



EAST WITTERING & BRACKLESHAM PARISH COUNCIL

East Wittering & Bracklesham Planning Position Statement

Background

Local planning policy is governed by the National Planning Policy Framework (NPPF)¹. This places upon local planning authorities a duty to be able to deliver sustainable development in their area based upon nationally directed Objectively Assessed Need targets for housing (OAN). The NPPF places what is known as a 'presumption in favour of development' on all planning applications unless it can be demonstrated that the development would be detrimental to an area.

In order to demonstrate that a development would not be detrimental to an area and in order to manage and control development in a strategic manner all local authorities are required to produce a Local Plan. This must be a robust and clear document that outlines the planning framework and long-term strategy for the area over a 15-year lifespan. The Local Plan in Chichester was adopted in 2015.

The local plan must be regularly monitored and updated in order to show that the planning authority have a five-year supply of land to meet the centrally allocated Objectively Assessed Need.

Chichester District Council began a review of the Adopted Local Plan in 2016 in order to demonstrate they had the land supply to meet the OAN of 12,350 dwellings for the remaining period (2016-2035). This means that the council must be able to demonstrate that it has sufficient sites allocated or in development to deliver 628 houses per year.

Chichester District Council is tightly constrained in the areas it can allocate for housing development as the majority of the district is located within the South Downs National Park (SDNP). The SDNP is its own planning authority and is therefore excluded from the Local Plan Area. In the remaining southern area of the district the Chichester Harbour AONB, Pagham Harbour SPA and Medmerry Compensatory Habitat are also excluded from development. This leaves a very limited area of land for housing allocation and inevitably squeezes development into a limited number of areas within the City, on the East-West corridor from Tangmere to Southbourne and on the Manhood Peninsula. Potential sites for development are assessed via a Housing and Land Availability Assessment (HELAA)² and then preferred sites from the HELAA are selected and allocated for future development. CDC have lobbied the government to take into account these limiting factors when allocating housing numbers via OAN, but to no avail.

Delays and cancellations to the A27 road improvement scheme have hindered the Local Plan Review as many of the assumptions around road capacity that informed the initial site allocations and transport capacity work had to be abandoned following the scrapping of the scheme by central government. Similarly, the introduction of new rules around nutrient neutrality in the waters of the Solent introduced by Natural England in June 2019 added further complexity to the allocation of sites.

This has caused completion of the Local Plan Review to fall behind schedule and as of July 2020, CDC could no longer demonstrate a five-year land supply to deliver the OAN of 620 dwellings per year.

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

² <https://chichester.gov.uk/article/29759/Housing-and-Economic-Land-Availability-Assessment>

This means that any new planning applications received by CDC will now have to be assessed against the NPPF, which states that

“where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, grant(ing) permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

The lapsing of the Local Plan leaves communities vulnerable to speculative applications from developers looking forward to bring forward sites that were included within the HELAA assessments and therefore identified as sustainable – they could argue strongly that they would not be detrimental to the area as they have already been identified by the authority as suitable for development, they have just not yet been allocated.

Proposed Changes to Planning Policy and Law

The government recently released a white paper³, ‘Planning for the Future’ proposing changes to planning law. This will essentially dispense with local district and parish council scrutiny of individual planning applications, instead moving to a ‘zoned’ system where land is designated as either ‘development’ ‘renewal’ or ‘protected’. Building in development and renewal zones will be automatically permitted, subject to meeting local design codes and guidance, whilst development in protected zones will be prohibited. It is likely that the parish would be zoned as either development or renewal land. The proposed changes would fundamentally alter the relationship between developers and local communities and make it much harder for local communities to resist development or influence the type of development.

In addition to the white paper which outlines potential changes to the planning system, the government also advised of proposed changes to existing planning law to come into effect later this autumn⁴. Of particular concern in those proposals are the following:

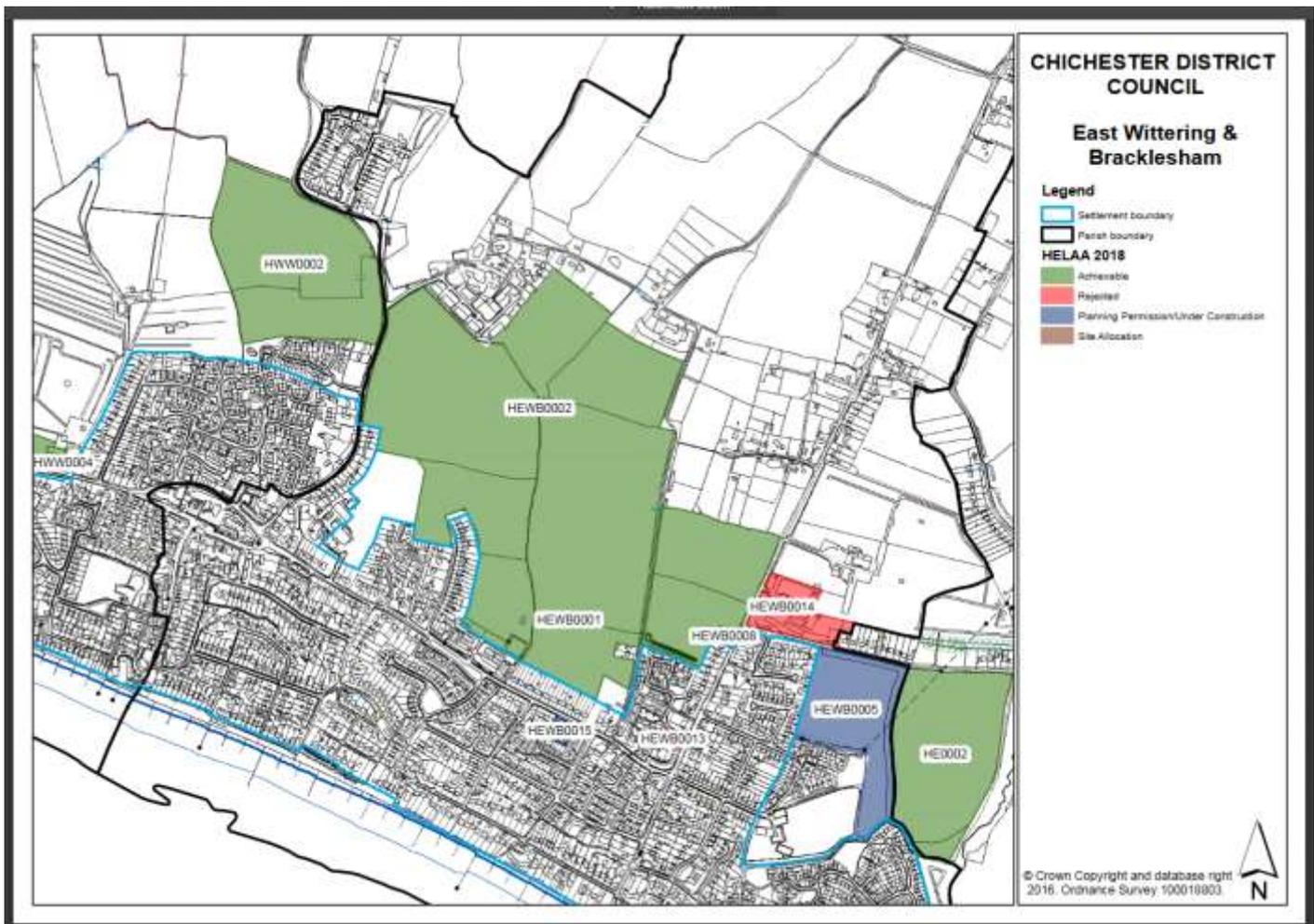
- i. Changes to housing numbers assessment criteria; this may result in an increase in the number of houses required for Chichester District, putting more pressure on local communities to accommodate additional development.
- ii. Changes to the S106 obligations for small developments – this would remove developers from the requirement to provide affordable housing units in developments of up to 50 properties (currently it is up to 10).
- iii. Changes to the rules around granting permission in principle to include developments of up to 150 properties; with the Local Plan currently out of date this may lead to ‘in principle’ applications coming forward in the autumn for land that was identified in the Local Plan HELAA assessments as ‘suitable’ for development.

The Scale of the Threat

The current HELAA for the parish identified a number of sites that were potentially suitable for development. They are identified on the following map (we understand this is under review by CDC):

³ <https://www.gov.uk/government/news/launch-of-planning-for-the-future-consultation-to-reform-the-planning-system>

⁴ <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>



Since the publication of the planning white paper and the proposed changes to planning laws on 6th August, we have had approaches from developers to discuss bringing forward the following sites:

HE0002: Seaward Properties, 100 properties

HEWB0001/HEWB0008: Liz Lawrence Planning, between 70 and 276 properties depending on extent of land developed

HWW0002: SP Broadway, 220 properties

In addition, Barratt Homes hold options on the land at HEWB0002 for up to 900 properties.

In a worst-case scenario the parish and adjoining communities are vulnerable to up to 1,500 new homes coming forward with no protection afforded from the out of date Local Plan. An increased risk is that following the changes to planning law coming in this the autumn, the sites are broken up into smaller parcels and brought forward piecemeal in order to avoid S106 infrastructure and social housing obligations. This would be a worst-case scenario for the community leading to over-development with no supporting community improvements, benefits or infrastructure.

Sustainable Development for the Community

In the adopted 2014 Local Plan the Parish was given a housing allocation of 180 properties. This allocation of new housing was delivered by 2019 via schemes at Beech Avenue, Clappers Lane, Stocks Lane and at the Royal Oak.

In the draft Local Plan Review the housing allocation for the Parish was increased to 350 properties (i.e. a further 170 properties over five years). The redevelopment of the Southdowns Holiday Camp site (80 dwellings) would count

towards the delivery of these additional properties, leaving a requirement for a further 90 properties to be delivered over the next five years.

The parish accepts that some level of ongoing new development is inevitable now that the Local Plan is out of date and that it is unrealistic to expect that we can prevent all new developments. The focus for the Parish Council must be in attempting to ensure that development is proportional, meets the housing needs of the local community and that all new developments contribute to the delivery of better facilities, amenities, services and infrastructure within the Parish.

As at 03/09/20 there were 64 families from the parish on the CDC housing register waiting for affordable social rented accommodation:

Households on the housing register with a local connection to East Wittering and Bracklesham Parish as at 03.09.2020						
Band	1 bedroom	2 bedroom	3 bedroom	4 bedroom	5 bedroom	Total
A	2	-	-	-	-	2
B	2	-	1	-	-	3
C	4	2	5	2	-	13
D	17	18	10	-	1	46
Total	25	20	16	2	1	64

Additionally, there were 82 individuals receiving Housing Benefit to help them meet the cost of their private rental accommodation who may also benefit from secure tenancies in social rented properties. Finally, we know that at the end of July 2020 180 residents were receiving Universal Credit, although it is not possible to ascertain how many of these were in receipt of the Housing element of the benefit. This demonstrates that there is a latent demand in the parish for affordable socially rented properties and therefore we will seek to prioritise the delivery of these units in any new developments that are proposed.

With that view, we will seek to actively engage at an early stage with all developers to advocate for our residents and ensure that any schemes that are brought forward incorporate elements that improve the community for all. We will attempt to limit the scale and scope of new developments to a manageable level, whilst accepting that our ability to do this is severely constrained.

Our approach to Future Development

The parish council will continue to uphold our most recent response to the District Council Interim Planning Statement as the starting point for our consideration of all new developments and to argue strongly that any proposals for further large-scale development would be unsustainable. The objections that we first made to the Beeches development in Clappers Lane in 2014 are even more significant now. We pointed out the transport and traffic implications at the time and these issues will continue to be problematic until improvements to the A27 are put in place. The dearth of local jobs in the area can only be detrimental to the transport issues.

Severe Traffic Impact

Our primary objection is due to the impact new development will have on the already critical traffic situation on the A286 at the notorious A27/Stockbridge Junction and junction of the A286/B2201 at the former Selsey Tram.

Both suffer from long tailbacks at peak times and at peak summer weekends due to traffic for the popular beach at West Wittering. Traffic backing up here can and does impact upon the safety and operation of the strategic road

network, in particular the A27/A286 Stockbridge Roundabout. Any further development in the parish will increase severely the problems of this well-known local bottle neck.

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, 2014). 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 back lanes. In 2019 West Sussex County Council imposed an experimental traffic order closing some roads to all but local residents on busy weekends in an effort to try and manage the influx of traffic, although results have been mixed.

The inspector, Sue Turner, who approved the adoption of the CDC Local Plan in 2014, 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 was subsequently cancelled and so we are now in a worse position as we have delivered the housing without the infrastructure to support it.

We believe that none 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 only half of the total.

In addition, there is limited capacity within the villages for additional large scale developments without it impacting negatively on safety and air quality. Church Road is one of only two roads out of the village and is already dangerous at school drop off and pick up times, does not have the capacity to accommodate an increase in traffic from large scale development of the adjoining fields and is not suitable for heavy construction traffic.

Bracklesham Lane is a well know accident and speeding blackspot and has seen an increase in usage from the 110 homes developed at the Beeches who have no choice but to exit on to the Bracklesham Lane and from the old Southdowns holiday camp site, which has begun construction of a further 80 units.

The western area of the Manhood has lost approximately 400 jobs in the past few years. Cobham in Stocks Lane closed three year ago with the loss of local jobs and the land has now been used for retirement dwellings. Other significant local employers that have closed or relocated in the last five years include:

Earnley Concourse

Castle Printers

Blakes Off Licence

Bramber Nurseries.

Southerley formerly North Shore Yachts.

(Units at Birdham Pool being converted to holiday accommodation)

Royal Oak Public House

Southdown (or Richardsons) Holiday Village. *Site approved for 80 dwellings, reserved matters approval granted and site clearance due to start imminently.*

Tudor Catering

Pro-force

The loss of local employment opportunities will undoubtedly be felt even further as a result of the COVID-19 crisis due to the high proportion of local jobs in the hospitality and tourism sectors – working age residents claiming out of work benefits in the ward have increased from 60 in February 2020 (2% of the working age population) to 180 in July 2020 (6.5% of the working age population) and we expect this to increase further as the government furlough scheme begins to unwind.

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.

A survey of some 2,000 job adverts in the local press or online in 2014 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.

Both the Local Plan and West Sussex Transport Plan 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.

At the appeal hearing for the development 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 then proposed upgrade to the A27 junctions underpinning the Local Plan. 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 gridlocked, 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. We understand that as a part of the Local Plan Review CDC are completing further transport and traffic modelling work, but this has not yet been completed and no mitigation proposals have yet been finalised.

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.

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 109 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.

Chichester and the A27 are six miles away from Bracklesham along the B2198 and the A286. The natural egress for the West Manhood is the notorious Stockbridge Roundabout. Long delays are a daily occurrence with traffic queues often stretching back almost as far as the Dell Quay turn off at peak times. No matter what improvements are implemented to improve the roads within the West Manhood, the problem with the bottleneck at Stockbridge remains.

There is therefore no likelihood of an improvement for commuters from the West Manhood to Chichester and beyond. Every addition to the population in this area increases the problem. There are also other significant developments on the West Manhood peninsula that require movement through Stockbridge roundabout that are either actually being built or are planned.

Between 2012 and 2019 a total of 162 new dwellings were delivered in the village across major and windfall developments. In addition to this the following developments are in progress and due for completion within the next 12-24 months:

Royal Oak: 10 dwellings

Elm Close, Old Post office: 4 dwellings

Middleton Close: 9 dwellings

Southdowns/Richardsons: 80 dwellings

By 2022 this will give a total cumulative new housing figure over the 10-year period 2012-2022 of approximately 255 dwellings.

The **cumulative effect on the traffic has already been dramatic** and the knock-on implications of future developments in this parish and for the West Manhood/A27 access will be unacceptable. Historically, as each development is taken on its own merit, the additional load of each smaller development is deemed to be acceptable but does nothing to help improve the road surface or network as a whole. The capacity of the road is already frequently exceeded due to the cumulative effect of 'smaller' developments which have been built in recent years, yet there is no significant improvement planned.

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Air Quality

The continuous volume of traffic also severely affects air quality and the A286/A27 roundabout junction has already been designated by Chichester District Council in July 2006 as an Air Quality Management Area because it failed the Government's air quality standard for nitrogen dioxide.

The UK government was found by the European Court of Justice (ECJ) to be in breach of legal limits for air pollution in May 2018, so developments which add to worsening air quality will be in breach of internationally recognised safe air quality standards and in breach of international environmental treaties and laws.

The National Planning Policy Framework states that, *“Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.”* (Paragraph 181) and further development in the area would be in clear breach of this policy.

Future development

Housing growth in East Wittering and Bracklesham should be contained by clearly defined settlement boundaries. The Parish should retain its rural character and setting. Accessibility to and connectivity between the existing network of footpaths, bridleways, cycle ways and other outdoor recreational and leisure assets should be improved.

We do not believe that the parish is a suitable location for large scale development. East Wittering & Bracklesham is currently designated as a settlement hub, largely for historic reasons that no longer apply. We no longer have any banks (having previously had four), all of our major local employers (including Richardsons Holiday Park and Cobham Engineering) have closed and there are now no significant local employers within the Parish. We have one medical centre, which is located in and shared with West Wittering, and one primary school, as do the neighbouring villages of West Wittering and Birdham. The village centre incorporates the Parish boundary with West Wittering, splitting retail businesses across the two parishes. We contend that we are now a service village and not suitable for further significant developments.

Bracklesham should be designated a Service village. Any proposals that will result in the loss of commercial use should be resisted and expanding existing tourist use should be supported provided the scheme makes provision for additional car parking.

Character of the area

East Wittering and Bracklesham Parish is a rural area and seaside holiday destination. There is a large number of holiday caravans and other holiday accommodation in the parish and adjoining parishes. Part of the area's character is that it does not have much in the way of industrial estates nor business parks. Many shops and food outlets only survive because of the very large number of holidaymakers. It is essential that this character is maintained for the economy of the area.

East Wittering and Bracklesham Parish and Village is located in the south west area of

Chichester District Council on the West Manhood Peninsula within the county of West Sussex. Close to the historical market town of Chichester itself, seven miles distant, the village is located in a relatively isolated and tranquil seaside rural area of the county, the nearest main roads being the B2198 and A286 and the main line railway station being located in Chichester. Bracklesham is normally reached via a seven mile “cul de sac” country road as it is not on any through road to any other place of significance. East Wittering has official recognition as a tourist area of peace and tranquillity. The neighbouring areas of Somerley and Earnley contain conservation areas, which form two of the main approaches to the parish.

It is inappropriate to build a large housing development in this location which will be detrimental to the rural aspect which is so important to our tourism economy.

The National Planning Policy Framework States:

“The planning system should contribute to and enhance the natural and local environment by:protecting and enhancing valued landscapes ..., preventing developments contributing to ... unacceptable levels of soil, air, water or noise pollution...” (para 170)

Primary School

Many parents who live in East Wittering and Bracklesham choose to send their children to schools outside of the area, an example being minibuses leaving the area daily with children who are of a Catholic faith. In recent years East Wittering School's capacity had been increased to service the demand of Selsey's rampant house building programme; minibuses and taxis ferry children from Selsey and back each day.

However further possible impact upon the school will obviously arise when the cumulative effect of housing on the Manhood is taken into account because all of the other schools on the Manhood are full. They are virtually full and they have little or no space on their sites to expand for the erection of temporary buildings. The result will be that no spaces will be available at any of these other schools for parents resident in our parish who would prefer not to use East Wittering School. This will obviously also apply to parents resident elsewhere on the Manhood peninsula. They face funding and arranging their own transport to another school which will most certainly be off of the peninsula, or have to accept a place at East Wittering School. It is obvious therefore that placing more dwellings in this parish will impact on East Wittering School because the surrounding schools are already full.

The National Planning Policy Framework (NPPF) states:

It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. “ (paragraph 94)

It is not appropriate to expand the number of family houses in an area with few primary school opportunities.

Secondary Schools

All secondary age children have to travel at least to Chichester or Selsey. School children have to leave this Parish before 8am to arrive in time for school at 9am, with young children spending considerable time on the bus sitting in traffic jams.

Sewerage

For years residents here have complained about the sewerage system. In recent years tankers have transported sewage on four different occasions from the pumping station in Church Road to the pumping station in East Bracklesham Drive. A local resident, who had been in correspondence with Southern Water for some time about the problem, received an email dated 20th July 2012 from them (Southern Water's ref. CCMS 220575), part of which is quoted below:

“The main did burst over the weekend and is now in the top five for replacement. We are currently evaluating the costs and the feasibility in comparison to other prioritised work.”

On Friday 13th July 2012 at about four o'clock in the morning raw sewage began to run out of a pipe in Charlmead, East Wittering, into Hale Farm Rife and subsequently, through an outfall pipe, into the sea. There was a distinct smell of sewage in Charlmead and on the beach – a blue flag beach vital to the local economy. The Parish Council reported this to the Environment Agency (reference no. 1014351) and to Chichester District Council who had not been informed by Southern Water. The Environment Agency and CDC contacted Southern Water and the flow was turned off on the 16 July. But by then it had been running for four days. The rainfall over this period had been only moderate.

Waste from East Wittering and Bracklesham, along with all waste from the Southern Manhood Peninsula, is processed at the Water Treatment Works (WTW) at Sidlesham. Planned developments across the area that have already received planning permission mean that the operating capacity of the WTW is now exceeded, without the introduction of any further developments. The site is also situated at 4m AOD and therefore liable to flooding under modelled predictions of future sea level rise and tidal flooding events. Until these very fundamental issues can be resolved there is not sufficient waste water infrastructure to support further development.

Sustainability

One would imagine that the word 'sustainability' would mean a community that is self-sufficient and does not need to rely on resources from other areas in order to survive. East Wittering and Bracklesham form a seaside community which is heavily reliant on seasonal trade, the weather and its unique setting as a largely unbuilt up area surrounded by farmland to the North and the sea to the south where tourists are eager to spend their holidays. It depends on its location for its success, particularly as there is no industry in the area. Past developments have already led to an unnaturally large conurbation regardless of the lack of resources in the area.

The National Planning Policy Framework states that:

"The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs" (Para 7)

The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in the National Planning Policy Framework (NPPF) taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system.

There are three dimensions to sustainable development: economic, social and environmental.

These dimensions give rise to the need for the planning system to perform a number of roles:

an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Significant new development within East Wittering & Bracklesham would fail on these points because it fails to contribute to protecting and enhancing our natural, built and historic environment.

These roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.

Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to): making it easier for jobs to

be created in cities, towns and villages; moving from a net loss of bio-diversity to achieving net gains for nature; replacing poor design with better design; improving the conditions in which people live, work, travel and take leisure; and widening the choice of homes.

Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.”

The South East Plan

Two of the bullet points from the **South East Plan** on *p5* are:

“Focusing development on regional hubs”

and

“Supporting the vitality and character of rural areas whilst protecting valuable natural and historic assets”

This area is a rural – despite its official designation – seaside area that attracts tourists for the very reasons noted above. It is not a development hub and never can be. A hub indicates being at the centre of an area, yet Bracklesham only has one side – North. The more development there is here the more it detracts from the “vitality and character” of the area.

Climate Change and Coastal Flooding

Sustainable locations need to be defined as sustainable for the long-term. The latest government Flood and Coastal Erosion Risk Management Strategy⁵ published in July 2020 states that “*We will maintain and enhance our planning policies that direct new development away from areas at risk*”. The Environment Agency advises local authorities to plan for flood and coastal risk up to 2065.⁶ NPPF states that “*inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)*” (Paragraph 155). Until a strategic Local Plan has been produced which fully accounts for the latest sea level rise predictions on the south coast and in line with CDC’s declaration of a Climate Change Emergency, sites close to the coast and less than 7m above sea level should be considered inappropriate for development and avoided as not being sustainable in the long term.

Adverse impacts of development should include the reduction of future climate mitigation flexibility. No new development should be permitted on sites which could be inundated due to rising sea levels within the next 100 years – such sites are no longer considered sustainable by most scientists. “Multiple time horizons need to be considered to arrive at intergenerationally fair, affordable solutions towards sustainable resiliency. The tendency to deny current coastal flood risks and future rising risks due to sea level rise must be overcome. We must use the best available scientific, technical, and socioeconomic data and methods to inform a proactive instead of a reactive political process. Sustainable resiliency, climate change adaptation, and mitigation must become core principles of our collective behaviour.”⁷

Section 6 and 7 of the NPPF specifically mentions Sites of Special Scientific Interest; irreplaceable habitats, and areas at risk of flooding or coastal change. Due to the known vulnerability of the Chichester coastline to sea level rise, sites close to the harbour or within one mile of the open coast should be precluded from development until an updated

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/903705/flood-coastal-erosion-policy-statement.pdf

⁶ <https://www.gov.uk/government/news/environment-agency-publishes-new-evidence-to-plan-for-flood-and-coastal-risk-up-to-2065> <https://www.gov.uk/government/publications/flood-and-coastal-risk-management-in-england-long-term-investment/long-term-investment-scenarios-ltis-2019>

⁷ <https://journals.sagepub.com/doi/pdf/10.1177/0096340215599777>

Strategic Flood Risk Assessment of the Chichester District has been undertaken factoring in predicted sea level rise over the next 100 years. The area's existing wetlands are of national and international importance both because of their biodiversity and their high capacity to absorb CO₂. Sea level rise will result in coastal squeeze and loss of irreplaceable wetland without the ability for it to move inland.⁸

Settlement hierarchy needs to be adjusted to reflect the fact that Chichester's coastal and harbour communities will face materially increased, possibly catastrophic, flood risk by 2065. CDC may need to consider relocation of some communities in the future so should significantly restrict any expansion of coastal and harbour communities as soon as possible.

Density levels should also reflect the physical ability of the site to absorb/drain flood water, whether caused by ground water, surface water or fluvial or coastal flooding. Recognition needs to be given that sud systems become compromised where water tables are high.

Highways access needs to consider where residents likely will be working and/or seeking higher education/training and what other commuter choices are available including different road options, congestion issues, public transport and cycling facilities and distance. Settlements accessed by only one road, with no train facilities and more than a 20 minute cycle ride to Chichester should be considered as isolated and remote. This reflects the fact that the 2014-2029 CLP limited housing numbers due to traffic congestion issues and inadequate road capacity in the district.

As a council that has declared a Climate Change Emergency, CDC should be taking significant note of emerging planning policies and guidance relating to climate mitigation particularly regarding flood risk and CO₂ emissions.

"...in accessible AND SAFE locations." Development proposals shall be in accordance with the District Council's declaration of a Climate Change Emergency. Safety from future flood risk is a critical planning aspect which needs to be included in the Interim Housing Policy Statement due to Chichester District's particular vulnerability to catastrophic flood risk from rising sea levels. In 2001 Dutch and British planners and water/coastal engineers described all land below 5 metres on Chichester's coastal hinterland as 'unsafe' for development due to fluvial and coastal flood risk.⁹ Since 2001 predicted sea level rise has increased significantly. Until a comprehensive and updated Strategic Flood Risk Assessment has been undertaken for the district in line with current predicted sea level rises and expected planning guidance changes, only sites above 7 metres above sea level should be considered as sustainable sites for new development.¹⁰ A Swedish lidar study warns that future inundation in the coastal areas of the South East of England needs to be factored into a long-term planning strategy. The study includes the Chichester coastal plain, which is particularly vulnerable.¹¹

In the absence of a Local Plan, settlement hierarchy must take into account CDC's declaration of a Climate Change Emergency, recent advice from the Environment Agency, Parliament and the Committee for Climate Change about the need for long term flood risk planning, and the reduced sustainability of any settlements which face significantly increased flood risk this century. The House of Commons Environment Food and Rural Affairs Committee last year urged local authorities to take a more proactive approach to planning in coastal areas and avoid inappropriate development in areas at risk from future flooding or erosion.¹²

Infrastructure should include flood mitigation and flood defence infrastructure that will be required for the lifetime of the development. In the case of housing this should be for at least 50 years in line with the Council's declaration

⁸ <https://www.carbonbrief.org/restoring-soils-could-remove-up-to-5-5bn-tonnes-of-greenhouse-gases-every-year>

⁹ *Going Dutch on the Manhood Peninsula*, West Sussex County Council and Nirov, the Netherlands Institute for Planning and Housing, 2001, p 27

¹⁰ <https://www.climatecentral.org/news/ipcc-predictions-then-versus-now-15340>;
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/827611/Exploratory_sea_level_projections_for_the_UK_to_2300_report.pdf;

¹¹ <http://lup.lub.lu.se/luur/download?func=downloadFile&recordId=8937311&fileId=8937312>

¹² <https://publications.parliament.uk/pa/cm201920/cmselect/cmenvfru/56/56.pdf>

of a Climate Change Emergency and the Environment Agency's and Committee for Climate Change's recommendation for long term flood planning.

Developers must include in the Sustainability and Design and Access statements evidence that the development site will be free from flood risk until 2065 in accordance with EA recommendation.¹³

Development should be located with reliable vehicular and public transport or cycle accessibility to Chichester or the nearest settlement with employment and higher education/training facilities.

All flood risk assessments should be informed by the most recent climate change allowances and sea level rises published by the Environment Agency. For sites close to the harbour or within one mile of the open coast a precautionary approach will be needed to allow for variance in sea level rise predictions. The EA currently predicts sea level rise of up to 1.6 metres for the south east coastline by 2125 but it states that predictions will have to be constantly be revised. US based Climate Central predicts sea level rise of up to 3 metres by 2110 at current CO2 emission levels. This would result in continual inundation of sea water across the Manhood peninsula and in all the coastal and harbour settlements.¹⁴

Conclusion

The interim policy statement suggests major development on agricultural land, impacting on the rural nature of the community. There are major considerations concerning the environmental impact to the area regarding flooding, road safety, traffic, sewage, economy and landscapes of historical significance.

Sustainability is difficult to justify given the rural nature of the location, particularly given the large number of houses being made available to first time buyers and those on low incomes by implication needing work locally.

The major issue however is the impact on the peninsula overall. The lack of facilities such as overburdened Doctors, dentist, school, transport access and parking, sewage, flooding and the impact on tourism. A large number of developments have already taken place or are in progress and the combined effect on the local environment is now significant. Until there is an overall plan taking these factors into consideration there should be no further development.

¹³ <https://www.gov.uk/government/news/environment-agency-publishes-new-evidence-to-plan-for-flood-and-coastal-risk-up-to-2065>

¹⁴ <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances#table-3>
https://ss2.climatecentral.org/#12/50.7693/-0.8715?show=satellite&projections=1-K14_RCP85-SLR&level=3&unit=meters&pois=hide