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**Manhood Peninsula Action Group**

*Campaigning to protect the Manhood Peninsula from over development*

To: Eileen Lintill, Diane Shepherd, Andrew Frost – Chichester District Council

**Outline of Objection to Chichester District Council’s Submitted Draft Local Plan 2023 on behalf of the Manhood Peninsula Action Group**

This objection is to be read in conjunction with our on-line submission. We are concerned that the process in place for comments is so cumbersome that it will dissuade individuals from engaging and responding.

There are 3 grounds for objection:

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

# **Legal compliance**

There has not been sufficient, recent public consultation. The last stage was in January 2019 on the Preferred Option as confirmed by the latest Statement of Community Involvement published in November 2018. Neither has there been published a Statement of Common Ground. It is recommended that this be published at same time as Regulation 19 i.e. Proposed Submission of Draft Local Plan [Feb 2023]. A lot has changed in four 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; this has not been done.

# **Soundness**

There are 4 tests of ‘Soundness’:

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

**2.a Positively Prepared - Does it meet Strategic needs of the area?**

This includes neighbouring areas.

As there is no Statement of Common Ground it is not possible to judge whether such major needs are being met. For instance, it does not commit to the provision of improved infrastructure as there are no published agreements with National Highways for the A27 junctions. Then it does not meet the strategic needs; in fact, by proposing 10, 000 more houses it worsens the situation.

**2.b 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, [and also in relation to waste water treatment improvements from Southern Water] then it does not pass this test. Surely, infrastructure needs should be met before more land is released, but there are no strategic phasing policies for housing. As is set out in Policy H1 **6386** houses are already built or committed, that is **62%** of the total allocation, and equivalent to **11** years of the annual requirement, meeting more than **twice** the 5-year land supply requirement.

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, 11 and 13 are only released one year after work commences on the A27 improvements at the Fishbourne and Bognor roundabouts, and, where appropriate, waste water treatment works.

# **2.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 basic infrastructure.

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

Contributions to the two A27 roundabouts for the uncommitted housing, 3351, about 40% of the total, is assessed at £7,728 per house at current prices. This is 4 times higher than current level of £1,803. Nowhere 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?

Many new Government policies and laws, have been published in the four years since the last stage of the draft 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. The Stantec report 2 “Chichester Transport Study [Local Plan Review Transport Assessment]” issued in January 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 of transport, the policies put forward are toothless i.e. T3 Active Travel, does not protect existing and proposed routes, as advocated in NPPF paragraphs 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 i.e. the two 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.

The Stantec report, mentioned earlier, models traffic flows over the plan period to 2039 using 2014 as the base year. It concludes [page 12] that up to 28% of the growth in traffic over this period can be linked to committed and proposed developments. The modelling shows that ALL junctions on the A27 bypass are well over capacity now, even before adding in the Local Plan development and that with the exception of the Portfield Junction they were over capacity in 2014 at one or both peaks. While the modelling assumes a 5% car trip reduction, mainly due behavioural changes, no measures to achieve a further reduction due to sustainable or active travel modes is proposed in the Draft Plan, and by 2039 despite the assumed

Improvements to both the Fishbourne and Bognor Road junctions, traffic congestion in 2039 is predicted to return to the baseline level i.e. over capacity at all junctions. Worryingly for the Manhood Peninsula, the draft plan does not propose any improvements to either the Stockbridge or Whyke Road junctions already over capacity in 2014, and ranked 5 and 6 respectively in priority [out of 6] in the Stantec study. Presumably these will have to await RIS 3. In addition, further traffic will use the A27 from neighbouring authorities, particularly Arun with 2,200 new homes planned in Pagham/North Bersted. Is this furthering SUSTAINABILITY?

An alternative policy T3 Priority for Walking, Cycling, equestrian, Mobility Needs and Quiet Lanes has been submitted. This alternative policy addresses some of these inadequacies, embraces all active travel and mobility needs, and follows other approved Local Plans e.g. South Downs National Park; Cambridge City.

# **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 to the whole by-pass. 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.

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