

7 February 2019

Comments on the Chichester Local Plan Review 2035 and Chichester Local Plan Transport Assessment

I am the District Councillor for the Ward of North Mundham and Oving, and I would like the following comments on the above-mentioned documents to be considered in any further work on the Local Plan:

General

1. The District of Chichester is grossly unbalanced: by which I mean that, because nearly 70% is now the South Downs National Park (SDNP), the vast majority of any development in the district has to take place in a relatively narrow coastal strip from Southbourne to Tangmere. This is evident in the Local Plan Review (LPR), where nearly all of the new housing allocations are in the south, while the SDNP seems largely exempt. While understanding that the nature of the Park should not be compromised, the current intention seems to be that it remain virtually preserved in aspic, while the unfortunate consequences of any development are endured by the already overdeveloped southern areas.
2. Another main general point that applies to both the CLPR and the Local Plan Transport Assessment, the Brett Study, is that Chichester city and district, particularly in the southern areas, can trace most of its problems to the grossly-overloaded main road that passes through, the A27. This strategic route has for at least 20 years been inadequate either as part of our national road system, or as the means of locals being able to journey easily to, from or round the City
3. For both studies, inadequate consideration appears to have been given to the impact on the wards of Chichester District of major housing developments proposed in Arun District Council in proximity, or adjacent to, CDC boundary wards. My particular concern is with the thousands of new houses planned in Pagham, Nyetimber, and Bersted, all part of Arun CDC, and the huge and underestimated effect of vastly increased traffic along the B2145, B2166, and Marsh Lane.
4. It was distressing to learn that, under National Policy guidelines, allocation and development of housing can be imposed by government on District Councils without any commitment to improve infrastructure or amenities.

CLPR 2035 Specific Points

Para 2.2, 2nd bullet: the accessibility from the Manhood peninsula to the north is much worse than the Plan records. Many of the roads are used by HGVs from the many horticultural businesses. Along them in parts, two lorries cannot pass without one stopping; in parts they overhang the pavements while negotiating bends. large numbers of cars from Arun and Bognor now use the B2166 and B2145, because the A259 and the A27 are so congested; there are almost no bus lay-bys; there are few usable cycle and pedestrian routes away from the roads; few of the roads have pavements; and the B2166 and 2145 pass close to schools in Hunston and North Mundham

Para 2.5: The A27 is operating at more than double its original capacity. Improvements have not satisfactorily kept up with traffic increases. it is now one of the most dangerous, busiest, not polluting major road in the country.

Para 3.19 Housing and Neighbourhoods: In this section there is no mention of the need for commensurate infrastructure to cope with all the new accommodation

Para 3.19 Strategic Infrastructure: Highway improvements especially on the A27 are vital, not only to mitigate congestion on that trunk route, but to reduce the volume of traffic in the City

Policy S3 Development Strategy, 1st two bullets: Sustainable growth can only go ahead if improvements are made to the A27 and many on the minor roads in the east west corridor and Manhood peninsula. Even so, the Plan seems to be a recipe for an overpopulated conurbation from Southbourne to Bognor to Tangmere, while the area of the SDNP remains largely untouched. This is borne out in **Policy S4, table 2,** where it shows that the E/W corridor takes more than 12000 houses and the SDNP, three or four times the size, fewer than 500.

Para 4.57 Allocations of Land: such allocation must take into account the need to safeguard production of food

Para 4.78 Addressing Horticultural Needs: This article contradicts itself, talking about 'land being required at the Runcton HDA which is almost at full capacity'. No proper reason is given, other than a reference to Policy DM15, which is a catch-all get-out to permit development on HDA land

Paras 4.80 - 4.83 Providing Support Infrastructure and Services: here in clear terms we see that there is no intended public funding for any infrastructure improvements. It places the provision of Support Infrastructure and Services clearly as a desirable consideration, but subsequent to any approval for development.

Para 4.84: Many, particularly in the south of the City, do not see the proposals to modify traffic flow on the A27 as 'improvements'. The measures provide some relief to the

longstanding congestion on the A27 by penalising the residents of the Manhood peninsula, and others by major restrictions on access to the main road and access to and from our City

Policy S14, Chichester City Transport Strategy: The first article in this section should be the permanent solution to the eternal traffic problems caused by the inadequacy of our existing A27. It is these that result in extra congestion in the City centre, and result in the serious pollution problems in Chichester. A City our size needs a proper by pass, i.e. a road that separates through from local traffic. the current road is inadequate in both roles.

Policy S16: The statement about a general presumption against development within 400m of Goodwood is not understood. The airfield and motor circuit are noisy but intermittent, but the noise along the existing A27 is constant and relentless. If development is to be allowed near the A27, then there should be the possibility of development close to Goodwood.

Para 4.121: 3rd bullet: While acknowledging the poor accessibility and congestion caused by the A27 to those on the Manhood peninsula, the report makes no reference to another major problem, that of the Chaos caused to people in the south during the increasing number of events at Goodwood, which result in the peninsula being virtually cut off for several individual days.

Para 5.19 Transport Infrastructure: It is true that traffic congestion on the A27 during peak hours, but serious disruption also occurs every sunny weekend in the summer with people trying to get to the Manhood peninsula, in particular the beaches at West Wittering, and as previously mentioned, during event at Goodwood motor circuit, and horse race track.

Para 5.22: This strengthens all I have previously stated about the inadequacies of the current A27. It is congested, dangerous, and polluting.

Para 5.28: is manifestly unproven and a statement of hope largely not supported by observation on the ground, unless the improvements to the A27 include an offline route that separates through traffic from local traffic. Most residents south and east of the A27 have no confidence that the provisions of the Brett study will 'accommodate the levels of development...in the Local Plan'. Indeed, the chaos resulting from the proposals for Highways England to undertake works at the 6 online junctions/roundabouts fill many with horror: one estimate is that they will be undertaken sequentially, take up to three years each (assuming HE improves its performance since the ill-fated footbridge across the A27), resulting in a period of disruption that could last for 15 years or more. This must be opposed by CDC

Policy S23 Transport and Accessibility4th bullet: Any proposal for a new 'link road' from Fishbourne roundabout to the Birdham road will be fiercely controversial. Many will see it as a foot in the door to establishing the full Stockbridge link road which was

roundly rejected by voters in 2017. its aim is to provide relief for the A27 be effectively redirecting much local traffic along the congested minor roads of the Manhood peninsula. This will be inevitable if the other provisos of the Brett report are implemented, preventing easy access to the A27.

Policy AL2: Another 585 dwellings as proposed, on top of the large Shopwhyke Lakes already recently completed will together change the nature of Oving completely

Policy AL6; 4th bullet: a minimum of 100 houses on a disputed link road, followed by a glib statement about improving the highway. The latter should be the pre-condition for the former.

Policy AL11, Hunston Parish: Hunston is a small parish that suffers from an exceptionally busy road bisecting it (B2145). This road is one of the busiest B roads in the county. Under this plan it has been allocated 200 houses. Such a large number will change the character of the village. The policy calls for a 'minimum' of 200 houses. Given the small amount of land close enough to the main part of the village to ensure proper assimilation, this should read 'about' rather than 'minimum'. The mention of road improvements to accompany the development mentioned in Para 6.77, 4th bullet, is not reflected in this policy and paragraph and should be a necessary condition.

Policy DM8: It is vital that the criteria listed in sub-paras 1 to 7 of this policy are fully and rigorously adhered to.

Policy DM24: mainly as a result of the huge increase in traffic over the last few years, and because of the ever-growing congestion on the A27 causing increased traffic within the City, Chichester's air quality is notoriously poor, particularly in the vicinity of one of our primary schools. Much of this pollution will disappear when a proper northern bypass is built, as it inevitably will be one day.

Appendix A Map A1: Is a perfect representation of how the development of our district has suffered from the requirements of the SDNP and as previously observed, shows that inevitably, there will be continuous development eventually from Southbourne to Tangmere

Wildlife Corridors : Maps East and West of City Strategic Wildlife Corridors: while agreeing that it is important to ensure that there are wildlife corridors for any new development, these must be so designed and planned so that all options for improving the development of our City are retained. In particular, that all possible routes for building a better A27 are safeguarded, and that wildlife corridors are not invoked to prevent such a development

Map AL4: I can see no justification for removing this very large and suitable area (marked in green) from the Strategic Site Allocation. If the justification is that contained in Policy

S16, I have already commented on the flawed assumptions above. Noise from the airfield is regrettably not concentrated just within proximity to the airfield. Every fine day, winter and summer, we on the Manhood peninsula have to suffer aircraft and helicopters from Goodwood conducting low level passages, or noisy and persistent aerobatics, above our houses

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Chichester District Council