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| *Via email:* planningpolicy@chichester.gov.uk | Network Rail1 Puddle DockLondonEC4V 3DSE craig.hatton@networkrail.co.uk |
| 28 May 2025 |

Dear Planning,

**CHICHESTER DISTRICT COUNCIL LOCAL PLAN 2021 – 2039 – SCHEDULE OF PROPOSED MAIN MODIFICATIONS (March 2025).**

These representations are submitted to Chichester District Council (CDC) by Network Rail Infrastructure Limited (‘Network Rail’), in respect of the consultation on the proposed main modifications for the Local Plan following its examination in public.

**Background**

Network Rail (NR) owns, operates, maintains and develops the railways in England, Scotland and Wales. NR is a public sector company, sponsored by the Department for Transport. NR is responsible for providing a safe, reliable and efficient railway while growing and upgrading the network to better serve passengers and freight. This also considers both individual and the cumulative impact of development sites on rail station accessibility and capacity along with rail services.

The train operating company through Chichester is Govia Thameslink Railway (GTR) with whom consultation has taken place and therefore these representations should be considered as a rail industry response. Additionally, where appropriate and not required to support the operational railway, NR will also promote land for re-development for alternative uses to support meeting need in the Borough.

As a key statutory consultee and provider of essential infrastructure, NR are committed to working collaboratively with CDC as the Plan moves towards adoption and subsequent work to be undertaken to review the Local Plan, should this be adopted.

**Representations**

This section sets out the areas for which comments have been made in relation to proposed main modifications.

* Chapter 2: Vision and Strategic Objectives
* Chapter 3: Spatial Strategy
* Chapter 5: Housing
* Chapter 10: Strategic and Area Based Policies

The above are broken down below, with each relevant main modification to be commented on also included to ensure clarity of where NR’s comments are directed.

**Chapter 2: Vision and Strategic Objectives**

MM5 – Objective 1

NR supports the proposed main modification to the second paragraph to include specific reference to rail stations. This will help to embed first and last mile principles for active travel to and from rail stations.

MM5 – Objective 7

NR notes the proposed main modifications in the second and third paragraphs. These are generally supported to increase opportunities to promote active travel links to public transport. It is considered fair and reasonable that new development contributes towards improving infrastructure, especially public transport, to promote an accessible network that can provide and sustain a modal shift away from the private car.

**Chapter 3: Spatial Strategy**

MM6 – Para 3.9

NR supports the proposed main modifications to remove reference to the neighbourhood plan and to afford the site allocations DPD primacy in site selection.

**Chapter 5: Housing**

MM31 – Para 5.1

NR welcome the clarity provided proposed modification to clearly set out the annual housing requirement for the District alongside this being the starting point for objectively assessed need.

Policy H2: Strategic Location/Allocations 2021 - 2039

MM32 – Policy H2

NR supports the modification to set out that the Southbourne Allocation DPD will come forward to provide clarity around the Broad Location for Development.

**Chapter 10: Strategic and Area Based Policies**

Policy A13: Southbourne Broad Location for Development

MM77 – Criterion 5

NR supports the inclusion of the need to consider the severance by the railway in the masterplanning of the Southbourne BLD. Southbourne has several of high risk railway crossings that give rise to significant safety concerns due to the quantum of development proposed. Dealing with the safety issues of the crossings is a critical element of the infrastructure needs within Southbourne to allow development to come forward.

Additionally, improving connectivity should be an important focus of the Policy however this must be done to minimise railway interactions and safe, alternative means of crossing the railway is essential for current and future occupiers within Southbourne. NR will continue to work with CDC to support development and minimise the impacts of this on railway safety.

**Concluding Remarks**

NR welcomes the positive movement of the Local Plan towards adoption. The district has a number of rail stations that could be utilised further through improved accessibility and connections with development growth. The Council should continue to engage with NR as to how best to maximise the existing rail connections and to identify opportunities to further enhance these to accommodate new development and ensure the safety of existing and future occupiers, especially where development is close to level crossings.

Yours faithfully

**Craig Hatton MRTPI**

**Senior Town Planner**

**Network Rail Infrastructure Limited**