

Subject: FW: Selsey Neighbourhood Plan Public Hearing

From: Lucy Seymour-Bowdery [mailto:lucy.seymour-bowdery@westsussex.gov.uk]

Sent: 16 November 2015 17:17

To: John Slater Planning

Cc: Sue Payne; Darryl Hemmings; Bernard Smith

Subject: RE: Selsey Neighbourhood Plan Public Hearing

Dear John

Please see the following responses to your questions regarding the Selsey Neighbourhood Plan:

- Can I have the Highway Authority's specific views , on the necessity or reasonableness of specifically Policies TR1 and TR2 in terms of transport policy/ impact and in particular whether contributions should be collected for development greater than one residential unit
Response: Policy TR1 states that traffic calming will be progressively introduced along the B2145 and lists the planned improvements associated with this. However, these are not improvements that are usually associated with traffic calming. The overall aim of this policy is unclear with the terminology that is currently used. Policy TR1 identifies infrastructure priorities to be funded by developer contributions. It is considered unnecessary and unreasonable to state these priorities in a specific policy in the absence of sufficient feasibility work to support them. As stated previously, it is suggested that these improvements are included in the Plan as a set of aspirations to be included in Appendix I. It should be noted that Chichester District Council (CDC) is preparing an Infrastructure Business Plan (IBP) to identify the infrastructure needed to support the development growth identified in the Local Plan to 2029. It prioritises infrastructure provision and phasing; identifies funding sources and responsible delivery agencies, and prioritises the projects to be funded solely or partly from the Community Infrastructure Levy (CIL). This includes the identification of local priorities from the town and parish councils. This will be the appropriate document to include the priorities that are currently set out in Policy TR1 if supported by sufficient justification.
As stated in a previous response, policy TR2 could be quite onerous and unnecessary if it is applied in all cases. If these surveys are intended to inform capacity assessments, the Local Highway Authority will, as part of the consideration of any notable planning proposal, determine which traffic surveys are required and where, as well as what junction capacity assessments are needed in accordance with prevailing guidance available at the time. In accordance with the NPPF, Policy 39 of the Chichester Local Plan sets out the requirement to submit a Transport Assessment where developments are likely to have a significant transport impact. The County Council will apply this to developments of 80 residential units and over. If the objective is to assess the impact of development on B2145 and / or B2201, it may be more effective if Policy TR2 requested that developments will be expected to assess their impact on these roads rather than to specifically undertake traffic surveys. It should be noted however, that traffic surveys may form part of this assessment where this is required by the Local Highway Authority.
In response to the latter part of the question and whether contributions should be collected for development greater than one residential unit, it should be noted that once CIL is introduced in Chichester District, this will be the primary means of collecting contributions for small-scale development. The spending of CIL will be set out in the Chichester IBP as referenced above. The use of S106 agreements will be limited to site-specific infrastructure. Improvements to be delivered through S106 planning obligations would need to meet the tests set out in Regulation 122 of the Community Infrastructure Levy Regulations. It is unlikely that the impact of a site as small as two units would require an improvement that would meet those tests. There are also restrictions that limit the pooling of S106 contributions.
- Whether the planned improvements identified in the 4 bullet points in Policy TR1 would be supported/implemented by the County Council , if funding referred to above could be secured.
Response: The planned improvements identified in policy TR1 would require sufficient evidence to support their inclusion in a policy. Some of the improvements have already been sought and secured as part of recent planning applications. For inclusion in the policy, it would need to be demonstrated that the remaining infrastructure proposals are deliverable; preliminary designs of the schemes identified some requirement for third party land which may prevent the

implementation of the proposed schemes. For the reduction of variances in speed limits, this would be subject to considerations stated in national guidance and the County Council's speed limit policy.

The County Council is currently undertaking a review of its capital programme and the processes used to manage the programme. This is to ensure that the delivery of infrastructure is aligned with its priorities. The capital programme review will seek to deliver schemes that will mitigate the impact of development and these schemes will be considered in due course. The commitment to deliver specific schemes would need to be considered against other potential priorities for investment. The County Council is also due to undertake a review of the process governing the prioritisation of local highway schemes. Whilst the County Council supports the proactive approach of the Town Council, the planned improvements identified in policy TR1 are not however agreed County Council priorities and therefore it is not appropriate for them to be specifically included in a policy. Their presence may raise expectations to a level that the County Council is unable to deliver.

- Does the Highway Authority support the requirement that any residential development over 25 units or commercial development over 10,000sq ft should be accompanied by an up to date traffic survey, for the roads set out in Policy TR2?

Response: Not in every case. Please see the response to the first bullet point above.

- I would welcome the County Council's response to the points made by the Town Council in paragraph 23 of their submission further to my Initial Comment (copy attached)

Response: As part of the evidence base to support the Chichester Local Plan, Chichester District Council commissioned consultants Jacobs to undertake a transport study to inform the preparation of the Local Plan. The study provides an assessment of the cumulative impact of potential housing and employment development on the highway network and identifies strategic-level mitigation measures. This includes an improvement at the B2145 / B2166 junction, which has subsequently been included in the Chichester Infrastructure Delivery Plan (IDP) to support the Local Plan. Local mitigation measures are identified through the Transport Assessments for individual planning applications. These consider the impact of a development on key junctions and identify improvements where required. If a site comes forward that is not part of the development plan, the County Council will consider the cumulative impact of the site alongside planned development. It is understood that the Town Council commissioned a study of the B2145 in 2014. The County Council provided advice to inform the preparation of the study brief and it was explained that we are not sufficiently resourced to provide ongoing support during its preparation. However, this study was not submitted as part of the evidence base to support the Neighbourhood Plan and we have not been subsequently requested to review it in the context of the emerging policies.

Kind Regards
Lucy

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