From Nic Siddle to the Inspector relating to the hearing of the Cheshire West and Chester Council Local Plan

Matter 10 – Transport, accessibility and infrastructure Relevant policies – STRAT 10 and 11

This is an amplification of my submission made 25th October 2013 re STRAT 10. My original submission is reproduced in italics below and I have highlighted the paragraphs to which the additional note* now added at the end refers:-

STRAT10 - Section 5

There are two fundamental issues with this STRAT10 section:-

Firstly, it is based on the demand information incorporated into the rest of the Plan – particularly STRAT2. It is clear that the housing and population figures being used as the basis for the LDF consultation are 'dwelling-led'(i.e. 'ambitious' targets have been superimposed rather than actual and realistic evidence based figures being used). They therefore contravene the NPPF guidelines which in turn puts this Transport section in error.

Secondly, it is not so much a 'Plan' or 'Strategy' as a 'wish list'. It has very little real substance, and what it does is questionable.

Specific problems arise in relation to the proposed re-location of the bus exchange to Gorse Stacks. All the evidence from newspaper articles etc suggests that this is not the location preferred by residents. I am not aware of any proper evidential survey having been conducted.

There is vague reference to a new Park & Ride at Hoole. Construction of one on the favoured land there would destroy Green Belt which in STRAT3 says should be protected. It has also been indicated in the transport consultation sessions that a developer led contribution would be sought for such a scheme by means of granting planning permission for house building on the adjacent Green Belt land. This would be in direct contravention of STRAT2.

There is no indication as to what the prime objective of a new P&R would be. It would not ease congestion while ever there is still a bottleneck at Hoole Railway bridge (and all studies show that such schemes rarely ease congestion, although they may allow an increased overall footfall into the town). There is no clarity as to how the running costs of the scheme might be paid for — Chester's other P&Rs require subsidy or &/run well under capacity. A P&R at this point would also seriously overload the existing greenway, which would need widening — not mentioned anywhere.

There is no apparent intention to extend the '20's Plenty' to new residential zones.

There is a 'mother's milk' statement about the use of cycle tracks/ canal paths but no indication as to where these should be or who and how they are to be maintained. The current canal path to Ellesmere Port from Parkgate Road has deteriorated to a state of unusability by road bikes now. Many existing cycle lanes are not fit for purpose, being too narrow or too short – some are positively dangerous.

The proposed route of the Westerly by-pass would have unacceptable consequences for the Sealand Road/ Bumpers Lane crossing. The very concept of another 'Hamburger' type roundabout (as at Caldy Valley) either here and/or at the Fountains Roundabout junction will paralyse the City.

There is no mention of the suggested new cycle/pedestrian bridge by the current Hoole railway bridge. In addition, there should be a new link from this, by the side of the 'railway lands' to join up with the Mickle Trafford to Deeside Greenway. This will provide students who are lodging in the soon to be built Crewe Street development easy access to both the main University and Kingsway campuses. Rights to the necessary land should be secured as soon as possible as it is likely that some developer will want to put housing on that land. If the requirement is documented, it would protect the option and also possibly open the way for a Section 106 agreement to help with the costs. The sketch below indicates what could be achieved:-



Note of amplification:-

*All the above considerations still stand, but it is now clear from recent promotional activity on the behalf of the developer that there is a intention to try and get the Inspector to include a scheme which is not even in the draft plan.

Cards have been lodged at various venues inviting people to sign a petition asking for a Park & Ride at Hoole Road. Nowhere on these cards (reproduced below) does it mention that they are demanding the right to build upwards of 300 houses on Green Belt land. That information is tucked away on the associated website in the sure and certain knowledge that few people will discover it.



For your information, I have below reproduced their Q&A from their website (www.hooleroad.co.uk) and added some observations:-

Q. What is this campaign all about?

We are promoting a potential new 650 space Park & Ride for Hoole Road on the way into Chester. The Park & Ride would include a passenger waiting area, travel information centre, coffee shop, newsagent, cycle hire and toilet facilities.

Observation:- How can they guarantee the cycle hire operation at this stage?

Q. What is the campaign trying to achieve?

The Cheshire West and Chester Council Local Plan is shortly due to be reviewed by the Planning Inspector. Our campaign is focused upon making the case to the Planning Inspector for the inclusion of Hoole Road Park & Ride in the Local Plan as part of wider development proposals <u>including housing</u>. If we get there, a full planning application focused on delivering a Park & Ride and <u>housing</u> will be pulled together.

Obs:- They appear to be going for this so that they get the housing permission which has already been omitted from the local plan.

Q. Where would the Park & Ride be?

It would be around two miles north east of Chester City Centre, south of Mannings Lane and beside Hoole Road.

Q. Why have you chosen that site?

There is a longstanding need for a Park & Ride facility north east of Chester City centre, something that is recognised by the City Council and identified in the Chester Transport Strategy. The site is ideally positioned for the purpose of getting people out of their cars and onto the regular bus service that will operate along Hoole Road. It is close to Junction 12 of the M53 and so will be easy to access for people coming off the motorway.

Q. Isn't the site Green Belt?

Yes, but we believe that the release of Green Belt land, on this location, will have dramatic benefits that justify this decision.

Q. Why do we need another Park & Ride in Chester?

Although there are four Park & Rides around Chester, the network currently does not offer a service for people living north east of Chester City Centre, or commuting into or visiting Chester from the east. Filling this gap by delivering a new Park & Ride on Hoole Road is integral to the Chester Transport Strategy and forms one of its key recommendations.

Obs. Part of the problem is that the Zoo (and Caldy Valley) P&R's are not signed from the Motorway exit. As a result, they are not fully utilised at present.

Driving into Chester along Hoole Road is increasingly difficult, with roads busy at peak times. Hoole Road Park & Ride will tackle this issue by taking up to 650 cars off the road, reducing the hassle of getting into the city for residents, commuters and tourists.

Obs. Many studies have already shown that building P&R's does NOT reduce car traffic. Any space so released is taken up by more cars. This may be good for city businesses, but it does not reduce traffic (or therefore, pollution). Nor is it clear how residents (at least those between the chosen location and the city centre) 'will benefit'.

Q. What does the council think about this?

Previously Chester City Council secured full planning permission for a Park & Ride on the site and has long sought funding for such a scheme. Cheshire West and Chester Council is committed to delivering the Chester Transport Strategy which identifies the need for a Park & Ride on Hoole Road. Investor and developer BDW Group is offering an opportunity for the council to deliver this vital piece of transport infrastructure at no cost to local taxpayers, a significant benefit at a time of continuing cuts to local authority budgets.

Obs. As usual, the developer and the truth seem to be strangers. As per the Council website, full Planning Permission never appears to have been given. Various applications have been either refused or withdrawn, but never passed:Ref. No: 6/17357 | Validated: Sat 16 Jan 1988 | Status: Application withdrawn

Ref. No: 6/17365 | Validated: Sat 16 Jan 1988 | Status: Application withdrawn A similar fate befell other development proposals for this land which did not specifically include a P&R:-

Ref. No: 6/21876 | Validated: Tue 27 Feb 1990 | Status: Application withdrawn Ref. No: 6/19595 | Validated: Mon 23 Nov 1992 | Status: Application withdrawn Ref. No: 6/17756 | Validated: Tue 16 Aug 1988 | Status: Application refused

Q. What is BDW Group?

BDW Group is an award winning housebuilder and developer, comprising Barratt Homes and David Wilson Homes, with a well established reputation for high quality developments. BDW is planning to invest £4million, together with providing the necessary land, in order to give Chester a new Park & Ride facility that meets the city's needs and BDW's high standards.

Q. Who owns the site?

The site is owned by Mannings Lane Developments Ltd (MLDL). If the Park & Ride is built, the site will be handed over to Cheshire West and Chester Council for operation.

Obs:- Major shareholders in Mannings Lane Development are Simon Parker (who has close links with Pochins), Bell Developments (the promoters of the failed 'Student Village' scheme), together with the Wycherly Group (owned by Charles Topham, a previous business partner of the Bells). As there are many changes going on at present in the plethora of interlinked companies, it is not at all clear as to who is responsible for what. The promoters say 'If the Park & Ride is built, the site will be handed over to Cheshire West and Chester Council for operation' but do not say who the ultimate whether the land would be gifted or whether a rent would be charged.

Q. How will the Park & Ride be paid for?

BDW Group is following the guidance of the Chester Transport Strategy, which specifically recommends that land beside a new Park & Ride should be incorporated in any proposals in order to enable a developer to generate capital to fund the new facilities. The investment required to deliver a new Park & Ride can only be generated by building high quality homes close to the site.

Obs:- What they are effectively saying is that they will only consider it in return for the release of Green Belt land. There is no reason why any housing to finance it has to be 'close to the site'

This campaign is focused solely upon convincing decision makers that the site is suitable for a Park & Ride. If we are successful, further planning can then take place to determine what further development would be required to make the whole thing happen. It is anticipated that these plans will include a medium sized, high quality residential development offering a range of homes for local people.

Obs: Whilst not specified here, previous figures floated have ranged from 300-400 dwellings. This is likely to generate as much traffic as that allegedly saved by the P&R. It will also overstretch medical and educational provision (the developer's submission to the LDF process still showed Woodfield and Kingsway as operational schools some 5 or more years after they closed). There is no mention of 'affordable' housing despite the fact that this is one of the few reasons for allowing Green Belt development.

Q. I like the Park & Ride, but not the new homes. Are there any other options?

Without the new homes, the significant investment required to deliver a Park & Ride cannot be delivered. The Council would have to go back to seeking other sources of funding, or commit to using local tax payers' money to fund a Park & Ride. Neither of these possibilities have been forthcoming and seem unlikely to materialise in the short or medium term. At present there is no viable alternative.

Obs. They do not say what other alternatives, if any, may have been explored. The publicly declared links between certain members of the Council and the developers are likely to create some suspicion about the nature of the scheme

Q. How do you arrive at the figure of a £4million boost for the Chester economy?

The development will add £4million to the Chester economy via a number of different ways, including: construction of the Park & Ride and associated housing; increasing the number of visitors to Chester City Centre and local businesses; and by providing access to jobs as Chester embarks upon an exciting 15-year regeneration plan.

Obs:- In other words, they have no calculations to justify the figures.

Q. How have you calculated the jobs figure?

The 13 permanent jobs created by the Park & Ride include servicing and staffing the associated facilities, including: passenger waiting area; travel information centre; coffee shop; newsagent; cycle hire and toilet facilities. The 62 jobs supported during construction relate to the hours of labour required to build the Park & Ride and associated housing.

Obs:- The 13 permanent jobs are said to include staff at a coffee shop and cycle hire. Who is to run the latter? What is its viability? No offset has been used for jobs displaced elsewhere. Do the other P&Rs have coffee shops, cycle hire and newsagents? It seems much more likely that anyone using the P&R simply would want to get into town — and spend their money there. Why would they expect it to work here if not at the others?

Q. How have you calculated the savings for commuters?

The average cost of parking in town all day is £5.80. Free parking and a daily £2 bus fare at the Park & Ride could put up to £874 per year back in your pocket if you park in Chester regularly.

Obs:- This calculation only works for single occupancy cars.

Further, the Council has raised P&R charges over the past few years and, in the light of other transport cuts, the long term subsidy commitment must be questionable. There is still the 'free after 3' scheme, which appears to be well used and the Deputy Council Leader is on the record as saying that the Northgate scheme will only be successful if there is associated City Centre parking.

Addn'l note:- no derivation is given for their average of £ 5.80/day. There seems to be plenty available from £ 5/day or less (eg the old Honda garage near the bridge).

Q. What will the impact on the environment be?

The new Park & Ride would reduce emissions by getting hundreds of people every day out of their cars and into buses. It is anticipated that the service will cut morning peak commuter traffic on Hoole Road by 10%. The provision of links to cycle-ways and pedestrian routes will encourage people to leave their cars behind and adopt healthier lifestyles.

Obs.:- Many previous studies have shown that P&Rs do not reduce traffic – any space released is soon taken up by other users. This may help the economy of the city centre, but it does not reduce congestion/pollution.

Q. How many cars will this take off the road?

The Park & Ride will have space for 650 cars and would therefore take up to 650 cars off the road at any one time. It is anticipated that, on an average weekday morning, 580 cars will be taken off the road, resulting in a 10% drop in commuter traffic on Hoole Road between 7 and 10am.

Obs.:- As above, P&Rs do not reduce overall traffic levels as freed space is absorbed by others. It will not reduce congestion/pollution, UNLESS city car parks are made significantly more expensive which is at odds with previous policy statements. Increased charges would have a negative impact on residents who are not using the P&R.

Q. How regular will the buses be?

There will be a bus every 10 minutes, on average. It won't take as long for the bus to get into town because there will be fewer cars on the roads at the busiest times.

Obs:- see above. Until the Hoole Bridge problems are sorted out, there will be no significant improvement in journey times.

If a 50 passenger bus is to travel every 10 minutes, that implies a capacity of 300/hr. The P&R is, presumably, designed for those staying most of the day (it is on that basis that the potential parking charge savings have been based). The suggested bus capacity far outweighs the capacity suggested for the car park. That means that either (a) buses will be running well under capacity and therefore contributing to excess pollution and congestion or (b) that the frequency will need to but reduced making the service less user-friendly.

Q. What is the timeline expected to be?

The Cheshire West and Chester Local Plan is to be examined by the Planning Inspector in June. Once the Local Plan is adopted, the Council will put together a land allocations document later in the year, so by the end of the year it should be clear whether Hoole Road Park and Ride can be delivered. A full planning application would then need to be submitted and approved by the council before any work could start.

Obs:- But if the P&R principal is passed, then the housing will inevitably follow – with an unnecessary loss of Green Belt

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