

EiP Statement

Cheshire West and Chester Local Plan Part 2

Our ref 40812/23/MW/NMi
Date August 2018
To Programme Officer
From Lichfields

Subject Matter 14: Transport and Accessibility

1.0 Introduction

- 1.1 Lichfields is instructed by Taylor Wimpey UK Ltd, Redrow Homes Limited and Lingley Estates Limited (the Companies) [Representor IDs: 1150612 and 778027] to make representations on the Cheshire West and Chester Submission Local Plan Part 2 (March 2018) [SLP2]
- 1.2 This statement sets out the basis of the representations to be made on behalf of the Companies at the forthcoming Examination in Public [EiP] hearing session concerning Matter 14: Transport and Accessibility.
- 1.3 These representations are made in the context of the Companies interests in Cheshire West and Chester, namely land at Wrexham Road, which is identified under Policy STRAT 3 of the CWaC Local Plan Part One [LPPO] as a Strategic Allocation for the provision of around 1,300 dwellings together with essential community infrastructure and a new primary school. Planning applications have been submitted to CWaC for the development of the strategic allocation which are currently being determined by the Council.
- 1.4 The representations in this statement are additional to and should be read in conjunction with the Companies previous submissions on the Local Plan Part 2 as well as those representations made on other matters.
- 1.5 This statement responds in the light of the Inspector's Matters Issues and Questions. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework [the Framework] and the National Planning Practice Guidance [the Practice Guidance].

2.0 Issue 1: Local road network improvements schemes Policy T1

Q1. How have the priority local road network schemes been identified? Should a route be safeguarded for the Chester Western Relief Road? What is the updated position regarding defining a proposed route?

- 2.1 The safeguarding of land for the Chester Western Relief Road [CWRR] was removed from Policy T1 and the policies map at the Local Plan Part Two; Land Allocations and Detailed Policies Publication Draft [PTPD] consultation stage. The SLP2 replicates the policy and explanatory text used for Policy T1 in the PTPB and does not provide any further update on progress on the Chester Western Relief Road [CWRR]. It indicates that the safeguarded alignment shown in the Chester District Local Plan is unlikely to be a feasible option and notes that the Council is exploring alternative routes for a CWRR.

2.2 For the reasons set out in our response to the PTPD, it is not justified, effective or consistent with national policy for the Council to safeguard land for construction of the CWRR when there is a high degree of uncertainty about whether it is viable and can be achieved within the plan period.

2.3 The Companies therefore maintain the view that Policy T1 is sound.

Q2. What is the justification for safeguarding the A54 Winsford Railway Station Stanthorne? Is the site boundary justified?

2.4 The Companies have no comments to make on this issue.

Q3. What is the updated position on Northwich transport strategy?

2.5 The Companies have no comments to make on this issue.

3.0 Issue 2: A56 Hoole corridor Policy T2

3.1 The Companies have no comments to make on this issue.

4.0 Issue 3: Railway stations Policy T3

4.1 The Companies have no comments to make on this issue.

5.0 Issue 4: Rail corridors Policy T4

5.1 The Companies have no comments to make on this issue.

6.0 Issue 5: Parking and access Policy T5

6.1 Policy T 5 sets out a range of criteria which seek to ensure that appropriate provision is made for access and parking. This includes the provision of appropriate charging infrastructure for electric vehicles in new developments as set out in Table 8.1 of the PTPD.

6.2 Table 8.1 sets out the following vehicle charging infrastructure requirements for residential development as minimum provision:

- Houses and flats with dedicated off-street parking – One dedicated 32 amp radial circuit or Type 2 charging point per dwelling
- Developments of 10 or more houses and flats with unallocated parking – One dedicated Type 2 electric vehicle charging point per 10 dwellings

6.3 Whilst the Companies do not object to the principle of providing EV charging points in new development, they consider that Policy T 5 fails to meet the following tests of soundness because:

- 1 **It is not justified:** The requirements for electric vehicle charging points for residential development set out in Table 8.1 to Policy T 5 are not based on proportionate evidence of the need for this infrastructure. There is also a lack of evidence to support the average cost used to assess the viability of providing such infrastructure.
- 2 **It is not effective:** The Policy could threaten the deliverability of development by placing unduly onerous requirements for charging point provision.

- 6.4 In order to address the conflict identified above and ensure that Policy T 5 is sound, it is considered that CWaC Council should amend the Policy as follows:
- 1 The minimum provision requirements for residential development should be deleted from Table 8.1.

The Inspector's Questions on Policy T5

Q1. Criterion 5 states that development should 'accord' with a supplementary planning document. In this regard would the policy be effective?

- 6.5 The Companies have no comments to make on this issue.

Q2. What is the justification for the proposed zonal approach to parking standards and the areas defined on the proposals map? i.e. Chester, Ellesmere Port, Northwich and Winsford? How have the areas been identified and how have the boundaries been defined?

- 6.6 The Companies have no comments to make on this issue.

Q3. What is the justification for the provision of electric vehicle charging infrastructure as set out in table 8.1? How would this impact on viability?

- 6.7 The Council has not demonstrated that the above policy requirements are justified or required. Local Plan Part 1 [Policy STRAT 10] states that proposals should seek to incorporate charging points for electric vehicles "where appropriate". The Council has not provided any evidence that the test of appropriateness as set out in the Local Plan Part 1, should be covered by a total requirement on all new dwellings. CWaC have not demonstrated that the above policy requirements are justified or required.
- 6.8 No such evidence is provided in the adopted Parking Standards SPD either, from which these standards have been derived. In any case, the Companies note that the SPD identifies the provision sought as "*recommended best practice guidelines*" rather than seeking to establish it as a standard requirement. In addition the Companies note that no evidence of the uptake of electric vehicle charging points in Cheshire West and Chester or evidence of electric vehicle ownership or usage within the Borough has been provided to support the standards applied.
- 6.9 As set out in our response to the PTPD, the Companies are particularly concerned that the impact of this infrastructure upon viability has not been properly considered. The Framework¹ emphasises the need to use a proportionate evidence base including adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. It further notes² that the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.
- 6.10 With regard to this matter, the Keppie Massie Viability Study which has been prepared to inform the PTPD states that the costs associated with electric vehicle charging points have been considered. The Viability Study³ states:

¹ National Planning Policy Framework (March 2012) §158

² Ibid. §173

³ Local Plan (Part Two) Land Allocations & Detailed Policies Viability Study (December 2017) §6.72

“WYG have estimated the cost of electrical vehicle charging points to be in the region of £220 per dwelling in addition to the base construction costs. Adding these costs into the viability assessments would mean that based on the average dwelling sizes this would lead to a reduction in the level of surplus in the range of £2.29 to £1.83 per sq.m. The cost of the electric vehicle charging points are so minimal that they makes no significant difference to the base construction costs and will have a very limited impact on overall viability”.

- 6.11 However, the Companies note that no evidence has been provided in the Viability Study to justify the cost figure used. In addition, there is no explanation in the WYG report (Appendix 7 to the Viability Report) as to how this £220 figure has been derived. It simply states:
- “The cost of providing a 32 amp radial spur with isolator has been assessed as £220”.*
- 6.12 In the absence of a detailed explanation as to how this figure has been identified, there is no clear evidence to demonstrate that it provides an accurate representation of the average cost of providing such infrastructure. The Companies are concerned that the figure used may be too low as it may not be representative of the true cost involved and could threaten the deliverability of development. For example, the Companies consider that the cost of providing such infrastructure in car parking to flat developments and developments with unallocated parking could be significantly higher than this figure given the likely additional works and materials required to provide such infrastructure in more isolated locations.
- 6.13 In addition, it is not clear whether it takes into account other infrastructure associated with the provision of charging points. For example, on medium to large schemes, it may be necessary to provide additional or dedicated substation facilities to power the charging points, the cost of which would be significant. At present, Scottish Power (who the Companies are in communication with on the Wrexham Road site) assumes a worst case scenario that all electric charging points will be used all night which places a significant demand on the electricity network and a primary substation would be required to address this matter. In reality, given the take up of electric vehicles in Cheshire West and the unlikely event that all would need charging concurrently, the demand upon the electricity network will be less than Scottish Power are envisaging. However, developers have no option but to include sufficient substations and ensure sufficient capacity for the “worst case” scenario. The Companies do not dispute the costs used by Keppie Massie in their Viability Study for the charging points but the Study ignores the cost associated with the need for significant electricity infrastructure to be provided on site. It is imperative that both are considered.
- 6.14 The Companies therefore consider that the minimum provision levels sought through Table 8.1 to Policy T 5 are not justified. In particular, there is no rational argument to justify the requirement for a charging point for every house or flat with dedicated off-street parking and the minimum provision requirements for residential development should be deleted from Table 8.1.