

## **Local Plan Review – Issues & Options Consultation**

### **Commentary on East Wittering/Bracklesham as a location for strategic large scale development (500+ dwellings) per section 3.5.5 of the consultation questionnaire.**

Earnley Parish Council strongly contends that any such proposal for large scale development would be unsustainable in planning terms: the transport and traffic implications would be severe and, because of the dearth of local jobs, such development would only create dormitory settlements.

#### **Evidence & Expert Opinion:**

1. The inspector, Sue Turner, who approved the adoption of the Local Plan, made clear in her report (para 109) that CDC were right, largely on transport grounds, to limit the Local Plan housing allocation for East Wittering/Bracklesham to 180 dwellings. She looked to the government to include the major A27 upgrade in their latest Road Improvement Strategy. However, this has been cancelled and so we are now in a worse position than when the inspector approved the allocation of 180. East Wittering/Bracklesham has already met this 15 year allocation with 186 dwellings either complete or in construction.

2. Besides, it is not at all clear that any of the (now cancelled) proposals from Highways England for major upgrades to the A27 would have helped with traffic leaving and entering the Manhood Peninsula. The proposals favoured the flow of through traffic, which makes up nearly half of the total.

3. Traffic leaving and entering the Manhood Peninsula on the only A road (the A286) is already at “severe” levels during peak hours as confirmed by the WSCC Highways Authority (Appendix 1 to the Clappers Lane appeal - APP/L3815/15/A/2219554). This is in addition to the horrendous levels of congestion and gridlock experienced throughout the peninsula on fine days in the summer, with large volumes of traffic heading for West Wittering beach and with locals trying to avoid this by using the minor lanes. A survey of local businesses, conducted by Birdham Parish Council as part of their adopted Neighbourhood Plan, showed that all such congestion was negatively impacting customer access, staff journeys and deliveries.

4. The western area of the Manhood has lost approximately 400 jobs in the past few years with the closure of the Earnley Concourse, Cobham Aerospace (now a housing development), Northshore Yachts and, most recently, Southdowns Holiday Village. The latter has been acquired by Seawards who are in pre- application discussions with the planning authority for an additional 74 dwellings. What jobs that remain are largely in the lower paid areas of horticulture, tourism, retail and care, many of which are either part time, temporary or both. It is therefore clear that any new residents will have to travel off the Manhood Peninsula for sustainable employment.

5. A survey of some 2,000 job adverts in the local press or online showed that the overwhelming number were in Chichester or in areas to the west or east of Chichester. Details of this survey (carried out over three time periods) were presented at the appeal hearing for the 160 dwellings on Clappers Lane and are available for inspection.

6. Both the Local Plan and West Sussex Transport Plan rightly refer to the need for residents in the western Manhood to travel to Chichester for shopping, leisure and other key facilities, including, in particular, daily trips to secondary schools in Chichester.

7. At the appeal hearing for the proposed 160 dwellings on Clappers Lane, both the transport consultant representing Wates, the appellant, and the transport consultant representing the

Consortium of Western Manhood Parish Councils agreed that traffic levels would be very severe at the end of the Local Plan period in 2029, even with the proposed upgrade to the A27 junctions underpinning the Local Plan and with optimisation of traffic signals to favour local traffic (itself a risk). With regard to the Stockbridge roundabout, the proposal is to convert this into a 4-arm traffic signal controlled junction. The upshot would still be queues stretching back 1.6km during the morning peak hours from the Stockbridge junction of the A27 southwards along the A286 and average delays of some 10 to 12 minutes as well as significant queueing east and west on the A27. Such queues would mean that the “Selsey Tram” roundabout, some 400 metres south on the A286, would be completely blocked (negating any benefits from converting to a lights controlled junction), blocking also the traffic from the Selsey area which accesses the A27 via the B2201 and the A286. Detailed numbers supporting these predictions were presented at the Clappers Lane appeal and accepted by the inspector. The numbers are based on detailed junction modelling carried out for Highways England (then the Highways Agency) by their consultants, Parsons Brinkerhoff. This work has been corroborated by the Jacob’s Transport Study commissioned by CDC. This study also concluded that, even with the mitigation measures proposed in the Local Plan (including transport “smart choice” measures), congestion would continue to increase on the A286 with no significant reduction for the Manhood as a whole (6.5.2 page 57)

8. In support of our case, it is worth quoting in full section 33 of the Clappers Lane planning inspector’s decision letter:

*The analysis demonstrates that the development envisaged in the emerging Plan would, in spite of all the junction improvements financed through contributions, result in very significant queues and delays at the end of the Plan period (in this context modelled as 2031). During the morning peak hour, queues on the A286 are modelled (assuming optimisation of the installed traffic signals) to extend southwards from the Stockbridge roundabout for some 1.6km (across the Selsey Tram roundabout) with average delays of some 9 minutes; queues in both directions on the A27 would be around 1.5km in length with tail backs blocking adjacent junctions to the east and west and incurring delays of 10 to 12 minutes. Such conditions would exacerbate the existing queues and delays, already described by the Highways Authority as “severe”. It follows that the modelled conditions at the end of the Plan could reasonably be described similarly and, consequently, that any measurable additional effect (even otherwise “unnoticeable” ones) might also be “severe”.*

It is true that the inspector accepted (section 35) the appellant’s claim that “a technical solution” to the traffic problems will emerge, citing in particular Highways England’s plan for a major upgrade to the A27, subsequently cancelled.

9. However, no such transport solution is in sight at the moment and therefore any proposal to site further large scale housing development in the area of East Wittering & Bracklesham would be unsustainable and in clear contravention of para 32 of the National Planning Policy Framework, which states that schemes should be refused on transport grounds where the residual cumulative impacts are “severe”. In addition, even were such a transport solution to be found, any large scale development in the area of East Wittering/Bracklesham would, because of the near total lack of suitable employment opportunities and other key facilities, completely fail to meet the stated objective of minimising the need to travel.

10. It could be argued that similar considerations would apply to the proposal for large scale development in Selsey, where the current Local Plan housing allocation has already been exceeded.