A27 and its interface with local roads around Chichester stands out, nationally, as an example of where the approach taken to accommodating and mitigating development impacts needs to make a clear break with previous “predict and provide” approaches** to meet forecast unconstrained car use as LTN 02/2022 makes clear as a principle. Policy in the West Sussex LTP to 2036 itself makes plain that “shared mobility” – including bus services – must play a much greater role in this area.

The existing Chichester Area Transport Strategy is focused on justifying capital contributions from committed development to fund highways capacity improvement – with nothing included to make bus services more attractive, or importantly more reliable. Indeed this “cars first” approach is so costly, that there is already accepted by WSCC to be insufficient land value remaining to be captured to put into substantial improvements for public transport. That much is very evident, and transparent, from paragraph 8.12 and 8.14, where south of Chichester *“This (one) package of works (of several improvements needed) would be between £57.23 and £82.79 million to deliver in full and would not be capable of being funded by development contributions alone.”* This assumes the scheme is otherwise deliverable, which on the evidence in the public domain for some time, has be considered challengeable.

The draft Local Plan and a modestly updated infrastructure package that flows from the 2023 Chichester Transport Study, pursues exactly the same approach.

**This strategy is also even more ineffective having regard to the roll forward of the Plan to 2039. It cannot deliver the key Strategic Objectives of the Plan; and in particular this is explicitly recognised by the Council in the failure of the draft Plan to accommodate the OAN in full.**

It is also obsolete, as it does not align, from first principles, with national policy (including the National Decarbonisation Strategy for Transport) and DfT Circular 01/22; nor the Council’s own declared Climate Emergency.

**As a result, draft Policies T1 and T2 are both unsound, as we will separately explain.**

**Owing to the lack of evidence about the implications of this for adjoining authorities – especially Adur District – in the absence of the review of the Local Strategic Statement – this has implications for fulfilling the Statutory Duty to Co-operate.**

**The absence of any meaningfully comprehensive refresh of the transport evidence base means that there are no meaningful schemes of any kind, defined in the plan or its IDP, to indicate either what level of growth can be accommodated, by delivering a change in travel behaviour. This would be aimed to secure a sufficient effective increase in junction throughput (measured in terms of person trips as opposed to passenger car unit movements (PCUs). Such evidence would propose measure to achieve that outcome and assess the efficacy and costs of such improvements, across all modes.**

Paragraphs 8.10-8.13 inclusive indicate that the Council “*has moved away from ‘predict and provide’”* and invites the reader to conclude this has translated into a programme of interventions that can be funded to deliver specific, credibly predictable outcomes. Such a programme should be clear in paragraph 8.11. and the IDP. There is no such clarity and this conclusion would be false.

It would also be evident in the language of the Chichester Transport Study 2023 and its refreshed proposals. Only the most token of lip service is paid to the matter. It is a plainly car-focused, predict and provide methodology to support a “predict and provide” strategy. **In fact, it is a brazenly car-focused approach, to the exclusion of all else.**

**The statements in the Plan regarding any other approach, read properly, offer nothing more than a vague commitment to look post-adoption, and implementation, at unspecified measures, based on problems that may arise in future that will be decided by a committee: the Traffic and Infrastructure Management Group (TIMG).** This does not yet exist and is obviously an attempt to posit a mechanism that retroactively will cover for the lack of serious multi-party engagement to address the existing and future issues. Such a group should, in our view, also include the public transport operators, not least if the requirements of NPPF Para 106c) are to be satisfied, and the strategy and measures to be adopted are material to supporting the Local Plan, as of course the purpose of the TIMG has as its core *raison d’etre.*

**The approach proposed by the draft plan is plainly ineffective and unsound in justifying the draft Plan.**

**It is more widely unacceptable to Stagecoach.** The issues are severe today and well-known, already serving to jeopardise the delivery of buses relied on by existing residents, much less attract new ones.

We also consider that HM Planning Inspectorate are likely to be quite resistant to accepting this aspect of the plan’s transport strategy, nor will it be appropriate for the Council, West Sussex County Council, or National Highways, to define such measures after the submission of the Plan during the Examination process. The Examination in Public of a local plan has no purpose to improve plans, or remedy deficiencies clearly evident prior to submission.

The examination of the West of England Joint Strategic Plan in 2019, and the Uttlesford Local Plan in 2021, among several others, demonstrates especially clearly that the Planning System and the Examination process is not amenable to post-hoc retrofitting of transport evidence and strategies to support a development strategy.

* 1. ***Transport Evidence Base***

Stagecoach **Objects** because the Plan:

• does not comply with the duty to cooperate

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

Most of Stagecoach’s serious concerns about the soundness of the plan arise from the fact that it has been prepared in advance of any up-to-date transport evidence and suitably robust transport mitigation strategy being advanced to support it. In essence, the Council has rolled forward the existing plan by 9 years, adding some additional sources of hosing supply, while still relying implicitly on a transport evidence base that was prepared 10 years ago.

This led to the formulation at that time of what can only be described as an attempt to develop an effective car-based mitigation strategy, creating capacity for general traffic added to accommodate unconstrained additional demands on an already over-taxed highways network – the Chichester Area Transport Strategy. Despite language in support of sustainable modes, no deliverable measures were identified to support either the extension of the bus network to serve allocated sites, and much less to create a vital improvement to the quality and reliability of public transport services. This approach reflected the approach set out in DfT Ministerial Circular 02/2013 “Development and the Strategic Highways Network”, applicable since the A27, which is the focus of the most severe difficulties, forms part of the national Strategic Roads Network.

This approach has proven ineffective even before substantial elements of housing land supply in the current plan come forward – in particular West of Chichester and West of Tangmere.

In addition, Circular 02/2013 has now been replaced by a new Ministerial Statement of 23/12/2022, DfT Circular 01/2022.

On both counts the transport evidence base and strategy needs to be properly revisited and established to provide effective mitigation for the plan, including current commitments that are being rolled forward.

The language of the current Ministerial Circular 01/2022 offers a highly condensed synoptic view of the proper approach to addressing transport matters in the planning system notwithstanding that it is directly concerned with the Strategic Roads Network. *Videlicet:*

*“31. The NPPF expects local plans and spatial development strategies to be underpinned by a clear and transparent evidence base which informs the authority’s preferred approach to land use and strategic transport options, and the formulation of policies and allocations that will be subject to public consultation. The company will expect this process to explore all options to reduce a reliance on the SRN for local journeys including a reduction in the need to travel and integrating land use considerations with the need to maximise opportunities for walking, wheeling, cycling, public transport and shared travel.*

*32. The Transport Decarbonisation Plan indicates that carbon emissions from car and van use is the largest component of the United Kingdom’s total transport emissions. While action is being taken to decarbonise transport such that all new cars and vans will be fully zero emission at the tailpipe from 2035,* ***the proposed location of growth in current plan periods and whether new developments would be genuinely sustainable remain important factors in demonstrating that a local authority area is on a pathway to net zero by 2050 and therefore compliant with the requirements of the Climate Change Act 2008.***

*33. Alongside this, the local authority should identify the key issues within their study area regarding transport provision and accessibility, setting out how the plan or strategy can address these key issues in consultation with (National Highways, and other transport stakeholders identified in NPPF paragraph 106b).* ***It is the responsibility of the local authority undertaking its strategic policy-making function to present a robust transport evidence base in support of its plan or strategy****. The company can review measures that would help to* ***avoid or significantly reduce the need for additional infrastructure on the SRN where development can be delivered through identified improvements to the local transport network, to include infrastructure that promotes walking, wheeling, cycling, public transport and shared travel.*** *A robust evidence base will be required, including demand forecasting models, which inform analysis of alternatives by accounting for the effects of possible mitigation scenarios that shift demand into less carbon-intensive forms of travel.” (our emphasis)*

Within the text quoted above, references to National Highways and “the Company” can quite legitimately be extended, given the statements in NPPF paragraph 16, 25, 26 and 106b, to include all the relevant transport infrastructure and service providers in the plan area. Circular 01/2022 also has the weight of secondary legislation as a Written Ministerial Statement and thus should be considered to be highly material.

To date there has been little attempt to explore, to the degree necessary, strategies that conform to Circular 01/2022. It is thus not possible to conclude, as the Council has done, that the issues on the A27 that present a constraint to development, are insuperable.

In line with comments made elsewhere in the response to this pre-submission draft, the Plan thus requires substantial further work to be undertaken with key stakeholders to establish a suitably effective and demonstrably deliverable transport mitigation strategy, to sustainably meet the District’s identifiable development needs and where apparent and appropriate, also ensure that wider cross boundary strategic issues are appropriately addressed, in conformity *inter alia*, with the Duty to Cooperate, NPPF paragraph 16 and 104-111 inclusive, and DfT Circular 01/2022 and to ensure the Plan’s own Strategic Objectives can be met.

* 1. ***Policy T1 Transport infrastructure***

Stagecoach **Objects** because the Plan:

• does not comply with the duty to cooperate

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

As described in comments elsewhere, Stagecoach does not see that a suitable proportionate and up-to-date basis exists to properly and appropriately address the transport issues in the plan area.

The 2023 Transport Study does not perform this role adequately but, contrary to the explanatory memorandum, is a scheme intended only to facilitate car-borne movements through some of the key junctions. There is no evidence that an holistic integrated and strategic approach to transport mitigations has been prepared. Certainly Stagecoach has not been involved in any of the discussion about appropriate transport measures in support of the plan, including the Transport Study 2023, contrary to the expectations set out in NPPF at paragraph 16 and 106.

Notwithstanding out fundamental concerns about the transport evidence case and mitigations strategy, Policy T1 reflects a weak and ineffective approach, that seeks to try and define a strategy post-adoption.

Contrary even to the explanatory memorandum for the policy, which seeks to maximise the contribution of sustainable modes, the policy is phased in such a way that it gives basis for previous “predict and provide” solutions to facilitate and support current levels of car dependency – already shown to be undeliverable and unaffordable – will nevertheless be the first rather than the last resort. There is no commitment to seek to maximise the contribution made by sustainable modes to meeting mobility needs. Nor is there any recognition that current chronic congestion and lack of network resilience jeopardises the ongoing attractiveness and long- term sustainability of the current public transport offer.

**To be effective and create alignment with national policy, and also provide for an up-to-date transport evidence base and strategy to be adduced, Policy T1 should be modified to read:**

*“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~~* ***through providing in the first instance, new and improved infrastructure and services that will be credible effective in maximising the*** *~~encourage increased~~ use of sustainable modes of travel, such as public transport, cycling and walking.*

***To achieve this****, the council will work with National Highways, West Sussex County Council, other transport and service providers (including through the Traffic and Infrastructure Management Group)*

*and developers to provide a better integrated transport network and to improve accessibility to key services and facilities…*

*All parties, including applicants, are expected to support these objectives by:*

*1. Ensuring that new development is well located and designed to avoid or minimise the*

*need for travel, ~~encourages~~* ***maximises*** *the use of sustainable modes of travel as ~~an~~* ***a credible*** *alternative*

*to the private car and* ***directly*** *provides or contributes towards new or improved transport infrastructure;*

*2. Working with relevant transport* ***infrastructure and service*** *providers to improve accessibility to key services and facilities* ***with primary emphasis on sustainable modes,*** *and to ensure that new facilities are easily accessible by sustainable modes of travel;*

*3. Targeting investment to provide local travel options ~~as an~~* ***that represent a clearly credible*** *alternative to ~~the~~ car* ***use****, focusing on the delivery of improved integrated bus and train services, and improved pedestrian and cycling networks, including the public rights of way network, based on the routes and projects identified in the Local Transport Plan,* ***West Sussex Bus Service Improvement Plan****, Local Cycling and Walking Infrastructure Plan (LCWIP) and the Infrastructure Delivery Plan;*

*4. Planning to achieve the timely delivery of transport infrastructure on* ***and approaching the A27*** *and elsewhere on the network, needed to support new housing, employment and other development identified in this plan;*

*5. Phasing the delivery of new development to align with* ***and where possible facilitate*** *the provision of new* ***and improved*** *transport infrastructure* ***and services*** *and the outcomes of monitoring travel demand on the network,* ***including that arising from areas immediately adjoining the plan area.*** *~~It may also be~~* ***Where*** *necessary* ***to achieve this alignment*** *~~proactively phase~~ development will be* ***phased*** *to take into account the monitoring ~~and effectiveness~~ of travel ~~plans~~* ***demands on the network*** *and to* ***ensure that measures are implemented to support the highest possible level of*** *~~encourage~~ sustainable travel behaviour.;*

*6. Using ~~demand management measures, such as travel plans, to manage~~* ***robust methodologies to assess*** *travel demand and minimise the need for new or improved transport infrastructure as part of the monitor and manage process.*

*7. Delivering a coordinated package of infrastructure improvements* ***at and approaching*** *~~to~~ junctions on the A27 Chichester Bypass along with other ~~small-scale junction improvements~~* ***interventions*** *within the*

*city and elsewhere, as identified through the monitor and manage process. These will ~~increase road capacity,~~ reduce traffic congestion, improve safety and air quality, and improve access to Chichester city from surrounding areas,* ***first by maximising the contribution of sustainable modes to meeting mobility demands, then, and only as evidenced by robust modelling and option testing, providing increased highway capacity for general traffic.***

*…”*

* 1. ***Policy T2 Transport and Development***

Stagecoach **Objects** because the Plan:

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

Section 1 b) of T2 will be **ineffective** as, absent measures to ensure buses can run reliably and efficiently, improved bus services will not be possible, in support of the plan’s own stated broad approach to transport mitigation, as well as wider local and national policy.

The draft policy does not require improvements to the quality of services such that sustainable choices will be materially more attractive than car use for many local journeys. Without this the Plan’s Strategic Objectives cannot be fulfilled and the objectives of the Plan and this policy, read in its own terms, will not be realised, where reduction in private car use is concerned. It is thus **ineffective.**

Absent measures to make bus services more reliable and more efficient, by insulating them from chronic congestion as far as possible, still further operating resource and therefore costs, will be needed to just to reliably run existing service frequencies, and capacity, as vehicle productivity continues to be more and more adversely affected by chronic delay. This will be further aggravated by increasing incidence of severe unpredictable service breakdown arising from incidents of diverse kinds on the network, especially on or around the A27, including that arising from more regular severe weather events. Longer journey times can only be expected to lead to relative disadvantage of bus services compared to personal car use, entirely contrary to the objectives of national and local policy, including Policy T1. It can also expect to lead to a dampening effect not on car use, but on bus patronage, threatening the ongoing viability of bus services across the plan area.

Section 1 b) of T2 should be modified to read:

*“b) Maximise ~~opportunities for~~* ***the use of*** *sustainable travel* ***modes******through provision of direct and efficient access both*** *to ~~either~~ the existing networks ~~or~~* ***and through*** *providing* ***such*** *new infrastructure or public transport services,* ***as can be credibly expected*** *to reduce reliance on the private car and work towards achieving net zero in greenhouse gas*

*emissions by 2050;”*

Section 1 d) of T2 will be **ineffective** as the location of development is fixed by this plan. We commend the fact that all the strategic allocations are or will be served by regular bus services.

However, the use of public transport services, where available, depends on the relevance and reliability of these services. Furthermore, provision of services without them generating sufficient patronage to support their long-term operation also threatens the sustainability of the plan and its supporting transport strategy. This is especially true of new services such as those intended to serve West of Chichester and Tangmere and East of Chichester Strategic Allocations.

This can only be assured by the plan being supported by specific measures to ensure buses can operate efficiently and reliably on the existing and projected services intended to serve the developments concerned, and also at the same time secure behavioural change from existing development.

To be sound and effective, the policy T2 1 d.) should be changed to read:

*“d) Ensure major development ~~is located to~~* ***proposals and the supporting mitigation measures*** *enable the ~~use~~* ***delivery*** *of* ***high-quality, reliable and effective*** *public transport* ***to present the most relevant possible choice*** *to access local services and facilities including employment, leisure and education facilities”;*

The Policy T2 makes no provision for buses, where necessary, to enter and make efficient and safe progress through major development sites. The plan is thus out of conformity with NPPF paragraphs 104-106. It makes no provision to ensure that penetration of bus services is achieved at a suitably early point in the development trajectory, undermining the achievement of the goals of the Plan and this specific policy. As a good example, West of Chichester Phase 1, currently under construction, cannot be served by buses as a strategy to effect interim bus penetration was never made.

Policy T2 1 f.) should therefore be amended to read:

*f) Ensure that the layout and design of ~~the site~~* ***development proposals*** *provides* ***effective penetration of the site by sustainable modes, at all points in the development build-out, including public transport where appropriate;*** *and sufficient space for all vehicles to manoeuvre without compromising the safety of pedestrians and cyclists,* ***the efficiency of bus services,*** *or the ability to provide an appropriate level of landscaping across the site”*

Policy T2 3.) regarding Travel Planning depends entirely on its effectiveness on the quality and relative attractiveness of sustainable alternatives over car use. In the absence of efficient frequent, reliable and direct public transport services (or similarly, high quality facilities for active travel, Travel Plans will continue to be the entirely ineffective “tick box” exercises that they generally are today, evidenced by much lower levels of public transport use in most new developments than it seen in nearby established neighbourhoods, as demonstrated broadly by Census data in 2011, 2011 and 2021.

For this policy to be effective an up-to date transport evidence base and strategy, underpinning a series of specified interventions to promote the relevance and effectiveness of all sustainable does including public transport in particular, needs to be put in place.

1. **Chapter 9 Infrastructure – Policy I1 Infrastructure provision**

Stagecoach **Objects** because the Plan:

• does not comply with the duty to cooperate

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

**Policy I1 could not expect to be effective without a clear understanding of the effectiveness and costs of a defined series of measures that are laid out in this Plan and its IDP, to mitigate the transport impacts of the development strategy.**

Where the Chichester Transport Study is concerned the only meaningful work has focused on the definition and delivery of a range of highways capacity schemes mainly on the A27 around Chichester.

As we have discussed elsewhere the effectiveness of these schemes is insufficient as set out at Tables 8.1 and 8.2 of the Chichester Transport Study 2023. The plan itself admits that the deliverability of this package cannot be afforded by developer contributions alone.

The Chichester Transport Study 2023 does not attempt provide a realistic assessment of costs to deliver these schemes, despite the fact that they have been under evaluation for many years. Nor does it offer any assurance that the schemes are technically achievable. **Rather, it states the opposite:**

*“9.2.3 No investigation has been carried out into specific land ownership details, or into the location details or cost of moving statutory undertakers and utility apparatus within the areas of the scheme. No design assessments were carried out at this stage to ascertain the deliverability of the proposals except where any Health and Safety concerns were raised.”*

**Thus on the grounds of effectiveness, deliverability and affordability, the measures on which the Plan relies must at the very least be considered to involve an exceptionally high level of risk. Since Policy I1 is founded on these assumptions, it cannot be considered effective.**

As we set out elsewhere, the Plan has been advanced on the basis that if any additional sustainable transport measures are required, these mitigations should be retroactively considered and defined after adoption of the Plan. In the light of the doubts that are apparent of both the deliverability, affordability and effectiveness of the Chichester Transport strategy this is especially unsatisfactory even if existing baseline conditions were reasonably acceptable.

However, the Chichester Transport Study 2023, as did its predecessors, makes plain that that existing problems are acute, and can rightly be considered “severe” in the sense of NPPF paragraph 111. Waiting to define deliverable affordable alternatives is an entirely inappropriate approach to the local plan transport mitigation strategy. Such an approach also makes it impossible to consider prior to adoption how far the transport impacts of the plan can be cost-effectively mitigated by alternative means, or whether they are deliverable having regard to technical achievability, land control, development viability, or any combination of the above. Thus, the plan cannot be considered justified, or effective.

Given the mutual dependence of development strategies in Chichester and Arun in particular on these measures this should be seen as crucial of the fulfilment of the Duty to Cooperate.

The remedy for this is ultimately to put in place a suitable transport mitigation strategy following a strategic appraisal of options through review of the LSS. This then must be supplemented by more detailed development specific and localised scheme definition, including, where necessary, bus priority and other measures to support the substantial promotion of the attractiveness of public transport in key bus corridors over private car use. This would then be reflected by costed proposals in the IDP.

Leaving these fundamental weaknesses to one side, even if such a strategy and mitigation package were defined, there is no mention of public transport in the policy even though it is clearly a key part of the policy environment and mitigation strategy for the plan as expressed in the explanatory memorandum for I1, but also at Policies T1 and T2. I1 thus does not effectively support the realisation of the intent of Policies T1 and T2.

**Policy I1 iii) should therefore be modified to read:**

*“(iii) Safeguard the requirements of infrastructure providers,* ***having regard to requirements within and where appropriate across the boundaries of the plan area,*** *including but not limited to:*

*…*

*• Highways* ***including specific measures to accommodate improved active travel and public transport level of service*** *~~and cycle lanes~~, and…”*

At limb v) the Policy expects developers to meet the “in perpetuity costs of operating and maintaining infrastructure”. This shackles development management decisions to developers assuming what are infinite costs – given that “in perpetuity”, read properly, can only mean “without any limit in time”. This means that it is impossible to meet the statutory tests on developer obligations set out in the Community Infrastructure Levy Regulations 2010 (as amended) at Regulation 122, also repeated in NPPF. This policy cannot be lawfully implemented and it is thus **ineffective.**

**In the absence of an up-to-date transport mitigation strategy that is fit for purpose, at the point the Plan is examined these costs of any additional infrastructure are not known in any case.** The strategy and its costs, including its affordability and deliverability, are crucial to assessing if the Plan is sound.

**Subject to an appropriate defined transport mitigation strategy being arrived at**, to be sound, the Policy I1 v) should be modified as follows:

*(v) To consider and meet as appropriate the ~~in-perpetuity~~* ***delivery*** *costs of infrastructure and,* ***where appropriate, improved services, to the point where its long-term operational sustainability is credibly assured from mainstream sources.******Where adoption is not envisaged by local authorities****,* ***that must*** *include arrangements for its ~~future~~* ***ongoing*** *management and maintenance;*

1. **Strategic and Area Based Policies**
	1. ***Policy A1 City Centre Development Principles***

Stagecoach **Objects** because the Plan:

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

Chichester City centre is rightly identified at 10.2 and 10.4 as the commercial and service hub of the District. It is also acknowledged to be the most accessible place in the District by sustainable modes, public transport in particular.

**Boosting the vitality of the city centre is something that Stagecoach strongly supports.**  Irrespective, the enhancement of the commercial and cultural life of the District in the place where these opportunities can be accessed broadly by sustainable modes, is one that has long been at the heart of national planning policy for town centres, reflected in the “town centre first” approach to locating major trip generating uses.

Paragraph 10.5 exposes an unbalanced and unsound preoccupation with aesthetic matters in its approach to the town centre, and far too little to ensuring that the central place function is enhanced through protecting and enhancing the quality of public transport access.

The city is relatively small but at the heart of an extensive hinterland, and thus the role of bus in supporting sustainable access to and enhanced city centre venue is one that needs appropriate recognition and emphasis. It is important to note that a dominant number of key service and facilities such as the General Hospital are relatively close to the city centre. This directly contributes to driving travel demand into the city, causing congestion. Most importantly, it also makes the task of mitigation simpler, given the impact a suite of active and sustainable measures can have within the same close proximity.

Policy A1 does not provide this. As such, achieving the strategic objectives of the plan is seriously threatened, and the plan is thus **not effective**.

The Plan needs to ensure that the approach to city centre regeneration maintains and enhances public transport access, interchange and inter-modal connectivity. It also needs to ensure that bus service stopping and interchange facilities are able to address increases in future demand, anticipated by **the clear intent expressed elsewhere in the Plan that public transport should be meeting a greater proportion of mobility needs, in a growing district. Achieving this demands an ambitious approach to the location, quality and capacity of bus stop and interchange.**

We have been in discussions with the District Council about this, alongside West Sussex County Council, for a very considerable period. Stagecoach has always been keen to help facilitate the Council’s aspirations for the city centre, and we continue to hold this intention. However, this cannot be at the expense of a material diminishing of the convenience and fitness-for-purpose of bus stop infrastructure and interchange. Stagecoach has significant concerns that current proposals to remove the bus station and have all bus services operate from the street kerbside, on an inner distributor road with similar of reduced net stop capacity, fall short of promoting attractive, convenient bus access to the central area as a destination.

For the longer term and where the objectives of the draft plan are concerned looking ahead to 2039, they clearly fall short of enhancing the convenience and attractiveness of public transport use. Much less do they make sufficient provision for a material increase in bus frequency, connectivity, and interchange convenience, on which the draft plan explicitly relies. **It is vital that the District Council is clear in policy about its objectives for public transport in the city centre. These objectives must also carry sufficient weight when held in tension with other aspirations for the centre and the constraints on achieving them.**

For the Plan to be sound, properly effective and compliant with NPPF, the approach to the City centre cannot ignore its role in the provision of sustainable transport service and connectivity.

**Policy A1 should therefore be modified** to properly reflect this crucial function, on which the vitality of the city centre must increasingly depend if unacceptable impacts on congestion, air quality and amenity are not to arise. This is still more crucial if wider aspirations to secure a more sustainable society and mitigate carbon are to be achieved.

*“…This will include provision for development and proposals that:*

*• Support and strengthen the vitality and viability of the city centre and its role as a shopping/visitor destination, employment centre,* ***public transport hub*** *and a place to live;*

*• ~~Support and promote~~ facilitate improved access to the city ~~and~~* ***with increased emphasis on sustainable modes of travel, with particular regard to enhancing the public transport interchange role of the city centre area,*** *in accordance with the transport strategy for the city and…”*

* 1. ***Policy A3 Southern Gateway Development principles Chichester Bus Station, Bus Depot and Basin Road Car Park***

Stagecoach **Objects** because the Plan:

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

There has been aspiration to redevelop the bus station and nearby bus depot from many years. Stagecoach has been engaged with detailed discussion with the District Council on this matter over a very extended period. We confirm that these discussions have reached a relatively mature stage, however at the time of writing are not concluded.

Stagecoach recognises and supports in principle the Council’s wider aspirations for the “Southern Gateway”, and this has governed our approach to the Council to date. We continue to have no “in principle” objection to relocating our administrative, engineering, operational and customer service facilities.

Leaving our proprietary interests entirely to one side, it remains vital that in so doing, the effectiveness, attractiveness and convenience of these facilities is not compromised, as we have outlined in our representations to Policy A1, if wider national and local transport policy, and the local plan strategy itself, are to be effectively achieved.

The depot is crucial infrastructure to support the safe, reliable and legally-compliant operation of Stagecoach bus services over a very extensive area covering the entirety of the District and beyond. Without securing equivalent facilities, that are fit-for-purpose, many of our services would have to cease.

If buses are to provide a greater and more attractive level of service (still more so if they are to be electrified) larger, more capable depot facilities, and city centre bus interchange facilities will be necessary.

Notwithstanding that the bus station and depot sites are leased from the District Council, these leases terminate well beyond the end of the plan period.

Finding suitable sites for a replacement bus depot in Chichester, in common with all similar localities especially in southern England, is extremely challenging. As a *sui generis* use, bus depots do not automatically benefit from policy support on land allocated for employment uses. Most bus depots benefit from being legacy assets established under very different economic conditions. That is the case here. The value of a depot site for redevelopment net of demolition and remediation costs, rarely approximates to that able to sustain the acquisition of land in a tight wider employment land market, and the construction of suitable new facilities.

Furthermore, the costs of operating bus services are sensitive to the parasitic costs of vehicle and staff hours and mileage associated with “dead running” to a remote depot location from the operational network. Here, the existing depot site is ideal, and any replacement will unavoidable add ongoing operational costs to the operation that cannot be directly recovered.

We confirm that a replacement depot site has been identified and has in principle been agreed, subject to overcoming issues with the disposition of existing and future structures on the site. However, the site is recognised as not capable of accommodating meaningful operational expansion. This is just one of the most important foundational reasons why a positive transformation of bus productivity needs to be achieved, across the plan area and beyond, to support delivery of greater bus mileage and frequencies with the same level of operational resource. At the time of writing, we are not fully convinced that the proposals for the relocation will be sufficiently fit-for-purpose in the event the above is not achieved. Thus, **we must raise a concern that the bus depot site might not be available during the plan period**. While there is a strong probability it will be, the certainty surrounding the availability of the site, especially within the first 5 years of the plan, needs to be made transparent.

* 1. ***Policy A4 Southern Gateway - Chichester Bus Station, Bus Depot and Basin Road Car Park***

Stagecoach **Objects** because the Plan:

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

Regarding the removal of the bus station, without equivalent replacement, Stagecoach has significant concerns. Pressures and conflicts at the current bus station site have been gradually rising for several years, arising from increasing use and the need for additional scheduled vehicle layover periods to reduce the risks of accumulated late running from traffic congestion. Peak passenger volumes have recovered strongly on several routes, however passenger accumulations resulting from more frequent delays and disruption have added substantial further pressure on limited space.

Under current plans, buses and bus passengers will be displaced to bus stops at new locations outside the city centre, along Avenue de Chartres. This road was always intended to be a relatively high-speed traffic route, outside the historic core of the city. The city centre has evolved in the subsequent years to reinforce already strong natural severance, with the highway lying beyond the city walls and the green space along the Lavant. It is a traffic dominated, unsurveilled and unattractive environment, reflecting the intended function of the road as an efficient movement corridor for high traffic volume, and nothing more. Avenue de Chartres is relatively close to the rail station and pedestrian connectivity can be provided at broadly equivalent distance to the current bus station, but again it is unsurveilled and currently unpleasant, lacking natural legibility or any sense of prominence.

We understand kerbside capacity on Avenue de Chartres will be strained even to accommodate current levels of service, with no expansion possible. There is therefore a strong probability that to accommodate more frequencies and key new routes, such as West of Tangmere, East of Chichester and West of Chichester allocations, additional future bus stops must occupy a different location. This makes interchange between routes and rail services substantially challenging and less attractive.

The emerging arrangements risk marginalising public transport and public transport users substantially. This strongly undermines achievement of the wider plan objectives and delivery of a significantly greater role for public transport. If substantial public transport growth is to be accommodated in a growing city and hinterland, as the draft plan anticipates, then a more ambitious strategic approach must be taken. This should plan for additional and improved facilities to accommodate all services predicted to be required, whilst enhancing the passenger experience to ensure meaningful and attractive modal choice.

There is therefore a need for the plan to evidence how these issues will be appropriately resolved, having regard to a suitably ambitious approach that properly supports clear objectives to boost the relevance of public transport. The current policy is weak, unspecific and indifferent to achieving the strategic objectives of the plan, including a transport strategy in support of the plan, and as such it is ineffective.

**Policy A3 should therefore be modified to read:**

*“…*

* *Be designed to encourage and facilitate* ***substantial increase in the use of active travel and public transport to, from and through the city centre****.*

*…”*

In line with the commentary above **Policy A4 should also be modified** to read:

*3. Enhance* ***the public interchange function of the immediate area,*** *~~the public realm~~, particularly connections to the railway station and the city centre via South Street, Southgate and Basin Road for pedestrians, cyclists and public transport users, and to National Cycle Route 2 and Route 88 which run close by.* ***Suitable replacement*** *bus stops and layover facilities should be provided to replace those at the bus station ~~in line with~~* ***reflecting*** *the* ***objectives of the*** *West Sussex Bus Service Improvement Plan,* ***and to facilitate growth to meet the requirements of the plan’s development strategy****. Routes and crossings should reflect pedestrian desire lines, ~~and public art should be incorporated to create a sense of place~~;*

*4.* ***Enhance the public realm, in support of this and wider objectives, incorporating public art and other measures to create a strong and attractive sense of place.***

***…(renumber remaining points)***

* 1. ***Policy A6 Land West of Chichester***

Stagecoach **Objects** because the Plan:

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

This is an existing Local Plan allocation. The public transport strategy for the site depends on the delivery of the second phase which Stagecoach notes is the subject of several applications now awaiting review and determination by the Council.

The site represents a compact form of development adjoining the city, as the most sustainable settlement, meeting housing needs close to where they arise, and affording very good opportunities for the use of sustainable modes, especially walking and cycling.

It is vital that a bus service is delivered to serve the site at the earliest potential. This was anticipated to be at the start of Phase 2 and will require the early delivery of the entire length of the spine road between the Old Broyle Road and Westgate and making it available for bus services.

It is not clear if the costs of pump-priming the service mentioned in the draft policy are anticipated to be met by the developer. Without such funding, the service will not be deliverable as years of losses will never credibly be covered from future profit. It is likely that the current wording will be interpreted by the developer as meaning that they have no such obligation binding upon them. Not does policy set out any specification for this service, thus its costs and the basis for securing developer contributions does not exist.

As such any wider transport strategy, that seeks to secure a greater role for the use of public transport, and the aspiration for this allocation cannot demonstrably be met. The policy is **ineffective.**

**Policy A6 should be modified to read:**

*“…*

*10. Make provision* ***to accommodate******and secure delivery of*** *f~~or~~ regular bus services ~~linking~~* ***running through*** *the site* ***to*** *Chichester city centre* ***operating at least every 30 minutes Monday-Saturday****, and new and improved cycle and pedestrian routes linking the site with the city,*

*…”*

* 1. ***Policy A7 Land at Shopwhyke***

Stagecoach **Supports**

This is an existing Local Plan allocation, largely built-out, that benefits from an existing set of permissions.

The public transport strategy for the site depends on the delivery of effective bus priority at Oving Crossroads. The current recently implemented scheme, undertaken by National Highways, makes no provision for effective bus priority and needs considerable re-evaluation.

The site represents a compact form of development adjoining the city, as the most sustainable settlement, meeting housing needs close to where they arise, and affording very good opportunities for the use of sustainable modes, especially walking and cycling. It lies on a new bus corridor that will shortly be put in place, running to Tangmere via Shopwhyke. The allocation is being significantly consolidated by further development in the immediate vicinity which strongly supports the potential for this new service.

As we explain in our representations for East of Chichester proposed allocation A8, and West of Tangmere Allocation A14, a clear corridor strategy to effect bus priority is needed, that should be delivered in support of that further growth, and that at Tangmere SDL. However this allocation is a near complete commitment and there is no scope through policy regarding this land to effect this outcome.

It is notable that Point 6) of policy A7 makes mention of a bus service. This language reflects the currently adopted Local Plan policy and has underpinned the existing permissions. **The failure of any bus service to be delivered demonstrates from first principles that this Policy has been entirely ineffective.** It is important that lessons are learned from this in the Local Plan Review.

* 1. ***Policy A8 Land East of Chichester***

Stagecoach **Objects** because the Plan:

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

This proposed allocation lies next to unallocated land that is already consented as a departure from the adopted development plan, with 143 units near completion south of Oving Road (20/02471/FUL). Additional land, also unallocated but similarly consented, has now commenced north of Oving Road (88 units under 21/02197/FUL). This and the allocation site consolidates earlier development at Shopwhyke brought forward under the current Local Plan, and allocated again as draft policy A7.

Development at Shopwhyke was brought forward on the basis of a premise that the developer would provide or somehow arrange a bus service, that was reflected in the policies of the current Local Plan. This was secured by an unenforceable condition. No bus service has been provided, as there was inadequate clarity regarding the basis on which the costs of establishing such a service would be met by the developer, and the expectations of policy on the developer. The site does however lies on a logical new bus corridor between Chichester and West of Tangmere along the Oving Road.

In addition, an expectation that modifications to the Oving Crossroads would effect bus advantage have proven false – the arrangements put buses into a similar or longer queue than if they use the route available to general traffic to and from the A27.

**Stagecoach strongly supports the principle of bringing this land forward**. However, the soundness of the site depends on deliverability of a regular, reliable and direct bus service along the Oving Road, taking advantage of effective bus priority.

Given the failure of existing policy in the adopted Local Plan covering the proposed A7 allocation to deliver a bus service, it is of great concern that there is no draft policy to adequately address the issue. The policy is out of conformity with NPPF paragraph 104-105 in that sustainable modes do not offer realistic choices, much less an attractive one, and as such also does not secure the objectives of national policy nor of the plan itself.

Currently the proposed allocation is not served at all by public transport. Policy needs to ensure there is a policy basis to secure contributions to deliver such a service, which may well take the form of a proportionate contribution to deliver a new service or enhance provision that is put in place between Chichester along the Shopwhyke Road to west of Tangmere.

**To become sound Policy A8 must be modified to read:**

“…

*12. Provide ~~for improved~~* ***high quality connectivity by*** *sustainable travel modes ~~and~~* ***focused in particular on a corridor between Chichester city centre and Tangmere along Shopwhyke Road, including*** *new improved cycle and pedestrian routes****, and a frequent bus service*** *~~including linkages with Chichester~~* ***taking advantage of effective bus priority******measures on Oving Road at the A27;***

*…”*

* 1. ***Policy A9 Land at Westhampnett/North East Chichester***

Stagecoach **Objects** because the Plan:

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

This land is already allocated and consented as part of the existing 2016 Local Plan. All reserved matters are determined.

The site lies on service 55 between Chichester, Westhampnett and Tangmere. This established service benefits from additional demand from the development at Phase 1. Phase 2 which is currently well underway, does not benefit directly from bus services. However it is a compact and logical form of development where walking and cycling to local facilities and employment is a credible option.

The existing allocation rolls forward policies in the 2015 Local Plan. In so doing it is possible to see which have been effective.

Point 9. regarding bus service and routing **has not been effective**. In particular the potential for a bus only link between the site and Graylingwell has not been established as policy anticipated. Given congestion around the Portfield area acutely affects public transport this, or alternative methods to secure bus priority over private car use, a clear and unequivocal policy steer is required.

The lack of an up-to-date transport evidence base is ultimately at the root of these issues. Arguably the policy and allocation can only be made sound once this refreshed evidence base in place.

**However, it is possible that the allocation could be made sound by modification of Policy A9 as follows:**

*“…*

*9. Make provision for* ***regular, direct and reliable*** *bus services linking the site with Chichester city centre, and new and improved safe and convenient cycle and pedestrian routes linking the site with Chichester city, the South Downs National Park and other strategic developments to the east of Chichester city including Tangmere.* ***These objectives*** *~~could include exploring the potential for a~~ ~~bus only route~~* ***require a deliverable scheme to afford bus priority through Portfield, and potentially*** *linking the development with the Graylingwell area* ***through use of a modal filter****;*

*…”*

* 1. ***Policy A10 Land at Maudlin Farm***

Stagecoach **Objects** because the Plan:

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

Stagecoach supports the identification of this site, which consolidates significant recent development on an existing public transport route. It is relatively close to the city and very near substantial centres of employment and services that can be reached by active travel modes, helping damp the demand for car use. It is a site which, with appropriate measures to substantially boost the relevance and attractiveness of sustainable choices, could be made sustainable.

The draft policy is not sufficiently clear and robust about the measures to support the damping of car trips that will be required to support development at this location without having an unacceptable impact on traffic conditions, congestion and the reliability of bus services at Portfield and over a wider area. In fact, the only reference that is made is that the development should fund highways capacity improvements. These improvements, as set out in the Chichester Transport Strategy, do not accommodate growth from additional sites over and above those already allocated in the 2015 Local Plan. They do not secure any mode shift away from car use. An update of this strategy has yet to be produced. This is an unsound, inadequately evidenced approach, that will be ineffective.

**Policy A10 should accordingly be modified to read**:

*“…*

*5. Provide safe and suitable access points for all users, including a main vehicle access from Old Arundel Road and, subject to further assessment, a secondary vehicle access from Dairy Lane. The development should make the requisite contributions for off-site ~~highway~~* ***improvements to transport infrastructure and services, with an emphasis o maximising the attractiveness of sustainable modes,*** *in conformity with the Policy T1 (Transport Infrastructure) and T2 (Transport and Development), which will include ~~promoting sustainable transport options~~* ***high quality pedestrian, cycling and public transport routes****;*

*…”*

* 1. ***Policy A11 Bosham – Land at Highgrove Farm***

Stagecoach **Objects** because the Plan:

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

Stagecoach supports the identification of this site, which consolidates significant recent development on an existing high quality public transport route, including Stagecoach service 700 and the Coastway rail service available at Bosham Station. It is relatively close to the city and very near substantial centres of employment and services that can be reached by public transport and cycling, offering strong potential to materially damp the demand for car use.

There are serious risks that development in the A259 corridor west of Chichester could place further demands on the junctions at Fishbourne and approaching Emsworth, leading to even more chronic and severe delay to travellers and in particular to bus services.

Nevertheless, given the potential to effect bus priority on the approaches to Fishbourne Roundabout, it is a site which, with appropriate measures to substantially boost the relevance and attractiveness of sustainable choices, could be made sustainable.

The draft policy is not sufficiently clear and robust about the measures to support the damping of car trips that will be required to support development at this location without having an unacceptable impact on traffic conditions, congestion and the reliability of bus services on the approaches to the A27 and over the wider corridor to the west. In fact the only reference that is made is that the development should fund highways capacity improvements. These improvements, as set out in the Chichester Transport Strategy, do not accommodate growth from additional sites over and above those already allocated in the 2015 Local Plan. They do not secure any mode shift away from car use. An update of this strategy has yet to be produced. This is an unsound, inadequately evidenced approach, that will be ineffective.

**Policy A11 should accordingly be modified to read:**

*“…*

*8. Provide safe and suitable access points for all users, including a main vehicle access*

*from the A259. The development should make the requisite contributions for off-site ~~highway~~* ***improvements to transport infrastructure and services, with an emphasis o maximising the attractiveness of sustainable modes,*** *in conformity with the Policy T1 (Transport Infrastructure) and T2 (Transport and Development), which will include ~~promoting sustainable transport options~~* ***high quality pedestrian, cycling and public transport routes, and providing substantial peak journey time advantage for sustainable modes on journeys crossing the A27 at Fishbourne****;*

* 1. ***Policy A12 Chidham and Hambrook***

Stagecoach **Objects** because the Plan:

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

Stagecoach supports the identification of this site, which consolidates significant recent development on an existing high quality public transport route, including Stagecoach service 700 and the Coastway rail service available at Nutbourne Station. Substantial centres of employment and services that can be reached by public transport and cycling, offering strong potential to materially damp the demand for car use.

There are serious risks that development in the A259 corridor west of Chichester could place further demands on the junctions at Fishbourne and approaching Emsworth, leading to even more chronic and severe delay to travellers and in particular to bus services.

Nevertheless, given the potential to effect bus priority on the approaches to Fishbourne Roundabout, it is a site which, with appropriate measures to substantially boost the relevance and attractiveness of sustainable choices, could be made sustainable.

The draft policy is not sufficiently clear and robust about the measures to support the damping of car trips that will be required to support development at this location without having an unacceptable impact on traffic conditions, congestion and the reliability of bus services on the approaches to the A27 and over the wider corridor to the west. In fact the only reference that is made is that the development should fund highways capacity improvements. These improvements, as set out in the Chichester Transport Strategy, do not accommodate growth from additional sites over and above those already allocated in the 2015 Local Plan. They do not secure any mode shift away from car use. An update of this strategy has yet to be produced. This is an unsound, inadequately evidenced approach, that will be ineffective.

**Policy A12 should accordingly be modified to read:**

*“…*

*7. Development should make the requisite contributions for off-site ~~highway~~* ***improvements to transport infrastructure and services, with an emphasis on maximising the attractiveness of sustainable modes,*** *in conformity with the Policy T1 (Transport Infrastructure) and T2 (Transport and Development), which will include ~~promoting sustainable transport options~~* ***high quality pedestrian, cycling and public transport routes, and providing substantial peak journey time advantage for sustainable modes on journeys along the A259, crossing the A27 at Fishbourne and where necessary on the approaches to Emsworth****;*

*~~8. Facilitate improved sustainable travel modes, and new improved cycle and pedestrian~~*

*~~routes, including linkages with Chichester city and settlement along the East/West~~*

*~~Corridor;~~*

* 1. ***Policy A13 Southbourne Broad Location for Development***

Stagecoach **Objects** because the Plan:

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

Stagecoach agrees unequivocally that Southbourne is a location that could accommodate growth on a strategic scale. It has a substantial range of service available within the settlement, including secondary education. It is well connected by bus and rail service to key destinations, including Chichester, lying to the east and west.

This is one of the few locations identified for growth that represents substantial additional development in a new location to the strategy in the existing Local Plan adopted in 2015. Thus, the transport impacts of development on the substantial scale envisaged at Southbourne are not covered or accommodated by the Chichester Area Transport Strategy that lies behind the existing plan. This demands, from first principles, that substantial further transport mitigation measures are required.

We recognise and endorse fully that the intent of the draft plan for Southbourne as a Broad Location for Development on a strategic scale, includes *“****Maximising the potential*** *for sustainable travel links through improved public transport, including consideration of opportunities to reduce community severance caused by the railway line as well as the inclusion of cycling and pedestrian routes.”*  (our emphasis).

The existing railway station at Southbourne is served regularly, however, it is not within the power of this plan to improve rail services. It is, however, well within the scope of action of the Local Planning and Highways Authority to work with bus operators to achieve a step change in the journey time, reliability, frequency and connectivity of bus services, and in particular the major corridor operated as service 700 by Stagecoach along the A259 between Havant and Chichester through Southbourne.

Notwithstanding the clear potential for sustainable connectivity in the western A259 corridor, there are very serious risks that development in the A259 corridor west of Chichester will place further significant car-borne demands on the junctions at Fishbourne and approaching Emsworth, leading to even more chronic and severe delay to travellers and in particular bus services, having the opposite effect to that intended: longer, less reliable and less frequent bus services, leading to a spiral of slowly declining use.

These risks, while very serious, look credibly likely to be entirely mitigated subject to carefully conceived and robust specified actions on the local highway network. It is perplexing to us that this potential still has not been identified, as part of a comprehensive “first principles” review of the transport evidence base. In particular given the former trunk status of the A259, the there is evident potential to effect bus priority on the A259, including on the approaches to Fishbourne Roundabout.

With appropriate measures, including but not limited to this, to substantially boost the relevance and attractiveness of sustainable travel choices, strategic development at Southbourne could well be made highly sustainable.

**In the absence of a refreshed transport strategy and transport evidence base, the draft policy is not sufficiently clear and robust about the measures to support the damping of car trips that will be required to support development at this location without having an unacceptable impact on traffic conditions, congestion and the reliability of bus services on the approaches to the A27 and over the wider corridor to the west**. In fact, the only reference that is made in Policy is that the development should fund highways capacity improvements. These improvements, as set out in the Chichester Transport Strategy, do not accommodate growth from additional sites over and above those already allocated in the 2015 Local Plan . They do not secure any mode shift away from car use. An update of this strategy has yet to be produced. This is an unsound, inadequately evidenced approach, that will be ineffective.

**Policy A12 should accordingly be modified to read:**

*“…Development should be comprehensively masterplanned to achieve a high-quality design and layout that integrates well with the surrounding built and natural environments to enable a high degree of connectivity with them, particularly for pedestrians and cyclists, and provides ~~good~~* ***the highest possible quality of access*** *to facilities and ~~sustainable forms of~~* ***improved*** *public transport* ***services.***

***…***

*4. Provide a suitable means of access to the site(s),* ***and*** *securing* ***secure*** *necessary off-site* ***transport infrastructure and service*** *improvements (~~including highways~~* ***in particular to the A259 corridor between Emsworth and Chichester****) in conformity with the Policy T1 (Transport Infrastructure) and T2 (Transport and Development) to ~~promote sustainable transport options~~* ***prioritising******delivery of high quality pedestrian, cycling and public transport routes, and providing substantial peak journey time advantage for sustainable modes****;*

*…”*

* 1. ***Policy A14 Land West of Tangmere***

Stagecoach **Objects** because the Plan:

• is unsound as it does not conform to the National Planning Policy Framework

• is not effective

• is unsound because it is not based on relevant proportionate and up to date evidence

Stagecoach strongly **supports the principle of intensifying the level of development** at the Strategic Development Location already identified and allocated West of Tangmere in the existing Local Plan. This serves to consolidate development at a location where effective and attractive public transport choices could be provided. It also conforms closely with the principle expressed in NPPF that the best possible use should be made of land on sites that are judged to be sustainable, or potentially sustainable locations for development.

It must be stressed that the current policy suite for the SDL has to date not brought forward development in this location. We recognise that a Master Plan has been adopted by the Council, and that a planning application (20/02893/OUT) for the full larger quantum of 1300 dwellings proposed in the draft plan has received a resolution to grant by the Council.

However, **we are not aware that a sustainable transport strategy has been finalised.**

**Land West of Tangmere is not served by any existing regular bus services. Rather, an entirely new bus service corridor is anticipated to operate in the near term from Chichester through Tangmere and beyond towards Barnham.** This would serve proposed allocations A7, A8 and West of Tangmere (A14) included in the draft Plan.

This is reflected in the language of the explanatory memorandum to Policy A14 at paragraph 10.65:

*“Opportunities, in partnership with relevant authorities, to provide improved sustainable public transport routes linking the village with Chichester city, to improve cycle routes to the city, and better transport links to Barnham rail station and the ‘Five Villages’ area in Arun District; and..”*

Initiating this service will be costly and will in large measure be funded not by developer contributions, but by DfT monies awarded through the West Sussex Bus Service Improvement Plan. It is crucial this service is both sustainable in the longer term without revenue support, and that the success of the service can be built on by scalable frequency improvements as strategic development comes forward in both Chichester District, and proposed allocations A7 A8 and A14, and in Arun District, in particular at Barnham, Eastergate and Westergate (BEW).

**This demands measures to effect safe, direct and swift operation of the service especially within the city centre, where it approaches and crosses the A27 at Oving crossroads and on the eastern fringes of the District east and west of Tangmere. Without these measures, bus journey time and reliability will be severely compromised and the and impact of this service to damped car trip demands will be very substantially compromised. No such measures are proposed in the draft plan or its evidence base.**

Changes to Oving Crossroads have recently taken place which, amongst other intentions, ostensibly provide bus advantage between Chichester and Shopwhyke. The junction in its current form does not offer material gain in bus journey time, as movements involve a less-direct route towards the city over an increased operating distance, much of which involves passage through heavily congested sections of the A27 and Westhampnett Road. A refreshed transport strategy supporting plan-led growth must revisit this area to secure an effective solution which offers bus customers the fastest and most reliable trip-time to and from the city.

In addition, the extension of public transport connectivity towards BEW and Barnham, including key links to secondary education and a logical railhead for journeys beyond towards Brighton and London as provided at Barnham Station, needs to facilitate bus priority between Tangmere and Nyton – whether using the A27, or preferably avoiding it altogether. There are significant safety concerns associated with the at-grade uncontrolled right-hand A27 exit onto the B2233 Nyton Road at Crockerhill Turn. This movement is also prone to extreme delay owing to the conflict with approaching westbound traffic on the A27, travelling at speed, which has priority. Our concerns with this junction in its current form can be expected to worsen with the increased traffic volumes predicted from new residential developments to the west of the city.

A solution providing a suitable short length of highway available only to sustainable modes, between Tangmere and Easthampnett, could provide a very effective solution to this. This would be deliverable within the scope of the separate proposed allocation at A19 Chichester Business Park, Tangmere. We comment on this separately.

Howsoever effected, a reliable direct and delay-free bus corridor between Barnham, BEW, Tangmere and Chichester could expect to secure very substantial elevation of the relative attractiveness of public transport over car use on the entire corridor and serve to effectively damp growth-related demands on this section of the A27. West of Tangmere, in the longer term, there is evident scope for the route corridor to operate as two branches – one via Shopwhyke and one via Westhampnett, effectively serving all the strategic developments proposed in the plan and transforming wider public transport connectivity to key employment destinations and services within and east of Chichester.

However, in common with all the other proposed allocations, the plan proposes no specific measures to provide, much less improve public transport or other sustainable modes to the site. This leaves the draft plan out of conformity with NPPF, especially paragraphs 104-106. The plan is inadequately evidenced and to the degree that public transport measures are identified and emergent, their successful implementation in the near and longer term will be jeopardised without clear measures to provide a safe as well as efficient bus route towards BEW and the Five Village area within Arun. The Duty to Cooperate is not effectively met and effective cross boundary collaboration on these strategic issues through the review of LSS is not demonstrated, despite the current version which identifies the issues.

To be made sound the LSS Review and a subsequent urgent review of the transport evidence base and strategy needs to take place. The strategic issues are especially critical east of Chichester, in our view.

Notwithstanding this foundational deficiency, to be made sound, **Policy A14 should be modified to read:**

*“…*

*8. Subject to detailed transport assessment, provide primary road access to the site from the slip-road roundabout at the A27/A285 junction to the west of Tangmere providing a spine road link with secondary access from Tangmere Road. Development will be required to provide or fund mitigation for potential off-site traffic impacts through a package of measures in conformity with Policy T1 (Transport Infrastructure) and T2 (Transport and Development)* ***and DfT Circular 01/2022 that maximise the relevance and use of sustainable travel modes, in particular bus services****;*

*9. Make provision for improved sustainable travel modes between Tangmere and Chichester city, in partnership with relevant authorities, including ~~improved~~* ***direct, seamless safe and reliable*** *~~and additiona~~l* ***bus and cycle*** *routes linking Tangmere with Chichester city, Shopwhyke and Westhampnett.* ***In conjunction with measures in support of Allocation A19,*** *~~Opportunities should also be explored~~* ***contributions shall also be sought for******providing*** *~~improving~~* ***high quality*** *cycling and bus service transport links with the 'Five Villages' area and Barnham rail station in Arun District; and…”*

1. **Concluding comments**

Stagecoach recognises its role as a key stakeholder in the plan, as well as a local employer and corporate citizen. We recognise the primacy of the plan-led system as the mechanism intended to resolve complex challenges, including the proper alignment of transport and spatial planning, which as the National Decarbonisation Strategy for Transport among other policies makes clear, has never been more vital.

In making our representations, we emphasise that we are entirely supportive of the Local Planning Authority and the relevant Highways and Transport Authorities, in their efforts to properly manage the amount and pattern of development to secure vital policy objectives. We recognise that balancing delivery of assessed development needs with a wide variety of other constraints is a very difficult task.

The transport issues faced by the plan are recognised in the draft plan as being serious and long-standing. We believe that there are ways to arrive at a suitable transport mitigation strategy that has regard to wider strategic issues and resolves existing problems in a much more effective way than those pursued to date.

We support the spatial strategy of the plan as it evidently provides the basis to secure the necessary step change in the quality and use of sustainable transport modes, as it explicitly seeks to do. However thus far, there has been insufficient work done to define the measures that will credibly secure these outcomes.

Stagecoach therefore urges the authorities to draw us into the necessary effective ongoing collaborations that is expected by NPPF paragraph 16 and 106; and DfT Circular 01/022, to do this work, prior to, rather than after the submission of the draft plan. We look forward to being approached to initiate this dialogue at the earliest opportunity.

Yours sincerely

**Nick Small**

Head of Strategic Development & the Built Environment

on behalf of Stagecoach South