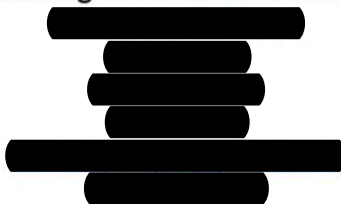


Donnington Parish Council



Chichester District Council
East Pallant House
Chichester
West Sussex
PO19 1TY

7th February 2019

Dear Sirs

Re: Chichester Local Plan Review 2035 Preferred Approach consultation – response

Donnington Parish Council has submitted its response in part through the Consultation Response portal, however we feel the cumulative effects of the proposals on our Parish could be overlooked if comments for individual policies/strategic allocations are considered in isolation. We also felt it was important that the fact that common issues arose for us and neighbouring parishes should be noted but this was not possible through the portal. We are therefore providing you with our comments in letter form so as to emphasise the impact on our and our neighbouring communities and trust this will be communicated to the Inspector as part of our response to your consultation.

Policies SP23 DM24 & SP28 - Proposals for A27:

Donnington residents will be hugely disadvantaged by proposed changes to A27 access arrangements under Policy S23 and the Peter Brett Associates report – effectively no access to Donnington unless they use the new link road and double back on themselves. Residents of, in particular, Hunston and Mundham, but also Pagham and the wider Manhood Peninsula who would previously have turned right at Stockbridge and Whyke roundabouts will need to use local back roads through Donnington to reach their destinations, increasing traffic levels on unsuitable rural roads. Traffic travelling along the A27 wishing to access the City from the east will have only two points of entry, (Fishbourne roundabout or Bognor Road roundabout), compared to the current 4 accesses. Important infrastructure such as the train and bus stations are reached most easily by these roundabouts so this will add to journey times to these destinations. Residents of Queens Avenue in Donnington have a direct access onto the A27 next to the Stockbridge roundabout. Under these proposals, when travelling east, they would need to travel to Bognor roundabout to return home.

The additional queuing times generated by traffic lights vs roundabouts at Stockbridge and Whyke junctions will lead to increased levels of pollution in an area which, in the case of Stockbridge, is already an established Air Quality Management Area..

The Peter Brett Associates (PBA) report states in the Executive Summary:

Air Quality (page xvii) that ..."Within existing AQMAs, with the Local Plan traffic in place, there are no predicted exceedances of NAQOs."

In Appendix G: Air Quality Assessment of the same report, Tables 4.1 and 4.6 show that the levels of NO₂ at Stockbridge have consistently exceeded maximum levels since 2012.

On page xvi of the Executive Summary, Table 1 shows that Stockbridge ranks 5th in priority of construction. Therefore, it will be many years before any expected improvement in Air Quality at Stockbridge.

At 4.99 the Plan Review acknowledges that the work required to assess the impact of traffic movements through the city as a result of development and the junction improvements proposed has not yet been undertaken. It is premature to promote these junction improvements before the wider impact is understood and mitigation established.

Each of the five junction modifications will require three years of work. This means 15 years of misery for Chichester residents whilst the junction works take place. We all remember the chaos caused by the replacement of one footbridge in Stockbridge, bringing gridlock to the area. (Policy S23 and Peter Brett Associates Transport Assessment)

Overall, the plans for improvements to the junctions are to the advantage of through traffic not local residents. The proposals bear a marked similarity to Option 3a from the Highways England Improvements to the Chichester A27 Bypass consultation, which were emphatically rejected by the local community - in Donnington and across the whole of Chichester. These improvements need to be re-thought.

Site AL6:

Site AL6 Land South West of Chichester (Apuldram and Donnington parishes) includes a flood plain. Using data from CDC's flood plain assessment, the average height of flood water on the River Lavant is 2.05 metres (6.07 feet) above datum (sea level). This means that the road will have to be elevated by at least 2.5 metres and more with the supporting structures and road thickness itself. Therefore nearer 4metres (13 feet). The impacts of this are:

- This would destroy the iconic views of the cathedral framed by the South Downs.
- The noise generated by a road at this elevation would also be unacceptable in terms of Policy DM25.

There is no mention of retaining the separation of Donnington, Apuldram and Fishbourne

Serious local concerns over the ability to ensure adequate Waste Water Treatment provision. Apuldram Wastewater Treatment Works (WwTW) is inadequate by CDC's own admission in para 6.40 in the context of the Southern Gateway Strategic Allocation AL5/ Wastewater from the site currently drains to the Apuldram WwTW. These works are subject to "environmental constraints which restrict its capacity to accommodate future development."

An additional access onto Fishbourne roundabout would be dangerous, even with the closure of the Terminus Road access.

There is no pedestrian access to the area proposed for employment use. A footbridge would be required to access across the A27 and the costs for this have not been factored in.

The concept of a link road was rejected by the public as part of the Highways England A27 Chichester Bypass Improvement proposals

This site has previously been considered and discounted from development plans (see DPD Sustainability Appraisal November 2016, Local Plan Inspector's report May 2015). Reasons include:

- the likelihood of flooding in the area;
- impact on water pollution of runoff
- proximity to AONB
- impact on wildlife
- impact on protected views

REMOVE POLICY AL6

Policy AL6, S15, S16 ALTERNATIVES TO AL6

A viable alternative site is available for industrial development within the buffer zone at Goodwood and the employment land should be allocated there.

Policy S4, Policy S5, Policy S19 HOUSING ALLOCATION:

The allocations of 200 dwellings for Hunston and 50 dwellings for North Mundham are overdevelopment of these small villages. This will lead to an increase on the local roads around their parishes and inevitably into Donnington as their residents seek alternative routes to A27. Anecdotal evidence suggests that Hunston does not operate as a Service Village – facilities in Donnington are used instead.

The South Downs National Park should take its allocation of 41 dwellings per annum – without some low level development in the Park, particularly social housing, communities there will not thrive. ().

The duty to co-operate is understood, however housing allocation was specifically front loaded during the current Local Plan period to allow for infrastructure developments across the district and it is unfair to ask the Manhood Peninsula/Donnington to take a number on this scale given its allocations under the new plan.

INFRASTRUCTURE

There are no proposals for any new schools in the Manhood Peninsula. This will only increase pressure on current schools to provide more places, and lead to increased traffic on the roads as parents are forced to commute to schools outside their local area where spaces may be available. Specific provision needs to be made if the Manhood Peninsula is to take the number of houses proposed.

Specific provision must also be made for additional doctors and other medical services if this level of housing on the Peninsula is to be considered.

Policy S18 Integrated Coastal Management Zone Manhood ECOLOGY

Impact on ecology - the Chichester Harbour and surrounding area are designated as an Area of Outstanding Natural Beauty and have the status of being a Special Protection Area, Special Area of Conservation, Site of Special Scientific Interest and is a Ramsar site. It is wholly inappropriate to consider development on this scale in such close proximity to an area with this status. There will be a significantly adverse impact on the ecology of the area and mitigation is not sufficient.

Policy S18 Integrated Coastal Management Zone Manhood ECONOMY

Green tourism is a very important part of the Manhood Peninsula economy and to overdevelop and spoil the natural environment which attracts this trade would be inappropriate and hugely detrimental.

COMMON CONCERNS

Meetings have been held with North Mundham and Hunston parish councils which have revealed that many of the concerns of our parish are also concerns of our neighbouring parishes too. In particular, the impact on traffic volumes of the proposed developments in these parishes and the wider Manhood peninsula is of common concern, along with reservations regarding the proposed improvements to the A27

Yours sincerely



Nicola Swann
Clerk & RFO
Donnington Parish Council