## Comment for planning application WSCC/052/20

Application
number
Name

WSCC/052/20

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Type of Comment Comments

Objection

- Traffic growth appears to have been underestimated by as much as 300%. - Claims that traffic modelling is validated are not supported by the evidence. - The design of the A29 Realignment Northern Tie In (A29 NTI) is not safe. - Objectives to reduce journey times and lower traffic levels appear invalid. - Noise and air quality forecasts are invalid for realistic traffic growth. - There is no Cumulative Environmental Impact Assessment (EIA) for the Road and its directly associated housing so that: o The high risk of groundwater flooding has not been fully assessed, o The ecological impact assessment is highly misleading. - The existing community's legitimate concerns that development should be 'in character with the local environment' have been ignored in contravention of National Planning Policy. - WSCC Officers have misled the public on Road Safety. - Charging the public 300 for the 'Environmental Statement' is not acceptable. The Planning Application needs to be withdrawn until these shortcomings have been corrected and then presented for public consultation, together with an independent, transparent audit of the traffic growth projections and modelling. Traffic Growth: 5,500 new homes in Aldingbourne, Barnham and Eastergate alone will put twice as many more vehicles on the roads in this area. A projection, based on the WSCC assumptions for current travelling patterns, would lead to some 5000 additional peak time journeys a day; but WSCC modelling only anticipates about 1000. And this takes no account of a comparable housing development increase in neighbouring areas of Arun. Barnham and Eastergate Parish Council (BEPC) report: "The conclusions from the traffic impact analysis defy any 'common-sense' test as the cumulative impact of SD5 and other planningapproved housing growth and the growing flows of traffic from Bognor Regis will be far higher than stated." (www.barnhamandeastergate-pc.gov.uk) WSCC Traffic Modelling. The fundamental evidence to support WSCC's traffic modelling, such as the baseline assumptions, are omitted from the documentation available to the public. WSCC's claim that the model used has been validated is not substantiated. Journey Times and Traffic on Existing Roads. WSCC's modelling indicates that the Fontwell Roundabout peak operation close to full capacity. With realistic traffic growth this junction will saturate and there will be higher levels of traffic on all roads (particularly Nyton and Barnham Roads, the A29 South from Eastergate and local lanes). All journey times will all increase significantly. Road Safety. The Road Safety Audit (RSA) "site visit was undertaken on 6th July 2020 between 1130 and 1300. The weather was overcast but dry, the road surface was dry. There was a high flow of vehicles on the A29, the flow on Barnham Road was low due to the closure of Barnham Road from the junction with Downview Road." Traffic levels were significantly supressed by Covid-19, mid-day traffic is no measure of peak traffic and the high levels of traffic on local lanes to avoid the Barnham road closure was ignored. The RSA does not meet the NPPF 110 requirement to "give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas" because: - Serious hazards from uncontrolled pedestrian crossings, across the very busy roads linking Fontwell to Bognor Regis, are not recognised. - Hazards to pedestrians (especially children and the elderly), cyclists and horse riders from substantial increases in traffic on adjoining rural lanes without footpaths are overlooked. Misleading Information: The Planning Application description posted on public notices and sent to the local community includes 'signalised' pedestrian and cycle crossings. Only uncontrolled crossings were shown in the detailed plans. When questioned, WSCC advised 'the description was an error'; but the public has not subsequently been informed of this 'error' and has therefore been misled on the critical issue of road safety for the duration of the consultation. Environmental Impact: There is no Cumulative Environmental Impact Assessment (EIA) for the road and the associated housing with which it is directly linked. Flooding: The road, built on the same developer land as the housing has a high risk of groundwater flooding. Arun District Council have advised the developer separately that a cumulative EIA is required for the housing development and road, taking full account of SUDs requirements. WSCC claim exemption from SUDS requirements for the road and have designed flood mitigation for protection of the road itself and a few houses which will be located within 20m of the road at the Eastern end. The potential significant risk to both the associated new housing and the remainder of the existing community is ignored. Noise, Vibration and Air Quality: Noise, vibration and air quality forecasts based on significantly underestimated traffic projections are not valid. The number of properties eligible for compensation is also not valid and almost certainly significantly underestimated. Ecology: The claim that ecological impact is minor is based on the misleading consideration of the relatively small footprint of the road. The associated housing, now the main reason for building the road, has a much larger footprint. The combination of the two will have a devastating impact on the local ecology. The natural habitat for a wide range of wild life, including deer, badgers, reptiles and many species of birds, will be reduce by more than 75% totally changing the character of the area. Visual Amenity: The Noise Barrier design is neither compliant nor consistent with the DMRB and is an

eyesore. In Planning Application drawings the road rises to 2.4m (WSCC Officers advised 1m) at the Eastern end making screening vegetation almost impossible. The video 'fly through' does not conform to the drawings in the Planning Application.

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**Attachments**