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15/03/2023

Dear Planning,

**NETWORK RAIL CONSULTATION RESPONSE: CHICHESTER LOCAL PLAN (2021 – 2039)  
CONSULTATION (REGULATION 19)**

Thank you for consulting Network Rail on the above consultation, I can confirm we wish to make the following comments.

Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland, and Wales. As statutory undertaker, Network Rail is under license from the Department for Transport (DfT) and Transport Scotland (TS) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway.

Having been in consultation with the train operating company, Southeastern Rail, of particular interest to Network Rail is the need to integrate active travel infrastructure and promote First and Last Mile principles. In addition, the impact of development on train stations and existing level crossings.

**First and Last Mile Considerations**

We encourage the Council to consider not only the impact of development on the railway itself, but also on the first and last mile element of passengers' journeys. This factors in

access to and from the railway, as well as how other transport modes are integrated and how well communities are connected.

Failure to integrate this represents an issue for rail travel as people who start journeys by car will likely continue to drive rather than stop to change to the train, as the cost and time of parking and train tickets offer no benefit to them.

Developing access to the railway using first and last mile principles has several benefits, including:

- Aligning with local and national policy to reduce carbon emissions and meet net-zero targets, by encouraging more active modes of transport such as walking and cycling
- Providing a seamless journey experience where various modes of transport are integrated, including bus and rail services
- Providing an accessible and inclusive offering of transport modes to both local residents and visitors
- Improving connections between communities which may not be as well-served by public transport

While infrastructure and transport services may be identified as areas for improvement, there may be other, smaller scale enhancements that can be made such as better provision of information or additional cycle racks. Network Rail's Planning team welcome further discussions with the council to gain a better understanding of how we can work together to improve access to the railway and integrate first and last mile thinking into the scheme plans, taking into account the various component parts of passengers' journeys and wider plans for the local area.

**Policy T3 Active Travel** – this has the broad support of Network Rail but should be strengthened to reflect walking/cycling as the first choice for local journeys; and for longer journeys part of an integrated bus/train transport chain that allows people to continue seamlessly.

Network Rail will support planning schemes within active travel distance of railway stations that provide continuous, direct and safe pedestrian/cycle routes that will serve rail passengers. Pedestrian routes should be prioritised over vehicles, meaning all schemes should be designed so that vehicles wait for walkers/cyclists, not the other way around.

### **Transport Infrastructure**

Accessibility should be built into new development in the form of active travel networks, which will enhance permeability in people's transitions between areas. Development requiring additional road capacity should not go ahead, except as a last resort.

**Policy T1** – in general this is supported. References to a 'coordinated package of infrastructure improvements' along the A27 should be replaced with a 'coordinated package of active travel and public transport improvements infrastructure', as this is more specific in emphasising that car transport should be minimised as much as possible.

**Policies T2 and I1** – in general these are supported in the sense they promote seamless and continuous active travel arrangement and minimise car use. However, references should be made to the concept of 15–20-minute neighbourhoods that provide a wide range of services within this walk time. The provision of amenities and leisure facilities within a 15-minute walk should be a cornerstone idea that drives mid to long term infrastructure goals for Chichester. Owing to the considerable amount of development anticipated by the Council, there is ample opportunity for local businesses and retailers to provide services within these local neighbourhoods.

### **Railway Station Considerations**

As a public funded company, Network Rail has responsibilities to spend public funds efficiently which consequently means we do not have the funds available to mitigate the impact of third-party development on railway stations. Where a significant amount of rail trips are generated by a third-party development, Network Rail expect that the development provides a contribution to mitigate the addition usage, ensuring that the rail network can continue to operate effectively. The contributions will encourage greater use of public transport by enhancing the rail experience for passengers.

The Local Plan has proposed site allocations across the district, for this reason the resulting increase to the use of stations should be recognized and mitigated against so that rail travel remains an attractive mode of transport. Failure to upgrade stations will result in less rail passengers which is counter productive to the Council's goals of a thriving public transport system.

**Southbourne and Fishbourne Stations** - Network Rail have concerns about the impact of future development on Southbourne and Fishbourne stations. As the stations themselves are small-sized, large-scale accessibility improvements would be potentially difficult. As a result, the provision of cycle parking facilities at both stations should be considered as crucial by the Council to ensure the station environment continues to modernize and encourage passenger use. This also ensures the stations integrate with proposed cycle/pedestrian routes across the area.

### **Level Crossing Considerations**

As part of Network Rail's license to operate and manage Britain's railway infrastructure, Network Rail have the legal duty to protect rail passengers, the public, the railway workforce, and to reduce risk at our level crossings so far as is reasonably practicable. Improving Level Crossing safety is therefore one of Network Rail's key priorities.

Closing level crossings is the only way to fully eradicate the risk. However, it is not always possible or practicable to immediately close all level crossings. Aside from financial and practical constraints, user convenience still needs to be a key consideration. A broad range of targeted interventions and initiatives are therefore needed to manage safety at crossings which remain open.

Any new development would need to provide an assessment of the impact on any nearby Level Crossings and in some cases, planning obligations may be required to mitigate the impacts on it.

**Policy A13 Southbourne Broad Location for Development** - Several strategic sites have been identified across the district, with a significant amount west of Chichester which

require consideration. Policy A13, which proposes 1050 new homes, will result in significant upturns in use of the Penny Lane and Church crossings, which are currently public footpath crossings and have high risk factors. Large-scale development could therefore warrant closure or installation of a footbridge. The Council should be aware of this as these projects are costly and would require requisite funding.

Network Rail are in the process of completing a risk assessment on the affected crossings. However, for context we recently reviewed the Copse level crossing (located approximately 1.9km eastwards from Penny Lane) which resulted in a 300% use increase from a 112-home development (Planning Application SB/22/01283/FULEIA).

I trust that the above is clear, should you require additional information please do not hesitate to contact me.

Kind regards,



**Sam Bhatti**

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