



Representation Form

Local Plan Review: Preferred Approach Consultation



The consultation on the Local Plan Review: Preferred Approach will run from 13 December 2018 to 7 February 2019. The document and more information on the consultation can be viewed on our website www.chichester.gov.uk/localplanreview

All comments must be received by 11.59 pm on Thursday 7 February 2019.

There are a number of ways to make your comments:

- Comment on the document on the internet using our online consultation website www.chichester.gov.uk/localplanreview (**Recommended**)
- Complete this form on your computer and email it to us at planningpolicy@chichester.gov.uk
- Print this form and post it to us at: Planning Policy Team, Chichester District Council, East Pallant House, 1 East Pallant, Chichester, West Sussex, PO19 1TY

How to use this form

Please complete Part A in full. Please note anonymous comments cannot be accepted, a full address including postcode must be provided.

Please complete Part B overleaf, using a new form for each separate policy or paragraph that you wish to comment on. Please identify which paragraph your comment relates to by completing the appropriate box.

For more information, or if you need assistance completing this form, please contact the Planning Policy Team by email at planningpolicy@chichester.gov.uk or telephone 01243 785166.

PART A	Your Details	Agent's Details (if applicable ¹)
Full Name	MICHAEL BRIAN DICKER	
Address	<div style="background-color: black; width: 100%; height: 100%;"></div>	
Postcode		
Telephone		
Email		
Organisation (if applicable)	<div style="background-color: black; width: 100%; height: 100%;"></div>	
Position (if applicable)	<div style="background-color: black; width: 100%; height: 100%;"></div>	

Is this the official view of the organisation named above? Yes ☐

No ☐

¹ Where provided, we will use Agent's details as the primary contact.

PART B

Please use a new form for each representation that you wish to make. Please note anonymous comments cannot be accepted. Any personal information provided will be processed by Chichester District Council in line with the General Data Protection Regulations 2018. More information is available at:

<http://www.chichester.gov.uk/dataprotectionandfreedomofinformation>.

To which part of the document does your representation relate?

Page/ Paragraph Number:	ALL of IT	Policy Reference:	
----------------------------	-----------	-------------------	--

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☐

Have Comments ☒

Enter your full representation here giving details of your reasons for support/objection:

See attached

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

See Attached

(Continue on separate sheet if necessary)

Declaration

I understand that any comments submitted will be considered by Chichester District Council in line with this consultation and will be made publicly available on their website www.chichester.gov.uk and may be identifiable by my name or organisation, if provided.

Name (print):	MICHAEL BRIAN DICKER
Date:	0502 2019

Response to the local plan and supporting evidence from

Mike Dicker



Introduction

1. As a resident of Chichester District Council (CDC) I am unable to comment electronically on the CDC Local Plan Preferred Approach as it is probably the worst set of documents I have ever had to read. I therefore provide all of my comments in this document.

2. I am not against a local plan in fact I think it is essential but sadly this local plan is not currently fit for purpose. Whilst I have stated my objections in the response I do have the following high level comments:

- a. The transport study conducted by Peter Brett Associates (PBA) is not fit for purpose and needs to be rewritten. The scope set for PBA is far too constraining and counters the democratic process agreed by the council to seek alternative routes.
- b. Many of the documents are inconsistent and in their current form smack of inconsistency and bias. Reasons for excluding some strategic sites are not consistently used for other sites.
- c. Many of the evidence documents are not present or are not complete for this consultation. These will need to be re consulted when they are complete.
- d. CDC should not be accepting the unmet housing need from the South Downs National Park (SDNP). They should also be going back to government to insist that until certainty is provided on the A27 this area can not accommodate future housing and or employment space.
- e. The proposed link road was resoundly rejected last time it was proposed by Highways England. CDC need to respect the voices that rejected what is option 2 by stealth. Particularly as the PBA report states that the building of the link road will offer other "strategic options". This will not be tolerated locally.

3. The rest of my comments are below and I reserve the right to raise all of these comments if they are not rectified in later iterations of the plan with the examiner:

Local Plan Preferred approach

4. Para 1.1. Whilst I acknowledge that the SDNP are a separate planning authority why is CDC not integrating the planning process with that element of SDNP that falls into the CDC area. The benefit of doing so is we would truly have an integrated local plan. In particular CDC need to understand where the unmet housing need from the SDNP is generated from. I further believe that if there is no integrated planning then those councillors whose wards are in the SDNP and not affected by this plan should not be able to vote on decisions on a local plan not in their area. The CDC West Lothian question. As this plan affects mainly those in the South of the region those ward councillors should be the only ones able to vote on this plan. Councillors that sit to the North of the plan area will have a vested interest in ensuring that their communities are not affected by unnecessary building and will be happy to ensure that unmet need is adopted out with their wards. If this is not addressed it will be raised as required with the examiner.

5. Para 1.16 This mentions the requirement to “cooperate effectively across administrative boundaries.” The evidence that I have seen under FOI does not show that appropriate and effective cooperation has occurred particularly with Highways England in regard to the development of the transport infrastructure. I note that Councillor Susan Taylor at a cabinet meeting on the 08 January 2019 stated *“Peter Brett associates through regular liaison with Highways England have followed the procedures in the document entitled “The strategic road network, planning for the future A guide to working with Highways England on planning matters” by involving highways England in all aspects of its work and allowing it to comment at all stages from first inception and through to the complete document therefore Peter Brett Associates believes that it has clearly followed the advice in the document and worked closely with HE and its appointed consultant at all stages of the project. CDC has engaged and will continue to engage with HE on the proposed improvements to the strategic road network that form part of the local plan review”* I can currently see no evidence that this is the case. From FOI revealed to me the following consultation has occurred:

- a. 15/11/17 where 2 members of HE were present and decisions had been made by CDC officers as to where development should take place and assumptions that the transport options would be upgrades to the existing A27 regardless of the democratic process of the council for “new routes”. At this stage HE advised that a number of options would need to be provided (Kevin Brown (KB)) – this has not occurred and KB stated that these would have to be looked at to reduce the potential for challenge when the plan reaches examination. The PBA report only provides 1 option as a result of the way the requirement was set by CDC. As there is no evidence that this has been undertaken it will be raised with the examiner.

b. February 2018 some minor email correspondence on detail but no real evidence of consultation.

c. 18 April 2018 CDC revised Local Plan Transport Study Inception Meeting. An email dated 19 April has been provided which outlines the decisions. These are the ones that we challenge:

i) Meeting to discuss new access route onto A27 – this should occur to meet the development in this area.

d. 14th May email where a discussion is made to set up a meeting under “duty to cooperate”. This meeting seems to have been held on 7th June 2018 – decisions that affect this plan include:

i) A27 junction proposed at Southbourne. This it would appear to have been rejected by Peter Brett Associates. This will be raised with the examiner as it demonstrates that PBA are contravening their remit and could make this subject to Judicial review.

ii) A follow up meeting in September 2018 is proposed. No evidence is provided that this meeting took place

6. I do not believe that the duty to cooperate test has been met and will wish to raise this with the examiner at the appropriate juncture.

7. Para 1.27 This mentions “Statements of Common Ground with relevant strategic policy-making authorities are currently being prepared and will be made available for review on the Council’s website”. In reference to my comment at Para 1.16 I note that these statements are not part of this consultation. By adding them after the fact they must be re-consulted on at the next stage. Failure to do so will open up the Local plan to a possible legal challenge and highlighting to the inspector when the plan goes to review. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

8. Para 1.30 This mentions “agreement on transport modelling and highway solutions.” The evidence of this is not available in the transport study and has, as a result not been transparently provided in time for this consultation. I would further contend that the transport study is wholly inappropriate and has not provided options. In particular I contend that Officers from CDC have acted outside of the democratic process in the way that they set the transport study requirements of PBA. In particular the requirement laid out in the Consultancy brief which stresses:

Scope: “to identify the transport infrastructure needed to address future development related problems on the highway network in the district and wider areas. Junctions considered most likely to require further analysis are:

A27/A285 Portfield Way roundabout
A27/Meadow Way/ The Street roundabout at Tangmere
A27/B2144 Oving Road traffic signals
A27/A259 Bognor road roundabout
A27/ A286 Stockbridge Road roundabout
A27/A259 Fishbourne road roundabout

9. I further contend that PBA associates have failed to meet the consultancy brief as they have only offered one option and not, as described in the brief the outputs. I therefore maintain that the work completed by PBA is atrocious and is not fit for purpose. They should be required to provide the outputs at their cost and this should be provided for consultation. I will wish to raise this with the examiner at the appropriate juncture.

10. Para 2.6 onwards. The data projected is the Chichester District and is irrelevant. The data in this plan should reflect the demographic data of the local plan area only. It is essential that we have plan area data as well as CDC data. In particular the social and economic characteristics must reflect the plan area and not the district as a whole. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

11. Para 3.4 makes no mention of the development opportunities to the North of the city. This must be a factor in the local plan to reflect the aspiration for the city and to enable us to reduce the pressure to the South where there is no current space out of flood plain. Northern considerations will benefit the rural communities and the economically inactive (unemployed) who may not be able to easily access employment opportunities to the South of the city due to public transport implications.

12. Para 3.7 States " The relationship between the National Park and significant natural areas to the south, especially Chichester Harbour Area of Outstanding Natural Beauty, will be carefully managed by maintaining and enhancing the countryside between settlements." This is not the case for the proposal at Apuldram for a strategic site which removes the countryside upto the AONB border and will remove the only view of a cathedral from the sea in the country and the long distance views of the SDNP beyond¹. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

13. Para 3.8 The plan states "For Southbourne, the aim is to take advantage of the village's good transport links" Whilst not a resident of Southbourne I would question this statement as Southbourne does not have good transport links and I can

¹ In the land availability study long distance views and proximity to SDNP boundaries are a reason for rejection of other more suitable sites but are inconsistently used through the documents particularly in relation to the Area Of Outstanding Beauty (AONB) boundary.

see no proposal that supports a junction onto the A27 to alleviate the transport issues faced by current residents let alone future on both car and public transport². Much of this increased movement will appear at Fishbourne or central Chichester. A junction on the A27 could alleviate this and deliver a mitigated northern route. This does not feature in the transport study. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

14. Para 3.17 This talks of cross boundary work but no mention is made of the agreement to accept 41 homes from SDNP per year for the life of this plan. This should not be accepted and the allocation should be handed back to the SDNP to absorb to facilitate new affordable homes to support their communities. I for one oppose accepting allocations from other planning authorities and this should be taken out of the plan especially as we acknowledge already the pressure for space. As there is an obligation to provide this housing within 5 miles of the requirement then if essential a site to the North of Chichester should be found. Currently neither Chichester District Council nor South Downs National Park planning authorities know where the unmet housing need comes from (Ref Councillor Susan Taylor cabinet meeting 08 January 2019 *"CDC has to follow the methodology set out by Government to calculate objectively assessed housing need this assessment of need is determined at district level and is not broken down to the level of individual settlements for areas within or outside the national park. The SDNP authority prepared its local plan before the government methodology came into force and commissioned its own evidence of housing need. Similarly this does not include analysis at settlement level"*). How then can CDC agree to accept an unmet housing need when it not even known if or where it exists from. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

15. 3.19 strategic objectives housing makes no mention of renewable energy and upto date digital infrastructure that should be built into any new development both for housing and employment space.

16. 3.19 Strategic infrastructure makes no mention of the mitigated Northern route. We must resist tinkering to the A27 that can be considered as community consensus and prevents us from getting our true requirement which is a strategic mitigated Northern Route. You are obliged to look at short, medium and long term solutions where they impact the strategic road network. The proposal in this plan is only short term and therefore does not provide a deliverable solution for the strategic A27 and is a waste of valuable infrastructure money locally. It is also in direct conflict with the works proposed but not undertaken in the current adopted plan. You are obliged to meet those requirements before then considering new development impacts. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

17. 4.5 The section states "It is recognised that growth in both urban and rural areas is required to meet the changing needs of the area's population." Growth in the

² Despite this being raised at the transport meeting on the 14th May 2018.

SDNP is required and therefore the acceptance of 41 homes per annum should be overturned and the allocation sent back to SDNP within our area for them to consider and incorporate in their plan. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

18. This mentions settlement hubs and the aspiration for development around these settlement hubs. No linkage is evident that consideration is made for improvements in infrastructure and public transport links to these settlement hubs that are already at breaking point. This linkage and consideration needs to be included in the local plan to adequately address current issues let alone compounding problems from further development. An example is children from Bracklesham having to travel up the Manhood peninsula to Stockbridge and then back down the peninsula to Selsey to attend secondary school. Double the journey distance and time from school provision in Chichester. This is work that should already be being undertaken and not to mitigate further development. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

19. In terms of infrastructure there are primary schools in the SDNP that are undersubscribed and development to the North is appropriate to meet housing need but also to maintain local viable public services such as school PANs. There is a need to sustain rural communities but whilst mentioned as a priority I can see nothing that addresses these needs in this plan. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

20. 4.20 The statement is "The local plan aims to continue to protect the countryside, but also recognises the social and economic needs of rural communities. As such, new development in the countryside will be generally limited to the appropriate diversification of traditional rural industries; small-scale housing that addresses local needs, replacement dwellings/buildings, schemes that provide renewable energy and proposals that contribute towards creating a more sustainable rural economy. Other policies in this Plan should be taken into consideration." Why then are we accepting 41 homes per annum from SDNP when the need in the rural communities is housing in their communities. Whilst I accept that the council is considering this³ my view is that this need needs to be handed back to the SDNP thus reducing the requirement to find a strategic site for 205 homes in this plan. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

³ Cabinet meeting 08 January 2019 – *Chief executive Diane Sheppard [afternote] "Just want to make it clear that the council resolution was to consider the 41 additional homes from SDNP we have not made a decision that they will be included within the final plan that is part of the assessment process that is taking part [suspect she meant place] at the moment and it is not until we get nearer the end of the process we can say whether we can or can not meet that unmet need so just to confirm that we are approaching it along the lines of the council resolution which was to consider whether we could meet that unmet need from the national park.*

21. Policy S3. Whilst Lavant itself is in the SDNP it should still be considered as a settlement hub or at least a service village for the purpose of the plan. Development can be considered South of the village and meets the remit of the requirements of the CDC strategy. Lavant itself can support the housing requirement and should be considered as a development area within the plan as it does not impact the SDNP if that development is outside the SDNP which it would be. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

22. 4.22 states "This reflects the identified objectively assessed housing needs of the plan area, plus an allowance for accommodating unmet need arising from the Chichester District part of the South Downs National Park." I do not believe that we should be accepting 41 homes a year from the SDNP in the life of this plan. The agreement between CDC and SDNP needs to be revisited and the allocation handed back to SDNP. We will not affect their overall numbers and will ensure that they meet the needs of their rural communities and this allocation could easily be met within their plan. This then would reduce the number of strategic sites we need to identify. It will also ensure that the public facilities can be maintained within their communities and reduce the need to increase schools in the city and to the south certainly in primary and infant settings. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

23. 4.2.4 The plan states "These include new strategic allocations made in this Plan, retained allocations from the adopted Local Plan 2014-2029, existing commitments," in the adopted plan there is a strategic site to the South of Goodwood aerodrome. This has been removed from the strategic site list and no consideration has been made for its adoption as an employment site which would have the benefit of "place" and interaction with a high tech business (Rolls Royce) good transport links and un-affected by the noise issue (Goodwood buffer) for residential housing. The site must be included in the employment site allocation.

21. Policy S4 there is no mention of housing allocation in the area North of Chichester and South of the SDNP. This needs to be allocated as a strategic site in the plan. In accordance with the reference⁴ at many meetings I am proposing that this site is adopted as a strategic employment site. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

22. 4.5.7 Makes no mention of employment site to the North of the city. This should be included in the plan to facilitate employment sites for those residents of CDC area outside of the local plan area that are likely to move to Chichester to become economically active. Only focusing on the other peripheral areas and in particular the South West means increased traffic journeys for staff or prospective staff to get to the workplace. Building employment space outside the SDNP but to the North of Chichester is essential to unlock access to employment opportunities from residents of the SDNP. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

⁴ Susan Taylor "As you are probably aware the preferred approach is now out for consultation and you are welcome to make a formal representation on the local plan review should you consider that CDC should adopt a different approach." Cabinet et al 08 January 2019

23. Common sense business gravitas and business growth is achieved by collocation of grouped businesses. As a result the benefits of employment site development in the Goodwood Westhampnett area delivers a motor technical base and benefits all businesses in that sector. No mention is made of collocating like business that can have huge business benefit and the effects to the local economy for raised income and business profit. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

24. 4.65 This makes no mention of Lavant as a village centre and as there is space for residential development outside of the SDNP this needs to feature in the local plan as a village centre to support the new settlement boundary that should be in the local plan as a strategic site outside of the SDNP. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

25. 4.84 "Some funding for the A27 junctions package of improvements has already been secured from planning permissions granted to date." This does not cover enough detail to be a statement in the local plan. Unless the detail is provided of the funds and the plan for the funds then this is irrelevant. Key is that the population of Chichester have asked for a new strategic route for the A27 endorsed by both CDC and West Sussex County Council (WSCC) in a democratic process. This needs to be incorporated into the plan. We should NOT be using development money to improve a Highways England (HE) road. If the main strategic road for the south coast is not fit for purpose, the government needs to provide sufficient funds from its increased roads budget to build one that is. If it can't afford to then it must reduce the housing quota for the district. CDC should go back to government and state that the allocation of housing numbers within a very constrained area is not deliverable unless an acceptable solution to the A27 is provided within the life of this revised plan. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

26. 4.85 There is known capacity with schools to the North of the city in the SDNP. Provision should be made for housing where vacancies currently exist and where the school PAN can easily be increased without resorting to further building. As a result options to the North of the local plan must be part of a strategic development site. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

27. 4.86 We are being asked to consult on this document. "For this reason an independent viability study will be carried out to inform this strategy and the IDP" this study must be included in the consultation and form the basis of the consultation evidence or the elements of the IDP that will change if the current IDP is not viable. As agreed at cabinet you will have to re consult on this and all elements of the plan affected by it.⁵ Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

⁵ Susan Taylor "The whole plan viability study can not be effectively carried out until there is a draft plan. Given the need to progress the local plan review this is being carried out

28. 4.98 This high level extraction is a rerun of Option 3 of the failed Highways England (HE) consultation and none of it will resolve the issues during rush hour and adverse circumstances such as beach traffic. Nor for that matter does it offer a strategic alternative route in the event of road closure. The problems of the A27 and its proximity to the city are the issue that currently exist. Nothing is or will be done to mitigate these within the adopted plan or this proposed revised plan. This plan does not integrate with the mitigated Northern route that we have all campaigned for. We must (as described in planning legislation) plan for an integrated solution which addresses the immediate, and future transport requirements. This policy of tinkering with the junctions will not resolve the issues of the A27. The council must integrate with HE and deliver a new strategic route and use the SIL and 106 money to provide our local integrated transport plan utilising the old A27. Furthermore if this plan where considered it would be unaffordable and wasteful of CIL and 106 money. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

29. 4.110 The noise abatement area does not affect employment space and this site around Goodwood should be brought forward as a strategic site for employment buildings close to current development and accessible for the SDNP. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

30. 4.113 This mentions the A259 corridor. This corridor is not fit for further development without an access link to the A27 and not at Fishbourne or Havant. For further development in this and the Southborne area there must be provision for another access onto the A27 both East and west near Southbourne. No consideration of this has been made in this or any transport review. This would alleviate much of the current and future pressure on the Fishbourne roundabout without having to expend money on pointless tinkering of road junctions that are the responsibility of HE, DFT and Government. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

31. 4.114 This proposed employment space area is wholly and totally unsuitable and the A259 is not a suitable road to support it. That and the flood plain makes this site unviable. The site is much better purposed as a park and ride site freeing up car parking spaces in the city to enable both residential and employment space to be built on current car parking spaces. This will also enable affordable home allocations closer to the potential need. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

32. 4.115 The position made in this statement is completely contrary to the benefits of a local plan. The area available is extensive and outside the SDNP. It is perfect land to be brought forward for strategic sites particularly in the Area of West Broyle and South of Lavant. Neither site will affect the AONB or for that matter the

now following agreement of the draft plan by the council and in parallel with the consultation any policy implications will be dealt with in the next iteration of the local plan review which is anticipated will be open to consultation later this year

SDNP. The areas are outside of flood plain and perfect for the development of employment spaces and the council must include these areas to be considered for strategic development sites. I have in accordance with reference from Councillor Susan Taylor⁶ suggested the site areas later in this plan. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

33. 5.25 mentions "At this time, there is insufficient detail and uncertainty on the proposed route to rely on a publicly funded solution in planning future development. It will also be necessary to coordinate Local Plan Review transport improvements with the eventual preferred Highways England scheme for the A27 bypass when this is known, both physically and in terms of funding." In formulating the local plan authorities are required to consult with HE in advance of the plan production in accordance with <https://www.gov.uk/guidance/planning-and-the-major-road-network-in-england> as there seems to have been no such consultation then the whole transport study needs to be reconducted with HE involvement from the start. Equally as important the local authority (CDC) are required to engage with HE for the short medium and long term solution to ensure integration and value for money. No evidence is provided that this essential work has been conducted. This plan can not proceed on this vital point until this coordination has been conducted and the evidence reflects that position. Who is the named HE contact for the development of these strategic sites. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

34. 5.30 The CIL and 106 money will not be sufficient for these at grade improvements that have not been considered by HE. This plan needs to go back to the drawing board as the evidence is completely flawed and open to judicial review which will impact the whole presentation of the plan. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

35. 5.26 Working with HE prior to consultation is required. The transport study evidence is therefore irrelevant in this study as it is not integrated as laid down in statute. No evidence of having worked effectively with HE has been provided in my FOI request. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

36. 5.28 CIL and 106 will not fund the flawed proposals in the local plan transport study. As HE have not been involved (from the evidence presented) in the preparation of this plan it must be rejected as having not been through appropriate statutory requirements and is therefore not fit for consultation. Current transport issues will only be further impacted by this local plan. No measures I can see in the transport study alleviate the increased demand. CDC must push for a strategic mitigated northern route and then invest the CIL and 106 money into local route mitigation including sustainable transport options. The proposed link road has no detail and has not been considered in any of the other studies. Unless this is

⁶ you are welcome to make formal representation in response to consultation on the local plan review should you consider that there are better sites for housing and employment development

adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

37. 5.29 Connect my comments to Para 5.28. Park and ride is needed now for both consideration of events (Goodwood and beach days) and for normal activities including employees in Chichester including East Pallant house. I believe that the site allocated for employment space to the SW in level 2 and 3 floodplain is perfect for a park and ride. This is the only suitable use for this site which will not impact the views of the cathedral and will not necessitate unsightly link road as access will be direct onto the A27. It will also offer up space in the city for employment and residential needs as the car parking spaces in the city are no longer required. Contrary to "assumptions" many people park on the side streets into Chichester and walk to work (because of parking costs). Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

38. 5.30 Connect my comments to Para 5.28. Stating that funding from development to improve junctions is a short sighted idea. The proposed junction improvements are unfunded and therefore strategic sites that directly impact the A27 are unaffordable and should not be part of this local plan. The land SW of Chichester at Apuldrum will have a major impact on Stockbridge and Fishbourne roundabout. Therefore the strategic site should be removed as the improvements will not happen prior to the development, nor for that matter after as the proposed improvements are unaffordable. Other suitable land including the strategic site to the South South Wes of Goodwood race circuit meets the need of employment space and has good links to road infrastructure. The infrastructure levy should be utilised to provide alternate commuting infrastructure and simple connections to this proposed site in accordance with the guidance from Councillor Taylor⁷. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

39. Connect my comments to Para 5.28. These schemes are a cynical ploy to implement Option 2 of the rejected public consultation from 2016. The council must not place this link road in the local plan. These junction improvements are unaffordable and a very short term view that will not solve the current problem nor for that matter the traffic problems caused by the selection of inappropriate strategic sites. We must review the transport study and implement a long term strategy (as required when dealing with the strategic network) so that we have a long term solution that provides the strategic transport infrastructure Chichester needs. All infrastructure funding must reflect a mitigated northern route and integrate with it when it is finally delivered. This does none of that. We voted against option 2 and 3 and it must now be removed from this plan. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

⁷ "you are welcome to make formal representation in response to consultation on the local plan review should you consider that there are better sites for housing and employment development and an alternative solution for mitigation of the transport impacts of development that do not involve the link road." Cabinet 08 January 2019.

40. No improvements as laid out in the adopted (current) plan have been delivered and we have no confidence in the Councils ability to fund these proposals let alone the flawed new proposals prior to building (despite assurances in this plan). The proposal in the adopted plan for road junction links to Westhampnett should be implemented which will support employment space in the strategic site in the adopted plan within the 400m noise buffer zone as this only affects residential property. The space is perfect for this use and must become a strategic employment site. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

41. Policy S23 No mention is made of the preferred Northern route as part of the RIS funding that CDC voted for. This strategic route must be mentioned in this local plan summary. The councils transport strategy must reflect this and work with HE to develop a truly integrated transport plan which ensures that strategic sites are positioned on the expected likely route of the mitigated Northern bypass.

42. Policy S23 the proposed link road (AL6) is not an appropriate consideration because of the effect this will have on:

a. The AONB and the boundary with the AONB

b. The views of the cathedral and the South Downs from the sea and the Apuldrum area (the only one where both are in one view). Views are a consideration for refusal of suitable land elsewhere within the plan⁸ yet this is not applied to this site. This affect on iconic views and habitats are further desecrated by an elevated road which is not affordable and was resoundly rejected by the public in 2016. There is no justification for the link road in the plan and the detailed impact is not available for us to comment on.

c. The road would remove the natural barrier between Chichester and the AONB and therefore needs to be removed as other areas have been removed for this same reason in this revised plan.

d. No consideration has been made for the Pollution impact including AQMA, Light into the dark skies of the AONB and noise.

43. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

44. Policy S23. I can see no evidence that the rejected option 2/3 which is proposed in this plan achieves the "These will increase road capacity, reduce traffic congestion, improve safety and air quality, and improve access to Chichester City from surrounding areas". This plan must come up with an integrated transport plan in coordination with HE which integrates with the Mitigated Northern route and does not allow the introduction of flawed online options which this council and the public voted against. The selection of sites is influencing a plan to deliver options that are not supported and the transport study needs to be redone to reflect the future and

⁸ Westhampnett site for example.

not cynically get a short term solution that will not meet our current let alone our future needs for truly integrated transport.

45. Policy S23 – no mention is made of engagement with HE this is a fatal flaw to this strategy and points to the fact that no such consultation has occurred and perhaps no consultation is planned. This will be subject to judicial review if this transport plan is proposed for adoption and will be a major consideration raised with the examiner/inspector. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

46. 5.36 to 5.40 This needs to apply to the area proposed as a strategic site SW of Chichester. The settlement boundary is breached and it goes directly upto the border of the AONB removing the buffer currently in existing and is likely to affect the wildlife corridor formed along the river Lavant that goes through the site⁹. It will also directly affect the salterns way footpath/cyclepath. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

47. 16th 5.41 Whilst we recognise the value of the SDNP we do not see the need for the rest of CDC outside the SDNP having to accept the unmet housing need of the SDNP. In fact CDC should not accept 205 houses in the life of the plan. This linked with the councils desire (5.38 “To support a prosperous and diverse rural economy, some limited and carefully planned development may be acceptable to enable the countryside and local rural communities to evolve and thrive.”) CDC should be engaging with SDNP to develop these 205 houses within the SDNP CDC area and not outside of the SDNP. This housing is needed by the rural community. The policy of delivering these homes in Chichester area outside the SDNP affects directly the ability for the rural communities to be sustainable. This will deliver problems downstream including loss of rural schools and pressure on Non SDNP schools as the young dependants of the rural community are forced to become residents outside the SDNP and then move away from rural community and work. Thus affecting the provision of rural services. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

48. 5.41 No mention is made of the importance of the Chichester Harbour AONB but reference is made of the SDNP. This is particularly pertinent as the effect on the AONB and boundaries (including views) is equally as important as those of the SDNP. The same rules for exclusion of strategic sites must be applied (consistency) which is not the case in this plan. SDNP is being given an unequal consideration.

49. 17th 5.44 This statement is probably the most important statement in the plan so far “The landscape of the coastline is characterised by its relatively flat topography which, on occasion, serves to provide views from the water across to the South Downs National Park.” The proposal to build SW of Chichester will not only spoil this view but will also spoil perhaps the only view framed by the South Downs of the cathedral in the whole area with employment sites and housing and with a

⁹ It is noted that the relevant report is not available at the time of this consultation.

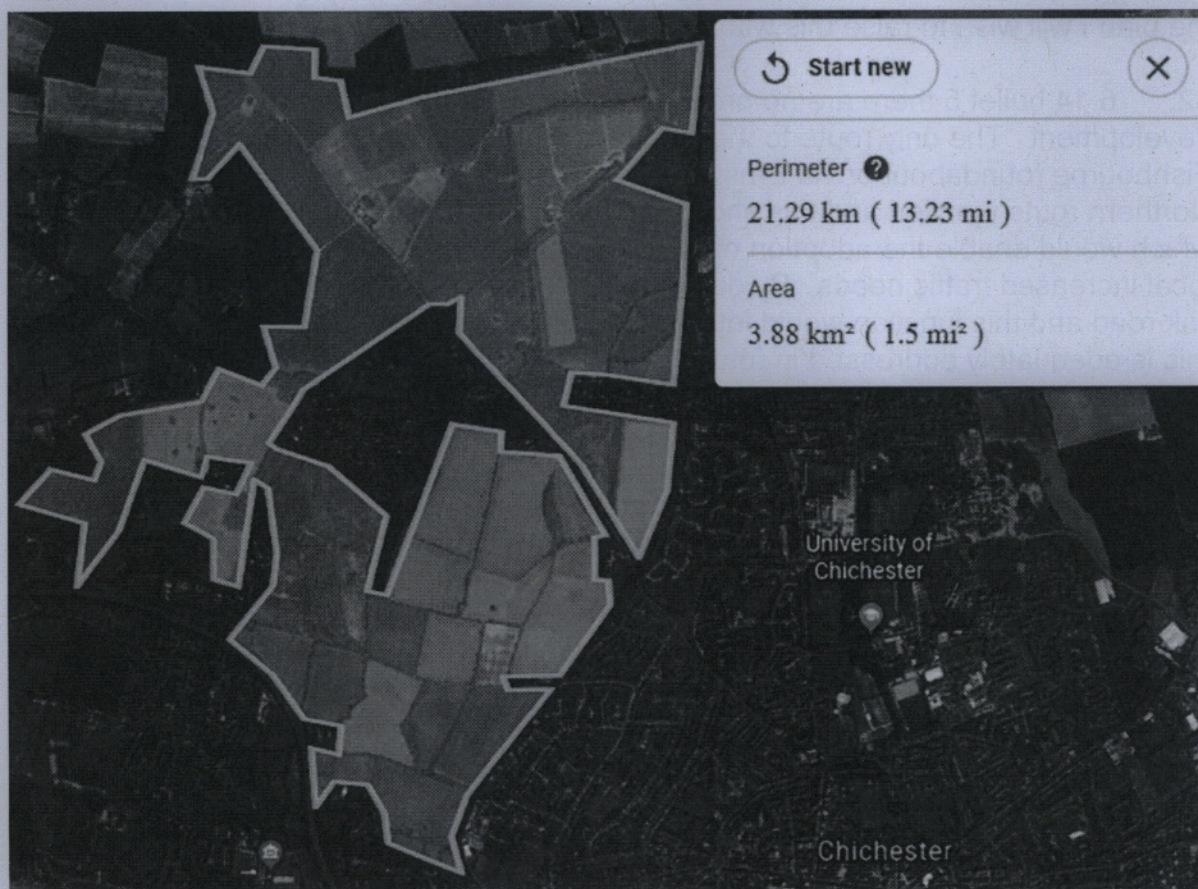
proposed raised link relief road through countryside bordering the Chichester Harbour AONB. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

50. 5.54 The council statement says that areas at risk of flooding should not be considered. The proposal for a link road and employment and residential use in SW Chichester (Apuldram) encompasses flood plain level 3 and the development site should be excluded in favour of non flood areas including that element to the south of Goodwood (for employment use) and around West Broyle and Lavant to support residential development outside of the SDNP but to accommodate any unmet need from the SDNP (which should not be included but if it is this is where the development should occur.) This would ensure that if the unmet need is forced on CDC outside the SDNP area then at least the communities are still in reach and not detached by the city itself without multiple public transport links to their rural community or employment. Areas have been suggested and are supplied here for rough reference:



Currently in the adopted plan for residential housing of 500 (planning for only 300 in progress). The adopted plan states that transport intersections can be at all areas of the area yet the revised plan removes the site entirely and introduces a noise buffer and a rolls Royce buffer. This site should be adopted for employment use as it

provides the required space and is largely out of flood plain. Contrary to advice to councillors from Officers this site does not affect views or the SDNP boundary. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.



Whilst it is understood that some development is taking place and wildlife corridors are a factor these should be considered as strategic sites in the plan as they offer suitable sites unlike the Apuldram, Fishbourne proposed site for both employment and residential and in particular affordable homes for the Northern rural community where appropriate¹⁰. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

51. 6.13 acknowledges the issue for building west of Chichester and advocates using the Tangmere waste water processing plant. The para acknowledges that Apuldram plant can't cope and therefore this will be impacted by the land SW of Chichester with the same reason. The strategic site West of Chichester may need to grow to replace the area proposed at Apuldram which is not and should not be a strategic site in the plan. Councillor Taylor stated¹¹ "It is not expected that there will be any impact on the Apuldram Waste water treatment works in terms of flooding. Southern water as a statutory undertaker needs to provide sufficient capacity to treat waste water from the developments either through an upgrade to their existing works or transferring to an alternate works if you have concerns about these issues you are welcome to raise them through formal representation in the current consultation".

¹⁰ Preference for this unmet need to be handed back to SDNP.

¹¹ Cabinet 08 January 2019 public question time.

am not privy to Southern water response but the proposed development at AL/AP6 will directly impact the Apuldrum site which the council itself acknowledges is at capacity hence the proposal for waste treatment from the West going to the East at Tangmere. CDC are aware of the limit on the site imposed by their own policy and have ignored its own cap. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

52. 6.14 bullet 5 there are no proposals for access to the A27 with this development. The only route to the A27 would be via Chichester city centre, Fishbourne roundabout or via Emsworth. This site would fit well with a mitigated Northern route junction and this should be the preferred strategic development site which would enable the adoption of a preferred route with junctions to support the local increased traffic needs. By doing this there would not be a requirement for a link road and this junction would integrate with a strategic network upgrade. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

53. 6.35 bullet 2. There are a number of considerations here. The statement is "Landscape sensitivity, particularly in terms of views towards and from within the SouthDowns National Park to the north [There is an error in this sentence as there can not be any effect on views from within the SDNP to the North]. The site lies within 1km of the National Park boundary [This is irrelevant as the same distance factor is not being considered with proximity to the AONB where the impact is the same if not greater and he proximity is less than 100 metres.] and is open to views from Goodwood [views from an aerodrome or motor circuit is irrelevant in planning terms and this is not a factor in declining a suitable strategic site] and The Trundle to the north" The justification here is therefore flawed and Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

54. 6.35 bullet 4. "and protects important views of Chichester Cathedral spire". The views from the proposed site are very limited of the cathedral. In terms of the land gradient the building is unlikely to affect the views of the cathedral and line of site needs to apply. This is not a reason for rejection of this site that can be developed for employment space. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

55. AL4. This site has not been considered for employment space. It should be the preferred site for employment space removing that proposed in the plan for the SW of Chichester. The benefits of doing so are as follows:

- a. Proximity to other business in the area and particularly Rolls Royce. Co location of business in specialised areas is a key benefit for supply chain and mentoring delivering the support mechanism for this high tech business.
- b. Benefit of opening up employment opportunities for the rural community within the SDNP without having to cross Chichester itself to reach employment opportunities.

- c. Limited flood plain impact as the majority of this site is outwith level 3 floodplain.
- d. Overcomes the noise sensitive impact of the race circuit and aerodrome.
- e. Outside the safe air corridor
- f. Good access to the A27 with no requirement for major new junctions or relief roads that are expensive and unaffordable.

56. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

57. 6.44 the summary is incorrect as there are more than one public links. Whilst it is accepted that some are dangerous there are in fact 3 rights of way to Chichester (not including roads). This needs to reflect reality. I will not wish to raise this with the examiner at the appropriate juncture.

58. 6.47 states "The impacts of development (including landscape, flooding and transport) in this location, along with the commercial attractiveness of the site, will need to be tested further as this Local Plan Review is prepared. However, based on an initial assessment of the area so far, it is considered that there is potential to deliver significant development in this area which addresses the constraints of the site and its wider environment". This "testing" is not available for us to comment on. As such this will need to be provided for consultation before this plan is sent to the examiner/inspector. That is unless this strategic site is removed as it is unsuitable for the proposed use as outlined further. This failure to consult on the testing means that currently this site should not be a strategic development site. Further if the unmet need for the SDNP is rejected and CDC go back to government to get the strategic route built or the housing allocation reduced then this site will not be required. Councillor Taylor said "*CDCs evidence based studies to support the local plan review have not at this stage all been finally concluded and for example the conclusions of the landscape study and further ongoing work in relation to the allocated sites in the plan will help inform their suitability for development*"¹². As a result this site which is the only untested site in the revised plan will need to go through consultation again before submission to the examiner. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture. Unless of course it is removed. This also applies to the link road which are both clearly a last desperate attempt to provided unsuitable land and justify its inclusion.

59. AL6 is an uncertain proposal as it currently stands in this plan. There is total uncertainty and as a result should be immediately removed from the plan. This means that as it stands (at this consultation) we have no certainty on this proposal and therefore are unable to comment in a constructive way due to the uncertainty. In particular:

¹² Cabinet 08 January 2019.

- a. Testing has not been conducted for this site this is acknowledged at 6.47.
- b. 6.48 is unable to provide any idea what the proposed usage of the site will be
- c. 6.49 makes no concrete proposal just suggesting a link road may be needed. This begs the question why as the proposed link road has NO impact on relieving traffic flows.

60. This is not a worked up proposal for a strategic site and should be removed unless CDC can demonstrate the appropriate evidence base for this which must be re consulted upon. Failure to do so will ensure that this site will be challenged at examination. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

61. AL 6 further comments:

- a. No mention is made of the unique view of Chichester cathedral framed by the South Downs which is one of the only such views in the area.
- b. No mention is made of the impact of development on the views of the South Downs to the North (where other removed or rejected suitable sites make this one of the reasons for removal).
- c. No mention is made that the proposed site is within 100 metres of the AONB where a reason for non development on other sites is the 1km proximity of the SDNP.
- d. No mention is made of the extensive level 3 floodplain and mitigation requirements as used on other strategic sites removed from the plan. This was a valid reason for removal of this site by the examiner at previous planning cycles.
- e. No mention is made of the impact to the river Lavant and its biodiversity and the Salterns way footpath/cyclepath by this development.
- f. Previous sites have discussed the impact on the Apuldram waste site yet this site will impact directly with no option to use other sites.
- g. Where would a Country park go that is not in the flood plain
- h. There will be no green buffer between Chichester and the AONB.
- i. Cost of road improvements and the delivery of a raised link road.
- j. This site was rejected by the examiner in a previous local plan. That "judgment" with reasons is conveniently not available for this consultation.

62. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

63. This site is wholly unsuitable and is not ready for consideration in this plan and should be removed as we are unable to comment on untested proposals. The element of at least 100 homes is not a proposal on which we can comment as it articulates in other documents that 200 homes could be built. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

64. AL7.3 Makes provision or mention of the A259 access but no mention of where this extra traffic will enter the A27 which will either be Fishbourne roundabout or Havant. This impact the Fishbourne roundabout. My proposal for a separate junction must be considered along the A27. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

65. AL8 overall mentions that the road infrastructure is not currently able to manage demand (especially on beach days!) yet no mitigation proposals are included in this element of the plan. The proposed extra housing will increase this burden and measures need to be put in place. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

66. AL9 This makes no provision for the road infrastructure impact of a further 250 dwellings onto the A259 and A27 and will impact the transport report. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

67. AL10 This makes no provision for the road infrastructure impact of a further 500 dwellings onto the A259 and A27 and will impact the transport report. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

68. AL11 This makes no provision for the road infrastructure impact of a further 200 dwellings onto the A259 and A27 and will impact the transport report. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

69. AL12 This makes no provision for the road infrastructure impact of a further 250 dwellings onto the A259 and A27 and will impact the transport report. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

70. AL13 This makes no provision for the road infrastructure impact of a further 1250 dwellings onto the A259 and A27 and will impact the transport report. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

71 7.1 Mentions “place housing in locations which are accessible by public transport to jobs, shopping, leisure, education and health facilities”. Whilst we do not believe that CDC should be accepting the unmet housing needs from within the SDNP if we are forced to provide this housing need it should be provided to the North of the city in the areas of West Broyle and Lavant to ensure that families are not distanced from their “parent neighbourhood”. As a result a strategic site for at least 205 affordable homes should be found in the area to mitigate the unmet needs of the SDNP. This would also remove the requirement to build on floodplain next to the AONB. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

72. DM1 needs to mention the requirement for special need of the rural community to the North of Chichester. Whilst we believe that affordable homes should be built (41 a year) in the SDNB. Key to wellbeing and improving mental health is that rural communities can be maintained. If rural workers and family groups can not have affordable new homes in the SDNP then they should be built as close to the SDNP as possible. As a result strategic sites must be found to the North of Chichester (west Broyle and Lavant) to maintain local connections and access to rural jobs via public transport where appropriate. Sites have been suggested which will be suitable including employment sites in and around Goodwood. This should be considered as an exception site and put into the plan with the caveat I have provided. Of particular note this would ensure that the 5 mile distance rule would apply to the bottom half of the SDNP which would not be met at other poorly proposed strategic sites. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

73. 7.25 mentions landscape buffers. From the untested AL6 there are no landscape buffers between Chichester and the AONB boundary. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

74. Policy DM6 – this needs to reflect the unmet housing need from SDNP although noted that we do not believe this unmet need should be accepted in this plan. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

75. DM 7 makes mention of local facilities. The plan should mention a minimum threshold of development (both employment and residential) that requires improved or new community facilities. AL6 makes no mention of this requirement. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

76. DM 9 makes no real concrete provision for meeting the employment needs of the rural communities. There is a real opportunity here to provide routes to employment that support the disconnected North of the CDC area within the SDNP and in particular the residents from hard to reach communities with the introduction of employment sites to the North of the city which are easily accessible for public transport. Using the strategic site in the current adopted plan with access from the North (Lavant) should be included in this plan. This should not be aspirational but meets the need of the disconnected community that would not be able to easily

access employment sites across the A27 to the South. This site would also add no noise impact to the local residents that is not already present from the local Goodwood activities. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

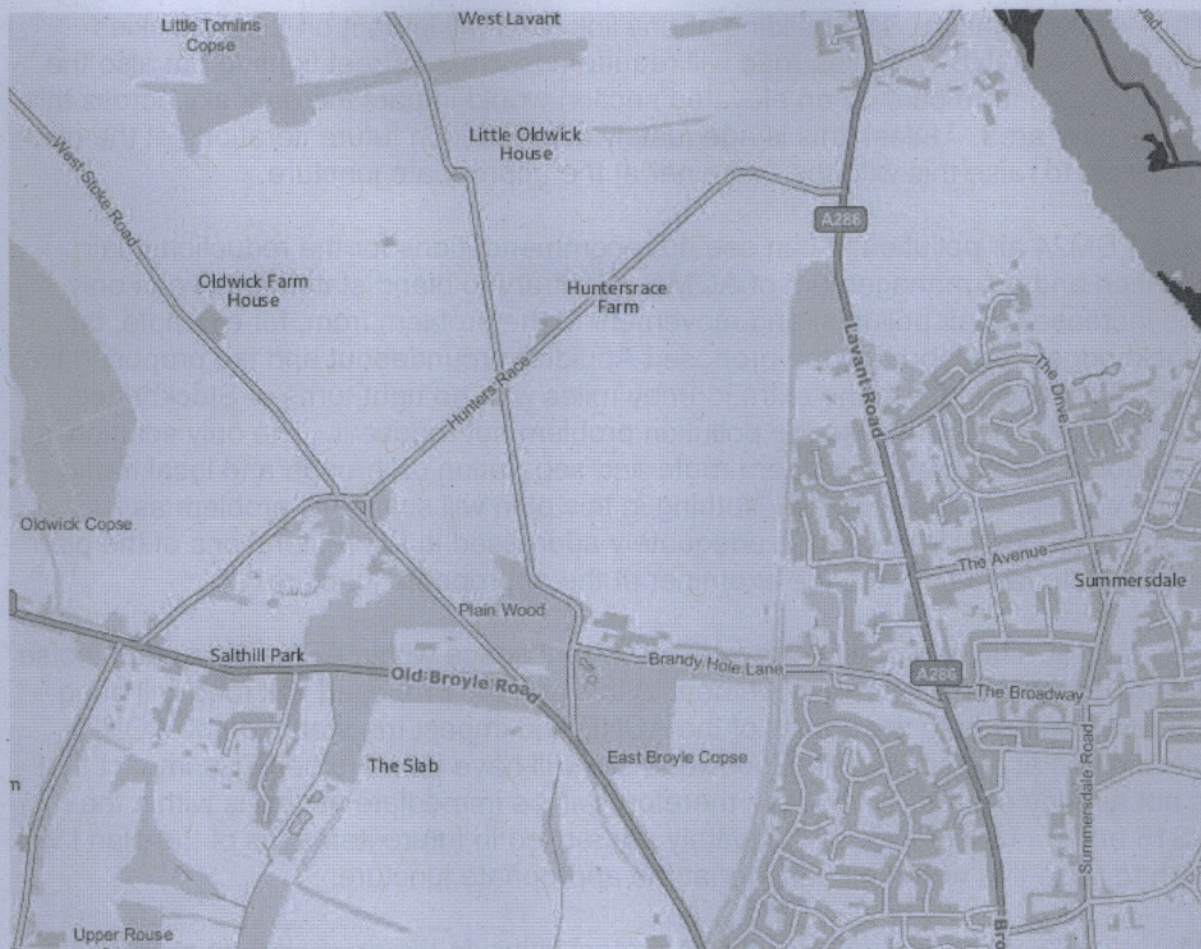
77. 7.61 Makes no mention of perhaps the best employment site that should be part of this plan which is in the current adopted plan of Westhampnett (for residential) South of Goodwood aerodrome. This site needs to be included as it would serve the North and the hard to reach rural communities that would currently have to utilise 2 transport modes (bus) to get to the proposed employment sites in the plan. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

78. 7.108 forwards articulates the councils approach to flood zone areas. AL6 in particular makes no specific reference to the flood zone which is listed as depicted in the environment agency map:



As no flood impact assessment has been or appears to have been completed this area should be excluded from the plan. To accommodate its removal we would suggest that the housing if still required should be accommodated at West Broyle and Lavant to meet the unmet housing need of SDNP communities with associated employment site within the 400m noise buffer around Goodwood. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.





79. 7.118 States "The flatness of the landscape makes the AONB particularly vulnerable to visual intrusion from inappropriate development, both within or adjacent to the boundary, which can often be seen from significant distances across inlets, the main harbour channels, or open countryside. The District Council will have particular regard to these characteristics in determining development proposals affecting the AONB". This is one of the key arguments against the development proposed at AL6. This elevated link road, employment space and residential proposals which are not tested contravenes this requirement and statement. This area is one of the only views of the cathedral spire framed by the North Downs which will be ruined with any development on AL6. In particular this development will remove the ability to see a cathedral from the sea (the only one in the country). Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture. It is also stressed that views and proximity to SDNP are used in other parts of the plan for removal of suitable land even though the views are non existent of unaffected and the proximity is 1 Km versus 100 Metres.

80. This is why the rural community needs to be supported if housing can not be built in the SDNP. The northern area south of the SDNP is the right location to provide the affordable 205 homes with employment space if they are not to be handed back to the SDNP to meet the need. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

81. DM23 lighting. The building of any link road will impact on the dark skies value of the AONB. Any link road will require associated street lighting but also the light pollution from cars on an elevated section would impact the dark sky across this flat harbour area. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

82. DM24 air pollution. I can see no recommendations for the reduction in air pollution and the management of AQMA. Contrary to bland statements I can only see increases in air pollution and movement of the problem from, for example, the Stockbridge roundabout to the proposed Apuldrum roundabout and the proposed link road. That coupled with the extra journey miles with no right turns at Stockbridge and Wyck will only increase the pollution problem not reduce it. The only solution is to endorse the mitigated Northern route and separation of through and local traffic which will remove the AQMAs. Nothing in this plan will solve this problem as it currently stands. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

83. 7.150 The proposal to move employment space within AP6 exacerbates noise pollution in the AONB. The movement of this and the proposed link road will bring the noise pollution to the border of the AONB and impact the status of the AONB. Placing this at the suggested Goodwood site will have no adverse noise impact that is not already present. Mitigation therefore will be immediate as this is within the AS15 buffer. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

84. 7.163 states the requirement to protect views in the area. It then mentions 4 views of which only AP6 covers 2 of them and will blight the view with employment space, residential properties and an elevated link road namely "Towards Chichester Cathedral; Towards the South Downs from the Coastal Plain". This strategic site should be removed and replaced with suggested alternatives in the North of Chichester which currently has no development sites proposed and where the views are unaffected. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

85. 7.168 states "Due to the coastal nature of the district the protection of the coast and views are of importance." This is clearly not the case with the proposal in SA6, Fishbourne and Bosham which will all impact this statement. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

86. 7.171 "The Council is currently identifying and mapping components of the local ecological networks, including the sites designated for wildlife, priority habitats and the wildlife corridors and stepping stones that connect them." As this is a work in progress I am unable to comment on the content at this consultation and therefore the wildlife corridors in the plan and any assumptions have not been consulted on and will need to be prior to the delivery to the inspector/examiner. This is essential as Ap6/AL6 is untested. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

General Notes

87. The infrastructure delivery plan is mentioned at points in the consultation document as “The Infrastructure Delivery Plan will be updated during the course of the Plan preparation” as this plan went to consultation (13 Dec 2018) the plan was not updated. As it is a critical piece of evidence it must be available for consultation prior to the plan being presented to the examiner/inspector. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

88. Waste – all of the development SW of Chichester the plan acknowledges the waste issue but does not propose a plan for a solution. As we know this will directly impact on our AONB and the harbour for water users and will impact the blue flag status of one of the areas greatest tourist attraction but is not considered in this local plan in any concrete detail. 3000 residential properties will have a massive effect on our status as a AONB. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

89. Unmet need from SDNP must be developed as close to the SDNP and must include majority social housing to ameliorate the distance from the communities that they come from. This must be an exception site for affordable homes outside the SDNP but North of Chichester. This must include only 1 public transport journey to prevent isolation from employment and or family. As a result residential and employment space must be allocated within the plan for employment space (near Goodwood) and residential (near Lavant, West Broyle) so that they can maintain links with their community but also become economically active both in new employment and in the rural economy. We would ideally not accept the unmet need. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

Proposed changes to policy maps

90. SB1 map should include an employment space and residential strategic site as an exception site for the SDNP unmet housing need. South and east of Goodwood ideal site for employment space and then the areas South of Lavant outside the SDNP to be inserted as a strategic site for 100% affordable homes (exception) to meet the unmet need from SDNP. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

91. S16 Goodwood buffer and adjoining land to be made a strategic site for employment space as not affected by noise pollution and will not contribute further to noise pollution. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

92. S30a & S30b are draft corridors as the biodiversity study is incomplete at the time of this consultation and will need to be re-consulted on. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

93. AL 1 is incomplete as presented. The settlement boundary should extend to include sites to the North to accommodate the unmet housing need as an exemption site for affordable homes 100% within 5 miles of the need (unless the unmet housing need is returned to SDNP as it should be). Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

94. AL4 the land proposed for removal should not be removed as a strategic employment site and should be included in the plan as any development will not be affected by the noise buffer and will not contribute to further light and other pollution not currently present at this commercial site. The settlement to the north should be extended as per statements in AL1. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

95. AL 6 is wholly un appropriate for development:

a. Affects the AONB on its border:

- i) Light pollution.
- ii) Noise Pollution.
- iii) Waste water issues.
- iv) Habitat risk.
- v) Green buffer between Chichester and AONB
- vi) Only view of cathedral from the sea lost
- vii) Unsuitable for residential property due to flood plain
- viii) Green buffer between Chichester and Manhood

b. Proposed link road:

- i) Ruined views of cathedral framed by South Downs
- ii) Traffic congestion onto Fishbourne roundabout moves pollution
- iii) Loss of Salterns way

c. Requirement for infrastructure (schools) which can be met with development in North with 100% exception site to meet unmet housing need of SDNP.

c. Employment space in floodplain:

- i) Noise pollution
- ii) Light pollution into AONB

Sustainability Statement

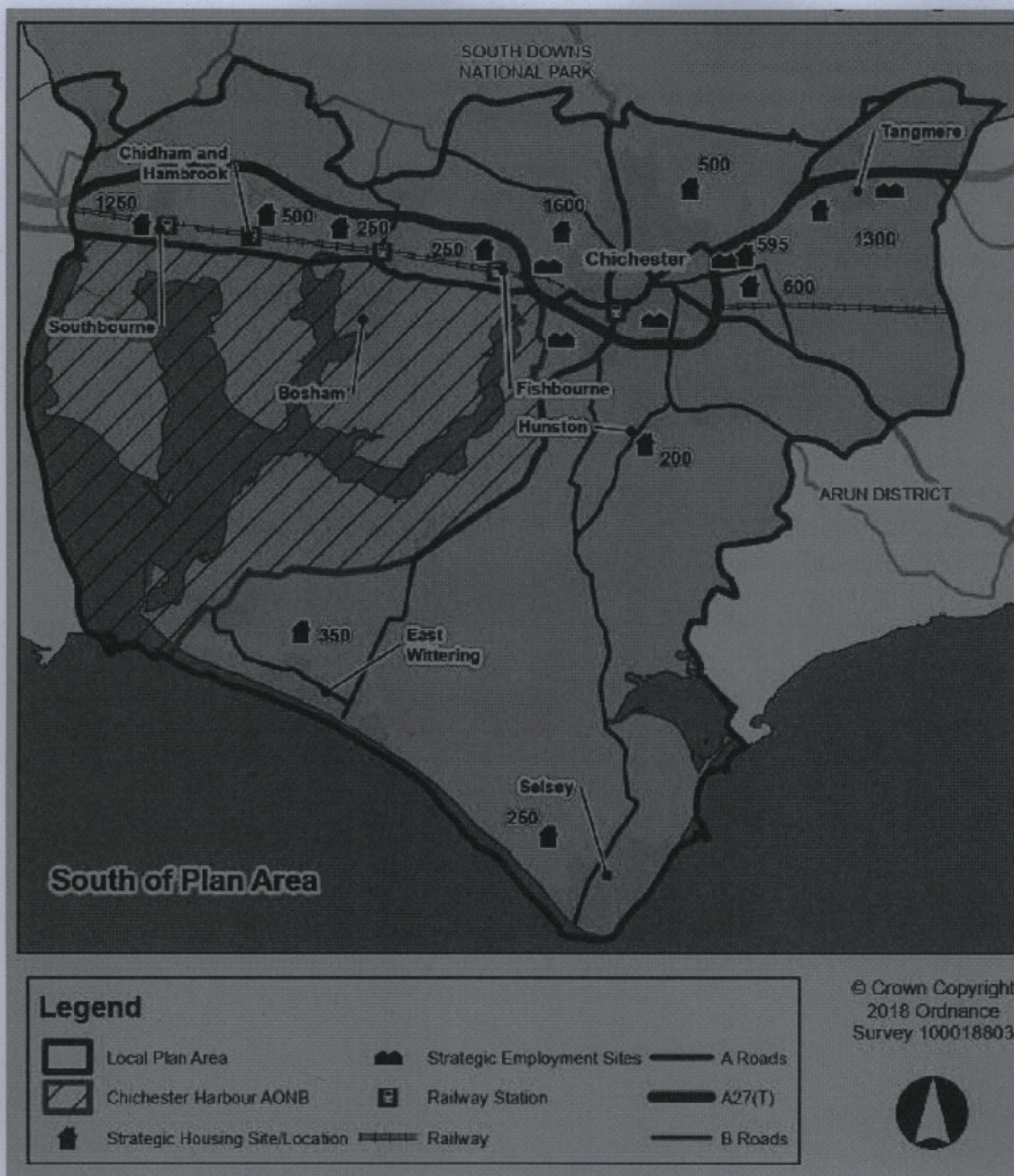
95. 1.1.1 I was not afforded the opportunity to comment on "This consultation took place from 22 June 2017 until Thursday 3 August 2017"

The sustainability assessment makes no mention of site AP6 anywhere on the strategic sites list and as such has not been assessed as a strategic site and should be excluded from the plan. It is also not considered in the previous sustainability assessment where Westhampnett site is and should be resubmitted in this plan as an employment space. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

96. Table 3 is the first mention in the sustainability appraisal of Apuldram (I assume AP6) as a site with the ability to deliver 100 homes across every scenario. I have the following comments:

- a. Why has this site now appeared in the appraisal.
- b. How can 100 homes in Apuldram be considered in the following scenarios:
 - i) Scenario 1: Focus on Settlement hubs and E/W corridor – Apuldram is neither a settlement hub or in the E/W corridor
 - ii) Scenario 1A: Focus on the settlement hubs and East/ West corridor, with reduced numbers on the Manhood Peninsula – clearly not Apuldram
 - iii) Scenario 2: Focus on E/W corridor Apuldram is not in the E/W corridor
 - iv) Scenario 3: Focus on Chichester city – Apuldram not Chichester City Centre
 - v) Scenario 4 : minimise development on the Manhood Peninsula – If Apuldram is not on the Manhood where is it?

In the key diagram AP6 has only been allocated for employment space with no intention for a strategic residential space shown. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.



97. 4.6.4 mentions "There is a risk of not meeting the local housing need on the Manhood peninsula which may lead to population decline there and the potential loss of services and facilities." Why is the same consideration not made for residential development in the North of Chichester to meet the unmet housing needs for the SDNP. It is essential that if this agreement between SDNP and CDC is to be met outside the SDNP then it must be met to the North of the city and not disjointed from their communities and support network in the South. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

98. 4.8.1 states "Of these, four proposed allocations are carried over from the adopted Local Plan unchanged and are not assessed further in this report (see Section 6). They are:

- AL1 Land West of Chichester
- AL2 Land at Shopwyke (Oving Parish)
- AL4 Land at Westhampnett / North East Chichester
- AL15 Land at Chichester Business Park, Tangmere

The strategic site at Westhampnett has then been removed where it would make an ideal employment site close to an alternate strategic housing site in the North of Chichester City next to what should be a settlement village of Lavant. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

99. 4.8.3 is the first concrete mention of the Apuldram site that clearly did not form part of the earlier consultation and has not been included in the 10 strategic sites. On reading section 5 it stresses that it considers the Apuldram site (SW of Chichester) in section 5 but I can find no correlation between the site and the following comments. In fact it seems that it has been totally missed. This will be brought out at examination if required. There is absolutely no assessment of the site.

100. **“5.2.7 S15 Goodwood Motor Circuit and Airfield** Further development at Goodwood could have a slightly negative impact on wildlife habitats and connectivity due to habitat loss and also result in an increase in air pollution and greenhouse gas emissions due to increased visitors to the site by car and intensification of the use of the site by aircraft and motor vehicles. The policy requires mitigation of these impacts.” There is no evidence provided for these assumptions. Exactly the same considerations apply to every site. AP6 Al6 in particular does not have the noise and industrial location that Goodwood already is especially on track days. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

101. **“5.2.8 S16 Development within the Vicinity of Goodwood Motor Circuit and Airfield** The policy provides a presumption against noise sensitive development within a 400m buffer of the Goodwood Motor Circuit and Airfield, with benefits to the noise environment and the tranquillity of the landscape. The negative impacts are on housing growth and provision of affordable housing.” There is no evidence provided for these assumptions. Exactly the same considerations apply to every site. AP6 in particular does not have the noise and industrial location that Goodwood already has especially on track days. How can affordable housing be more affected by noise than any other housing. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

Habitat Regulations Assesment

102. 5.24 alerts the council that the AP6 site is within 400m of SPA/ Ramsar site and as such could affect the European sites in urbanisation effects. Similar other sites are also listed that are proposed as part of the EW corridor without, at this stage, the link road being a consideration as this was not included in the

assessment. The link road would impact on the SPA/Ramsar and no evidence has been provided into the impact because this site has not been assessed at this consultation. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

103. 5.37 mentions "Policy AL6: Land south-west of Chichester (Apuldram and Donnington Parishes): development proposals are required to... 'provide mitigation to ensure the protection of the adjacent SPA, SAC and SSSI at Chichester Harbour'. There are no mitigation measures in the AL6 proposal of the main plan. This strategic site has been added as a late addition and should be removed as unsuitable at this stage and not be reconsidered as other more suitable sites are available. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

104. None of this document has considered the proposed link road to this site and its impact on habitat. This would need to be conducted as it would appear to be a prerequisite for the development of the site. More importantly this site and the proposed link road should be removed as a strategic site as it has clearly been entered as an afterthought and no real plan exists as the documents point to at least 100 homes but other document supports 200 homes. This element of the plan is not fit for consultation and should not be included. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

Chichester Local Plan Review: Preferred Approach Consultation

105. My only comment is that running a consultation over Christmas is wholly unsuitable and it would be helpful if you warned us of the next consultation round prior to examination/inspection to see whether you the council have listened to our valid concerns. In particular the appropriate dates for publication of uncompleted documents at this consultation.

EVIDENCE

Chichester Local Plan Review Preferred Approach Equality Impact Assessment

106. Vision This local plan I believe fails the following vision elements:

- a. Live in sustainable neighbourhoods supported by necessary infrastructure and facilities
- b. Move around safely and conveniently with opportunities to choose alternatives to car travel.
- c. Have a quality of life that is enriched through opportunities to enjoy our local culture, arts and a conserved and enhanced heritage
- d. Afford good quality dwellings to suit their incomes, needs, lifestyles and stage of life;
- e. Find a range of jobs that match different skills and pay levels and meet their aspirations for employment;
- f. Feel a sense of community, and empowered to help shape its future.

107. No provision is made for the unmet needs of the SDNP and the housing allocation in this plan isolates them from their own community as an exempted group. To resolve there should be a 100% exemption site for affordable housing to the North of Chichester outside the SDNP for 205 houses unless CDC remove the agreement to meet the unmet need from SDNP planning authority. An employment site should be established to meet the employment aspirations of this group at the South and West of Goodwood aerodrome inside the noise buffer making both sites easily accessible by current public transport through the main route in the SDNP and within the 5 miles laid down in statute. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

108. This proposal for affordable homes and employment space North of the city supports the following objectives from the CDC plan (Unless the unmet housing need is returned to the SDNP where only those in italics would be directly supported by employment space):

- a. *Promote economic development to maintain quality of life and competitiveness; Enable viability of the rural economy with enhanced diversity of employment opportunities*
- b. Increase availability of affordable housing
- c. Achieve a sustainable and integrated transport system through improved cycling networks and links to public transport

109. In the impact assessment the following statement is made:

SA6 This policy will ensure good links between this site and Chichester city and provide new employment land, a neighbourhood centre, community hub, open space and green infrastructure and regular bus services to the city which will benefit all people.

Any building in this area would not improve access to a regular bus service or would remove the bus service from other communities (Donnington). With the proposed building there is no possible useable green space outside the flood plain that could be useable nor community hubs and neighbourhood centres for a community of 100 residential properties. SA6 with a link road has not been thought through and is a clear afterthought to meet housing numbers. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

Chichester District Council Housing and Economic Land Availability Assessment Report

110. 2.3 and 2.4 states that only sites proposed to the council have been considered under a call for sites. Under the rules for local plan development the council are statutorily obliged to do a desk top exercise on all available sites regardless of whether they have been offered or not. Further the Town and Country Planning act allows for compulsory purchase of land once it has been identified as having a strategic development opportunity. As such the council have not considered statutory sites under their HELAA and statutory obligations and this is a

flawed assessment. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

111. 2.11 states “A site is considered available for development when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners.” This contravenes the statute in that sites for a local plan can be considered available for development if they have a community need and can be purchased under a compulsory purchase order for development by local authorities on behalf of the community. Therefore the HELAA has not considered all available sites according to the statute rules.

<https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/766/76607.htm>

Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

112. This document is dated August 2018 yet para 2.31 states “The Council will continue to accept new sites for the HELAA. Potential sites received since 3 August 2017 will be kept on file until the next review.” When then was this review conducted and why have no new sites been added to what is clearly a year old document? Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

113. The annexes have not been presented as part of the consultation but are available with some exhaustive searching from within the document. This means that many will not see the relevant annexes to comment on. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

Appendix 1 Sites not considered

114. Provision in these sites for Westhampnett only amounts to 400 homes. As a result the proposal to exclude the strategic site from the current adopted plan should be stopped as the requirement in that site is for 500 homes. A further yield of 100 homes needs to be identified. The site now needs to also be considered for employment space as it has the merit of supporting the new housing and the SDNP and is not affected by noise and light pollution. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

Appendix 2 Sites rejected with reasons

115. The following sites have been removed with an assumption of unsuitability. The following reasons are not justification for removal as other sites have been included which have the same and greater reasons for removal:

HWH0003	Land east of Rolls Royce	Impact on long distance views to the South Downs National Park. Site forms part of the buffer for the Rolls Royce factory.
HWH0004	Land south of Stane Street and	Detached from a settlement boundary.

HWH0006	Land west of Rolls Royce	Situated underneath a Goodwood safeguarding flight path.
HWH0010	Corner of Claypit Lane and Madgwick Lane	Situated underneath a Goodwood safeguarding flight path.
HWH0012	Former civil defence site	Detached from a settlement boundary and located underneath a Goodwood safeguarding flight path.
HWH0013	Westerton Farm	Detached from a settlement boundary.
HWH0014	Land north of Maudlin Farm	Detached from a settlement boundary.
HWH0015	Paddock at Westerton House	Detached from a settlement boundary.

The Goodwood safeguarding flight path is not a reason for non development. Development in a flightpath area according to the CAA has to consider height considerations but can be built on. More importantly many of these sites do not fall under the flightpath except for rotary wing aircraft (helicopters) which do not have the same restrictions as fixed wing aircraft (highlighted in blue)

<https://www.goodwood.com/globalassets/flying/flying-school/fixed-wing-circuit-patterns.jpg>

The long distance views argument is breached by other developments and in particular AP6/AL6 where there is no mention of the iconic view of the cathedral framed by the South Downs. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

116. No description is made of the Rolls Royce factory buffer so we are unable to respond to the validity of that reason for rejection but can see no viable planning purpose for this special status. It is understood that Goodwood and Rolls Royce have been given this special status which is inappropriate in planning terms and the site should be considered for both residential and employment space with appropriate mitigation. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

117. All of these sites (listed above) should be brought back into consideration especially to meet the current unmet requirements of 100 homes from the current strategic site allocation in the adopted plan. This would then mean no need to build residential properties in AP6/AL6 allocation with all of the factors associated with that undesirable site. Further consideration must now be made for an employment site in the noise buffer area of the airfield. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

Appendix 3 Potential housing, employment and mixed-use sites

118. 3a Hap 0003 housing sites suggests a potential housing yield of 200 homes. The proposal elsewhere in various references is 100 homes there is a clear inconsistency and this needs to become an excluded site for the following reasons:

- a. Flooding.
- c. Iconic views of the cathedral and South Downs.
- d. Infrastructure problems including:
 - i) Waste water capacity.
 - ii) Flood plain.
 - iii) Rural buffer.
 - iv) Road links (no evidence of mitigation and suitable affordable and achievable solutions).
- e. Proximity to AONB.
- f. Impact of pollution on AONB.

119. 3b counts the allowable space as 118.4ha yet council documents state that the available space is 85ha of which 48ha is outside the flood plain and unusable. Therefore the projections presented are incorrect and AP6/AL6 should be removed or adjusted accordingly. (Ref CDC letter from CEO Reference DS/ZAH dated 03 December 2018) Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

Appendix 4 Detailed site assessment forms

120. HAP0003 – no evidence has been provided that all the assessments for this site have been conducted. At the present time the site background, assessment and all factors are “yet to be tested”. This site contravenes many of the stated mitigation plans of the council and even the useable space is uncertain. The allowable space is states as 118.4ha but council documents state that the useable space is 48ha. Making basic assumptions this means that half is for employment space and half residential. With the requirement for a link road (where to date there is no detail) it is unlikely that this site will be suitable and should be excluded. To help exclude it CDC should in order of priority:

- a. Return the unmet housing need of 205 houses in the life of the new plan to SDNP thus removing the need for this site altogether.
- b. Provide an exemption site to the North of Chichester outside of the SDNP boundary with 100% affordable homes to meet the unmet housing need from the SDNP whilst within the 5 mile distance and single public transport range of economic sites and rural communities.
- c. Provide employment space to the North of the city outside the SSDNP to provide much needed access to economic activity (work) for the rural communities and the SDNP residents to make them economically active.

This detailed site assessment makes no mention of all of the mitigation that would be required to build on the site and does not appear with any of the mitigation anywhere else in the consultation document. It has clearly been added to ameliorate the

issues associated with development at Westhampnett at short notice and should be removed from consideration. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

OPEN SPACE EXECUTIVE SUMMARY

121. Table 6 and 7 of the main report clearly shows that Apuldram currently has no open space in any of the categories. These will have to be provided in what is currently a rural parish. As a result AP6 is inappropriate for the setting and green buffer to Chichester especially as it is not a settlement village nor could it be. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

INFRASTRUCTURE DELIVERY PLAN

122. This is referred to as draft and untested in the main plan. As a result any comments on this are based on the current evidence provided and not the final version. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

123. This document is undated and not version controlled so we have no way of knowing the status of the document and when it was written. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

124. Table 7 refers to: transport costs £77,620,900 excluding land purchase as at September 2018. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

125. Section 8 talks of funding sources but makes absolutely no mention of the RIS funding for the A27 nor the councils decision to go for a mitigated northern scheme with the southern scheme as a possible alternative. This is critical in the local plan but may be addressed by the relevant report as yet un reviewed. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

TRANSPORT STUDY

126. Main report - the lack of paragraph numbering makes this report very difficult to comment on. I will not wish to raise this with the examiner at the appropriate juncture.

127. In the **introduction** no reference is made to the Highways England modelling that preceded the 2016 debacle of a consultation. This is a clear error in relevant A27 data that should have been reviewed as part of this study. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

128. In para 3 of the **introduction** there is mention of the response to the LMVR received from HE why are these not presented in the report. Unless this is

adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

129. **National Guidance** Para 3 states "Summer tourist season or ... Goodwood. For these types of assessment which are regarded as INFREQUENT occurrences for the purposes of the study, the council would be required to carry out more localised studies". I can see no mention of this study having been conducted by the council and am unable to consult on what are NOT INFREQUENT events in the Chichester area and essential to any transport study in this area and should be part of this consultation. This failure to conduct this further study makes no justification for the study or for that matter the inappropriate link road which is inserted for "other reasons". Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

130. **Local Plan Review.** In this section the transport study has been conducted solely on the proposed strategic development areas. This means that no alternative areas considered as part of this plan will have appropriate transport considerations. As the site AP6 should be moved this will impact directly this transport study which will need to be addressed and redone. Equally as important is that CDC officers only allowed PBA to consider the junctions and not have any flexibility or original thought in the report. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

131. **Wider studies** para 3 is wholly incorrect as the Systra study proposed 2 options with no online options being taken forward. CDC chose a preferred mitigated Northern route with a southern alternative as a possible option. No recommendation was made for an online junction improvement and needs to be removed from this study. The scope set by Officers to PBA has led to a totally ineffective transport study. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

132. No mention is made of the RIS process and the announcement on the RIS 2 which will be made in time for the Transport study and local plan to reflect integration with the Governments likely investment of the A27. Failure for this is critical and this plan should be rejected in its entirety as it does not address the strategic goals for Chichester nor for that matter the local transport requirements. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

133. **Scenarios tested.** This section makes no mention of consultation or engagement with HE as to their progress towards a mitigated Northern Route nor early engagement with the local planning process which is the required process for any development that is likely to affect the strategic network. It also does not offer any other scenarios except for junction tinkering and delivery of Option 2 by stealth. This plan should therefore be rejected and redone with HE involvement as laid down in their strategy. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

134. The mitigation scheme has 4 components but no mention is made for a strategic junction onto the A27 (west of Chichester) to facilitate the traffic for the

developments to the West including Southborne. This is critical as the extra traffic will hit the Fishbourne roundabout and Havant roundabout which is already heavily congested. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

135. In part 1 proposals are made for junction improvements. As this is a strategic route no effective coordination has been had with HE and any changes to the junctions have already been rejected through public consultation. In fact the PBA suggestions are the same as Option 2/3 of the disastrous HE consultation which had the second worst response rate and was wholly rejected by all respondents to the consultation.

136. Costs – these are wholly inaccurate especially when no account has been taken from the HE costings of Option 3 in 2016. This in itself demonstrates the poor level of this report. The costings for Option 3 are available, are industry standard and use the agreed HE model. PBA have failed the council by not utilising current relevant data that could have been updated and given appropriate costs in this report. The lack of land purchase costs, compensation costs etc makes this an unviable report to evidence in the local plan and highlights a huge cost overrun risk for the council which would have to be met by the council and not the developers. It makes this proposal unviable as it stands. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

137. Air quality – PBA say that the development will not increase air quality issues but makes scant mention of the current AQMA and more importantly states “Outside of current air quality management areas (AQMAs)”. There is no mention that the Stockbridge AQMA will improve with any of the proposed junction improvements and as such this should be rejected especially the proposed link road. No mention is made of the effect to the AONB of building the proposed link road. The reality is that what these proposals will do is move and extend the AQMA. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

138. NOISE – no study of the noise impact to the AONB has been conducted as part of this study from the delivery of the link road. This needs to be conducted and considered before this link road is considered further. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

139. Light pollution – I can see no indication of the increased levels of light pollution in the AONB from the delivery of the link road and associated vehicle lights and street lighting. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

140. Sustainable travel – park and ride it is stated that there are limited workers currently in Chichester City Centre but no mention of what numbers these are. If a Park and ride is proposed it suggests Portfield or Fishbourne but no allocation is made for this within the plans. It would impact directly on AP6 and this has not been factored into the plan.

What is good in the report (the only bit so far) is the suggestion that a park and ride and amendment of parking in the city brings forward alternate sites for development in the built up area. This should be seriously considered as part of this local plan to develop more city centre properties particularly affordable housing and employment space. Park and ride is the only option for the AP6/AL6 site and alternative sites for housing and employment should be adopted including parking spaces in Chichester. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

141. Conclusion The report states "For Scenario 1, and with the proposed mitigation in place, the network conditions are generally projected to be comparable to those in the baseline suggesting that junction mitigation has the potential to mitigate and accommodate the growth provided for in this scenario" I do not believe this is the case and will only deal with the short term and does not address the medium to long term requirements that HE require local plans to consider and to engage with them early. HE study says that capacity will be breached within 6 years of building which is not highlighted in the PBA report. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

142. General comment no alternative modelling has been provided and PBA should have integrated this with HE plans. As there has been no effective interaction with HE with the exception of the LMVR this is a flawed study and should not be relied on for the Local Plan. This will be robustly challenged at Examination/inspection.

143. Para 2.2.2 see my earlier comments on this incorrect statement.

144. 2.3.1 to 2.3.6. This section describes the way forward and makes some very dangerous statements. The proposal to make "improvements" to the strategic network must be done in consultation with HE. There is no evidence in this report that this has occurred. As a result this transport study is pure fantasy as there is no indication that PBA have undertaken this vital work. As a result these junction improvements are undeliverable and the local plan will fail as the required infrastructure improvements will not be delivered. As a result this report is critical and must be redone to ensure that the short, medium, and long term considerations are undertaken and any local traffic improvements are integrated with strategic development to the A27. Blaming the timeline for examination is not acceptable and this evidence must be represented with appropriate integrated plans and more importantly real options for the strategic development of the A27. More importantly representation should be made to government to ensure that no money is wasted on un required improvements until certainty is received on the strategic network. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

145. 3.4.3 Model year and time tables are flawed for this study. The local impact of traffic is found before 0800 in the morning and between 1600 and 1800 in the evening. This is mirrored with the small issue of city centre traffic affected by schools times which do not truly factor in this report. The report is flawed as is this

peak flow modelling. Small example is Bishop Luffa schools which starts at 0800 so traffic flows around Tesco and Fishbourne roundabout do not run only from 0800 – 0900 and through traffic starts earlier than 0800. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

146. Table 5.9 I have added limited comment on the relevant data in the transport study as I think the whole process is flawed. To highlight this AM departures from Apuldam are described as 36 yet a minimum of 100 houses are being built. This assumes that in the AM only 18% of the households will travel away from their house by car in the peak. (assuming all residents are “active” and have at least 2 cars per property.) If only one car per property then only 36% of cars will move in the AM meaning that any other movement will be by sustainable means – a flawed statement. In light of the likely occupancy of this site it will be 2 employed adults as a minimum and therefore the traffic projection is wholly inadequate. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

147. 6.1 makes no mention of dialogue with HE. This is a critical failing of the study.

148. Figure 6.1 states that the volume to capacity ratio at peak hours (0800-0900, 1700-1800) are Fishbourne Amber, Stockbridge red, Wyck amber Bognor Red Portfield obscured. This is the current position and I would dispute the Fishbourne grading.

149. Figure 7.1 is the same, with the exception of the link road, as option 3. This was resoundly rejected by the local population at consultation and should be removed from the local plan. CDC in partnership with WSCC, BABA27 and HE must now provide a transport mitigation study that examines the short, medium and long term transport solutions and get behind its preferred mitigated Northern route. This plan should reflect integrating with that strategy and not waste public money on junction improvements that we the public rejected in vast numbers. The developers money should be used for local transport improvements and not provide solutions to mitigate through traffic which is what this report does. The link road has no justification for construction. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

150. JCT 13 comments:

- a. No modelling has been conducted in this report for the beach traffic flows that will now affect the Fishbourne roundabout if a link road is built. This will back up and block the roundabout as the traffic lights come into play.
- b. No modelling I can see projects the increased traffic from the West developments onto the Fishbourne roundabout.
- c. Increased pollution will be experienced on a proposed link road from departing traffic being signalled controlled at Fishbourne.

- d. The proposed link road is a possible site for a park and ride
- e. No plans or costings for the link road are evident.
- f. The west spur will block up as traffic is held at the light prior to entry onto the A27 west bound
- g. The slip onto the A27 westbound will block as the 2 lanes from the proposed link lane filter into one.
- h. No indication of the works required and the impact on congestion as this is built.
- i. This proposal has not been consulted on with HE effectively.

Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

151. Junction 14 & 15 comments:

- a. Does not improve local traffic flows.
- b. West bound traffic will use this route to access the beach.
- c. The removal of the slip lane will exacerbate traffic issues on the A27 and there will be no change to the pollution experienced.
- d. An inability to turn right will exacerbate the town centre traffic as people rat run through town to get to Portfield and beyond.
- e. The addition of the left turn slip road is welcome but it is not a slip lane and the run onto the A27 will back up as traffic waits to access the A27. If this where to be implemented (and it should not) then the slip lane would need to be extended to facilitate traffic flow.
- f. There is no indication whether right turns from the A27 will be allowed. This needs clarifying as the diagram indicates forward only. Signal controlled right turns would need to be implemented which would affect through traffic (which should be removed to a Northern bypass) The diagram clearly demonstrates that right turns are unlikely.

Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

152 7.5.8a. The insertion of the link road does not offer allow for turning restriction on the A27. This would be disastrous for the Local residents. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

153. 7.5.8b This statement is incorrect. The useable space outside the flood plain is 24Ha which does not meet the employment space needs. The provision of park and ride at this site would mitigate the requirement for the link road altogether as residential and employment sites could be identified in the city as parking is removed. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

154. The link road would not provide access to the employment space as there is no junction of the elevated road identified and the space required would negate the available space (because of flood plain). Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

155. 7.18 The link road will reduce the available space within AP6 which is an untenable development. The following comments are made on this proposal:

a. Impacts on the AONB:

- i) Noise pollution increase close to the AONB
- ii) Light pollution increase close to the AONB from both traffic and associated street lighting
- ii) Pollution moving and increasing the AQMA to the south

b. Impacts on views:

- i) An elevated link road would be required to accommodate the extensive flood plain level 3 no account of this is made in the report. Estimate from CDC reports is that the road surface would need to be raised above datum by 2.6 metres minimum.
- ii) An elevated road would ruin views of Chichester Cathedral and the backdrop of the South Downs.

c. The site is untested as stated in the local plan.

d. The link road would reduce the useable space in AP6 and has not been considered as part of the modelling.

e. Traffic will back up on beach days as east and west bound traffic are signal controlled on the Fishbourne roundabout in both directions at peak hours which **has not been modelled**.

f. Inbound east based traffic will still use the left turn at Stockbridge as will many west bound traffic as the roundabout at Stockbridge (new) backs up.

f. Pollution will increase as traffic stands on the link road.

g. It will be unaffordable and does not integrate with strategic plans for the mitigated Northern route

g. Habitat loss.

Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

156. 7.5.13 is the real issue. PBD states "Alternatively, as the link also offers strategic opportunities and therefore, should be considered for funding through the local plan" This is not a strategic opportunity to deliver the resoundly rejected online options proposed by HE. Councillor Dignum stated that these were "NOT...embracing any 2016 options for the A27" Clearly this is not the case as this does not constitute a grade improvement and should be removed from the plan. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

157. COSTS – until accurate costs are provided there is no point commenting on those presented. It has been acknowledged that the costs are the build costs only. As such these are irrelevant as they are unaffordable through SIL and 106 funding. As such none of these proposals are deliverable and HE have acknowledged they have no money to support this plan. Therefore the plan should be rejected and other affordable integrated proposals brought forward as part of this plan if it is to pass scrutiny. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

158. None of these schemes alleviate the impact on local roads they merely mitigate the impact on the strategic route. This plan is a cynical view of some in the council to deliver unsupported online options through another route. This plan should be rejected. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

159. The costs are nearly 50% less than those presented for option 3 by HE. Councillor Dignum stated that this was because the HE costs included full cost of construction which is not the case. In fact HE costs with the exception of Land contamination and remediation costs should be broadly comparable. Therefore the transport plan should be discounted and redone in time for the submission to the examiner. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

160. 11.2.4 Please refer to my earlier comments on park and ride scheme. There is no mention of how many travellers use the train to get to and from Chichester to travel to other work locations. The introduction of an appropriate park and ride scheme would support these journeys and must be factored in as well as people that work in Chichester. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

161. Appendix A – K are not present and therefore the evidence is not only flawed but incomplete as it went to consultation. This report needs to be redone and CDC should investigate whether payment is made for a wholly inappropriate piece of evidence. I will not wish to raise this with the examiner at the appropriate juncture.

162. There is an issue with the transport study in that the proposal to close off Terminus road to the West at Junction 13 means that all transport going to businesses in Terminus road will need to pass through the Stockbridge

road/terminus road junction or go via the “tesco lights” improvements. No account has been made for this increase in commercial traffic including the largest lorries. They will not be able to turn right at Stockbridge and will be forced to enter and exit via a very poor junction/s. This has not been taken account of in the plan as presented. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

FLOOD RISK ASSESSMENT

163. 1.2 states “Level Two: where land outside Flood Zones 2 and 3 cannot appropriately accommodate all the necessary development creating the need to apply the NPPF’s Exception Test. In these circumstances the assessment should consider the detailed nature of the flood characteristics within a Flood Zone and assessment of other sources of flooding”. It also identifies a number of sites that are in level 2 and level 3 (a & b) flood plain. CDC have not evidenced that the sequential test and the appropriate exception test have been conducted for those sites and as such should not in accordance with the NPPF be brought forward as strategic sites until this is conducted. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

164. Further any proposed infrastructure options including Fishbourne roundabout (Junction 13), Stockbridge roundabout (junction 14) and the link road must have the same factors considered. This has not been done for this consultation so the transport evidence and the AP6/AL6 site evidence is not available and should not continue into the local plan:

“Sequential and Exception tests

The SFRA has identified that areas of the study area are at high risk of flooding from both fluvial and surface water sources. Therefore, it is expected that several proposed development sites will be required to pass the Sequential and, where necessary, Exception Tests in accordance with the NPPF. Chichester District Council should use the information in this SFRA when deciding which development sites to take forward in the Local Plan Review. It is the responsibility of Chichester District Council to be satisfied that the Sequential Test has been passed.” This has not been evidenced in any of the relevant consultation documents or supplied evidence as part of this consultation

Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

165. The appendixes maps are not available for the consultation (no content). When following relevant links nothing is displayed therefore only able to comment on the main document. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

LANDSCAPE CAPACITY STUDY

166 I am unable to comment on this as there are no available maps for the following areas as the links do not function; The missing elements are:

- a. Section B – E-W Corridor reports
- b. Section D – NE Reports
- c. E – Record sheets
- d. The manhood peninsula only covers the area to the south of Chichester Harbour Marina and excludes Apuldram so I am unable to confirm if a study has been conducted on the flood plain area.

Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

CHICHESTER EMPLOYMENT LAND REVIEW – June 2009

167. Para 1.5 does not identify the AP6 area SW of Chichester. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

168. Para 4.62 of the report concludes “The Southern part of the A27 district sub-area has had difficulty attracting demand for B-space, particularly in the more southern parts of the sub-area which are very isolated. It would therefore be hard to justify increased floorspace provision without other measures to promote economic development as a catalyst for generating employment development interest. The northern part, close to Chichester & Tangmere, is more successful in attracting interest” why then is AP6/AL6 being considered for employment space as the report demonstrates that no demand is present. Much better to provide supply where the demand exists. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

169. Section 6 makes no mention of the SW AP6/AL6 site that has suddenly appeared as suitable for employment space in a level 3/2 flood zone from the river Lavant and tidal considerations in Chichester harbour AONB. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

170. Section 6.17 promotes business space west of Rolls Royce and this is recommended as suitable for business (employment) use. Why is this not in the plan as suggested. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

180. 6.19 & 6.20 supports the use of the land South and South West of Goodwood for employment space but this has not appeared as a strategic site in the local plan. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

EMPLOYMENT LAND REVIEW UPDATE – 2013

181. Future portfolio of employment land. "Consideration of the feasibility of mixed-use development on the former MOD Fuel Depot Site, Bognor Road, Chichester for waste/recycling uses together with up to 2.8 hectares of employment land for industrial (B2 and B8) uses"; This is not mentioned in the local plan and is a perfect brown field site for development. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

182. 6.32 to 6.36 confirms that the land south and south west of Goodwood should be developed as suitable with appropriate acceptance of the noise issue. Why then is this not a strategic employment site. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

183. 6.61 articulates the AP6/AL6 site for employment use but cites the following as making it unsuitable at this time:

Accessibility of the site which will need full testing [This has not been done for this plan and as such AP6/AL6 should be excluded as a strategic site]. "We understand that a link road providing a relief road to Stockbridge has previously been considered but is now unlikely to be delivered" "A significant proportion of the land to the south of the River falls within the flood plain."

Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

GOODWOOD NOISE STUDY

184. This has not been read in detail. However it is clear that the buffer only applies to residential properties within 400 m of the circuit. It is notable that the report suggests 800 metres. One option is to reduce and get Goodwood to mitigate the noise issue with appropriate screening, buffering or reduction of activity. Development of an employment nature is permissible and should be considered as the 400 metre buffer is not relevant in that instance. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.

Summary

185. I am wholly underwhelmed with the state of this plan. I am happy to work with officers on all of my points but we should not have been consulted on what is an awful incomplete document that was not ready for consultation. Unless this is adequately addressed in future iterations of the plan I will wish to raise this with the examiner at the appropriate juncture.