

Possible error in numbering system.

This submission was compiled working from a paper version. On belatedly looking at the version on the website, the paper version appears to have been an earlier draft, occasionally using a different system for reference numbers. Every attempt has been made to update this submission to the numbering system on the website. However, the older numbering system may occasionally have accidentally been retained.

While preparing this submission, a number of general points arose that are not adequately addressed anywhere in the plan.

- Urbanising economic growth is largely incompatible with rural-based economic growth. The Plan needs to state which it wants, or it will lead Chichester district sleepwalking into the wrong choice.
- The district needs a policy to identify important walking and cycling routes, and potential walking and cycling routes, that should not be degraded or lost to new development.
- The district needs a policy to identify particularly sensitive landscape views, particularly those that appeal to tourists and contribute to residents sense of place and quality of life.
- There is little attempt to preserve good grade agricultural land. This raises issues of food security.
- It is desirable to specify a Build height restriction for the city.
- Given what has happened at recent development sites, the Plan needs specific protections for hedgerows, to protect against loss of character and habitat, and protect against the 'creeping urbanisation' brought in by bland fencing.
- The plan insufficiently recognises the potential of cycling to mitigate road traffic increase. As a result:
- Transport priorities should be reversed from the roads-first approach consistently assumed in the plan. (See response to Section 5.26 for further reasoning. And also consider the wisdom of Plan Section 7.49 which calls on developers to "*identify reasonable opportunities for sustainable transport modes to reduce the need for major transport infrastructure*". What the Plan calls on developers to do, our Councils should be doing as a matter of course.
- In order to protect against the effects of sea level rise, there should be blanket provision against building on any land lower than 1.5 meters above sea level. (In addition to sea level rise, the north of Britain is still rising, but the south is still sinking, as a result of the lifting of the weight of the glaciers after the last ice age).
- There is an assumption in the plan that development on the "wrong side" of a major road can still be regarded as an extension. This is perverse. Any such development is "severed" and simply cannot be characterised as an extension to the city. The Plan should stop pretending to believe otherwise (particularly on Land SW of Chichester).
- There seems to be insufficient appreciation within the Plan of the value of the city's rural hinterland (value in terms of both resident's quality of life and as a driver for tourism). This has already had unfortunate effect in the forthcoming loss of Whitehouse Farm. The land here was characterised by the SDNP Inspector as being "*of high scenic quality*", and containing "*a mosaic of woodland, parkland*

and pasture” with “a network of quiet lanes, bridleways and footpaths that provide important open-air recreational opportunities”. Yet this land was thrown away. Now an ongoing cavalier attitude to the city's rural setting is being applied, in particular, to "Land South West of Chichester". There will regrettably soon be no nearby quality landscape for Chichester visitors and residents to escape into – at least not without first having to take to a car, which is against Plan policy. (In this context small token "country parks" are no substitutes for an existing "green gym".)

- When it comes easing congestion, the city centre railway barrier timings should be low hanging fruit that can be easily plucked. It is understood that it is technically eminently possible to have these barriers operate far more efficiently than now, and that Network Rail intend to adopt the technology sometime. The plan should put pressure on them to sort out these timings now.

In addition, the plan uses biased language that skews debate. In order to foster more objective and balanced debate, this language should be corrected throughout the document.

- Firstly, "*road improvements*" are only improvements from the point of view of the driver. They can often be "disimprovements" from the point of view of landscape, biodiversity, noise/air/light pollution, severance etc. The biasing term "road improvements" should therefore never be used (I would recommend "road intensification" as an alternative, but "road reworkings" would likely be more acceptable to all)
- In similar vein, rename the "East-West Corridor". This term could be mistaken to imply that this land is just a traffic through route (like "the M40 corridor"). It fails to acknowledge quality of life for people already living there (and the scenic quality of much of the existing roads) . This could instead be termed "the plain south of the Downs".

The Plan cannot be considered Robust until all the above have been addressed.

End of General Observations
Specific Observations Follow Below

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Section 1.7 –

COMMENT Local community involvement under the existing plan has been a travesty of what it should be.

Section 1.10

DELETE: "*The Plan provides a direction for development based on the characteristic of the areas*"

REASONING: This assertion cannot be sustained. Developments that have taken place under the existing Plan have not respected the character of Chichester; notably the City is a small market town set in a rural setting, and, importantly, with easy cycling and walking access between that rural setting and the city. All recent proposals have urbanised Chichester and its setting, and have severely degraded the city's surrounds.

Section 1.26

SUPPORT

Support the specific mention of the need for cross boundary cooperation over dark skies policy.

Section 2.2

INSERT New bullet point

- One characteristic common to almost all the settlements is easy access to countryside for informal exercise and recreation.

REASONING As developments permitted under the present Local Plan have now shown, this access is fragile and easily disrupted or downgraded by new developments (a notable example being the downgrading of the southern end of Centurion Way). So issues of rural setting, and green access to that setting apparent needs to be better acknowledged and better protected.

Section 2.13

INSERT Tourism

I.e. Tourism is also a significant employer.

Section 2.18

DELETE "The sentence *"This area benefits from good access to the main road and rail network and offers the best potential for attracting inward investment."*

REASONING The end phrase *"offers the best potential for attracting inward investment"* is not substantiated. Troublingly, it biases the plan towards an overly transport-centric concept of development without considering the lost opportunity cost and outright losses that transport-centric development can bring in its train. In terms of opportunity cost, put starkly if you entice in banal growth you scare away other potential forms of growth (heed should be paid to the comment from Rolls Royce that the new housing development at Westhampnett would mean that *"Rolls Royce will effectively be located within a housing estate that is indistinguishable from any UK urban location; exactly the situation we sought hard to avoid"*. Would they have moved here if they had known the housing was on the cards?)

The an also needs to be asked whether new jobs drive out some of the existing "self employed" and some of the existing "micro, small and medium sized businesses" (section 2.18). Some of these are undoubtedly here partly because of the quality of life and quality of landscape the area affords, and they would quietly move out of area if it became too urbanised.

Section 2.18 (Continued)

OBJECT To the phrasing

"However, there is also a need to support and diversify economic activity in the rural parts of the plan area"

REPHRASE

Suggest rewording to: *"However, there is also a need to support economic activity in the rural parts of the plan area, and diversify into areas that afford quality jobs without changing the character of the area"*

REASONING The original wording is too unfocussed; apparently allowing any form of diversification. But, as already stated above, some forms of "economic activity"

are inimical to others. Only diversification that complements the area should be contemplated.

(For example, acres of glass houses (as once proposed for Almodington) are inimical to the tourist economy whether it be from walkers, cyclists, bird watchers or people taking a scenic country drive as an adjunct to a visit to Goodwood).

Section 2.28

OBJECT To the phrase "... whilst recognising the need to accommodate new development"

REASONING This kind of phrase, while seemingly "only being realistic", is too often used by developers to shoe-horn in inappropriate developments. It would be desirable to add greater constraint.

RECOMMENDATION Delete the above phrase.

Section 3.2, Bullet point 10

CHANGE FROM *Move around safely and conveniently with opportunities to choose alternatives to car travel;*

CHANGE TO *Move around safely and conveniently, prioritising alternatives to car travel, and reducing the need to travel in the first place.*

REASONING The existing phrasing (carried over from the previous version) is looking complacent in the context of the recent IPCC report predicting 12 years to implement "urgent and unprecedented changes" to keep the global temperature rise down to between 1.5C and 2.0°C. (<https://www.ipcc.ch/sr15/>). In the next Plan period, it is a priority to further downplay the car – and to minimise the need to travel in the first place. The Local Plan should now be revised to better support the national commitment to combat climate change.

Section 3.4

CHANGE FROM *with a range of opportunities for business, shopping, leisure and entertainment*

CHANGE TO *with a range of opportunities for business, shopping, entertainment and leisure (including informal recreation in open spaces)*

REASONING The whole tenor of this section is too economic focussed. Without further elaboration "leisure" could be assumed to mean only paid-for leisure (cinema, bowls, trampolining etc.). Specific mention is needed of quality of life issues not accounted for by paid-for activities; notably informal recreation in the rural surrounds and easy (non car-based) access to those surrounds. In particular quiet rural recreation has an uplift on mental health in a way that paid-for activities do not (see for example "Links between natural environments and mental health: evidence briefing (EIN018)" issued by Natural England (<http://publications.naturalengland.org.uk/publication/5748047200387072>))

Section 3.4 (Continued)

CHANGE FROM *with good public transport, pedestrian and cycle links to other parts of the city*

CHANGE TO *with good public transport, pedestrian and cycle links to other parts of the city and into the city's rural surrounds*

REASONING Simply stating "other parts of the city" could be taken to imply that wider access beyond the city is not important. (This is not just a theoretical worry,

given the cavalier treatment of the southern end of Centurion Way at the Whitehouse Farm development under the existing Plan).

Section 3.5

OBJECT To the phrasing "*Most of the new development will be well located in and around the main settlement of Chichester together with Tangmere and Southbourne*"

REASONING **Tangmere** does not have a railway station (and it is severed from Chichester by the A27). Hence, by comparison with Chichester and Southbourne, Tangmere cannot be said to be "well located". Also the proposed footbridges, while better than nothing, are distinctly uninviting for walkers and cyclists. On that score too, it is not "well located".

Moreover essential to **Chichester's special character** is that it is a small city with easy, car-free access to its rural setting (as per Section 5.37). In terms of good practice, and the theory of optimum settlement size, the sheer numbers being tacked on do not make Chichester "well located" for as much development as is proposed.

RECOMMENDATION

Rethink this whole section.

Section 3.6

CHANGE FROM

Strategic development to the east, west and south of the city will seek to conserve and enhance the local distinctiveness, character and cohesion of existing settlements, whilst ...

CHANGE TO *Strategic development to the east, west and south of the city will seek to conserve and enhance the local distinctiveness, character and cohesion of existing settlements, which attract residents, visitors and businesses to the area. A selective and sensitive approach to development will be taken whilst*

REASONING The phrase following "whilst" opens the door to much development that is undesirable/inappropriate. The additional underlined text adds some redress; introducing the importance of local character as part of economic development. (The underlined text has been borrowed from Section 3.11 – what is sauce for the Manhood Peninsula is also sauce for Chichester. Sensitive development is not inconsistent with other forms of envisaged development).

Section 3.6 (Continued)

CHANGE

FROM This highly accessible transit corridor

TO The close proximity of these sites to the city

REASONING

The areas to the east west and south of the city do not constitute a single "corridor".

Section 3.7

ADD (at the end of the sentence)

In particular, walking and cycling routes between the National Park and the areas to the south will be protected and enhanced for the benefit of both local residents and visitors.

REASONING The cavalier treatment of the southern end of Centurion Way under the existing Local Plan again provides a salutary lesson of what risks happening if the revised Plan fails to specifically mention the importance of green routes between the North and South.

Section 3.8

OBJECT

further enhance local facilities

REASONING This phrase fails to acknowledge the that introduction of (paid for) formal local facilities often comes at the loss of (free) informal facilities. Hence greater focus is needed; specifying in greater detail precisely what new facilities are desirable and what are not.

RECOMMENDATION Flesh out some detail.

Section 3.9

CONCERN

improved and additional cycleways

OBJECT

Nothing wrong with the vision, but much wrong with the proposed implementation. As already pointed out above, the proposed bridges are not universally regarded as an improvement.

In addition, if memory serves, some of the bridges do not even qualify as cycleways, as they are designed only to footbridge standards (notably in terms of width, and probably also turning circles for disability cycles and "non-standard cycles" (see Local Transport Note LTN 2/08 2.6.2)).

Section 3.9 (Continued)

COMMENT

ADD (at the end of the paragraph):

"Cycleways between settlements should anticipate heavy use, and anticipate users travelling at significantly different speeds; with far more use of electric bicycles than at present. As such, they should take advantage of their relatively unconstrained greenfield location and should be built to wide width, relaxed turning circles and without compulsory dismounting" (See LTN 2/08, section 3.6 stating the cyclist dismount sign " is very rarely appropriate").

REASONING – Should be self explanatory.

Section 3.12 (2nd sentence)

CHANGE FROM *Opportunities for regeneration that arise in these settlements*

CHANGE TO *Opportunities for selective and sensitive regeneration that arise in these settlements*

REASONING The term "regeneration" is too often used to promote inappropriate development. Clarity is needed that only sensitive regeneration is being looked for.

Section 3.12 (Continued)

COMMENT

INSERT (at the end of the paragraph)

In particular, the Selsey Greenway (formerly known as the Selsey Cycle Route) should be prioritised, in order to provide significant opportunity not only for green tourism but also to extend the tourist season, while at the same time also helping to promote the transport objectives of this Plan.

REASONING – Should be self explanatory.

For details see: <http://www.selseyinfo.co.uk/cycleroute.html>

Section 3.19, Objectives, Environment, Bullet point 3

CHANGE FROM *Minimise the net increase in greenhouse emissions by maximising use of renewable and low carbon energy sources;*

CHANGE TO *Minimise the net increase in greenhouse emissions by, in the first instance, minimising energy requirements and, in the second instance, maximising use of renewable and low carbon energy sources;*

REASONING – When considering carbon reduction, energy saving is too often overlooked. Unless specifically mentioned, developers will likely overlook it too.

Section 3.19, Objectives, Strategic Infrastructure, Bullet point 1

OBJECT

CHANGE FROM: *Highway improvements to mitigate congestion, especially on the A27;*

CHANGE TO *Transport improvements to mitigate congestion, especially on the A27.*

REASONING: The initial wording is too prescriptive too early. In the first analysis, congestion should be regarded as a transport problem not necessarily a roads problem. A road-building programme is not necessarily the optimum solution, and should not be written into the Local Plan as the only recourse. (In particular, road building is particularly problematical in terms of the country's commitment to reducing carbon emissions: firstly during the build stage, and secondly forever after.) Other solutions such as better public transport or light rail may be feasible and should not be written out of the plan.

Further, it is far from certain that the relief predicted from roadbuilding will be achieved, given that the accompanying Brett Report overtly states that it takes no account of induced demand.

In addition, the County Councils Road Space Audit recommends a wait and see approach for parking, due to possibly substantial but as yet unpredictable changes in technology. These changes will take place over the life of the revised Local Plan, which should therefore leave some room for flexibility.

In particular a proposal is emerging for "eways". [See attached summary for details](#). In fact, in the attached, the key aspect is probably in the final box, dealing with "extraction". A change in mindset, starting to deal with extracting inappropriate journeys, could negate the need to build any new roads.

In addition, priorities should be reversed: concentrating first on getting the walking and cycling and public transport infrastructure sorted, and seeing how that effects congestion on the roads before then deciding what road-intensification works are still needed.

Section 3.19, Bullet point 4

SUPPORT for *Encourage improved access to high speed broadband and new information; and communications technologies.*

Section 3.19 INSERT - between bullet points 3 and 4

- *Encourage new approaches such as park and ride, car clubs, car sharing and goods-consolidation centres*

REASONING Failure to mention these seems like an oversight, and goods consolidation centres are specifically mentioned in the WSCC Road Space Audit.

Park and Ride would open city centre car parks to other, more vibrant activities – as also suggested in the Road Space Audit.

Also, both P&A and goods consolidation centres would likely substantially reduce pollution and carbon emissions in the city, and would reduce land-take for parking in new developments.

Water Resource and Flood Risk Management

COMMENT

CHANGE - Bullet point 3

Minimise flood risk for new and existing development

→ *Minimise rainfall flood risk for new and existing developments*

SuDS systems only help with rainfall flooding – not flooding from sea level rise or from high tides (as in Bosham). The Local Plan should acknowledge this.

INSERT (a bullet point 4)

- *Minimise risk of flooding from sea-level rise, by avoiding new build on land below 1.5 metres.*

REASON Even in a best case scenario, the IPCC expects global temperatures to overshoot before falling back to 1.5 degrees C. At between 1.5 and 2.0 degrees C, the sea level is predicted to rise between 0.4 meters and 0.46 m

(<https://tinyurl.com/ybrdpklc>). Introducing a margin for error, and for storm surges, a figure of 1.5 metre seems appropriate. (It could be positively conservative. For example if we reach one of several hypothesised "tipping points", such as Greenland ice melt, we could get to a 6 metre rise. And Antarctic ice melt would bring the sea level rise to 60 metres!). Introducing this minimum land-height figure is positively required in order to comply with the government's own definition of sustainable development, namely development now that does not make things worse for future generations (by building in a flood risk area).

(As a fun aside, to give an idea, with a sea level rise of just 1 metre, Selsey reverts to becoming an island, and there is a sea creek from Littlehampton to Pulborough, according to <http://www.floodmap.net/>).

Section 4.9

OBJECT

DELETE

Generally the larger settlements ... are able to accommodate higher levels of growth without adversely impacting the character of the settlement.

REASONING This statement is overly simplistic, and has not been borne out by real-life experience under the present Local Plan.

1) Overly simplistic: As a first stab at giving more nuance to a complex issue, to some extent it is a question of the percentage increase in the settlement. There is also the question of encouraging sufficient development in a settlement to encourage in desirable development (e.g. a shop in a small village) without swamping the settlement and changing its character beyond recognition. Chichester is in danger of being changed beyond recognition.

2) Not borne out by experience: In Chichester, the above over-simplistic approach has seen: loss of access to the fields of Whitehouse Farm for local informal recreation; disruption of the southern end of Centurion Way as a local commuting route and as a potentially very significant driver of tourism (cf The economic benefits of the Camel Trail in Cornwall); threats to the character and even existence of the last low-car

"green" route into the Downs, namely Fordwater Lane (certainly, as seen from Fordwater footpath, urbanisation is creeping up the formerly almost completely rural valley); and increased congestion from outlying residents accessing over-centralised provision which has sucked the vigour from existing provision elsewhere (e.g the new free school in addition adversely impacting surrounding roads, and adversely affecting Chichester High School student numbers. Meanwhile the out of town shops concentrated on Chichester are adversely affecting the city centre – devastatingly so as of the time of writing)).

Section 4.21

DELETE (or CLARIFY)

Locating a significant proportion of development in or around Chichester City reduces the need to travel to facilities.

REASONING: This statement is an oversimplification. Locating large supermarkets around Chichester causes them not to locate elsewhere (perhaps with smaller floor area), and shuts down city centre traders. E.g. Chichester (population 28,500) now has 6 massive supermarkets (Tesco's, Sainsburys, Waitrose, Aldi, Lidl and Iceland) plus a Waitrose and multiple Coops, whereas Selsey (population 10,500) has one Asda and a Coop. *A priori*, this relative lack of provision will generate journeys from Selsey into Chichester. (And also from places like Bognor, one suspects).

Conversely, more housing development at a currently under-serviced settlement should (in time) generate more shopping provision there.

Either way, even after the projected increased population has arrived, Chichester needs no new supermarkets.

Additionally, in practice, the distance travelled may be reduced by concentrating development in one place, but the need to travel will not (assuming, for example, that the typical person still needs a car to carry the weekly shop). Hence congestion will increase, and provision of the facility may have been better in a currently less congested settlement.

Hence, at a minimum, there is a need to better clarify what sort of "development" will help reduce the need to travel. Demonstrably such development does not include supermarkets.

Policy S3: Development Strategy

CHANGE FROM *Focus the majority of planned sustainable growth at Chichester and within the eastwest corridor,*

CHANGE TO *Focus the majority of planned sustainable growth at Chichester and within the eastwest area of the coastal plain, while minimising its impact on tourism (particularly the opportunity for Chichester to serve as a "green gateway into the downs").*

REASONING – The whole of this document (at least so far) seems to have significantly underplayed Chichester's role as a tourist destination, and in particular its potential as a gateway into the South Downs. This seems an appropriate place to start redressing the balance.

Policy S3: Development Strategy (Continued)

CHANGE FROM *With a greater proportion of development in the larger and more sustainable settlements:*

CHANGE TO *With a greater proportion of development in the larger settlements*:
REASONING – As argued above, it is an oversimplification to regard the larger settlements as inherently more sustainable for all forms of development. The initial wording is therefore over simplified, and insufficiently nuanced.

Policy S3: Development Strategy (Cont.)

Section 2b

SUPPORT

Local community facilities, including village shops

REASONING – See above comment about desirability of not shoe-horning all shopping developments (particularly supermarkets) around one hub (Chichester)

Section 4.52

OBJECT Object to the whole tenor of this section, and, in particular, the words "high growth potential".

REASON This section

- (1) Fails to be balanced, in that it fails to acknowledge the need for only low-carbon growth (to which the national government is committed),
- (2) Fails to resist loss of green fields which are essential for: national food security (see section 5.52); local character (which is "primarily rural" – Section 2.2); local quiet amenity (including informal exercise); and local mental health (see link to Natural England evidence briefing (EIN018), mentioned in response to Section 3.4").
- (3) Also, while this kind of short-term "dash for growth" thinking takes effect up and down the country, the rarity and hence the economic value of Chichester's rural surrounds will increase (both for tourism and because of the value of the food produced). There is no way to reconcile short term profit maximisation and long-term profit maximisation. The Plan should hold out to protection of our fields, and thereby maximise long-term, more sustainable growth.

Section 4.53 (Section 4.54 in paper version)

OBJECT

The words "*improvements to transport*" constitutes too un-nuanced an approach to creating jobs and economic vitality. Transport links "can suck away as much as they bring in". As evidence, consider that historically Chichester was rather cut off. Travellers first had to travel west or east, before travelling back along the coastal plain (or else they had to negotiate narrow back tracks across the downs). This remoteness, more than anything, led to Chichester becoming an important centre in its own right.

For more evidence, see the CPRE publication "*The end of the road? Challenging the road-building consensus*" (<https://tinyurl.com/ycopaoyy>) which details the findings of several case studies, and concluded that "*road-building is failing to provide the congestion relief and economic boost promised, while devastating the environment.*"

RECOMMENDATION Rephrase Section 4.53 in light of the above comments.

Section 4.53 (Section 4.54 in paper version) (Contd.)

SUPPORT

Strong support for improvements to "telecommunications" (particularly with the advent of 5G now on the horizon).

Section 4.54 (Section 4.55 in paper version)

OBJECT This is again insufficiently nuanced. And fails to acknowledge the inherent values of landscape and heritage "assets" other than via their economic valuation.

RECOMMEND

CHANGE FROM *"The Local Plan Review also seeks to maintain an attractive environment through protecting the landscape and heritage assets which will encourage tourism and inward investment from businesses that wish to locate here."*

CHANGE TO *"The Local Plan Review also seeks to maintain an attractive environment through protecting the landscape and heritage assets. These are recognised as being important assets for wildlife biodiversity and sense of wellbeing, and to hand down to future generations. They will also encourage tourism and inward investment from such businesses as are able to locate here without adversely impacting the assets.*

POLICY S8

OBJECT

Object to the wording *"Proposals for significant new office development will be encouraged in Chichester City centre"*

There is no evidence that this can be achieved in a way compatible with other commitments, notably protecting historic "assets". At the very least, the plan needs to be more specific as to the sites (possibly the "Southern Gateway" or Northgate).

RECOMMENDATION

Either delete the above phrase, or specify more clearly where suitable sites are likely to be.

Section 4.60 (Paper version, Section 4.61)

OBJECT

The *"night time economy"* was a concept that came in under New Labour, but has since been much discredited. It is now widely recognised that rather than the hoped for *"café society"*, it tends to encourage a *"drinking culture"*. One 2012 report to the Mayor of London details the problems as: •Crime •Fear of crime •Ambulance/A&E/hospital •Street cleaning around licensed premises and late-night fast-food takeaways •Sale of alcohol to underage persons, and •Noise and light pollution. (<https://tinyurl.com/y7y2nzjr>)

Without acknowledging, let alone addressing these problems, the Plan Review is (again) insufficiently nuanced and over optimistic.

(Noise pollution, in particular, directly conflicts with aspirations to bring back dwelling accommodation over city-centre shops).

RECOMMENDATION

Either remove any reference to the night time economy, or introduce more discernment into what aspects of the night time economy are desirable.

SUPPORT Final bullet point (referring to *"Improving access ... by sustainable modes of transport ..."*)

Section 4.66 (Paper version Section 4.67)

COMMENT *"The health of Chichester City centre retail has been resilient through the recent recession"*. As of the date of writing, this statement no longer holds true. There's been recent closure of House of Fraser and HMV. And multiple smaller shops also standing empty. In all, there are 9 signs offering shops *"to let"* on East St

and North St alone (5 on East street, 4 on North Street. To confirm, this does not include one building where the "business is unaffected" nor does it include one office to rent on a first floor in E. Street).

RECOMMENDATION Review the situation (is the above perhaps a temporary state of affairs). If it appears to be a permanent state of affairs as the Plan review period draws to a close, delete the above comment, and reconsider the rest of this section accordingly.

SUPPORT Given the above parlous state of the city centre, strongly support the statement *"it is important to promote the city centre and restrict further developments in out of centre locations"*.

OBJECT Strongly object to the reference in the final sentence to expanding retail provision *"in or adjacent to the city centre"*.

REASON Widening the area of the retail centre would make the centre less easily walkable (particularly for the disabled, and for the area's increasingly elderly population). And it would entail more people crossing major roads, with the likely unintended consequence of increasing traffic congestion.

Widening the shopping area also reduces the ability of peripheral sites (particularly the car parks) to be used to absorb some of the high housing quota imposed on Chichester district.

Closing the car parks would also require a policy commitment to Park and Ride, which has only weak support from the Plan.

Again, unless the Local Plan can be made more precise as to the nature of the architecture of the envisaged new retail space, it is practically certain that the new builds will be of an unsympathetic, even brash character that clashes with the city, rather than complementing it. This has been a problem for cities since the sixties. A problem that Chichester has previously avoided, and so currently forms part of Chichester's distinctive offer to shoppers and other visitors.

Further, the loss of large and small shops has been commented on immediately above. Against this background, for the foreseeable future any new edge-of-centre shops would simply encourage a hollowed-out city centre (almost as much as out-of town shops have done).

Moreover, one noticeable trend is that, even when new businesses do move in, "useful shops" are replaced with less useful ones (David Messam with a phone accessory shop, and the Crane Street office stationers with a "vape store"). So, again, new retail on edge of town would simply encourage more of the same, which would detract from the high-quality distinctive offer the city currently draws trade from.

(In passing, what is actually needed in order to, in the words of this section, "enhance the retail offer", is not new-build premises but rather to ensure that anyone coming to the city centre is able to buy precisely what they are looking for. This is not always possible at the moment: not because there is insufficient shop-floor space, but because some retailers are insufficiently attuned to customer needs, or else cannot offer goods at a price competitive with the out-of-town shops. This lack of price competitiveness would not be changed by building edge-of-centre shops – where business rates and rents would remain a problem).

Policy S9

COMMENT

In the first paragraph, the figure of "9,500 sq.m (gross) of comparison retail floorspace at Chichester City" should be reduced to reflect the point made in response to Section 4.66, namely that it is not desirable to expand the retail offer into edge-of-centre sites.

Also, for clarity, should "at Chichester City" read "in Chichester City centre".

In the final paragraph, change the wording as underlined: "will be welcomed by the Council provided that it adds to the range and accessibility of goods and services" to "will be welcomed by the Council only if it adds to the range and accessibility of goods and services".

REASON

The policy remains the same, but the change sends a clearer message to developers who may be tempted to test the system.

Section 4.72 (paper version Section 4.73)

OBJECT to the phrase "*Proposals which provide quality places for eating, drinking and fashion retailing would enhance the roles of these settlements.*"

REASON While supportable in sentiment, this cannot be tied in with the reality on the ground. There is nowhere to accommodate new provision other than green fields. Provision on green fields is at odds with the Plan policy to enhance the District's rural character as a tourist and local amenity asset.

For further details regarding loss of green fields, see points (1)-(3) in response to Section 4.52.

(Also, it is not clear that there is a demand for "fashion" in the Witterings, where part of the attraction for many (at least many visitors) is to dress for the beach and forget about the distractions of fashionable city living for a while.)

RECOMMENDATION Remove the above phrase.

Policy S11

OBJECT

REASON

The proposal to allocate "*a maximum of 228,000 sq/, of additional floorspace for glasshouse, packhouse and polytunnel development*" is in direct and irreconcilable conflict with aspirations to make Chichester's rural hinterland a driver for tourism. It is also in conflict with quiet enjoyment of rural landscapes by locals.

Even if the Plan is not in a position to reconcile this conflict, the conflict should at least be acknowledged.

RECOMMENDATION To acknowledge the conflict, a sentence should be inserted (after the last paragraph) to the effect:

"Aware that Chichester's rural surrounds serve not just horticulture but also drive tourism and foster local quiet recreation, horticultural development will be expected to be highly sympathetic to its surroundings. In particular, all horticultural developments will be expected to respect the Dark Skies policy of the adjoining South Downs National Park" (<https://www.southdowns.gov.uk/enjoy/dark-night-skies/>).

(Note: This statement seems absolutely necessary, in the context of Chichester District's "duty to cooperate" with the SDNP).

Section 4.80 (paper version Section 4.81)

OBJECT

This section is insufficiently nuanced. It fails to distinguish between infrastructure which imposes a high-carbon and/or air quality burden (e.g. roads) from infrastructure which is carbon light (e.g. telecommunications, which can even be positive in terms of carbon emissions and air quality, by reducing the need to travel).

It also fails to distinguish between infrastructure which greatly impacts the landscape and/or historic environment, and infrastructure with less impact.

This section also fails to "take the bull by the horns", and so effectively facilitates high-impact development (particularly car dependent housing developments) and fails to insist on better (e.g. low-car developments).

THE PLAN CONSISTENTLY DISAPPOINTS WITH SUCH LACK OF NUANCE - AND LACK OF INSISTENCE OF THAT DEVELOPERS COME UP WITH TRULY SUSTAINABLE PROPOSALS

RECOMMENADATION

Either delete or bring greater nuance to this section.

Section 4.86 (Section numbering in the web version and the paper version now agree again, following the insertion of a new section 4.84 in the Web version)

OBJECT

Object to the wording "*The requirement to provide new or enhanced infrastructure must not be so onerous as to render development unviable, taking into account other policy requirements such as affordable housing provision*"

REASON Affordable housing provision is unique in expecting developers to "take a hit" for the sake of public policy. If this section is intended to apply only to such provision, that should be made clear.

Otherwise, new developments are only ever asked to shoulder the burden of the extra costs that they impose. There should be no question of letting them "off the hook" and expecting the public purse to pick up the strain.

If infrastructure costs seem set to jeopardise a development, in the first instance the Plan should impose on the developers a duty to re-plan for a less impactful development (e.g. in new developments, low-car housing would lessen the need to pay a share of expensive new roadworks). This section should be rephrased accordingly.

RECOMMEND Change to the wording: "*If the requirement to provide new or enhanced infrastructure looks likely to be so onerous as to render development unviable, developers will be expected to examine how their plans could be revised so as to impose less on infrastructure. In particular, this may involve planning for less car-reliant housing developments that impose less new traffic on roads.*"

AS AN ASIDE I do not understand what is meant by the final phrase "*taking into account other policy requirements such as affordable housing provision*". So I cannot comment.

Policy S12 Paragraph 1

COMMENT

CHANGE "*The Council will work with neighbouring councils, infrastructure providers and stakeholders to ensure that new physical, economic, social, environmental and green infrastructure is provided to support the development provided for in this Plan.*"

TO "*The Council will work with neighbouring councils, infrastructure providers and stakeholders to minimise the need for new physical, economic, social, environmental and green infrastructure. After this step has been taken, the council will work with the*"

above bodies to ensure necessary infrastructure is provided to support the development provided for in this Plan."

REASON This "minimise" approach is fully consistent with point 1 of the subsequent text. It is also more sparing of both the public and the private purse, and is less likely to result in infrastructure that works against other objectives of the plan (carbon reduction, preserving rural character, quality of life). Ultimately, it is simply good practice to order priorities this way (analogous to "*reduce, reuse, recycle*").

Policy S12 Subsection 2

OBJECT

Object to the bracketed phrase "*(including full fibre communications infrastructure)*".

REASON

With the advent of 5G, fibre based communications may be as old hat as copper cable by the end of the plan period. If so, its installation will only impose costs on developers, that will be passed on to end customers.

RECOMMENDATION

Delete the above italicised words.

Policy S12 Subsection 3

COMMENT

After the last bullet point add three more:

- Lines of former transport routes (notably the old Selsey Tram, and the Midhurst Railway)
- A site for Park and Ride
- A site for a goods consolidation centre

REASONING

Old transport routes (notably the old Selsey Tram and the Midhurst Railway) have great potential for new green infrastructure ("greenways") to promote tourism, and to alleviate congestion (cf. the Camel Trail in Cornwall, which brings in millions into the economy each year, and, unexpectedly, turned out to be one of Cornwall's few year-round attractions).

P&R and a goods consolidation centre are recommended in the County Council's Road Space Audit – which has now been adopted.

Policy S12 Subsection 5

COMMENT

"Where appropriate" seems unduly weak. Delivering "necessary infrastructure" on time is always appropriate. Any resulting increase in developer costs will simply be reflected in a lower purchase price for the land in the first place. Developers have too long been allowed to lead councils a merry dance by leaving infrastructure as late as possible .. or even then turning round and claiming it cannot be afforded. This practice needs to change.

Moreover, on new developments, leaving green infrastructure until late sets up undesirable habits among the people who move in; habits that are then hard to break later. (For example, where are the promised safe walking and cycling routes from Shopwhyke Lakes, where is the safe crossing into town from Graylingwell).

RECOMMEND

CHANGE FROM "*Where appropriate*"

TO "*Where applicable*"

Policy S12 Final paragraph

COMMENT

Before the first bullet point, insert an earlier one, and amend the start of what now becomes the second bullet point as follows:

- *prioritise minimising infrastructure requirements (in particular lowering car dependency if the cost of road-based infrastructure is a hurdle)*
- *after that, look to developer contributions made through CIL*

Section 4.88

OBJECT

Object to the phrase "*Development in this corridor also provides the opportunity to minimise the*

impact of development on the natural environment,"

REASON Development in this area has a high impact on the natural environment.

Notably the A27 and the railway and existing housing sever habitats between north and south, and make it difficult for fauna (including deer) to cross between the two. Increased housing and factories in this area would compound the problem.

RECOMMEND A less blasé turn of phrase, such as "*Development along this plain also provides the opportunity to minimise the impact of development on currently less spoiled natural environments*".

Section 4.90

OBJECT

"Development at the edge of the built area provides opportunities to achieve additional green infrastructure in and around the city, particularly linking towards the South Downs National Park and Chichester Harbour."

REASON

Given what has happened under the existing Local Plan, this phrase is untenable.

As far as I am aware, little "Additional green infrastructure" has been planned and, none has yet come about. And the additional green infrastructure that has been planned comes at the expense of richer, more attractive and more organic green infrastructure.

Meanwhile, green links to the South Downs and Chichester Harbour (and elsewhere), have been degraded. Specifically:

- 1) The city is losing easy access into the scenic fields of Whitehouse Farm. (The SDNP Inspector characterised this area as being "*of high scenic quality*", containing "*a mosaic of woodland, parkland and pasture*" with "*a network of quiet lanes, bridleways and footpaths that provide important open-air recreational opportunities*". These fields are now to be replaced with run-of-the-mill housing and a pocket so-called "country park" which will be a pale shadow of the fields there at the moment).
- 2) The SDNP Inspector also noted that Centurion Way provided a good link into the South Downs National Park. But the southern access from the Whitehouse Farm development will now run across this link, thereby degrading it. The access also urbanises Centurion Way, and adds a detour (running alongside cars and along the fencing of games pitches).
- 3) Off site, some of the cars using the southern exit from Whitehouse Farm will run along Westgate, thereby making "green" access more difficult not only to Centurion Way but also to Salterns Way and Chichester Harbour. Not to mention green commuting from places like Fishbourne.

And it's not just Whitehouse Farm.

4) The route between the City and Tangmere Aviation Museum, which (outside peak hours, and excepting the A27 crossing) used to be largely a quiet rural one, is now urbanised by the Shopwhyke Lakes development (notably loss of trees) – and is far more dangerous to cycle – let alone walk.

5) At Fordwater Lane, the views from the Green footpath into the downs is being degraded as development creeps up the Lavant valley.

The theory was always dubious, and, now it's come time to review the theory, it is demonstrably not working on the ground. It's time to remove this flawed concept from the Plan. I.e. even if these sites are the "least bad option", the Plan should not construct a rationale for them that does not fit the facts.

RECOMMENDATION

Delete the whole of the above phrase.

Section 4.91

OBJECT

Object to the whole of this section.

REASON The wording of this section is not crystal clear. It may be that it was meant to be read in the way outlined below. But, assuming that it was not:

The sentiment is superficially worthy, but in a historic centre it is impossible to "accommodate *new retail, other business uses such as offices, and residential development*" without new build. In hindsight, new build has been the blight of city planning since the 1960s and undermines a city's distinctive offer (consider the "anywhere towns" in the news a while ago). Hence new retail and new offices should be "new" only in the sense of replacing vacating retailers and offices, but should not involve new buildings to any great extent. Meanwhile, new residential should mostly only be "new" in the sense of replacing vacant (or under-used) upper floor office space.

RECOMMENDATION

CHANGE FROM "*it is desirable to plan to accommodate a mix of uses including some new retail, other business uses such as offices, and residential development.*"

TO "*it is desirable to plan to accommodate a mix of uses, including conversion to residential of under-used upper floor spaces. It is particularly important to try to ensure that any vacating retail and office space is replaced with new.*"

Section 4.92

COMMENT (Insertion)

REASON For cyclists and pedestrians, the Southern Gateway provides an opportunity to improve not just "access to the city centre from the south" but across the site more generally. (In particular, Market Avenue is an uninviting road to walk along. Historically there was an alternative route, a footpath between the car park (opposite the Law Courts) and the Cawley Road medical centre. This footpath then links to another one and create a more direct and more "green" route into Whyke and, significantly, to the Sterling Road footbridge. At some stage, someone took their eye off the ball and let this first footpath get severed by new build and a gate. However there is no physical problem to reinstating it, and it would be highly desirable to do so. But to achieve this, support from the Plan is need)

RECOMMENDATION

CHANGE "... *better cycling and pedestrian access to the city centre from the south*"

TO "... *better cycling and pedestrian access to the city centre from the south, and across the site generally*"

Policy S13 - bullet point 9

COMMENT (Conflict of priorities)

REASON Policy S13, bullet point 9 perpetuates a problem already highlighted above (in response to Section 4.90). Namely, to take one specific instance, that it is a poor trade off for the city to be 'gifted' a 'pocket handkerchief' country park in exchange for what a planning inspector had previously described as "*a mosaic of woodland, parkland and pasture*" with "*a network of quiet lanes, bridleways and footpaths that provide important open-air recreational opportunities*". In order to better protect local character and rural character (which in turn feed into economic development via tourism, and into local quality of life), the issues need to be more fully teased apart.

RECOMMENDATION

CHANGE FROM "*• Provide or contribute towards an enhanced network of green infrastructure, including additional parks and amenity open space, outdoor sport pitches, recreational routes and access to natural green space;*"

TO TWO SEPARATE BULLET POINTS

- *Provide or contribute towards enhanced access to natural green space;*
- *Provide or contribute towards an enhanced network of green infrastructure, including additional parks and amenity open space, outdoor sport pitches and recreational routes, insofar as such infrastructure does not detract from access to more natural green space*

Policy S13, bullet point 10

SUPPORT for "sustainable modes of travel"

Section 4.97

OBJECT

Addressing these transport issues is critical to enable the city to remain ... commercially competitive as a business location.

This is not necessarily true, with a good telecommunications network the city would not need to lean so heavily towards businesses that are reliant on roads. And, to some extent, the two are even mutually exclusive. To elaborate, the kind of person working in the knowledge economy (such as IT or publishing) or in the arts will be more likely to move here (or stay here) if the local environment is conducive to their leisure activities, which tends to exclude urbanising forms of development such as haulage, packhouses, and warehouses, and housing estates marring views from once favourite country roads.

RECOMMENDATION

Delete the above phrase as it is overly prescriptive to fostering one (damaging) route to economic development, at the expense of another form of (less damaging) development.

Section 4.97 (Continued)

the city presents good opportunities to encourage more sustainable travel patterns

Over the life of the existing Plan, there seems to have been little substance behind these words. To this extent the plan is not robust.

RECOMMEND Reinforce the above wording by adding the words "*It is recognised that over the period of the Plan until now, such opportunities have not been exploited*"

to their fullest. Hence, standards accepted over the period of the present Plan should not be regarded as precedential of standards that will be accepted over the period of the Revised Plan.

Section 4.101

COMMENT

After the final sentence, insert the wording: *"To this end, suitable sites for Park and Ride will be identified and secured against future loss".*

REASONING

The council has already lost the soon-to-be Lidl site, which (according to a former chair of the Chamber of Commerce) was once identified for P&R. Next best site is probably Sullivans Yard (south of the A27) which will also be lost unless identified and secured. For the avoidance of doubt, "secured against future loss" does not mean no activity. It simply means no activity that would preclude use for P&R.

Section 4.102

COMMENT

"Funding for these transport measures is expected to primarily be drawn from development contributions through the Community Infrastructure Levy (CIL),"

It seems a poor state of affairs that the original promise from politicians was that, in compensation for new housing, local communities would see tangible, visible benefits from CIL levies. Instead the Local Plan proposes to channel a substantial amount of these moneys into infrastructure that simply keeps things at square one, with no visible new benefit to existing communities.

POLICY S14 – Bullet point 2

COMMENT (Mention parking fees)

REASONING Chichester parking charges are currently low by national standards. Increasing fees is politically sensitive, but that does not mean that increased charges should not be mentioned in the Plan. In fact, putting them in the plan takes the issue out of from party politics where the right thing to do sometimes slips away due to party jockeying for votes.

RECOMMENDATION

CHANGE FROM *"Reviewing car parking provision, including encouraging use of peripheral car parks to reduce traffic in the city centre and giving consideration to the introduction of parking restrictions along some arterial routes to improve traffic circulation (particularly for buses)"*

CHANGE TO *"Reviewing car parking provision, tailoring parking fees to dampen peak time demand and discourage unnecessary car journeys, and encouraging use of peripheral car parks to reduce traffic in the city centre and giving consideration to the introduction of parking restrictions along some arterial routes to improve traffic circulation (particularly for buses)"*

POLICY S14 (Contd.)

COMMENT (Re-order bullet point priorities)

- *Exploring potential options to provide an improved bus / rail interchange;*

This is an attractive proposition, but the proximity of the two is already pretty good (a covered connecting walkway would do almost as much as side-by-side proximity).

RECOMMENDATION Move this bullet point down to the bottom of the list.

Conversely, regarding final two bullet points:

- *Delivering strategic cycle routes linking the city centre, residential areas and key facilities, including proposed areas of new housing, employment and greenspace within and close to the city; and*

- *Improvements to the pedestrian network within and around the city, including proposed areas of new development and greenspace.*

These two points seem far more likely to have a positive effect than "Initiatives to promote behavioural change" or "Variable Message Systems (VMS)".

RECOMMENDATION These two bullet points should be moved to the top of the list.

Policy S15 – Point 4

COMMENT (Insert extra final paragraph)

REASONING The number of visitors to Goodwood during major events are indeed "well documented" (Section 4.106). The total visitor spend has presumably also been reported somewhere too. But I have yet to see well documented reports of how much of that spend spreads beyond the Goodwood estate. Anecdotally, it has been reported that there is currently less direct spill-over economic benefit into the wider business community than might be thought (the same has been said of the Theatre). Also, there have been well documented reports of the disbenefits of Goodwood days; namely congestion and noise pollution (and presumably air pollution too). There is, fortunately, an existing footpath between the city centre and Goodwood, which would help partially address all these downsides. (This path leads via Fordwater Lane, across countryside of the kind that visitors come to Chichester to experience, and ends at a gate to the motor circuit which is semi-permanently locked, but which could easily be manned during major events.) This footpath could be combined with a route through the city centre, to bring more direct spend into the city centre.

RECOMMENDATION

Insert final paragraph to the effect *The council will work with Goodwood to ensure greater spill-over benefits into the wider business community from Goodwood events, and explore the possibility that the "non car based travel options" of section 4 above include options for walking and cycling.*

Policy S16

COMMENT (Reworking)

REASONING This policy fails to recognise the amenity value of this part of the upper end of the Lavant valley for quiet recreation and tourism. Notably the top of the valley hosts one of only two surviving truly "green routes" for Chichester residents and visitors to access the Downs (along Fordwater lane and then footpaths, with very few vehicle movements and against a landscape of moderately high quality looking back down the valley). There should be a higher presumption against even "non noise sensitive" development here.

RECOMMENDATION

After final paragraph, insert text *"Also, mindful that this area is one of few surviving truly quiet "green routes" from Chichester into the downs, and currently has a largely rural aspect, any development in this area (whether noise sensitive or not) will be sympathetic to this rural character and will enhance views from nearby paths."*

Section 4.113 & 4.114

COMMENT

These allocations are disastrous to the character of these once largely rural settlements. The effect could be usefully mitigated by insisting on measures including low-car

housing, home working and ensuring small-scale shopping and schooling facilities on site. The Plan is weak in all these areas.

Section 4.115

SUPPORT But consideration could also be given to developing (low-key) tourism in these areas (such as the now defunct "Haredown Hill" near Singleton, which offered landboarding, much to the enjoyment of local youths).

Sections 4.116 to 4.120, and Policy S17

SUPPORT – Seems a sound approach to Thorney Island (Give or take the currently unquantifiable possibility that electric planes may change the noise implication of aircraft movements).

Policy S18 – Point 5

COMMENT (Insert text)

REASONING The canal footpath is also an important green route, and worthy of specific mention (as is the canal itself, but that's for another day)

RECOMMENDATION In bullet point 5,

CHANGE FROM "... *including the National Coastal Footpath*"

TO "... *including the canal footpath and the National Coastal Footpath*"

Policy S18 - (Contd.)

COMMENT (Insert extra text)

REASONING Dark skies (or relatively dark skies) are a part of the tourist attraction of the Manhood Peninsula, and possibly an attraction for many residents too. They are also part of SDNP policy. Dark skies should therefore be protected in the interests of tourism, and in the spirit of duty to cooperate with the National Park Authority (minimising light spill into night views from the park, notably from the Trundle).

RECOMMENDATION

After point 5, insert a new point 6 (and change the existing point 6 to point 7). New text to read something like: "*6. Preserve the current relatively dark skies of the Manhood, in order to preserve the present character of the peninsula and to reduce power consumption, and in the interests of tourism and cooperation with the Dark Skies policy of the National Park.*"

Sections 5.1 to 5.7

SUPPORT – But why does so little of this sentiment show through on the ground at (1) Whitehouse farm, (2) Shopwhyke Lakes, (3) Odds Farm, and in so much of the infilling currently going on (notably in Summerdale on Lavant Road – where is the sense of place in the outsized new builds going in there, and the loss of hedges).

Section 5.8

OBJECT

REASONING As currently worded, this treatment of car parking accepts current practices which have led, *inter alia*, to: very inefficient land use in developments (far more land take than necessary); congestion; and the obesity epidemic specifically mentioned in Section 5.6. Developers need to be at least allowed (and ideally encouraged) to try a more visionary approach.

RECOMMENDATION

CHANGE TO

5.8 Car parking requires careful consideration. Parking requires inefficient land take, given over to expensive assets that depreciate fast and, on average, remain parked for 90% of the time. In suitable locations, developers should therefore consider reducing land take by offering alternatives to car parking, notably car clubs and public transport, and making walking and cycling easier than the car for short journeys. Otherwise parking spaces should be an integral part of the layout and design of the new dwelling. Care is required to ensure that parking is convenient

POLICY S20 - Point 1

OBJECT

REASONING The whole initial thrust of point 1 is undermined by the ending " ... whilst not preventing innovative responses to context;" (it's like saying "do this, unless you don't want to").

RECOMMENDATION Delete "whilst not preventing innovative responses to context;"

POLICY S20 - Points 2 to 13

SUPPORT

POLICY S22

SUPPORT (With the proviso that I have yet to get my head around the last paragraph. Can the same message be written more clearly?)

Section 5.16

Comment (Reword)

REASONING Walking and cycling are given short shrift. Their importance for "green" journeys and alleviating journeys made by road should be acknowledged.

RECOMMENDATION

CHANGE FROM ".... There is an extensive public rights of way network across the plan area, and a number of cycle paths."

TO ".... There is an extensive public rights of way network across the plan area, and a number of cycle paths, including the nationally important National Cycle Route Two. There are also several cycle routes that are currently incomplete but have great potential as drivers for tourism, and to offer alternatives to the car on shorter journeys. These include the Centurion Way (with a proposed extension to Midhurst), the Selsey Greenway (formerly the Selsey Cycle route), and the Chemroute (a proposed route between Chichester and Emsworth.)

Section 5.18

COMMENT – This is missing any mention of landscape protection.

Section 5.26

OBJECT

REASONING This is a fair summary of the current situation, but it is a misguided approach. Congestion is a transport problem, which has been put out too early for a roads solution. "Improvements" to the junctions are not the only solution, and not necessarily the best solution. The council should reverse priorities: first installing better walking and cycling infrastructure (particularly those connections described as "incomplete" in response to section 5.16). Then look to "extract" a portion of journeys

onto public transport and potentially "Eways" (as detailed in the appended document), and only then see what is still needed on the roads.

Section 5.27

COMMENT (Completely baffled)

In the light of severe recent bus timetable cuts, how on earth can the plan expect any modal shift from "continuing to target investment in local transport infrastructure". You can have all the infrastructure you like. If the service is poor, people won't use it. If they have the expectation that it will get even worse, they will plan an otherwise unnecessary car purchase accordingly. And once the purchase has been made, it's well nigh impossible to entice people back onto the busses. In this regard, the plan is being totally unrealistic in its expectations.

Section 5.28

COMMENT Re. *"measures to control travel demand"*

The Brett report overtly states that it ignores *"the effects of induced demand"* (Section 4.2.2) and instead *"a fixed demand approach has been used"* (Section 4.2.5). Failing to predict induced demand is not a measure to control travel demand, it is a recipe for being surprised by it when such demand is induced. To this extent the Revised Plan is not robust, and the above comment is misplaced in its optimism.

Section 5.29

OBJECT

If a review of potential sites for P&R is carried out only after the need becomes clear, the best candidate sites will have been lost. It is imperative to identify and secure sites now.

RECOMMEND change the last sentence to *"In preparation for such a situation arising, potential park and ride sites will be identified at an early stag of this plan period, and if necessary secured. Also, a review may be required to revise the transport strategy for the city."*

Section 5.30 – Third Sentence

OBJECT

The third sentence "jumps the gun" in assuming that it will be necessary to effect junction reworkings (termed "improvements" in the Plan). As already discussed, congestion may be mitigated by methods other than roadworks.

RECOMMEND

CHANGE FROM *"Implementation of the junction improvements"*
TO *"Implementation of the necessary measures"*.

Section 5.31

COMMENT – to reiterate points made above

The transport assessment was flawed in that it explored only changes to the roads. As such, it failed to consider other objectives of the plan including (1) mitigating climate change, (2) minimising pollution (air, noise, light), (3) protecting the character of the area from visual intrusion. All the above can be better addressed by reversing priorities (as per reply to Section 5.26). In this regard, the plan is therefore self contradictory, in that it fails to reconcile station 5.31 with other key objectives.

POLICY S23 – Bullet point 4

OBJECT (Strongly) –

The proposed road will (1) undermine commitments to mitigate climate change, (2) bisect a wildlife habitat (where deer can be seen) in contravention of Section 5.64, (3) intrude into an area of quiet recreation and tourist potential (notably Salterns way and footpaths across the fields), and (4) its mitigation potential is questionable as predictions appear not to have taken into account induced demand (Brett Report Sections Section 4.2.2 and 4.2.5). A road here runs directly counter to other objectives of the Plan (protection of local character, wildlife habitats, and offering alternatives to the car).

Moreover, its claimed mitigating effects can likely be better achieved by greater commitment from council to "the usual suspects"; i.e. low car housing, home working, better public transport (including separate bus lanes), better walking and cycling links for local journeys (including separated cycle ways), and, possibly, innovative transport solutions such as the Eways (described in the attachment supplied).

RECOMMENDATION

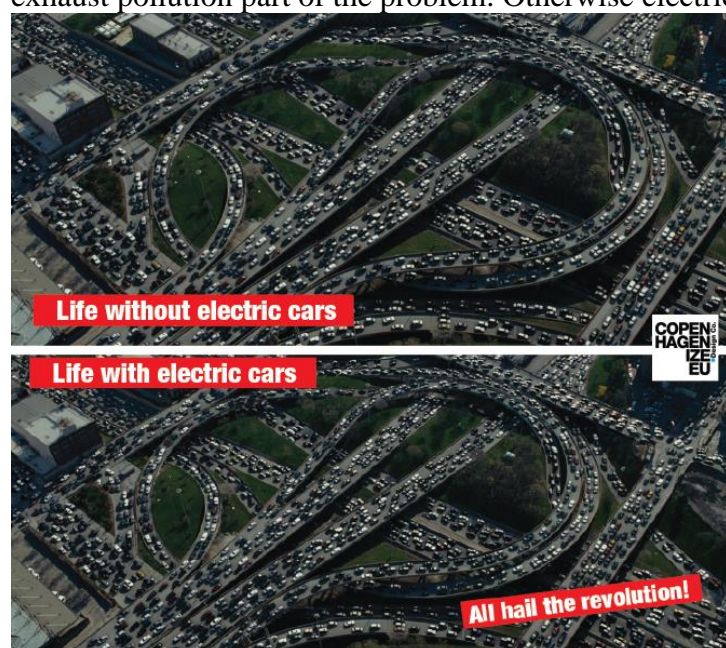
Delete bullet point 4.

POLICY S23 – Bullet point 5

SUPPORT (Car sharing clubs)

POLICY S23 – Bullet point 5

COMMENT – Car charging points are worthy, but electric cars will only change the exhaust pollution part of the problem. Otherwise electric cars won't change much else:



POLICY S23 – Bullet point 7

OBJECT – Object to the proposed new road (for the reason given in response to bullet point 4, with the addition that the now overtly stated "increased capacity" will induce demand that otherwise would not be created)

Section 5.37

SUPPORT – and COMMENT (Protection from creeping urbanisation)

On the ground, there is precious little evidence of this having been robustly implemented during the period of the present Local Plan (loss of hedgerows at the borders of new housing developments is of particular concern – often replaced with urbanising fencing).

Council itself needs to implement this provision more robustly. In particular by bringing it to the attention of developers at an early stage.

Section 5.41

SUPPORT – and COMMENT (Connectivity into the downs)

On the ground, there is precious little evidence of this having been robustly implemented during the period of the present Local Plan. A particularly salutary lesson comes from the severe degrading of the quiet access onto Centurion Way at its southern end, due to a new access route for cars into the Whitehouse Farm development. This cavalier throwing away of a well established major connection should never be repeated. Council needs to look to itself as to how to give more than lip service to the provisions of section 5.41. (See also response to Policy S24)

In addition,

RECOMMEND adding text

FROM " ... *The Park represents a significant asset for the plan area in this regard and it will be important to ensure that connectivity between the areas are protected and enhanced, with new recreational opportunities explored further as they arise.*"

TO " ... *The Park represents a significant asset for the plan area in this regard and it will be important to ensure that connectivity between the areas are protected and enhanced, with new recreational opportunities explored further as they arise. It is particularly important to protect and enhance connectivity into the park through walking and cycling routes. Of particular relevance are Centurion Way, the footpath leading out of Summersdale, and the quiet route leading via Fordwater Lane.*"

POLICY S24

Insert another item (item 4.)

4. It does not degrade existing connections or identified potential connections; particularly walking and cycling connections, and connections for innovative low-carbon technology that might help relieve congestion on the A27.

REASONING – See earlier responses to Section 5.41 and Section 3.19

Section 5.44

CHANGE FROM "... *flat topography which, on occasion, serves to provide views from the water across to the South Downs National Park.*"

CHANGE TO "... *flat topography which, on occasion, serves to provide views from the water across to the South Downs National Park, and as a key part of the view from the Park across to the Sea (particularly from the Trundle).*"

REASONING Under the duty to co-operate, the Local Plan should also look at things from the Park's perspective. Adding the above wording here would help clarify that, in Policy S26, the words "*setting of the South Downs National Park.*" mean views both into and out of the SDNP.

POLICY S25 – Bullet point 2

CHANGE FROM *leisure/recreational uses, including water based activities;*

CHANGE TO low-carbon and low pollution *leisure/recreational uses, including water based activities;*

REASONING Should be self evident, particularly in the context of an area threatened by sea-level rise from CO2 based global warming.

Section 5.53

OBJECT

Strongly object to the underlined text in the phrasing "*Much of the undeveloped coastal plain of the plan area is high quality agricultural land which falls within Grades 1, 2 and 3a of the Agricultural Land Classification. In planning for the sustainable growth of the plan area, it is recognised that there may be occasions when the loss of such land is necessary.*"

REASONING This is double think at its best. Loss of food growing land when the population is rising is the antithesis of any definition of "sustainable" (even the government's own definition, since food shortages would "make life worse for future generations").

Moreover, agriculture is an economic activity in its own right. It seems likely that loss of food growing land in this country and across the globe will lead to scarcity of agricultural land, thus causing farming to "come up from behind" (like the tortoise passing the hare) and proving to be the cleverer and more profitable form of economic development in the long run.

RECOMMEND

Delete the underlined sentence above.

Section 5.61 "blue spaces"

COMMENT – Re. the phrase "blue spaces", define this lesser known phrase (for the benefit of non-expert readers who may need to refer to this passage at some stage).

Section 5.61 (Contd.) Definition of "Green Infrastructure"

CHANGE FROM *As a network it includes parks, open spaces, playing fields, woodlands, but also street trees, allotments and private gardens. It can also include streams, canals and other water bodies and features such as green roofs and walls.*

CHANGE TO *As a network it includes parks, open spaces, playing fields, walking and cycling routes and "greenways", woodlands, but also street trees, allotments and private gardens. It can also include streams, canals and other water bodies and features such as green roofs and walls.*

REASONING Lack of the inserted phrase would result in Policy S29 ostensibly allowing new developments at "Strategic Development Locations" (5.62) to be planned without any regard whatsoever to green-route connections.

Section 5.68

COMMENT – As a matter of good writing practice "GI" should be defined before the abbreviation is used on its own.

RECOMMEND Insertion in section 5.65

CHANGE FROM "*They also function as green infrastructure.*"

CHANGE TO "*They also function as green infrastructure (GI).*"

AFTER SECTION 5.8

COMMENT (Re. insertion of a new paragraph)

REASONING The whole section on Strategic Wildlife Corridors is missing acknowledgement that some of these corridors could be substantially improved.

Notably, they are all severed by both the railway and the A27. Remedial work is desirable.

RECOMMEND

Insert new paragraph (=> "Section 5.68a" or "Section 5.69" ?)

All the identified wildlife corridors are to some extent severed for non-flying animals by the railway and the A27. It is desirable to introduce remedial measures (such as animal tunnels) to mitigate this.

This new wording gives potential developers (and planners) a better steer as to one aspect of what is meant by not having "an adverse impact on the integrity and function of the wildlife corridor" in Policy S30, Subsection 2, and what can be meant by "enhancing" in Subsection 3.)

SECTION 5.72

COMMENT – Define "SPD" for the non-expert reader of the plan.

SECTION 6.5

COMMENT Re. the text *"The strategic development locations will be planned and designed to be of a high standard as sustainable development, well integrated with existing settlements and neighbourhoods."*

During the period of the present Local Plan, this has simply not been the case. In particular the Shopwhyke Lakes site is not "well integrated" because it is severed by the A27 (and the planned bridges are hardly an inducement to walk or cycle, unless you cannot afford to drive). Elsewhere Whitehouse Farm comes crashing into existing green infrastructure. The aspirations of the Plan are not being robustly implemented. In this regard, the present plan and its revised version are not sound.

POLICY S36 – Subsection 1. 4.

CHANGE FROM *"maximising existing and potential movement connections and accessibility to encourage walking, cycling and use of public transport"*

CHANGE TO *"maximising existing and potential movement connections and accessibility to encourage walking, cycling and use of public transport including walking and cycling provision both across the site, and between the site and the wider area"*.

REASONING This starts to add a corrective to what went badly wrong in the planning for walking and cycling at Whitehouse Farm and Shopwhyke Lakes.

POLICY S32 – Final paragraph

INSERT reference to "self build" and "custom build" and the District Council's commitment to identify suitable sites for such activity (in accordance with what seems to be government policy: <https://www.gov.uk/government/news/boost-for-aspiring-self-builders>)

Section 6.10

OBJECT This paragraph is imbalanced. It fails to acknowledge the considerable disruption the southern access route will cause to Plan objectives for greener modes of travel (along Centurion Way and more widely along the presently quiet roads into the City. As reflected in the concerns of the Friends of Centurion Way and the Westgate Residents' association). In essence this car-based disruption negates the point of selecting Whitehouse Farm on grounds that it offers "good accessibility to the city by sustainable modes of travel" (Section 6.8). To redress the balance:

RECOMMENDATION Insert new final sentence.

It is recognised that under present proposals the southern access causes disruption to pre-existing walking and cycling routes (notably Centurion Way, and currently quiet roads such as Westgate). Should the developer be so minded, the council would welcome a low-car development on this site, with consequent lesser burden on the developer for road based CIL money contributions.

Policy AL1 – Point 7

SUPPORT

Strong support for policy the "Keep land north of the B2178 in open use, free from built development".

Policy AL1 – Point 12

OBJECT (Provisional objection)

"Provide or fund mitigation for potential off-site traffic impacts through a package of measures in conformity with the Chichester City Transport Strategy (see Policy S14)"

REASONING Earlier responses suggested only minor modification to Policy S14. So incorporation of S14 into policy AL1 would be fine, except that policy S14 also refers to and thereby incorporates Policy S23. Previous responses recommend substantial changes to Policy S23. Therefore the above wording is only acceptable if the earlier recommended changes to Policy S23 are accepted.

RECOMMENDATION Accept amendments to Policy S23, as recommended in earlier responses.

(The above response applies also to Policy AL4, Item 11, and Policy AL14, Item 6)

Policy AL1 – Point 15. 1.

It would be appropriate to specifically add the extension of Centurion Way to Midhurst as a driver of local recreation and tourism.

RECOMMEND Change to: *"Provide multi-functional green infrastructure both across the site and linking development to the surrounding countryside and to Chichester City and potentially making a contribution to the extension of Centurion Way to Midhurst;"*

Section 6.19

OBJECT to the wording *"This will involve opportunities to provide new facilities to serve the wider local community with good off-site access, particularly by walking and cycling to existing local facilities and facilities in the city."*

REASONING This is complacent. A bridge (particularly one across a fast-moving road) will always be offputting to a section of walkers and cyclists, and to a section of the disabled. And some of the proposed bridges are only designed to the standard of a footbridge (rather than shared foot and cycle bridge) and/or with bends so tight that they do not accommodate non-standard cycles (Remembering that *"Designers should anticipate the use of non-standard cycles"* according to Local Transport Note 2/08, Section 2.6.2). The present proposal does not qualify as "good off-site access". The Plan is overly complacent in this respect, and therefore not robust.

RECOMMENDATION Add the words *"Cycle provision will be expected to be fully compliant with all relevant aspects of current Local Transport Notes and, where doubt exists about compliance, developers may be asked to submit an independent cycle audit"*

Section 6.20 – Bullet point 7

OBJECT to the words "*and a new footbridge connection across the A27 via Coach Road to Westhampnett village*".

RECOMMEND:

CHANGE TO "*and a new bridge, built to shared foot and cycle bridge standards, across the A27 via Coach Road to Westhampnett village*"

REASONING The plan regularly stresses the need for good green routes as an ideal, but in settling for a footbridge, rather than a foot and cycle bridge, seems all at sea in actually being able to encourage such green infrastructure when an opportunity presents itself.

AFTERWORD Since discovered that this is rectified in Policy AL2, 9. But it is still worth making the above change to the preamble to the Policy.

Section 6.22

OBJECT

It is not clear how the site can be severed from the city by the A27 and yet at the same time be an "extension to the city". The two concepts are mutually incompatible. This section is also optimistic in its expectations of the quality and the impact of walking-and-cycling infrastructure. This section is therefore not robust. (See also response to Section 6.19, particularly regarding need for a cycle audit).

POLICY AL3 – Point 2

AMEND

CHANGE TO "*A range of types, sizes and tenures of residential accommodation to include specific provision to meet specialised housing needs including accommodation for older people and home working;*"

REASONING Home working reduces the need to travel at peak hours, and therefore reduces pressures on the roads a times they are least able to accommodate extra capacity. The Plan should therefore be encouraging home working.

POLICY AL3 – Point 4

OBJECT to wording "*off-site highway improvements*"

CHANGE TO "*off-site traffic improvements*"

"Highway improvements" is too prescriptive at too early a stage (particularly given that there is as yet no way of knowing the results of WSCCs newly launched initiative to investigate community ideas for traffic mitigation)

For the reasons given, the above two changes to Policy AL3 should also be implemented in all other Policies where the same wording occurs.
(I.e. Policies AL7; Highgrove Farm, AL8: East Wittering, AL9: Fishbourne, AL10: Chidham and Hambrook, AL11: Hunston, AL12: Land North of Park Farm, Selsey, AL13: Southbourne, AL14: Land West of Tangmere)

6.35 – Bullet point 2 (Landscape sensitivity)

CHANGE TO *The site lies within 1km of the National Park boundary and is open to views from The Trundle to the north and also from Goodwood and from the northern end of Fordwater Lane, which currently constitutes an important section of green infrastructure linking the city to footpaths and bridleways into the downs;*

6.35 – Bullet point 2 (River Lavant floodplain - opportunity to plan for green infrastructure)

SUPPORT Though it may be advisable to add that infrastructure detailing should be rural in nature (e.g. soft detailing such as hedges, not metal rails or bland fencing)

6.44

AMEND

Firstly change "*only one public right of way*" to "*only one continuous and safe right of way*". Secondly, immediately after "*alongside the Chichester canal*", insert a new sentence: *There are also a number of historic footpaths which were severed by the construction of the A27 bypass. These footpaths have potential to once again act as important green infrastructure routes, if the short severed sections are reconnected. Such reconnection could potentially take place, with least disruption, if undertaken during other proposed roadworks on the A27.*

Sections 6.44 to 6.49

OBJECT Apart from the briefest of mentions in section 6.47, these sections pay insufficient regard to the sometimes high landscape value of this area (as shown here: <https://tinyurl.com/y8a2cjxe>). There is no acknowledgement of the potential for a severe adverse impact on Salterns Way (affecting both local quality of life and tourism). Nor is there an acknowledgement of the impact on the Wildlife corridor west of Chichester (already less intact than might be hoped due to severance by the railway and the A27).

RECOMMEND This section needs reworking to fully acknowledge the above three factors.

Policy AL6

OBJECT (Strongly)

General. The District Council has sacrificed extensive areas of Greenfield for "development". Notably Whitehouse Farm will no longer be available to local residents wanting a walk in the scenic countryside. Following these losses, the Land South-West of Chichester (Apuldrum and Donnington Parishes) is now one of the only remaining stretches of land easily available for them to get out into. It is wrong to throw away the entire rural setting of Chichester. At least some should be preserved. This area should be removed entirely as an area of search for new development. In short, it is not acceptable to sacrifice expansive rural landscapes in exchange for token "country parks".

That said, assuming CDC is not likely to accept the above, at least the following changes need making.

Policy AL6 – Paragraph 1

OBJECT / AMEND

Insert after end of the first paragraph.

It is recognised that this road would be damaging to wildlife habitats and quiet recreation, and the council will keep a watching brief for the emergence of proposals that make it unnecessary (with particular reference to the recently launched search for alternative proposals by WSCC).

Policy AL6 – Paragraph 2 - ... sustainable transport facilities (if required)

OBJECT Delete "*if required*". In responses above, it has already been pointed out that it would be a quick and easy win to reconnect the footpaths here. Hence alternative more sustainable provision is obviously required here, and is deliverable.

Policy AL6 – Item 1

There is no way one can expect any development south of the A27 (i.e. severed by the A27) to provide "*good access to the city centre*".

RECOMMENDATION Remove this wording.

Policy AL6 – Item 2

OBJECT To the reference to a link road. This may not be necessary, and therefore should not be prescribed too definitively at too early a stage.

Policy AL6 – Item 5

OBJECT – Remove reference to "highway improvements" (overly prescriptive).

RECOMMEND

CHANGE TO "*Necessary mitigation measures*"

Policy AL6 – Item 5 Make provision for regular bus services

COMMENT

In the past, bus services have only been provided for a limited time. After that time, the service has tended to disappear. Unless things are done differently this time round, bus services at the discretion of the developer are no way to find a sustainable long-term traffic mitigating measure.

In this respect, on past evidence, the Plan is not robust.

Policy AL7 – Item 1

There is nothing in this policy which ties in with the pre-amble in Section 6.56 – Bullet point 8 ("Maximising the potential for sustainable travel links with Chichester City and settlements along the East-West corridor"). (Item 1 only talks about links integrating with "the existing Settlement").

Ribbon development along the A259 is making it less safe to cycle (and walk). Some form of entirely segregated off road path is becoming necessary. This is the place to mention CIL contributions to a new ChemRoute (See response to Section 5.16)

RECOMMEND Insert extra item, reading "*Making a contribution to sustainable travel links with Chichester City and settlements along the East-West corridor*"

Section 6.53

OBJECT

It's a bit late now, after CDC has prematurely granted planning permission in advance of adoption in the Plan (and in advance of the Bosham Neighbourhood Plan) , but it should still be said that the text here lacks balance as it misses a number of things.

Namely it fails to mention views across the site into the downs, which give the site considerable attractiveness and form part of Chichester's rural setting. There is also no mention of the very high grade of the farmland here.

POLICY AL8

OBJECT

This policy is not complete without consideration of global warming and sea level rise (Bracklesham Bay will be underwater at 1.5 metre rise).

RECOMMENDATION

Introduce an extra, separate point referring to the need to consider sea level rise.

Policy AL8 – Item 3

OBJECT (Unsound phrasing)

securing necessary off-site improvements (including highways) to promote sustainable transport options;

This phrase gives contradicting instructions, so-called "*improvements*" to highways do not "*promote sustainable transport options*". In fact they take potential developer contributions away from sustainable transport options.

RECOMMENDATION

Ensure this phrase does is amended to avoid giving irreconcilable instructions. One way to do this is to delete the phrase "including highways".

NB This phrase recurs in AL9, AL10, AL11, AL12, and AL13 – where it should be sorted out as per the above.

Sections 6.79 to 6.85, and Policy SA12

AMEND

Sections fail to mention the Selsey Greenway project (formerly the Selsey Cycle Route). Yet the Greenway is a key part of mitigating growth in vehicle traffic off the Manhood, and a potential major tourist attraction too.

Policy SA12, Item 6, goes some way to rectify the situation, but still does not mention the route by name, which surely handicaps attempts to implement the route in terms of accessing CIL contributions, and obtaining protection and promotion in planning policy. (More on the Selsey Greenway at <https://tinyurl.com/yccu6ksl>)

RECOMMEND

In sections 6.79 to 6.85, insert a paragraph about promoting the Selsey Greenway.

In policy SA12, mention the Selsey Greenway project by name in Item 6. (e.g. make it clear that "settlements" does not just mean nearby villages but into Chichester itself).

Section 6.90 – Bullet point 6

AMEND TO *as well as the inclusion of cycling and pedestrian routes (in particular an integrated, segregated cycle route running between Chichester and Emsworth – sometimes referred to as the Chemroute);*

Policy SA13 – Item 10

AMEND After the end of the present text, insert the same bracketed phrasing as above. Namely (in particular an integrated, segregated cycle route running between Chichester and Emsworth – sometimes referred to as the Chemroute);

Policy SA14

AMEND Add an extra bullet point to the effect "*Retention and enhancement of existing hedging and mature shrubbery alongside boundary roads*"

REASONING The need for a phrase such as this has become apparent during the course of the existing local plan. Developers are routinely digging out hedgerows at site boundaries, and often replacing them with fences. The results are particularly stark at the nearby Shopwhyke Lakes. The loss of these features (and replacement with fences) is fast urbanising Chichester's once rural setting, and taking away biodiversity and small refuges for wildlife habitats.

Section 7.25

COMMENT Parking is a hugely inefficient use of space. "Adequate parking" would be less of a problem if the Plan did more to encourage, in particular, low-car housing including car clubs and home working.

Section 7.50

OBJECT Concentrating only on "the availability of car parking" is an invitation to developers (and planners) to only think about car-dependent developments.

RECOMMENDATION Redress the balance by adding a final phrase "*Conversely, developments that reduce land take for car parking will be welcomed if they can robustly demonstrate that they are planned around a low car dependency lifestyle.*"

Policy DM8 – Item 4

CHANGE "*through the creation of links*"

TO "*through the creation or safeguarding and enhancement of links*"

The last Plan failed to safeguard the bottom end of Centurion Way, and the low-traffic link from there to the city. This rewording adds redress that problem.

End of Text

(Ran out of Time)

Solving the A27 Crisis

The ever increasing congestion along the A27 can be reversed. It is entirely possible to extract a portion of the traffic and bring numbers back below the level of congestion. Current technologies make it fully possible to build an alternative route that can create extra capacity and, at the same time, squares up to today's environmental requirements far better than traditional road schemes. If adopted it would likely be widely emulated, and could confirm Chichester as a world centre of expertise in a new transport revolution.

A high-speed 'eway' is proposed. This takes the form of a trackway largely "shadowing" the existing road and rail margins, for use by lightweight electrically powered vehicles.



'TREV' - A typical e-car



"Eway" - Showing height comparisons



Junctions with public roads will be at roughly 5km intervals. Users drive their e-vehicles on road to the nearest eway under internal battery power. Once on the eway, they will pick up power for high-speed traction and can also recharge, so overcoming the current problem of 'range anxiety'.

The eway will offer more reliable journey times and far quicker journeys at congestion-free speeds of 70 mph (110 kph) or more, thus increasing economic and social opportunities in a way that is safe and environmentally acceptable. Journey times are expected to halve. For example Chichester-Brighton should take less than half an hour compared to an hour or more for the road and rail equivalents.

Eways will also be self financing. The transport analytics company INRIX calculates that the average cost of congestion per driver is £1.2k per year. If the equivalent amount were spent on eway toll fees equal to those on the M6-T motorway (8.1p/km), eways would pay for 9,250 miles (14,800 km) of congestion-free travel.

Eway capacity equivalent to two extra road lanes would extract between 15% and 20% of traffic, and the resulting reduction in congestion would be enjoyed at no cost by other users who choose to continue to use the A27.

The price of an e-car is expected to be about £8,000. This is similar to the cost of the average motorbike, and half the price of a typical small car. Outright purchase could be complemented by car hire or "car club" type arrangements (which in turn could be used to reduce land-take for parking in new housing developments).

Environmental impact will be minimised by the use of vehicles which are lightweight, and therefore consume less regardless of fuel type, but whose fuel is actually electricity and therefore involves no emissions at point of use and can increasingly be derived from sustainable sources.

Where necessary, the single lane track would run raised on columns that do not need earthworks or drainage infrastructure, and avoid the "severance" too often created by traditional roadworks

(both severance of communities and severance of wildlife corridors). Helical pile technology, used for the column foundations, would allow fast installation (and fast removal leaving no permanent trace). The eway columns will take up minimal land area, and will not require compulsory purchase orders but could be arranged through the system of wayleave (as used for electricity pylons).

Existing infrastructure routes along the South Coast corridor will be used where possible, such as railway margins and A27 fence lines. In order to gain acceptance from residents along the route, optimum routing and screening can be planned using tried-and-tested planning tools such as geographic information systems (GIS) and virtual reality (VR).

Initial research indicates that an eway running along the total route of the A27 could be achieved for a budget of about £100 million. This compares with the likely cost to the Government of around £900 million for the existing A27 schemes which could be shelved if this solution is adopted. The eway would be a pay-as-you-use route and therefore represents a profitable investment opportunity for private investors. In short, instead of needing government/taxpayer funds to build, and then needing more such funds for maintenance forever after, there need be no call on central government coffers at all. (The savings can be used to fund schools and hospitals, cycleways and public transport, pothole repair or whatever else the community wishes to prioritise).

In addition, an eway could provide a test bed for autonomous vehicle technology. After commuting to the start of the eway, "drivers" could switch to autonomous mode and get on with more productive work, or simply relax on a track affording total safety that cannot yet be guaranteed on public roads.

In sum the proposed eway represents a new phase; not unlike past shifts from turnpike roads to canals, from canals to railways, and from railways back to publicly funded roads. It will provide an optional adjunct to the existing 'free' road system, but will offer faster journeys and be financed by affordable toll-fees. It will also generate huge business opportunities both locally and for export of technology and know-how.

The social and economic benefits are obvious, the contributing technologies are mature, there is a viable investment case, and there is no competition ... this next new phase in transport is ready to roll.

Tony Nordberg

And More Locally: The above emphasises the substantial cost and time savings if "eways" were to be implemented along the entire length of the A27. It should be noted, however, that shorter eway tracks can also have substantial benefits. For example:

- In the Chichester context, an eway between Selsey and Chichester or between Bognor and Chichester (or both) would achieve a number of objectives which were universally supported at the recent "Build a better A27" public workshops. Namely (1) Keeping local traffic separate from through traffic (far more completely than any of the current road schemes manages), (2) Use of new and more environmentally friendly, and less aesthetically intrusive technology than roads, and (3) Minimal disruption to existing traffic during the construction period.
- If the eway vehicles were autonomous, they would (1) help keep the elderly mobile for longer in their own homes, and (2) reduce parking pressures by driving themselves away to the next user or to an edge-of-town holding area, so that what commuters pay on eway costs, they save on all-day parking charges. Potentially, this then also frees up some current car parking space for alternative uses, as suggested in the County Council's Road Space Audit.

- Whether the vehicles are autonomous or not, a "local eway" has other advantages. Specifically, it will take many years before a significant portion of the nation's stock of cars turns electric. An eway would ensure that, sooner than otherwise, a higher proportion of journeys are made by electric vehicle where it matters most, namely in town where air-quality issues are at their most pressing, and where the car is often the wrong tool for the job (see "Extraction" in box below).
- Around Chichester, wildlife corridors and habitats have been identified as important considerations. The relative ease with which an eway can be raised ensures against the near complete partitioning of habitats that new roads bring.
- Where visual intrusion is an issue, which is to say if the choice is between sinking an eway and sinking a road, costs are significantly affected by the cutting width and depth (or the tunnel diameter). In which case, sinking an eway requires considerably less space, and so considerably less cost than sinking a road.

Extraction. Many journeys are currently made using vehicles that, from an engineering point of view, are often "a sledgehammer to crack a nut". Which is to say, a vehicle carrying many fewer people than designed for; with generous luggage storage capacity, which is not needed on that particular journey; in stop-start traffic although the engine is designed for cruising; over distances so short that the engine runs inefficiently, having never warmed to its optimum temperature; and, when it gets to its destination, the vehicle spends long hours parked on valuable city-centre land that could be better used for other purposes. Obviously the car is sometimes the right tool. But, where it is not, it is highly desirable to extract this traffic and offer an alternative. Eways provide that alternative.