**Outline of Objection to Submitted Draft Local Plan**

**on behalf of The West Sussex Cycle Forum, Chichester and District Cycle Forum and Sustrans( Chichester and Arun Branch).**

There are 3 grounds for objection;

1. Legal compliance
2. Soundness
3. Duty to Cooperate.
4. **Legal compliance**

There has not been sufficient, recent public consultation. The last stage was in Jan 2019 on the Preferred Option as confirmed by the latest Statement of Community Involvement published in Nov. 2018. Neither has there been published a Statement of Common Ground. It is recommended ( in Government Guidance )that this be published at same time Reg.19 i.e. Proposed Submission of Draft Local Plan [ Feb 2023]. A lot has changed in 4 years, including government commitments to tackle Climate Change and Sustainable Transport. Environmental conditions re water, sewerage, sea level rise, pollution have all worsened locally yet the Council has not allowed the public to consider this worsening scenario. The delay in moving to this stage, over 4 years now, requires there to be a reassessment of the proposals and policies. In relation to Active and Sustainable Travel Government Guidance has significantly changed with the Publication of Gear Change and Decarbonising Transport. Scant regard is given to mitigate the use of vehicles which these documents require. For example in the latter White Paper under Theme 2 “ Putting cycling and walking at the heart of transport, place-making and health policy “ it states that “ to receive Government funding for local highways improvements where the main element is not cycling or walking improvements there will be a presumption that all new schemes will deliver or improve cycling standards to the new standards laid down …” It places the same requirement in RIS2 on National Highways.

The draft plan does not give sufficient weight to these new approaches to transport and their environmental benefits.

**2.Soundness**

There are 4 tests of ‘Soundness’;

1. Positively Prepared
2. Justified
3. Effective, and
4. Consistent with Government policy.

a : **Does it meet Strategic needs of the area ?** This includes neighbouring areas.

As there is no agreed Statement of Common Ground it is not possible to judge on whether such major needs are being met. Also we argue that as the draft Plan does not commit the provision of better infrastructure as there are no published agreements with National Highways then it does not meet the strategic needs, in fact by proposing thousands of more houses it worsens the situation. Similarly there are no policies which commit to the provision of necessary active travel infrastructure to cope with this increase in population and travel needs

B. Justified- **Is the Strategy reasonable and appropriate ?**

Again by assuming that infrastructure will be funded in line with land release for housing but with no phasing proposed and no commitment to fund by National Highways despite having £15m already, then it does not pass this test. Surely infrastructure needs, in particular for Active and Sustainable Travel, should be met before more land is released, but there are no strategic phasing policies. In providing such travel modes at the outset of new development modal switch from polluting, unhealthy modes will be more easily established. As an example the attached amendment to Policy H2 { Attachment 1} is proposed.

c. Effective- **Is the Plan deliverable, have strategic matters been dealt with as evidenced by Statement of Common Ground.?**

No, see above., there is no agreed Statement of Common Ground.

An Infrastructure Delivery Plan has been produced; however in studying the section on Plan Area Wide Infrastructure Needs no dates for implementation are given for the major changes to the A27, illustrating the lack of commitment to the delivery of the basic infrastructure .

Contributions to the two A27 roundabouts for the uncommitted housing , 3351, about 40% of the total, is assessed at £7728 per house at current prices. This is 4 times higher than current level of £1803. No where does there appear to be an assessment as to whether this is viable for the land developers and house buyers. Viability is a key test with regard to deliverability but the Plan is silent on this key issue. So is the plan deliverable? Does it further price first-time buyers out of the market even more so than now when Chichester has already one of the highest Ratio of Affordability in Sussex and Hampshire ?

d. **Consistent with Government Policy. Especially with regard to Sustainable Development**.

Many new Govt. policies , laws, have been published in the 4 years since the last stage of the Plan. For instance in relation to Transport two White papers, Decarbonizing Transport and Gear Change have been published. Scant regard is given to mitigate the use of vehicles which these documents require. As set out above in the latter White Paper under Theme 2 “ Putting cycling and walking at the heart of transport, place-making and health policy “ it states that “ to receive Government funding for local highways improvements where the main element is not cycling or walking improvements there will be a presumption that all new schemes will deliver or improve cycling standards to the new standards laid down …” It places the same requirement in RIS2 on National Highways.

The Stantec report 2 ”Chichester Transport Study [ Local Plan Review Transport Assessment]” issued in Jan. 2023 states that “ as per the guidance the emphasis should be delivery of a sustainable transport strategy, which will enable growth while also considering environmental impacts and climate change targets”

While some reference is made to encouraging more use of sustainable modes the policies put forward are toothless ie. T3 Active Travel, does not protect existing and proposed routes, as advocated in NPPR paras. 104 to 106. Again Govt advice on integrating Local Cycling and Walking Infrastructure Plans [LCWIP’s ] with land use plans through their incorporation into Supplementary Planning Documents is ignored in the Submitted Draft. In contrast the current SPD approved in 2016 on ‘Planning Obligations… ‘ requires 100% of transport contributions to be used for highway improvements ie the 2 redesigned roundabouts on the A27. This is not in compliance with any recent Government publication or policy. The Government commitment to achieve ‘ Net Zero ‘ by 2050 is perhaps the most fundamental shift in its policies and priorities in the last 4 years. The proposed Plan period is to 2039 which is two- thirds of this timescale. Yet the major transport proposal in the plan is to require £43 million on two roundabouts to accommodate the increase in traffic including a further 10,000 houses; in addition further traffic will use this road from neighbouring authorities. Is this furthering SUSTAINABILITY ?.

The Cycle Forums, and the local branch of Sustrans ,are therefore submitting an Alternative policy T3 ‘ Priority for Walking, Cycling, Equestrian, Mobility Needs and Quiet Lanes. ( See Attachment 2 ). This alternative policy addresses these inadequacies, embraces all active travel and mobility needs , and follows other approved Local Plans, e.g. South Downs National Park, and Cambridge City.

3**. Duty to Cooperate.**

Mention has been made of the lack of agreements in relation to this statutory requirement, Statement of Common Ground.[ Apparently CDC officers have said this not necessary !]

In April 2021 CDC received advice from the Government’s Planning Advisory Service in relation to the considerable infrastructure constraints it was faced with in relation to housing land release. This advice has not been followed in terms of producing compelling arguments as to how the infrastructure deficits can be overcome in conjunction with the public and private undertakers. There is no commitment from National Highways, for instance, as to when the two roundabouts will be started , let alone the major improvements known to be necessary to A27 as a whole through the Plan area. As none of the housing land release is linked to the lack of programmed improvements it is logical to assume that all the housing land could be approved and built before the infrastructure is provided. This is the antithesis of Town and Country Planning. It is proposed therefore that Policy H2 Strategic Locations/Allocations 2021-2039 be amended so that the following strategic sites; A2,4, 5, 8, 10, 11and 13 are only released one year after work commences on the A27 improvements at the Fishbourne and Bognor Road Roundabouts. Ian Sumnall 10.03.23