

Comments on the Local Plan Review submitted by Sarah Sharp, City Councillor for Chichester South and Coordinator of ChiCycle

Challenges and Opportunities facing Plan Area

2.29 OBJECT due to omission

Climate change is missing from this list.

One of the biggest challenges any area faces is climate change. IPCC report states we have 12 years to act to prevent global warming. Government Committee on Climate Change stated we are not on course to meet our legally binding carbon budgets. We have 12 years to act on climate change - it is the biggest challenge we are facing as a District.

Please add

“Encourage businesses and individuals to adopt climate friendly lifestyles in order to prevent rising sea level rises and temperature increases which could harm our residents”

Section 3.2 – The Vision

Comment

1) Need to add

“Live protected from the worst risks of climate change;

To live a low-carbon lifestyle”

Justification IPCC report

2) Comment on the section

“Move around safely and conveniently with opportunities to choose alternatives to car travel” – WSCC is only able to provide 5 kms of safe cycle infrastructure every year for the next 5 years in the whole of the county (email from Louise Goldsmith) – without more safe segregated cycle paths this vision will not be realised.

Section 3.10

Comment:

This section talks of “increased use of public transport options” as the timing of the 700 bus have been reduced from every 10 minutes to every 20 I suggest you should add to this section

“by increasing the frequency of buses and trains”

Having a public transport option running every 20 minutes is not reliable enough to provide an alternative to the private car.

Section 3.17

Object:

Need to include another Strategic Objective

Strategic Objective 5: Mitigating and Adapting to Climate Change

Justification for this is IPPC report

Section 3.19

Economy

Object:

Delete the words “promote economic development” and replace with

“Support shared prosperity for all to maintain quality of life” delete the words “and competitiveness

Justification: We are currently living a lifestyle of more than 1 planet can sustain. Please see this WWF report

http://assets.wwf.org.uk/downloads/lpr_2012_rio_summary_booklet_final_9may2012.pdf

If we continue to drive non-stop economic growth we will not maintain quality of life as our quality of life will be impacted due to the unsustainability of our actions. There will be fewer natural resources for our children and grand-children to inherit.

Environment

Comment:

Please insert

“Reduce reliance on fossil fuels”

Strategic Infrastructure

Object:

Please insert as the first bullet point

“Reduce the need to travel through provision of onsite facilities, small shops, doctor’s surgeries, within developments”

Change the order of the bullet points

The “sustainable and integrated transport system” should come before the “Highways Improvements”.

Justification: Transport planners talk of a hierarchy of demands. We should

- 1) Reduce the need to travel
- 2) Prioritize sustainable means
- 3) Make the transport system more efficient
- 4) Increase capacity

Please see <https://www.eta.co.uk/2017/01/18/hierarchy-to-help-transport-engineers/>

Change the word Highways improvements to Highways **works**

Using the word “improvements” is a value judgement which doesn’t consider the detrimental impact on wildlife, pollution, walking and cycling infrastructure which sometimes suffers as a result of so called improvements.

Justification – dictionary definition of improvement <https://www.dictionary.com/browse/improvement>

Section 4.2

Comment:

Insert the word “**and natural**” in the last sentence

...must not adversely affect the character, quality, amenity or safety of the built **and natural** environment

A Sustainable Strategy

Section 4.3

Insert the word **natural environment** in the first sentence

...and meet the needs of places, communities **and the natural environment** across the plan area...

Section 4.21

Object:

There is still a need to travel to facilities even for people moving to developments close to Chichester City so this last sentence needs to be re-written with the words in green added.

Locating a significant proportion of development in or around Chichester City reduces the need to use **the private car** to travel to facilities. **The provision of a safe and segregated cycle and walking network and an affordable and frequent bus service serving places such as WHF and Westhampnett are key.**

Meeting Housing Needs

Section 4.22

Insert a sentence at the end of section

Allowance should be planned for future needs due to climate change displacing residents. It is predicted that sea levels will rise by 1m (Chichester Harbour Conservancy bases this figure on government predictions). This will severely impact on the south coast with cities such as Brighton and Portsmouth under threat. 1.9m people in UK will be at risk of flooding by 2050 (Committee for Climate Change stats)

Section 4.28

Question – does Chichester City Council have a say in the Development Plan Document

I question this as I don't think CCC has been consulted on this.

Affordable Housing

Section 4.3

Object:

Insert **Council should build its own affordable housing to meet its housing need. In this way there will be fewer large, executive style houses and more houses available for key workers, young people who we need to keep in the area.**

Justification: Councils sometimes secured as little as 13% affordable housing when their stated targets were as high as 50%, according to analysis commissioned by BNP Paribas Real Estate, which advises local authorities and housebuilders in negotiations. Please see this link as an example <https://www.building.co.uk/focus/housebuilding-by-numbers-how-many-homes-should-london-be-building/5096803.article>

Section 4.39

Insert

Insert these words **including the council itself**

“approved Bodies” **including the council itself** to deliver affordable housing units

Justification – Bristol City Council still has a large housing stock which enables it to provide for its young people and key workers

Policy S7

This covers Gypsies, Travellers etc.

Insert a section on refugees

The World Bank is predicting 140m migrants by 2050 due to climate change. As the District is close to Gatwick and has a long exposed coastline, we need to make some provision in this document for refugees.

Section 4.59

Support

The interspersal of flexible working space close to housing reduces the need to travel. The seminal work by Jane Jacobs “The Death and Life of Great American Cities” is an expose on the importance of “mixing up” planning uses to create liveable and friendly cities where there is less of a reliance on travel and greater well being, less crime etc..

Expanding the current retail offer

Support

“restrict further developments in out of centre locations”

The doughnut effect has damaged our city centre. Building on green fields outside the city centre has encouraged people to drive to out of town supermarkets increasing our reliance on the private car, increasing carbon emissions etc, decreasing our health and well being and causing (luckily) fairly limited decline to our city centre.

Insert

It is key that this Plan promotes the growth of shops near to where people live to reduce the dependency on the private car and give people local places and amenities to walk to.

Justification: Jane Jacobs https://en.wikipedia.org/wiki/The_Death_and_Life_of_Great_American_Cities

4.7.3

Insert in last sentence:

Eating, drinking, fashion retailing, and community noticeboards would enhance the roles of these settlements

Justification: For a community to be vibrant community activities need to be shared and well communicated - although there is a huge reliance on the internet for information it is important that we don't neglect the "real world" of notices, signs and posters – eg Cambridge is a very vibrant place with lots of signs up on the railings for the huge range of concerts, plays, cultural activities – people miss in Chichester the noticeboard that there used to be in the Buttermarket and in the library (the plastic sleeves provided by WSCC are sanitised and people don't look at them).

4.76

OBJECT

Horticulture need not only include glass houses. Orchards should be encouraged throughout the plan area to increase our food security. Insert the following "The Council will also encourage and support community projects to plant up grass verges or use redundant land for community orchards or growing vegetables"

Justification: <https://parkpeople.ca/archives/8247> "Plant an urban fruit orchard, grow a vibrant city"

4.81

Support and Object

"A key element of the Local Plan Review is for new development to be coordinated with the infrastructure it requires and to take into account the capacity of existing infrastructure"

I support this statement as it is what should happen but also object because but having lived in Chichester since 1999 and having been involved in local affairs, I fear that this has not happened so far.

EG – There is still no crossing of Oaklands Way to get from the City Centre to Rousillon and Graylingwell. This crossing of the road is key as the road has 4 lanes of traffic.

Also the new development will put huge strain on existing provision eg hospitals, swimming pools, and other amenities – eg please look at current waiting lists of yoga classes in Westgate

4.8.4

OBJECT

The CIL system is not a good system for providing infrastructure as it is patchy.

So many facilities and needs need to be met by this system.

For example to provide safe, cycling infrastructure that links communities together you need to work together with all parish councils. Southbourne, Fishbourne, Bosham and Chidham and Hambrook have come together to all ask for a safe, protected cycle path linking their 4 parishes.

To my knowledge there has been no such cooperation between other councils to ensure that we prioritize safe, segregated paths between Tangmere and Oving and Chichester and Westhampnett to the East of the City. By dividing pots between different parish councils in this way, links between parishes are harder to pay for.

Policy S12

Second paragraph

Insert

Trigger points for sustainable travel infrastructure eg walking and cycling provision must be earlier in the development timeline. Walking and Cycling links are just as important for access to the development as links by motorised vehicles.

Justification: I have seen slippage in current developments eg Graylingwell and Shopwyke where the pedestrian bridge to get to the north of the development is very late. If we have such late trigger points then we are putting walkers and cyclists at a disadvantage. (especially given the lower rates of car ownership the plan states for Chichester City). If we want to limit climate change and increase our health we need to prioritize sustainable modes.

Section 5 says “Where appropriate” delete this and write

Phase development **must always** coordinate with the delivery of necessary infrastructure

Delete the section starting

“If infrastructure requirements could render a development unviable....”

This section would mean that developers could deliver housing and not have to deliver infrastructure which would make development unsustainable. Relying on re-negotiating such obligations puts further strain on our councils. We should strengthen our plan by deleting this by ensuring that development is not planned in such a way that infrastructure requirements are too great.

Delete “defer part of the developer contributions requirement to a later date” due to risks of lost monies eg at the Canal in Chichester.

Section/Policy Number	Paragraph	Object/Support/Comment	Delete or insert	Changes	Justification
Policy S13		Object	Include in the list of bullet points “Enhance and improve the paving in the City Centre”		Justification: The safety of pedestrians is more important than anything else eg heritage, arts and culture, entertainment offer. We have an aging population so we need to make sure the pavements are safe as a priority.
		Object	Insert in last paragraph	Change “may” to “must” Delete “If necessary,”	<p>The Council must prepare a Supplementary Planning Document(s)</p> <p>The aspirations of policy S13 are good however I have yet to see some of these things happening – eg “enhance the character and distinctiveness of the city’s local neighbourhoods” – I am a member of the Whyke Residents’ Association and no approach has been made to us despite all the development so far.</p> <p>We definitely need a plan to “support and promote improve access to the city and sustainable modes of travel” I understand that a LCWIP is finally being started in Chichester with a small amount of central government funding. This should be built upon so that a proper network of cycle infrastructure is put together. Just by having aspirations things won’t happen. Just by having a document things won’t get done either. The documents must contain concrete, achievable projects of how these things are going to get done eg where the new cycle lanes will go and how they will be protected from the traffic not just paint.</p>

4.95	Chichester City Transport Strategy	Object	Delete this phrase “Due to the historic character of the city, there is limited space for road widening or engineered junction improvements”	Road Space Allocation policies must be reviewed to prioritize sustainable means according to the transport hierarchy. This new approach to road space allocation is required in the Plan area due to the historic character of the city and the need to enable sustainable travel modes to combat climate change.	Need to allocate road space more fairly between different users according to the transport hierarchy: https://consultations.tfl.gov.uk/policy/mayors-transport-strategy/user_uploads/mts-consultation-report-4.pdf
4.95		Object and comment	On street parking limit traffic flows on some radial routes	Replace some with “most”. Also rewrite as “on-street parking slows traffic flows to improve safety on many radial routes.”	This is an issue more widely eg St Paul’s, Westhampnett, Whyke, Kingsham. However this is perhaps a good thing as it slows the traffic and ensures that traffic can’t speed through. On-street parking could be relocated and road space allocated to bus lanes and protected cycle routes.

4.96		Object	Insert a new sentence	Other areas of the city are also under scrutiny and could be declared Air Quality Management Areas	See Cabinet papers of CDC in autumn 2018
4.97		Comment	Change encourage to enable and also insert the final clause in green	the city presents good opportunities to enable more sustainable travel patterns and increase the use of sustainable modes of travel "provided safe, segregated and joined up cycle routes are provided"	Paint is not enough There is also a big difference between "encouraging" and "enabling"
		OBJECT	Change "offers potential" to must be used to	Furthermore, the proposed development must be used to develop coordinated strategies and funding	Potential is too weak a concept and could so easily be missed or slip through the Council's hands without a lot of diligent work on behalf of officers and pushing by members. To ensure that proper infrastructure is delivered this phrase must be strengthened.
4.98		Object	Over-use of the word improve		COMMENTS ON PBA PLAN WILL BE SENT IN ON A SEPARATE DOCUMENT.

			and improvements		From the point of view of people who walk and cycle very often highways changes are not improvements. They are better described as “works” or “changes”. Less of a judgement word.
		Object due to Addition to the list on section 4.98	Insert 2 more junctions	Eastgate Square Westhampnett, (Sainsbury’s) roundabout	Work on Eastgate Square is crucial – due to air quality issues and its inclusion in the Chichester Vision document as a key pedestrian street for shopping and evening economy (near Church Square with its restaurants) Roundabout near Sainsbury’s and Crematorium leading to Westhampnett should also be included on this list as it is a crucially difficult junction for people walking and cycling from the east into the city. (Visitors to Crematorium don’t have a pavement either).
4.99		Change	Delete “Encouraged”	Insert “enabled”	
4.100		Object	Delete “whilst this plan is not depended”	This plan must be viewed and constructed in close collaboration with the outcomes of these studies....	Chicken and egg – these outcomes should not be incorporated as an after-thought. The tensions between CDC and WSCC which are apparent to the concerned and engaged resident need to be overcome. Planning for roads and houses must go hand in hand.
4101		Object	Insert	Introduction of a work place parking levy should be started to gain extra revenues to invest in sustainable travel means	Most European cities are progressively reducing their car parking capacity and investing instead in walking and cycling and public transport. This paragraph should be re-worded to include Work Place Parking Levy. Please see Nottingham City Council’s work which was taken forward as a “model policy” by the Government Committee on Climate Change. This paragraph should also reference the Road Space Audit. The fact that it does not highlights the lack of working together of WSCC and CDC – car parking strategy on road and off road should work together to aim to reduce pollution in the city as

					the key health aim this plan should include.
4.101		Object	Delete “increase”	Insert: “decrease”	RSA and City Vision document envisage reducing the amount of parking in the city centre and shifting policy towards sustainable means
4.102		Object	Insert	Funding for these transport measure is expected to be dran from development contributions and work place parking levy	
4.102		Comment			Diverse funding sources make planning properly difficult as piecemeal infrastructure is the result. For example the Chichester to Emsworth Chemroute needs to be planned as a whole – not little sections done and others left. Also New Homes Bonus gets spent on charitable works not infrastructure projects. As such Plan will fail to deliver infrastructure needed.
Policy S14		OBJECT	Bullet point 2Delete “giving consideration”	Insert: prioritising	Plans in this section are laudable but should have been worked up before agreeing to the houses going in. Trigger points are generally left too late.
			Bullet point 1 should be lower down the list		Behavioural change initiatives should come after providing the safe links for people walking and cycling. In Denmark they don’t need to do this. They provide the safe and attractive links and people cycle because this is the easiest way to get about.
			Insert new bullet point in S14		Actions should be taken to make it more difficult to get into the city by car.
			Bullet point 3	Insert St Paul’s Road and St Pancras and	The White House Farm development means that 1,600 people will need to get into the city by the quickest and most direct route – also the routes in from the East need direct on road

				Westhampnett Road	cycle routes
		Support the last 2 bullet points	The last 2 bullet points should be moved higher up		
S14			Insert definition of cycle routes into the phrase	Delivering joined-up, coherent, direct, segregated, comfortable, attractive, adaptable and safe cycle routes	Without a clear definition of what sort of cycle routes are required to encourage modal shift, we risk being provided with paint on the road which is not good enough quality for less confident cyclists. I refer you to the London Cycling Design Standards which list clearly the requirements for cycle infrastructure design. http://content.tfl.gov.uk/lcds-chapter1-designrequirements.pdf Please see Figure 1.2a page 6 Cycle routes must be safe, direct, comfortable, coherent, attractive and adaptable.
S14		Object	Insert sentence below in green	In addition to the coordinated package of improvements to junctions on the A27 Chichester Bypass identified in Policy S23, the Council will also work closely with West Sussex County Council to implement the highway interventions identified in the	A LCWIP (Local Cycling and Walking Infrastructure Programme) needs to be developed as a priority and if already done (by time Local Plan adopted) we need to prioritise resources to implement it. PBA report is heavily biased towards traffic flow and motorised road users. Non motorised road users must not lose out to the car.

				<p>forthcoming Chichester Vision – Transport Feasibility Study in order to reduce traffic congestion and improving safety at key junctions in the city. This Feasibility Study and the LCWIP (Local Cycling and Walking Infrastructure Plan) will need to have earmarked reserves to implement the recommendations.</p>	
S14		Object	<p>Insert /Change in the Section which starts “Reviewing Car Park Provision”</p>	<p>Change Review to Reduce including closing of the inner city car parks.... This policy can be started with a car free Sunday once a year, then several</p>	<p>This idea of increasing the pedestrianisation of the city centre was put forward in the Chichester Vision document worked on by CDC, CCC, WSCC, BID, the Cathedral, CFT (the Chichester Festival Theatre). All major stakeholders signed up to this Vision and consultants were employed to suggest ways of making the city centre more vibrant. Unfortunately the document has not been followed up by constructive actions to improve air quality and improve the ease of access for pedestrians and people on bikes into the centre from the theatre or the Hornet. Much of the city centre within the walls</p>

				times a year leading to once a month. This should lead to the gradual phasing out of the inner city car parks and the reallocation or space for community events and people-centred places for example more green space, community orchards, play areas for children and young people, a covered market space.	is dominated by heavy traffic which queues to get into the inner city car parks and which dominates the street scene on North Street and East Street. It is clear that the Vision Document should be mentioned in this context and drawn upon to close down the inner city car parks and reallocate space to people not in cars. This can be successfully trialled on Car Free Sundays and then gradually extended. Priority should be left for people with disabilities but other people should be encouraged to walk into town from the peripheral car parks.
			Last bullet point	Insert repaving and repair of the city centre pavements	Trip hazards are causing a lot of people to fall over and uneven paving stones are uncomfortable for people in wheel chairs
4.106		Object	Insert acknowledgement of the noise and disturbance due to traffic	The economic and cultural benefits afforded to the wider from such events and the	

			chaos	noise and congestion experience by locals	
4.116	Thorney Island		Comment and support Insert at end of paragraph	To ensure climate change risks are kept low climate change adaptation and mitigation is essential.	Climate change poses a major risk to this area as well as Pagham and the whole of the Chichester Harbour. With 1 m sea level rise predicted (UK Climate Change Committee) we need to reduce our carbon footprint. Our carbon footprint in the carbon sector is going up and so adding new roads should be avoided due to induced traffic.
4.121	Manhood Peninsula	Third bullet point	Insert	Poor road accessibility and problems of traffic congestion result from lack of a safe cycle route and limited road connections to the north	If people have no choice over how they travel they will have to use the car.
		Third bullet point	Insert	Safe cycle routes, separate bus lanes funded by Work Place Parking Levy and improved bus services are needed to offer residents real and attractive	

				choice in the way they travel	
4.122			Insert after first sentence	The whole Plan area needs to become carbon neutral by 2030 to prevent catastrophic climate impacts affecting the Manhood.	Uk Committee on Climate Change report in June 2018 states that we are not course to meet our carbon budget commitments.
Policy S18		Bullet point 3	Insert bullet point 7	Support the Plan area to become carbon neutral to prevent sea level rises by 2030.	Plan of 1m sea level rise cuts Selsey off from the rest of the peninsula.
		Bullet point 5	Support		
Policy S19	North of the Plan Area		Comment Insert	Improve accessibility by safeguarding bus services to facilities	The last bullet point isn't compatible with WSCC's decision to cut bus services. This plan will not work if CDC and WSCC do not work together and extend and improve bus services. Charging more for car parking to make it more expensive to park than to drive in.
5.8			Delete "Spaces should be situated within the cartilage of individual plots....)	Spaces should be away from houses to encourage people to walk and cycle first. Housing should be decided in community focussed people	Justification – need to produce modal shift to prevent climate change and reduce overreliance on car use.

				centred places where social interreaction and neighbourliness comes before ease of getting to your car.	
	S20	Bullet point 4	Support		
		Bullet point 13	Support	Insert ...taking into account landform, layout, building orientation for solar panels, massing...	
5.9		Planning for Health and Wellbeing	Support	Insert as last paragraph Safe, segregated cycle facilities that enable children from the age of 8 up to elderly residents of 80 should be included.	Quote Mayor of Bogata
Policy S22			Comment and Object	Insert a new bullet point Heritage should be widened to consider buildings of later	The definition of “heritage” needs to be broadened as this is too narrowly seen and leads to the loss of buildings of note eg in Summersdale the Art Deco type buildings that have been converted into flats. If heritage is only viewed as building pre 1900 we miss keeping examples of architecture that many might not like eg 20 th

				dates. To limit our Climate change risks an analysis should be carried out to ascertain whether it is better for the Plan area's carbon footprint to demolish older buildings and replace with new carbon neutral build or to retrofit and to preserve examples of 20 th century architecture	century buildings. The bus garage and bus station are two examples of buildings that are of their time and should be protected. We need the widest definition of heritage to avoid another Somerstown. People's definition of heritage change.
Transport Infrastructure	5.16		Insert	and a number of nationally important cycle paths including the Salterns Way and Centurion Way that need to be preserved and enhanced	
	5.18		Object and delete this phrase "The strategy aims	Insert: The strategy requires government input and	Transport planning shouldn't follow on as an after-thought but we should envision the sort of place we want to be and have to be (to prevent climate change). Our reliance on the private car has to be curbed and effective transport planning can achieve

			to tackle identified transport issues as and when funding becomes available”	earmarked funding to pre-plan the required integrate transport needed to enable the area’s residents to travel sustainably	this if done properly by investing in rail and sustainable options instead of tackling problems as they arise when putting together funds “as and when it becomes available”. Chicken and Egg. Continental places do this the other way round eg suburb outside Vauban outside Friburg https://www.nytimes.com/2009/05/12/science/earth/12suburb.html
	5.21		Insert	Without mitigation, and putting forward a fully financed integrate transport plan, this would lead	
	5.23 and 5.24		Comment and object	Insert Local communities firmly voted against a southern relief road and no right hand turns on the A27 during the HE consultation. The PBA report has reintroduced	

				elements into the plan that were rejected by local communities.	
	5,26	Object		To address this position, the Council will work with Highways England, the County Council, the local community and Network Rail and major development	The local community has been left out of this paragraph. Communities need t be brought into the discussions. Heed must be taken of previous consultation results which firmly rejected A27 options. Also include train operators to improve train services. Overreliance on the private car must not be the only strategy the Plan uses to ease congestion due to increased population.
	5.26		Object and insert	Insert A central element of the strategy is package of proposed improvements to the rail network and sustainable travel network for people on foot and on bikes and works on the junctions.....	Trains and and cycle and walking network must be included in the package being discussed.
	5.27		Comment		So far the only things we are doing is changing all the bike racks

					to stainless steel. Unless we take away space from traffic eg at Eastgate, Southgate etc we will not make it safe enough for people to travel
			Change of managing to reducing	Parking policies will also play a role in reducing growth in car use	
	5.28		Insert at end last paragraph	...need to be carefully monitored and funding coordinated to prevent rat running through local communities, put in more crossings and safe cycle routes to cross the road	
	5.29		Comment /Object		Work for park and ride needs to be seen alongside the road space audit. Objections to this policy as it is being viewed in isolation and not working effectively with its partner council WSCC.
	5.31		Object Delete "Small scale junction improvements"	Change to "Dutch-style roundabouts and allocation of more space to people who walk and cycle are needed to	Sustrans Handbook for Cycle Friendly design "Junctions pose the greatest danger on the roads. Two thirds of all collisions take place at junctions; this increases to three quarters of all cycling collisions. We must undertake a review all important junctions, rating them in terms of the level of service they provide to people walking and cycling." Manchester's "Made to Move" report (2018) Small scale works that prioritize traffic flows are not sufficient

				enable modal shift”	and we need major improvements to prioritize people who walk and cycle.
			Delete “New road connecting Birdham Road to A27 Fisbhourne Roundabout		This road doesn’t help our climate commitments. Is too close to AONB Is on a flood plain New roads simply induce more traffic Destroys nature. Will lead to more congestion on A286 Will reduce our farmland – we need to conserve our fields to grow more food for our nation not less
	5.33			With Network Rail, train operators and local stakeholders to improve and extend services to facilitate.... The Council also works closely with bus operators to put in cleaner buses and extend their services.	
Policy 23	Transport and Accessibility		Insert a new bullet point	Provision for a Car Free Day	Car Free Day enables the local population to experience more traffic calmed area. Putting people-centred places forward as an example of sustainable city planning is key to enabling the city to cope with 12,000 new homes. If we continue to prioritize increasing road capacity we will never make enough roads for everyone to drive wherever they want all of the time. We must start to restrict the growth in private car use.

			Change bullet point	Provision for electric charging points and hydrogen refuelling	Please see work of Chichester University under Professor Seamus Higson Deputy Vice Chancellor – he predicts that hydrogen cars are the better replacement for fossil fuels.
			Add new bullet points	Provision of bus lanes and cycle lanes	
			Comment and object on section “Funding for Community Infrastructure Levy will be used ...		CIL is controlled by councillors whose political will dominate how this money is spent. This money should be allocated to pushing forward a fully integrated transport plan of measures designed to address our climate change obligations and health needs to travel more sustainably to reduce stress on NHS due to our unhealthy lifestyles, rather than being used to finance largescale works on the A27 which has been rejected by the residents in recent consultation.
Policy s25			Include new bullet point	A plan to become carbon neutral by 2030 to prevent major sea level rise	IPPC and UK Committee for Climate Change
5.53	Natural Environment		Add to end of paragraph	, after proper consideration has been given to using all brownfield sites, empty properties.	
5.53			Delete the last sentence		The National Farmers’ Union says that soil degradation in UK is so bad we only have 100 harvests left. UK imports a growing proportion of its food (DEFRA “The UK is currently 77% self-sufficient in foods which can be produced at home, but this

				<p>key indicator has declined steadily over the past 20 years, from 87%. The report says the biggest long-term challenge to food production systems is the impact of extreme weather events resulting from climate change." We must not build on our high quality agricultural land but make plans to become carbon neutral and protect our fields. Please see the following links to maintain the need to not build on green fields Michael Gove says 30-40 years</p> <p>https://www.theguardian.com/environment/2017/oct/24/uk-30-40-years-away-eradication-soil-fertility-warns-michael-gove</p> <p>Farmers weekly says 100 harvests</p> <p>https://www.fwi.co.uk/news/environment/only-100-harvests-left-in-uk-farm-soils-scientists-warn</p> <p>This all may track back to the paper behind this announcement from this University of Sheffield</p> <p>https://www.sheffield.ac.uk/news/nr/soil-loss-climate-change-food-security-sheffield-university-1.530115</p> <p>who tentatively suggest allotments as coming to the rescue</p> <p>https://www.sheffield.ac.uk/news/nr/allotments-could-be-key-sustainable-farming-1.370522</p> <p>We are also producing a low percentage of our own food - and have a rising population, and a pound that is loosing purchasing power on global food markets.</p> <p><i>"Based on the farm-gate value of unprocessed food in 2017, the UK supplied just under half (50%) of the food consumed in the UK. The leading foreign supplier of food consumed in the UK were countries from the EU (30%)."</i></p> <p>https://www.gov.uk/government/publications/food-statistics-pocketbook-2017/food-statistics-in-your-pocket-</p>
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					2017-global-and-uk-supply
5.54			Insert sentence	Actions to prevent climate change and become carbon neutral must be prioritised by this council	
Policy S27	Flood Risk Management		Insert a bullet point	In order to reduce the overall and local risk of flooding in the area: Teh Plan area must become carbon neutral by 2030	Please see UK Committee on Carbon Change report June 2018 https://www.theccc.org.uk/publication/reducing-uk-emissions-2018-progress-report-to-parliament/
Pollution	5.59		Object	Insert: The Council will investigate means to limit pollution caused by vehicles including but not limited to: clean air zones, clean buses, safe cycle routes, anti-idling zones, school streets, increased car charging points, use of bus lanes,	This section needs to be more robust given a plethora of legal cases brought against UK government for its weak Clean Air Strategy. In order to protect itself against legal challenges by such organisations as Client Earth, Friends of the Earth more must be done than just monitoring the air.

				workplace parking levies, car free days,	
	5.63	Green Infrastructure	Object	The benefit of these spaces for climate change, the economy,....	
S30	Strategic Wildlife Corridors		Support		These corridors link the AONB with SDNPA. If they were not maintained wildlife would have no ability to travel between areas which would limit the gene pool and species would become weaker and die out.
6.12	West of Chichester		Object Remove the “not” and insert the phrase in green	The site does present major issues of flood risk and it contains rare chalk streams	
SA1			Support bullet point 7		
			Bullet point 10	Insert: Provide an appropriate wildlife and landscaping buffer	
			Last bullet point	Insert Development of the site should be phased so that the sustainable cycle and walking paths, the	The need for people to walk and cycle safely in and out of the development should be treated as as important as the primary access for cars. As there is no safe route from the north of the development (roundabout onto B2178) then it is imperative that a new, direct and safe route direct into the centre (not round the houses) should be provided. This is a requirement of the IPCC report which requires “urgent

				neighbourhood centre/community hub...are delivered at an early stage	and unprecedented changes” in the way we travel in order to prevent temperatures rises. Should we not follow the IPCC report and as the risks of climate change are known, there are increased risks of councils being sued as scientific evidence is clear that we need to keep global temperatures down by making Chichester carbon neutral by 2030.
Policy SA2	Land at Shopwyke	Last but one paragraph	Change Delete “should be phased”	Development of the site will be dependent on provision of bridges providing access out of the site	Safe walking and cycling links are as vital as wastewater provision. It is unacceptable to make people who walk and cycle wait until a certain number of houses have been built as this would preclude people who don’t drive from buying a property. We already know at the time of writing that the trigger points for this development have been pushed back.
Section 6.34			Change Delete “is expected to”	The development must provide improved access and transport links	
Section 6.37			Comment on the phrase “The majority of the buildings within the site do not make a positive contribution to the charter and appearance of the area”		This is a value judgement. Views of the 20 th Century Society should be considered. Buildings such as the Bus Garage and Station might not be “liked” or valued but they are examples of their time and should be preserved.
Section 6.41			Object		Playing pitches are valuable assets. Once built on they cannot be put back. This makes the area attractive for local residents.
Policy SA5	Southern		Addition of a	12 Proposals	The Bus Station at the Hard in Portsmouth is an excellent

	Gateway		requirement	should include a bus station for passenger to find out information about buses and wait in the warm and to be able to use public facilities.	example of a rather poor quality area where having been improved with a cafe, large and attractive waiting area, a Tourist Information office with a shop. It is a most attractive and welcoming area to the city and functions as an excellent public transport hub. Chichester's plans to take the bus station away and replace it with bus stops on the road is like the situation outside Cambridge station which is most unwelcoming. There is no one to ask about the buses and it is less conducive to support the modal shift onto public transport.
6.47 and 9	Apuldram and Donnington Parishes		Object		The road is not wanted by the residents who were consulted by HE. The area is close to the AONB and is a wildlife corridor. The road and housing takes away valuable agricultural land. There is a risk of flooding. New roads bring about induced traffic and this road will only lead to more congestion on A286. –The harbours of Chichester and the peninsula, including Pagham and Medmerry nature reserve, the Fishbourne Meadows, the coast and the Canal, form a large complex of some of Britain's most important and fragile areas of diverse wildlife, both fauna and flora. Chichester Harbour AONB alone has 11 national and internationally recognised environmental protections.
Policy AL6	Land South-West of Chichester		Object to second paragraph Delete the brackets (if required) And include a new crossing	Provision will also be made for sustainable transport facilities. A crossing of the A27 will be provided for	Of course they will be required. How else are the new residents or workers going to access this land? NICE guidelines insist that pedestrians and cyclists' links are prioritised when new building goes in. See also NPPF 102 – 104 There is a need to provide direct links between the new development and the city centre / bus and rail transport hub. People who walk and cycle need to travel the most direct route as they are using their own energy to travel so long detours are more offputting to them.

				pedestrians and cyclists to reinstate the footpath severed by A27.	To enable this area to be as sustainable as possible, bridges over A27 and railway need to have slopes as well as stairs so the bridge over the railway off Via Ravenna should be upgraded.
SA6		Bullet point 2	Insert “cycling and walking provision”	Developemtn of the site should be phased so that cycling and walking provision and the link road...	
		Bullet point 6	Object		It is not possible to mitigate the destruction of the wildlife at this site. The adjacent SPA, SAC, SSI and Ramsar at Chichester Harbour would be damaged by development on this site.
6.63	Fishbourne				There are no shops in the Service Village of Fishbourne. As such it can not be considered as a sustainable location.
6,64,6.56, 6,64, 6.69	Fishbourne, Bosham, Chidham and Hambrook and Southbourn e		Support		All of the parishes along the A259 have identified the need for cycle and footpath provision between their parishes and to Chichester in the East and Emsworth in the West. In order to facilitiate safe cycling and walking a continuous, direct, safe and comfortable path must be provided which is protected from the traffic. Traffic speeds should be reduced to 30mph along the route and the routes must not give up at junctions. Paint is not sufficient. This route must be planned as a whole and not delivered in bits as people need a safe route all the way to their destination. Leading off the main route there should be links off the route both north and south linking the communities.
SA10, SA11, SA12 , SA13, SA14,		Bullet point 2	Object	Insert To meet specialised housing needs	The Foyer has been closed in Chichester and there is little affordable housing. This plan should include provision of housing for younger people with shared communal areas, kitchens, living areas, music rooms, games rooms etc to make

				including accommodation for older and younger people	living in shared communities an attractive and affordable proposition to attract more young people to stay in the area. Section 2.7 Of the Plan shows that we have a higher than average older population and a smaller than average working population so we should provide more accommodation for young people.
6.77				Insert a new bullet point Particular regard should be taken of the Chichester Free School , located near Hunston	
SA12	Land North of Park Farm	Bullet Point 1	Insert “and affordable” Object	Provision of a high quality and affordable form of development	We need more affordable homes – there isn’t a shortage of high quality ones.
		Bullet point 3	Change/Object Delete “encourage” and replace with “enable”		The National Institute for Health and Care Excellence (NICE) has stated that pedestrians, cyclists and people using public transport should be given priority when new roads are built or upgraded
SA14	Land West of Tangmere	Bullet point 7	Object and change Delete “Opportunities	Insert Make provision for transport links with the	This wording is too weak and it could easily happen that opportunities are explored and the developer/council wants to avoid costs and not include this.

			should be explored for improving transport links”	Five Villages area.....	
7.2	Housing		Insert and object	This includes housing for families, young people, older people....	
7.7	Housing for Older People		Insert	Housing for older people must be properly designed to cope with high summer temperatures as older people are significantly more at risk from heat. Older housing stock must be adapted as older buildings	https://www.cdc.gov/disasters/extremeheat/older-adults-heat.html
7.11			Insert	Opportunities should be explored to deliver high quality HMOs that appeal to single people who live alone	Old Oak Collective in Willesden, London is an example.

				to use shared facilities (library, music room, laundry, kitchens and entertainment areas). This new type of shared living strengthens bonds between individuals and reduces one impact on the environment.	
7.18	Housing Mix		Support		Support the need for smaller units as there are more single-person households due to the breakdown of traditional family units.
7.25					Support the need for smaller units which are more densely arranged to reduce the need to build on green fields . High density housing close to the city and village centres or public transport links is also better for to reduce our carbon footprint. Ideally housing is more dense to enable more open green space to remain.
			Insert "pollution and noise"	...need to create high quality development that has appropriate landscape,pollution and noise buffersb	
	7.35	Affordable Housing on			Comment – this “local connection” policy should be amended

		Exception Sites			to include step-children step relationships. Justification some people only have step-children and are prevented from settling near them as this is not seen as a sufficient relationship.
Policy DM5		Needs to have another category for refugees or a new policy needs to be inserted in the plan			United Nations are predicting a huge numbers of people will become homeless due to failed harvests, water shortages etc. This will lead to mass migration. We need a policy to start planning for this as we have an open coastline.
7.44			Insert	The Plan must provide an additional swimming pool in the plan area to cater for demand.	
7.50	Transport, Accessibility and Parking		Insert "and bus services"	The availability of car parking and bus services have a role in improving accessibility to necessary local....	
DM8	Transport, Accesibility and Parking		Insert	In order to achieve this criteria, a Local Integrated TransportPlan will be adopted by the Council to ensure uptake of sustainable transport modes	Evidence from the Free School in Hunston is clear that this criteria is unachievable. The risk from the White House Farm development impinging on the Centurion Way is large enough that this criteria could be challenged legally at a later date.

				is achieved	
		Section 4	Change	Insert: Other ultra-low emissions vehicles which should be placed on the road and take away space from pedestrians.	
7.64					
7.101		Object	Change in the second sentence Delete “will be cnouraged”	Developers will implement appropriate mitigation and adaptation initiatives	
7.105		Object	Insert	To ensure that the Council embraces effective energy efficiency and the use of on site and off site renewable energy in all new development	Object to reliance on off-site renewable energy as this wastes the potential of on-site use of roofs, ground source pumps
7.111 and 7.110		Object			Flood resistance and residence measures should be matched with flood prevention measures ie the need to limit our emissions and become carbon neutral by 2030. The level of detail of these sections although practical is not a comfort in that it fails to miss the key point that the Plan should not

					provide for building on the flood plain and many more measures should be included to prevent flooding occurring. Also this level of detail has not been applied to the section on Air Pollution.
7.118					This highly productive farmland should not be developed and is a reason why development SA1 should not be included in the plan.
7.121		Object	Insert “within the SDNPA”	Communities within the AONB and SDNPA have development needs	<p>the South Downs National Park whose villages are threatened with primary school closures, no village shops and decreasing local support for our ageing population in the future unless small-scale social or affordable housing is built for local families priced out of the market. If 10 affordable family homes were built in each SDNP village, we could protect the social infrastructure and family support structure in the park for future generations. In contrast, the villages on the coastal plain have absorbed increasing amounts of housing in recent decades. The different character and individuality of these harbour, coastal and peninsula villages risk becoming merged into anonymous dormitory, commuter suburbs, a trend that will adversely strain both the district’s infrastructure capacity, its social cohesiveness and most importantly the crucial tourist and agricultural sectors.</p> <p>CPRE has highlighted the plight of rural communities that don’t have enough social housing. The Ministry of Housing, Communities and Local Government (MHCLG) data shows there are now 173,584 families on the waiting list for social housing in rural councils. Yet last year, just 1,336 homes for social rent were built in those councils’ areas. CPRE is deeply concerned that communities in market towns and villages across the country are being forgotten by central government. Therefore I</p>

					suggest that the plan is updated to allow more sensitive building of affordable houses in the SDNPA especially supporting those villages whose facilities might otherwise be under threat of closure.
7.121		Object	Insert a sentence	All development in the AONB comes at a risk of making wildlife and biodiversity unviable if wildlife corridors are not maintained.	
7.122		Object	Insert	villages and hamlets should be protected and enhanced and actions brought forward by the Plan to combat climate change in line with Government policy as outlined by the Committee for Climate Change.	https://www.theccc.org.uk/publication/reducing-uk-emissions-2018-progress-report-to-parliament/
7.139		Object	Delete the phrase "Where necessary, the Council will		In order to reduce the need to travel, it would be harmful to restrict the range of goods sold. If people in rural communities don't have so far to travel to access a range of produce this will reduce Greenhouse gas emissions.

			restrict the range of goods sold”		
7.147	Air Quality		Insert	these include but are not limited to; planting, change to cleaner buses, anti-idling campaigns, School Streets, Car Free Days, Car Free Zones, sale of masks to vulnerable sectors of society, making registration to Sussex Air alerts compulsory to major employers in the area and schools, introduction of workplace parking levy policy	More detail is required (along the lines of 7.111)
DM24	Air Quality		Insert	6. Measures to reduce air pollution will be pursued by WSCC and CDC. These measures	Justification is the large number of deaths and illnesses connected to air pollution. Air pollution affects people from the womb to the grave. This plan needs to include more details of how air pollution risks will be mitigated.

				include but are not limited to clean air zones, work place parking levy, cleaner buses, anti-idling zones, School Streets, increasing pedestrianisation of the city centre, adoption of car free day	
DM27	Historic Environment		Insert	6. Development does not harm or damage existing trees and hedges which act as valuable carbon sinks, homes for wildlife, and protect the city from heat.	
DM 31	Trees, hedgerows and Woodlands		Insert	6 A tree planning and hedgerow planning policy is to be adopted by the council to reduce the risk of climate change, offer	

				shade and reduce urban heat effect, reduce risk of flooding.	
DM32	Green Infrastructure	Support and comment	Insert in first paragraph	and the protection and enhancement of existing green infrastructure including Salterns Way, Centurion Way and other existing cycle routes.	
DM32		Support and comment	Insert in point 4	The proposals do not lead to the dissection of the linear network of cycle ways, public rights of way, bridleways and ecological corridors especially Salterns Way, Centurion Way and the Chichester to Bognor and	

				Chichester to Emsworht and Chichester to Selsey cycle routes.	
DM16	Sustainable Design and Construction		Object		<p>Homes Quality Mark 4 stars is not good enough! The Greater Manchester Combined Authority (GMCA) has pledged to ensure that all new buildings erected in the city region will be 'net-zero' carbon by 2028. https://www.edie.net/news/6/Manchester-commits-to-making-all-new-buildings--net-zero--by-2028/</p> <p>Planning policy and building regulations form the framework for standards within which new homes are built. This framework was severely weakened in the past 6 years by the abolition of the Code for Sustainable Homes and further undermined by the scrapping of the Zero Carbon Homes plan. Further, the Written Ministerial Statement (25 March, 2015) stated that:</p> <p><i>'Local Authorities would only be able to require energy performance standards higher than Building Regulations up to the equivalent of Code for Sustainable Homes Level 4'.</i></p> <p>This was implemented at a time when there were plans for Part L 2016 and an update to the Planning and Energy Act 2008. Either statute may have brought forward stronger regulations, but neither has happened as the Government's sole focus at this time is Brexit.</p> <p>Since 2015, in districts outside London, house builders have successfully challenged both local planning policies and planning conditions related to energy standards in new homes. The net result is that in practice, due to councils not being able to condition code 5 as they used to do, the current performance requirement on new homes is typically less than it</p>

					<p>was eight years ago.</p> <p>This under achievement has been exacerbated at Parliament in the past month when the Secretary of State for Housing, Communities and Local Government, was asked whether local authorities can set energy efficiency standards higher than Level 4 of the former Code for Sustainable Homes. The response was:</p> <p><i>“Local authorities may include in their local plans policies which set reasonable requirements for new development to meet higher energy performance standards than those required in building regulations. Policies must not be inconsistent with relevant national policies. The Written Ministerial Statement of 25 March 2015 set out relevant national policy.”</i></p> <p>This question was asked in order to clarify the July 2018 Statement by the Government on Building Regulations:</p> <p><i>“Local Authorities are not restricted in their ability to require energy efficiency standards above building regulations. The Government remains committed to delivering the clean growth mission to halve the energy usage of new buildings by 2030”.</i></p> <p>There has not been an updated Part L (Building regulations) and the legal context explained above establishes Code 4 as the maximum improvement that Local Authorities (outside London) can demand of developers. <u>What was previously set as a minimum standard from which to progress towards Carbon Zero has in reality become the maximum standard enforceable.</u> However, shockingly some councils including Chichester I understand don’t even enforce this low standard and developers are allowed to build homes to building control requirements only.</p>
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					<p>Considering the Government's target of constructing 300,000 new homes a year and at least 1 million new homes in England by 2022 we are at the start of house building boom and, unless the standards change quickly, a worsened environmental disaster.</p> <p>Chichester, as an absolute minimum right now should demand the recommended UKGBC requirement of all new homes going forward so that:</p> <p><i>'new build residential development should achieve reductions in CO2 emissions of 19% below the Target Emission Rate of the 2013 Edition of the 2010 Building Regulations (Part L)'.</i></p> <p>I would hope that an even greater standard, working towards carbon zero, could be set.</p>
DM17	Stand-alone Renewable Energy		Support and insert extra sentence	Insert: The Local Plan will provide space for renewable energy developments including on shore wind and large battery storage.	<p>As Clair Perry, Energy Minister has recently said: 'From power stations to solar panels, the future is local' https://www.energylivenews.com/2019/01/08/clair-perry-from-power-stations-to-solar-panels-the-future-is-local/</p> <p>This means that space in the area has to be found for siting these renewable energy developments. The area has a good wind resource and an excellent solar resource and biomass.</p> <p>Also, provision may be required on the coast for enabling the connection of an off-shore wind farm and other marine generation.</p> <p>Moving to more electric heating and electric cars, so electricity consumption increasing.</p> <p>Space also has to be found for large batteries.</p>

S21	Health and Well Being		Insert	<p>Due to the increasing numbers of people in the local Plan Area,</p> <p>increased health care provision in surgeries and the hospital must be planned for.</p>	
3.2	Vision	Change and Object	Delete “Move around safely and conveniently with opportunities to choose alternatives to car travel”;	Replace with “Take advantage of a full network of joined up, safe, segregated, convenient, direct, and inclusive cycle and walking routes that enable people to chose to travel distances under 5 miles in complete safety without relying on the private car”	<p>We support creation of an integrated and sustainable transport plan for the District especially along the east and west corridors leading into Chichester. This plan should draw upon the ongoing work of the Cycle Forum and the Chemroute’s proposals and be coordinated with WSCC with the goal of introducing high quality and separated cycle links between the villages along the A259 and between Westhamnett and Tangmere and Chichester. The route or routes may include a fast but safe and segregated link along the A259 and along the Westhampnett Road and Shopwyke Road aimed primarily at experienced cyclists and commuters as well as a slower, more meandering and leisurely route north of the A259 (and perhaps the railway). To make these cycle routes sustainable they will need connections and feeder routes from new and existing developments.</p>

					https://www.youtube.com/watch?v=FXZyF1ZXPiY&feature=youtu.be Please see this video which shows how places can be designed with cycle routes that are completely separated from motor traffic, but also protected intersections on busy crossings where cyclists and drivers meet. All of the cycle routes in the video are separated or protected from motor traffic in some way. There are no on-street cycle lanes: "The city does not believe paint is infrastructure."
S6	Affordable Housing Para 5	Object and insert	Where the authority has been satisfied that a proposal is genuinely unable to meet the requirements		The required numbers of affordable housing are simply not being delivered. Reports by the Charities Shelter and CPRE show that developers frequently break promises about the number of affordable housing they will deliver, using a the "viability" loophole. The loophole involves paying high prices for land in the knowledge that the overpayment can be recouped by reducing the obligation to deliver a specified number of affordable houses. The authority needs to be able to challenge any claims of non-viability, and the onus of proof should be firmly on the developer. https://www.thetimes.co.uk/article/loophole-lets-developers-halve-number-of-affordable-homes-8nn3kmcj7 https://www.theguardian.com/politics/2018/mar/03/affordable-housing-rural-england-planning-laws-loophole-exploited-

Comments on Peter Brett Report by Sarah Sharp, City Councillor for Chichester South and Coordinator of ChiCycle

- 1) No modelling for holiday or events – park and ride should be put in place to offer people choice of how to get to events – this is already in place for Goodwood events from the station – “holiday” buses should be put on to ease access to beach
- 2) 5% mitigation due to modal shift is not a big enough aspiration for climate change and health and reducing pollution. This figure should be put back up to 7%
- 3) Change of word “improvements” to “works” as the changes could well have a devastating effect on wildlife and destroy habitat, destroy the rural feel of the area. What a driver might consider an “improvement” in that the journey is shorter, might for other people be the opposite if we are responsible for destroying wildlife, habitat and biodiversity.
- 4) We would support resurfacing of the road surfaces especially near residential houses to decrease noise impacts. Residents of Langdale Avenue were promised improved road surfaces years ago.
- 5) We support uptake of workplace parking levy and bus lanes. We support gradual closure of inner city car parks and changes in charging to make inner city car parks more expensive and reserved for the disabled.
- 6) We support development of a segregated network of cycle lanes and pavements.
- 7) Support of “Healthy Streets” initiatives to restrict access of the most polluting cars. Also “School Streets” where rising bollards limit car access round school drop off and pick up times.
- 8) Section 2.11 refers to lack of community support for the options presented by HE. In effect this documents puts the Southern Link Road and the no right hand turns back on the table after having been roundly rejected by the community.
- 9) Air Quality – we reject the Report’s assertion that air quality will not be impacted by the increase in housing and subsequent extra traffic.
- 10) Support of 20mph on Southgate and closure of crossing to prioritize buses and bikes
- 11) Decision to decrease modal shift requirement from 7 to 5% is regrettable in the light of global warming and need to adapt to reduce the area’s carbon footprint.
- 12) Need for anti rat-running measures in the city to prevent spike in air pollution in the city of Chichester
- 13) Page 62 right hand turns are banned from A27 only .Table 5.3 says dedicated right turn lane off A27 in both directions. There is confusion about what will be allowed in these two tables. We oppose 7.3.6 where right hand turns are banned off the A27. This will mean more carbon emissions in travelling onto the next junction before a fraction of the traffic simply turns round and heads back on itself (not only is the journey length increased, but also the acceleration and deceleration involved are known to increase emissions disproportionately to that length). Also, if the next junction is not a roundabout, then vehicles won’t be able to turn round to access the road they actually want and will probably end up travelling into Chichester in order to turn round in residential streets. The writing on the figure for the Stockbridge Roundabout – Figure 7.5 is unclear so you can’t actually read the notes – there seems to be some impact on the crossing for people on foot or on bikes. IT APPEARS THE WORDS ARE INCORRECT AND

THE FOOTBRIDGE IS GOING TO STAY IN PLACE WHICH WE SUPPORT. The road appears to be much closer to the housing in Claremont Court which would pose a greater risk for people's health due to poor quality air. We would object to these changes if they take away any hedges or trees which are essential to limit climate change risks and clear the air.

- 14) Fishbourne Junction – oppose the closing of the link to Terminus Road as this will bring lorries closer to College and residential area – not beneficial for safety or air pollution. Oppose the impact on hedging and trees.
- 15) Whyke Roundabout – no right hand turns off the A27 would impact on the Hunston Free School. We would object to these changes if they impact on hedging, trees or the bridge which is key to people travelling to and from St Joseph's Hostel and the Free School
- 16) Bognor Road Roundabout – object to any works which take away trees and hedges or the bridge which is a key walking and cycling link between Bognor and Chichester. Most particularly, the bridge is a key walking and cycling link between Bognor and Chichester (both for work commutes and for leisure/tourism). Details of any reworking of this bridge must be illustrated and presented to the public for comment in as much detail as has been given for the road reworkings. The current statement that, effectively, "something will be done" is unacceptable.
- 17) 7.3.16 the new Vinnetrov junction involves diverting the cycle and walking route – this should be done in a manner to make it easier to walk and cycle to Bognor according to NICE guidelines.
- 18) 7.4.1 – missing from this list is Eastgate Square, Westgate, Southgate, New Park and Spitalfield Lane junction (near the University)
- 19) Junction signals on Northgate roundabout (Junctions 5 and 6) – is it a good idea to direct people on bikes onto this fast moving roundabout? Best to put in 20mph on the junctions, also need crossing points for people to be able to get to Metro House.
- 20) We need plans of Southern Relief Road from WHF development – this could also be joining Cathedral Way roundabout which would make it very busy alongside the extra arm for Terminus Road too. The mini roundabout at the end of Westgate and Sherborne Road has insufficient capacity for all the Phase 2 traffic and yet no plans have come forward for this area. Junction 8 drawing doesn't include the Southern Access Road from White House Farm development or the new road to and from Terminus Road.
- 21) Figure 7.15 is unclear
- 22) Junction 11 – this road impacts on the SSI and the river Lavant, is on farmland of value to food security, wildlife and quiet informal recreation and will only lead to air pollution and congestion impacts on the A286.
It would be more important to put in a pedestrian and cyclist footbridge direct from the City Centre to the area to allow direct links for sustainable means. The junction on the Birdham Road would impact the trees and wildlife in the pond.
- 23) The PBA document doesn't include any extra crossings to help pedestrians cross the road – all the works on the different junctions have failed to consider people who walk. The corridor fund to improve the junctions fails to consider the needs of people who walk and cycle.
- 24) Peak hour bus lanes would be helpful as they would make taking the bus the better option than driving.
- 25) Park and Ride is not seen as viable by the PBA report. This is a contestable point of view. Even if it is true now, a site still needs to be secured in anticipation of future changes in travel

patterns, and/or in anticipation of an even more greatly increased population changing the economic viability. This is the whole point of having a Plan, it should plan positively for the future. A park and ride for people travelling to the Witterings in the summer would be an important addition to ease traffic chaos in the summer.