

MATTER 15 – 148 NIGEL SMITH

Comments on Questions & Issues raised by Inspector relevant to DM35

Matter 1.1 The A259 MRN (Major Road Network) is the subject of a potential bid for up to £50m central government funding by ESCC due to the limitation of the road and the excessive pressure this places on congestion and journey times. A Freedom of Information request to both ESCC and B&HCC has established that one relevant thread has taken place between these two local authorities in recent years.

1.5 (1) B&HCC have consistently missed climate change targets relating to traffic. Of course climate change is not considered on a front line, accountable basis within planning applications. The majority of planning applications in Brighton & Hove are approved without full transport assessments. Cumulative impact is not considered either in B&HCC's area, nor for the neighbouring area of ESCC.

2.1 There was a determination to propose without appropriate consideration of Infrastructure and impact on the A259 and certain other roads. A culture of avoiding any potential Judicial Review from developers has been at the forefront of B&HCC planning policy and still is. There is a unbalanced reluctance by councillors on the planning committee to reject some unsuitable planning applications through fear of Judicial Review. This has been communicated to councillors quite clearly to the extent that lay residents have understood the instruction.

3.1 (10) Developers have at appeal stage gone to extensive lengths to emphasise B&HCC's failure to meet its housing targets and reduce its shortfall. I participated in one such successful appeal. I backed B&HCC's stance on one particular upcoming site on the basis of DM35, but there were just too many other questionable sites in the SHLAA. In my view, the Examining Inspector was right to conclude that "the lack of flexibility in the housing supply would require very close consideration in the preparation of this plan". The council remains unable to demonstrate a 5 year housing land supply., so surely cannot be said to have met the requirement set within City Plan Part 1 to satisfy the Examining Inspector's expectations. Their attempts do comply have resulted in some highly inappropriate planning applications being approved, many where DM 35 was not satisfied. The pressure of compliance is working adversely on infrastructure and appropriateness.

7.15 (3) There is a wholly inadequate bus service to this site, creating the need for extensive car use. This is the ultimate **fringe** site, where a smaller initial proposal gave way to a much larger planning application, which will put significant additional pressure on the already congested A259, the AQMA in Rottingdean (cumulative impact) and the inadequate infrastructure. The A259 congestion comes in the face of falling bus passenger numbers. This will not improve until the congestion issues on the A259 are alleviated (potentially by current ESCC scoping prior to a potential bid for central funding to improve the flow and timeliness of journeys. Given the distance from Brighton and climatic considerations, cycling and walking are very limited options.

7.16 (1&3) Please see 7.15 (3)

17. All the aforementioned points apply to Matter 17. The plan is positively prepared, but unfortunately it is too positive in its expectations and assumptions, rendering it unjustified and ineffective. The impact on infrastructure is ill conceived. born more out of a need to hit numbers rather than develop appropriately in a manner which allows acceptable and sustainable travel. There is a recognised congestion issue on the A259. This makes a bad problem worse. Surely, knowing that a potential major project is proposed for the A259 Greater Brighton Area, the most appropriate

course of action would be for City Plan 2 to be paused until these potential major works have been undertaken. This is a Plan for the future. Surely any such future plan must pause to include the traffic capabilities of the future.

The following documents are readily available if requested and add valuable support to the issues raised:

The Big Petition (A259) signed by 17,000 residents requesting studies to be undertaken on the A259 MRN to address extensive and increasing congestion. (NS1)

The script which accompanied the presentation of The Big Petition on behalf of 17,000 residents detailing the aims and rationale for The Big Petition to alleviate excessive and growing congestion on the A259. (NS2)

Documentation from the B&HCC Council meetings relating to the A259 and the requests of The Big Petition. (NS3)

Letter from Mark Prior (B&HCC Transport) to Rottingdean Parish Council specifically relating to ESCC's proposal to apply for funds to alleviate the A259 including the major issues within B&HCC's area, together with acknowledgement of the A259 being given MRN status. (NS4)

Email thread (52 pages) between B&HCC officers and councillors relating to A259 congestion. (NS5)

Letter from Rottingdean Parish Council to Geoff Raw (B&HCC CEO) relating to A259, B2123, MRN status for A259 and potential central funding bid for A2259. (NS6)