

Manhope response to Local Plan Submission.

Manhope is a local interest group and represents more than 500 residents and users of the Western part of the Manhood Peninsula (WMP); the part of the district at greatest risk from climate, travel and infrastructure challenges.

Our sole purpose is to protect the unique character of the Western Manhood Peninsula by opposing inappropriate and unsustainable large building developments before the necessary infrastructure is actually in place.

We are not sufficiently au fait with the policies to be able to use the clause by clause “speech bubble” approach to comment. Therefore, our response is by way of email as suggested by our MP, Gillian Keegan in her letter to residents in February this year.

We understand that only three topics are open for comment in respect of the proposed Local Plan submission.

1. Is the submission legally compliant?
2. Is the submission 'sound'?
3. Does the submission comply with the Duty to Cooperate?

We are not qualified to comment on either 1. or 2. so these comments will address the question of whether the proposed submission is sound.

Chichester District Council has, quite rightly in our opinion, placed no demands for further large developments in the WMP apart from windfall sites. In our opinion even these should NOT be approved until the caveats shown in our Conclusion are implemented.

The following subjects have been well aired so we will not dwell on them in great detail but will summarise them as follows.

Transport.

The transport network serving the CDC area is already unable to cope at peak times and groaning at most other times. The A27 frequently gets headline recognition and from a strategic national point of view rightly so. The various arguments are again well rehearsed elsewhere especially from other local interest groups such as MPAG, SOSCA and the Harbour Trust and we support their submissions in this respect.

It is sufficient for us to say that if it was recognised that mitigating measures were required to cater for the huge increase in developments then it follows that the absence of such mitigation should halt completely such development. That is just pure logic.

Everyone who lives, works, uses or visits the WMP knows that having left behind the A27 they have not left behind the traffic problems. The obverse has become the “new norm” with the most minor hold up, such as refuse lorry, slow moving device or minor road works causing substantial delays and queues sometimes up to eighty vehicles long

The system whereby WSCC highways review the impact of planning applications is dysfunctional.

This is evidenced by WSCC highways department being unable to provide accurate feedback to the LPA as to the ACCUMULATIVE impact of very large developments. The modelling simply does not allow it and there is no scope for actual local experience or common sense. In not one case of over twenty applications for ten or more houses have they even flagged a cautionary note about this accumulative impact.

For example many - actually most - accidents are not reported so the West Sussex Accident Location Map so this source often used by planners and developers to demonstrate how safe our local roads are, is dangerously misleading. Many life changing injuries have been sustained and known about by local people in the WMP but virtually none of these appear in "formal records"

Flooding.

Because of the low lying and vulnerable southern part of the district the findings and implications of the CDC Level 1 Interim Strategic Flood Risk Assessment (December 2022) need to be fully understood by parishes, councillors and local residents before comments of any real value can be made. We asked five elected or formally appointed local representatives and not one felt they had a full grasp of the SFRA's implications and only one had a fair understanding.

We do know that the risk of significant flooding has increased. We also know that even before the SFRA was published the West Sussex County Council Lead Local Flood Authority gave a thumbs down to two of the large applications B 21/01830/OUT in Birdham and EWB22/02214/FULEIA.

CDC have recognised that the Manhood Peninsula has specific challenges including flood risk hence the zero requirement for housing in the WMP. In this respect we think the submission is probably just sound enough and hope that this approach filters through to decisions for applications yet to be determined.

However, to be certain of real soundness the work needs to be completed BEFORE implementation. Please see our notes under "Conclusion"

Sewage.

There can be no doubt that this subject must impact whether the submission is sound or not. The arguments are complex and lengthy but two basic simple facts remain.

1. The main sewage plant for the Manhood Peninsula is Southern Waters Siddlesham WWTW. This plant is a couple of metres AOD and yet planners, the EA and developers argue as to whether four or five meters is an appropriate floor level on new developments. Hardly a sound approach when the treatment works will have been inundated well before even a three metre threshold will have been reached. One example of these discussions can be seen at E 22/03125/OUT for 100 houses
2. Southern Water have a policy of deploying large road tankers when heavy rain is forecast to standby local sewage points as there is a high risk of the system being overwhelmed. Frequently the drivers have to stay in their cabs all night.

Yet Southern Water are obliged to advise the LPA that they can deal with the additional load from huge new developments. Neither CDC nor the Inspector can solve the sewerage infrastructure issues but the above facts raise serious doubt as to the soundness of the submission. Please see our further notes under "Conclusion"

Conclusion.

Manhope recognise the real imperative of having a local plan in place and is appalled that the system has resulted in a colossal amount of work for the LPA and yet still a disastrous delay in getting this in place let alone full and proper consultation with parishes and local people. Further delay in the submission of the local plan is therefore wholly unacceptable so our uncomfortable is that the submission, whilst barely sound, is as sound as it can be and should go forward BUT with some very clear caveats. Our suggestion for these are shown below.

- A. No new developments of ten or more dwellings shall be **commenced** until suitable mitigating road improvements to the A27 are in place.

- B. No new developments of five or more dwellings shall be approved by the LPA until the following reports, work and maps have been completed and due consultation has taken place with residents & parishes, (in line with the latest government approach to restoring local democracy).
 - a. Environment Agency flood maps based on the Interim SFRA (December 2022) have been completed.
 - b. Sewage infrastructure work as yet unknown in Southern Waters upcoming Asset Management Period to be in place before any development of 5 or more dwellings are approved.
 - c. Full and proper engagement with NHS as to practical limits on health demands as a result of new housing developments especially on the Manhood Peninsula. NHS's advice was ignored by CDC and a planning inspector for a 70 house development (WW/20/02491/OUT) so they have not responded to further consultation requests. Vis EWB 22/02235/OUT and EWB 22/02214. This cannot be allowed to happen again.
- C. Insert a policy in the submission that CDC planning reserve the right to apply their discretion in planning decisions when consultees provide advice that is contrary to public and parish experience. ie Where formally submitted local and Parish advice given in their written response to planning applications is not aligned to other consultees then take the Parishes advice. To avoid using this discretion is not consistent with exercising a duty of care.
- D. A policy written in the final submission to assemble a consortium of stakeholders to conduct a full survey as to the condition of Pagham Harbour. The scope would cover impacts on marine and land-based environments from chemical, micro plastic and sewage contamination of the harbour and it's immediate coastline. Stakeholders would include Natural England, Environment Agency, CDC, Southern Water and the R.S.P.B. It is highly likely that Pagham Harbour is traveling a parallel downward path as Chichester Harbour in terms of condition but no stakeholders are paying this anything like the attention it deserves.

March 2023.