

**Sustainable Development which does not compromise the lives of Future Generations**

**The Voice to the West of Chichester**

**Local Plan 2021-2039 – Reg 19 Consultation – Observations/Comments/Objections**

**Executive Summary**

The Local Plan as written lacks ambition and vision, and will be detrimental to the landscape within which the district lies. It is a plan borne out of a need to produce a legal document which will satisfy the regulatory authorities. In terms of Urban Planning it fails “To meet the needs of the present without compromising the ability of future generations to meet their own needs” (NPPF).

The development that will consequentially arise from the deployment of such a made Local Plan is not **sustainable**. It will adversely affect the Character, Amenity and Safety of the built environment, throughout our district.

In particular, the Local Plan is inadequate for the needs of the people in the district both at present and in the future because –

1. It has been written in advance of the District having a properly formed and agreed Climate Emergency Action Plan. It is inconceivable that such a key document will not shape our Local Plan. It is this Action Plan that is needed first in order to provide the long-term strategic view as to how and what the District will look like in the future; this, in turn, will help form and shape the policies outlined in any prospective, Local Plan. The Plan as proposed is moribund, as a result of “cart before the horse” thinking.
2. The Local Plan as written does not adequately address how infrastructure, transport and services are going to be materially and strategically improved to meet the predicted growth and shift to a significantly ageing population. There is presently insufficient capacity to supply services and to have adequate people and environmentally friendly connectivity, as a direct result of decades of neglect towards investing in infrastructure and services to meet the needs of the District’s population. We are led to believe that developers through increased levies in order to gain permission to build will fulfil this need, but all that this will result in is an uncoordinated, dysfunctional mess completely lacking in any future-proof master planning approach. We contend that this will do nothing for the quality of life of Chichester District residents and it will create a vacuum whereby few if indeed any can be held accountable or indeed found liable for shortcomings in the future.
3. The Local Plan as written does not state how it will go about addressing the need to create affordable homes. The District Council’s record on this matter since the last made plan has been inadequate and now the creation of affordable homes has become urgent as political/economic/social factors drive an ever increasing rate of change within the District.
4. Flood risks assessments used in forming the Plan are out of date (last completed in 2018) and any decision to allocate sites is contrary to Environment Agency policy. Additionally, since March 2021 Natural England established a position in relationship to ‘Hold the Line’ vs. ‘Managed Retreat’ in environmentally sensitive areas, of which the Chichester Harbour AONB is a significant example. CDC have failed to set out an appropriate policy within the proposed Local Plan that addresses this requirement.
5. The A27 needs significant investment in order to yield significant benefits for those travelling through the East-West corridor; this is unfunded. Essential improvements to the A27 are key to the success of any Local Plan particularly as the city’s ambitions are to expand significantly in the next two decades. But any ambitions will fall flat if the A27 is not improved before such plans are implemented.. The A259 is an increasingly dangerous so-called ‘resilient road’ with a significant increase in accidents and fatalities in recent years. In 2011, the BBC named the road as the “most crash prone A road” in the UK. There is nothing in the Local Plan that addresses this issue. There is no capacity within the strategic road network serving our district to accommodate the increase in housing planned, and the Local Plan does not guarantee it.
6. There is insufficient wastewater treatment capacity in the District to support the current houses let alone more. The tankering of wastewater from recent developments that Southern Water has not been able to connect to their network and in recent months the required emergency use of tankers to pump out overflowing sewers within our City/District reflects the gross weakness of short-termism dominated thinking at its worst and is an indictment of how broken our water system is. The provision of wastewater treatment is absolutely critical and essential to the well-being of all our residents and the long-term safety of our built environment. The abdication by those in authority, whether that be nationally, regionally or locally, is causing serious harm to the people to whom those in power owe a duty of care and their lack of urgency in dealing properly with this issue is seriously jeopardizing the environment in which we and all wildlife co-exist.
7. Settlement Boundaries should be left to the determination of Parish Councils to make and nobody else. The proposed policy outlined in the Local Plan to allow development on plots of land adjacent to existing settlement boundaries is ill-conceived and will lead to coalescence which is in contradiction of Policy NE3.
8. All the sites allocated in the Strategic Area Based Policies appear to be in the majority of cases Greenfield Sites. The plan makes little, if any reference to the development of Brownfield sites. In fact, there is not a Policy that relates to this source of land within the Local Plan as proposed. Whilst in the 2021 HELAA Report sites identified as being suitable for development in the District as being Brownfield sites were predicted to yield over 4000 new dwellings. Why would our Local Plan not seek to develop these sites ahead of Greenfield sites?
9. The Local Plan does not define the minimum size that a wildlife corridor should be in width. What does close proximity to a wildlife corridor mean? How can you have a policy (NE 4) that suggests you can have development within a wildlife corridor? These exceptions need to have clear measures and accountability for providing evidence of no adverse impact on the wildlife corridor where a development is proposed. Our view is quite clear. Wildlife and indeed nature in the UK is under serious and in the case of far too many species, potentially terminal threat. Natural England has suggested that a Wildlife Corridor should not be less than 100metres wide. The proposed Wildlife Corridors agreed to by CDC must be enlarged and fully protected from any development. This is essential and urgent for those Wildlife Corridors which allow wildlife to achieve essential connectivity between the Chichester Harbour AONB and the South Downs National Park.
10. Biodiversity Policy NE5 - This is an absolute nonsense. If biodiversity is going to be harmed there should be no ability to mitigate or for developers to be able to buy their way out of this situation. This mindset is exactly why we are seeing a significant decline in biodiversity in the District which should be a rich in biodiversity area and why the World Economic Forum Report (2023) cites the UK as one of the worst countries in the world for destroying its biodiversity.
11. In many cases as set out in the Policies the strategic requirements lack being SMART in nature – particularly the M Measurable. These need to be explicit and clear: “you get what you measure”.
12. **65% of the perimeter of the District of Chichester south of the SDNP is coastal in nature**. The remainder being land-facing. Policy NE11 does not sufficiently address the impact of building property in close proximity to the area surrounding the harbour, something acknowledged by the Harbour Conservancy in a published report in 2018 reflecting upon how surrounding the harbour with housing was detrimental to it long-term health. And here we are 5 years on and all of the organizations that CDC are saying that they are working in collaboration with, to remedy the decline in the harbour’s condition, are failing to implement the actions necessary in a reasonable timescale. CDC are following when they should be actually taking the lead on the issue. Being followers rather than leaders makes it easy to abdicate responsibility. There must be full and transparent accountability.
13. The very significant space constraints for the plan area must be taken into account. The standard methodology need no longer apply where there are exceptional circumstances and we are certain that our District should be treated as a special case because of the developable land area is severely reduced by the South Downs National Park (SDNP) to the north and the unique marine AONB of Chichester Harbour to the south. A target of 535dpa is way too high. This number should be reduced to reflect the fact that only 30% of the area can be developed and much of that is rural/semi-rural land which provides essential connectivity for wildlife via a number of wildlife corridors running between the SDNP and the AONB. Excessive housebuilding will do irretrievable damage to the environment and lead to a significant deterioration in quality of life for all who reside within the East / West corridor.
14. Many of the sites identified in the Strategic & Area Based Policies could result in Grade 1 ^ 2 farmland being built upon. The UK is not self-sufficient in our food security. It is short-sighted to expect the world to return to what we have come to expect. Our good quality agricultural land should not all be covered with non-environmentally friendly designed homes.

**Chapter 2 – Vision & Objectives**

The total population of Chichester District is 124,100([[5]](https://chichester.oc2.uk/document/45/306#_ftn5)), a growth of 9.1% since 2011. (What is the predicted growth to 2039? Is the prediction credible?) The percentage of the working age population (16-64) is below the national level of 62.3% at 55.8%. This is in contrast to those over the age of 65 at 27.7% compared to the national level of 18.5%. By 2039, those of working age are expected to account for 50% of Chichester District's total population([[6]](https://chichester.oc2.uk/document/45/306#_ftn6)), whilst the number of people aged 65 and over is expected to account for 35%. An ageing population of this scale presents challenges for health and caring services, particularly in rural areas where access to transport, services and everyday activities is difficult.

The Local Plan as written does not adequately address how infrastructure, transport and services are going to be strategically improved to meet the predicated growth and shift to a greater aging population.

The special qualities of the area offer a good quality of life, which creates a high demand for housing. This demand has caused a widening gulf between local incomes and house prices([[7]](https://chichester.oc2.uk/document/45/306#_ftn7)). The need to provide affordable housing remains a priority for the council.

The Local Plan as written does not state how it will go about addressing this issue with the creation of affordable homes. What is the District Council’s record on this matter – how many affordable homes have been built since the last Local Plan 2014-2029, compared to the total number of properties built in the same period?

The extensive coastline, which forms the southern border of the plan area, varies in character, with shingle ridges, sandy beaches, and a variety of wetlands, salt marsh and harbours, including the Chichester Harbour Area of Outstanding Natural Beauty. The coastal and harbour areas are important for biodiversity, recreation and tourism.

The total area west of Chichester is dominated by the Chichester Harbour AONB, taken as a whole area the harbour represents approximately 35% of the total space to the western side of the district south of the South Downs National Park, which then, subject to any human influence, has had far reaching impacts in the derogation of the harbour in the last 2 decades. CDC’s strategy of principally locating houses in the west-east corridor in the plan period 2021-2039 will have a catastrophic impact on the harbour and its biodiversity resulting in negative long term impacts on recreation and tourism.

Climate Change - All proposals for new development should be considered in the context of a climate emergency. In the Chichester plan area, the likelihood of sea level rise and increased risk of flooding is a key consideration, alongside other impacts such as higher temperatures, water scarcity and more extreme weather events. Flood risk will be considered using the council's latest Strategic Flood Risk Assessment together with any more recent information from the Environment Agency.

There are no criteria nor measurements for assessing flood risk in the Local Plan. How will CDC make the assessment as to whether a development meets a threshold when the Local Plan as written does not include the criteria and measurements by which such decisions can be made? Since March 2021 Natural England established a position in relationship to ‘Hold the Line’ vs. ‘Managed Retreat’ in environmentally sensitive areas, of which the Chichester AONB is a significant example. CDC have failed to set out an appropriate policy within the proposed Local Plan.

CDC have said that they are developing a Climate Emergency Action Plan which is still in progress. It is this action plan that is needed first in order to provide the long-term strategic view as to how and what the district will look like in the future; this, in turn, will help form and shape the policies outlined in any prospective, proposed Local Plan. The Local Plan as proposed is moribund, as a result of this “cart before horse” strategic thinking.

The Vision for Chichester (2017) and its constituent components is an exercise of Form over Substance – “new development will be designed and located to mitigate and withstand climate change”, “the special natural environment and biodiversity of the area and the strategic wildlife corridors and nature recovery networks are fully protected, managed and enhanced”, “get about easily, safely and conveniently with less reliance on private cars –making use of the rail and bus network, and with more opportunities for active travel including walking and cycling”, “good access to education”, “accessible and unspoilt harbours, coast and countryside”, “sustainable neighbourhoods supported by necessary infrastructure and facilities, designed with natural processes to prevent storm flooding and enhance biodiversity”.

**Chapter 3 – Spatial Strategy**



The National Planning Policy Framework defines sustainable development as "meeting the needs of the present without compromising the ability of future generations to meet their own needs". New development must achieve sustainable development principles and must not adversely affect the character, quality, amenity or safety of the built environment, wherever it occurs. The Local Plan as proposed will not deliver this goal.

Of the total Local Plan number of 10,350 identified as being the Housing Requirement over the plan period, the western side of Chichester will be required to supply 3195 properties (31%), in an area dominated by Chichester Harbour to the south and the SDNP to the north. To the East of Chichester its housing requirement is 3,330 properties (32%) in an area without the same spatial constraints.

One of the key components forming the Spatial Strategy is – Environmental constraints – taking a sequential approach to avoiding flood risk areas, protecting environmental designations, landscape quality, the historic environment and settlement character. In what way has this component been duly considered in relationship to the area West of Chichester? Has attention been paid to the impacts upon water catchments in this area?

A second key component forming the Spatial Strategy is – Infrastructure capacity and constraints, in particular relating to wastewater treatment, roads and transport – In what way has this component been duly considered in relationship to the area West of Chichester? Sewage discharges are increasing. The road system is still what it was 30 years ago. Bus services in this area have been reduced.

Fact: sewage discharges into Chichester Harbour in January 2023 exceed total sewage discharges in the whole of 2021. The environment is already being degraded. Source: Southern Water Beachbuoy genuine sewage discharges.

 Full Year Full Year Jan 2023

The East / West corridor from Southbourne in the west to Tangmere in the east benefits from comparatively good public transport options, easy access to higher order/ larger scale services such as those available in Chichester city. Development in this corridor also provides the opportunity to minimise the impact of development on the natural environment, including designated sites. The A27 needs significant investment in order to yield significant benefits travelling through the corridor; this is unfunded. The A259 is increasingly become more and more dangerous with a significant increase in accidents and fatalities in recent years. In 2011, the BBC named the road as the “most crash prone A road” in the UK with 7,721 crashes and 120 deaths over 12 years from 1999 to 2010, an average of 65 crashes per mile. The A259 is listed in the top 50 most dangerous roads in Britain. The inner ring road around the north of the city is grid locked at certain times of the day. There are no safe routes for cyclists or pedestrians to use which are away from the main road system.

Nutbourne (with a railway station) and Hambrook (to the north of Nutbourne) function as one service village. The coalescence of these two villages has occurred in the last 9 years. The area has been subjected to the development of 200+ houses when the 2014-2029 Local Plan target number for development was 25. In this time there have been no improvements to road infrastructure, transport services, medical services or educational services. The area still has the same very small part-time post office / convenience store. The only additional resource delivered has been a small play park. Pynham Meadow, acquired by Chidham & Hambrook Parish Council following developer default is in the process of being developed with allotments; an orchard; a sizeable play are for young children and a green open space. These changes do not explain or justify how can it be described as a Service Village when facilities are so minimal.

The north of the plan area covers those parts of Chichester District which lie north of the South Downs National Park boundary. This includes Loxwood Parish and most of the parishes of Kirdford, Plaistow and Ifold, and Wisborough Green. This part of the plan area is predominantly rural with few sizeable settlements, characterised by undulating countryside with a high proportion of woodland, typical of the Low Weald landscape. Conserving the rural character of the area, with its high-quality landscape and environment, is a key objective. If this is a key objective and rationale for limiting development in this area, surely the impact of development in and around the AONB is of equal importance particularly as environmental surveys and reports show the harbour to be in significant decline. Wildlife Corridors are essential to provide the connectivity for wildlife between the AONB of the harbour and the SDNP. But we contend that these essential corridors are overlaid in fine painted colours but almost certainly not remotely wide enough and without much clearer language without adequate protection in perpetuity. Absence of clearly enforceable protection of wildlife corridors puts areas that are currently very biodiverse under permanent threat.

**Settlement Boundaries**

There is a presumption in favour of sustainable development within the settlement boundaries which will be reviewed through the preparation of development plan documents and/or neighbourhood plans, reflecting the following general approach:

1. Respecting the setting, form and character of the settlement;
2. Avoiding actual or perceived coalescence of settlements; and
3. Ensuring good accessibility to local services and facilities.

All the potential sites deemed to be suitable by CDC as per the 2021 HELAA in the Parish of Chidham & Hambrook will lead to the coalescence of the settlements. The local school is full with no capacity to expand. There is not a convenience store of an appropriate size to serve the three villages centrally located thereby minimizing travel time. Public transport is limited to an hourly train service and the need to access the A259 if you wish to utilise bus services. Medical services are in the adjoining Parishes and with the current well-documented shortages of doctors, nurses and other NHS staff existing practices are simply unable to serve existing residents.

In principle these criteria seem reasonable. However, where it falls down is noted as follows:

All development proposals should take the opportunities available to provide for new or enhanced habitats within the site of the proposed development

How can you have new and enhanced habitat sites within the proposed development when, in the majority of sites, this has turned or will turn green open space countryside land into sites covered by bricks, mortar, and tarmac? Increasing the density of dwellings will increase light pollution and cat predation has a massive impact on wildlife numbers. Proper, safe wildlife habitats need to be established well away from human, domestic pets, light and sewage. This Plan does not allow adequately for this.

**Chapter 4 – Climate Change and the Natural Environment**

**Stand-alone Renewable Energy – Policy NE1**

Development proposals will be granted for stand-alone renewable energy, where it has been demonstrated that there is no significant adverse impact upon:

1. Landscape or townscape character, ecology and wildlife, water environment, heritage assets whether designated or not, or upon areas or features of historic or local significance;
2. Local amenity, outlook through unacceptable visual intrusion or upon general health and quality of life as a result of noise, odour, emissions to atmosphere, electronic interference, or traffic generation; and
3. Highway safety or aircraft safety.

In principle these criteria seem reasonable. However, where it falls down is noted as follows:

 All development proposals should take the opportunities available to provide for new or enhanced habitats within the site of the proposed development

How can you have new and enhanced habitat sites within the proposed development when, in the majority of sites, this has turned or will turn green open space countryside land into sites covered with bricks, mortar, and tarmac?

**Natural Landscape - Policy NE2**

Protecting and enhancing the natural landscape of the plan area is a key objective for the Local Plan, due to its coastal nature, safeguarding the coast and views is also important.

This Local Plan takes account of and seeks to avoid and reduce the impact of development on the plan area's natural landscape, safeguarding areas for climate change adaptation and providing nature-based solutions which protect the natural landscape.

In seeking to reconcile the demands on the plan area's natural landscape, the council will only support proposals that safeguard the richness of the landscape and take opportunities to conserve and enhance its value. The council will seek to protect the best and most versatile agricultural land from large scale, inappropriate or unsustainable non-agricultural development proposals that are not in accordance with the Development Plan.

All of these in principle read positively but where is the focus upon connectivity between the harbour AONB and the SDNP? Enlarged, dedicated and fully protected Wildlife Corridors are essential for the future survival of our indigenous and migratory wildlife. Without connectivity being maintained, our record as a nation of nature destroyers will get worse still. We are not far above the list of the most offending nations in the world

Key elements of the Policy include –

Development proposals need to maintain the identity of settlements and ensure the integrity of predominantly open and undeveloped land between settlements is not undermined;

Development of poorer quality agricultural land is fully considered in preference to best and most versatile land (Grades 1, 2 and 3a[[17]](https://chichester.oc2.uk/document/45/317#_ftn17)). Where proposals would result in the significant loss of best and most versatile agricultural land, proposals will need to consider the economic impacts and the impacts on soil, air, water or noise pollution, or land instability;

All development proposals affecting the natural landscape will be required to meet criteria contained in other relevant policies, especially: Landscape Gaps; Chichester Harbour AONB; Development around the Coast; Development in the Countryside; Biodiversity; Development and Disturbance of Birds; Trees, Hedgerows and Woodlands; Equestrian Development and the pollution policies.

Again these elements of the Policy seem positive in protecting the applicable areas in the district.

**Landscape gaps between settlements – Policy NE3**

4.10. As Chichester has expanded there is a need to ensure that nearby settlements retain their character and identity. Equally in many parts of the plan area villages are located relatively close together. This is particularly the case along the A259 towards the west of Chichester. Retaining the separate identity of each settlement is recognised as a key consideration of any development strategy and this approach is highly valued by local people. Landscape gaps can help guide where new development should be built and ensure the maintenance of open land between settlements. They prevent settlements merging into one and losing their character and identity. It is recognised that the merging of villages comes about through a gradual process, so while one development of a particular site may not in itself result in merger, it may be a contributory factor.

This is absolutely on the money, and one that we wholeheartedly agree with. However, this is at odds with the policy on Settlement Boundaries which allows adjacent plots of land to be deemed to developable given their proximity to the Settlement Boundary. This is one sure-fire way of causing coalescence and the suburbanisation of whole swathes of the District before there is any improvement in infrastructure.

Policy NE3 - In order to prevent coalescence of built-up areas, maintain the individual identity of settlements, actual or perceived, and ensure the integrity of predominantly open and undeveloped land between settlements is not undermined, the generally open and undeveloped nature of gaps between settlements will be protected. The precise boundaries of gaps will be defined in either a Site Allocations DPD or through neighbourhood plans.

Development will only be permitted within gaps provided:

1. It would not diminish the physical, visual and/or perceived openness of the gap; and
2. Individually or cumulatively, it would not result in the actual or perceived coalescence of settlements.

It is important for Chidham and Hambrook that the gaps between Nutbourne East and West are so defined, likewise Flatt Farm between Broad Road and Drift Lane and to the east between Chidham and Bosham. The same is true of the Highgrove site to the east of Broadbridge (north of Bosham). Our Neighbourhood Plans need to echo this very sound policy.

**Strategic Wildlife Corridors – Policy NE4**

Development will only be permitted where it would not lead to an adverse effect upon the ecological value, function, integrity and connectivity of the strategic wildlife corridors.

Development proposals within strategic wildlife corridors will only be granted where it can be demonstrated that:

1. There are no sequentially preferable sites available outside the wildlife corridor; and
2. The development will not have an adverse impact on the integrity and function of the wildlife corridor and protects and enhances its features and habitats.

Development proposals outside, but in close proximity to the strategic wildlife corridor will be acceptable where it can be demonstrated that:

1. The development will not have an adverse impact on the integrity and function of the wildlife corridor; and
2. The proposal will not undermine the connectivity and ecological value of the corridor.

All proposals for new development (with the exception of householder applications) within or in close proximity to wildlife corridors should take opportunities available in order to extend and enhance those corridors.

**The Local Plan does not define the minimum size that a Wildlife Corridor should be in width. Natural England’s policy is quite clear: a minimum width of 100metres is required. What does close proximity to a Wildlife Corridor mean? How can you have a policy that suggests you can have development within a Wildlife Corridor? These exceptions need to have clear measures and accountability for providing evidence of no adverse impact on the Wildlife Corridor where a development is proposed.**

**The latest evidence within the plan area is very far from convincing. The eastern Wildlife Corridor has effectively been blitzed and the Ham Brook Wildlife Corridor is not only not remotely wide enough to be Natural England compliant but has been silted up due to a proximate ongoing development in Hambrook. This brook is one of only 200 chalk streams in the world. Further developments are possible and will damage this watercourse beyond repair.**

**Biodiversity – Policy NE5**

In exceptional circumstances, where a development proposal would result in harm to biodiversity and geological interests that cannot be prevented or mitigated, appropriate compensation will be sought. Development will also be expected to make a positive contribution to the ecological network, providing biodiversity net gain on site, and where this is not achievable locally off-site.

This is UNSOUND in the extreme. If biodiversity is going to be harmed there should be no ability to mitigate or for developers to be able to buy their way out of such a situation. This mindset is exactly why we are seeing significant diminution in biodiversity throughout the plan area in what should be a rich in biodiversity part of West Sussex. Merely installing a few bat and bird boxes in suburbanised areas will be to pay lip service to protecting and enhancing biodiversity. There appears to be no consideration given to the creation of a protected Nature Reserve between Settlements which would provide a great community asset and the essential relief for wildlife from so much exposure to humans and their way of life. We need big picture not microcosmic strategic thinking.

**Chichester's Internationally and Nationally Designated Habitats – Policy NE6**

4.27. The purpose of this policy is to set specific strategic requirements relating to the Mens, Ebernoe Common and Singleton & Cocking Tunnels SACs, the Arun Valley SAC and SPA, and the Solent Coast SPAs (Chichester Harbour, Langstone Harbour, Pagham Harbour, Solent and Dorset Coast, and Medmerry Compensatory Habitat). Where relevant, this policy should be read in conjunction with the corresponding policy specific to each habitat, namely Policy NE16 (Water Management and Water Quality), Policy NE18 (Nutrient Neutrality), and Policy NE7 (Development and Disturbance of Birds in Chichester, Langstone and Pagham Harbours and Solent and Dorset Coast SPAs and Medmerry Compensatory Habitat).

Development will only be permitted where it would not lead to an adverse effect upon the integrity, either alone or in-combination, directly or indirectly, on internationally, European and nationally important habitat sites, including:

**Nutrient Neutrality in Chichester and Langstone Harbours SPA**

Development proposals for any net increase in overnight accommodation that drain to Chichester or Langstone Harbours must demonstrate that they will be nutrient neutral for the lifetime of the development, either by their own means or through the provision of appropriate mitigation in accordance with Policy NE19 (Nutrient Neutrality).

**Recreational Disturbance in Chichester and Langstone Harbours SPA, Solent and Dorset Coast SPAs, Pagham Harbour SPA and Medmerry Compensatory Habitat**

Development proposals for any net increase in overnight accommodation within the Zones of Influence for Chichester Harbour SPA

The set of strategic requirements lack being SMART in nature – particularly the M Measurable. Accountability needs to be explicit and clear: “you get what you measure”.

**Development and Disturbance of Birds in Chichester, Langstone and Pagham Harbours – Policy NE7**

It is Natural England's advice that all net increases in residential development within the 5.6km zone of influence are likely to have a significant effect on the Chichester and Langstone Harbours SPA either alone or in-combination with other developments and will need to be subject to the provisions of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). In the absence of appropriate avoidance and/or mitigation measures that will enable the planning authority to ascertain that the development would not adversely affect the integrity of the SPA, planning permission will not be granted because the tests for derogations in Regulation 64 are unlikely to be met. Furthermore, such development would not have the benefit of the presumption in favour of sustainable development in the NPPF.

This as a policy appears on the surface to be strong and very relevant to development within close proximity to the Harbour. Significant attention to connectivity is vitally important and unless the rapid decline in the condition of our harbours is reversed quickly, and we achieve some increase in both resident and visiting bird species, the future of the AONB will be very much at risk. **Recommended Reading:** ‘Rebirding’ by Benedict Macdonald.

Appropriate avoidance/mitigation measures that are likely to allow the planning authority to ascertain that there will be no adverse effect on the integrity of the SPA will comprise:

1. A contribution in accordance with the joint mitigation strategy outlined in the Bird Aware Solent Strategy; or
2. A developer provided package of measures associated with the proposed development designed to avoid any significant effect on the SPA, provided and funded in-perpetuity; or
3. A combination of measures in (a) and (b) above.

Once again how can paying some money or finding some way to fudge the outcome of this policy be allowed. It is “but” thinking which is neither strategic nor affords the protection these designated areas deserve. Accountability needs to be clear and unequivocal. What does a contribution look like? Money cannot restore diversity.

###  **Trees Hedgerows and Woodlands – Policy NE8**

Development proposals will be granted where it can be demonstrated that all the following criteria have been met:

1. Proposals conserve and, where appropriate, enhance existing valued and protected trees, hedgerows and woodlands;
2. Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and trees; veteran trees; protected trees, groups of trees and woodland and hedgerows) should be refused unless there are wholly exceptional reasons and a suitable compensation strategy in accordance with relevant legislation, policy and guidelines;
3. Loss or damage of woodland and hedgerows that are priority habitats and non-protected but valued trees, woodland, community orchards, and all hedgerows should be avoided, and if demonstrated as being unavoidable, appropriate mitigation measures provided;
4. Proposals should maximise opportunities for planting of new trees, woodlands and hedgerows to contribute to biodiversity net gain, green infrastructure and nature recovery strategies and networks. In addition, proposals will be required to plant two trees for each one lost through development; provide new planting to thicken existing hedgerows, and fill in all gaps in all hedgerows;
5. Proposals should have a minimum buffer zone of 15 metres from the boundary of ancient woodland or veteran trees to avoid root damage (known as the root protection area);
6. All major development proposals will be required to provide street tree planting;
7. Development proposals must demonstrate that appropriate protection measures are in place prior to any work on site and throughout the development process as part of a tree protection plan;
8. Suitable opportunities for the restoration, enhancement or planting of trees, woodland, and hedgerows are identified and incorporated into a comprehensive landscaping plan; and
9. Where appropriate, the council will seek minimum five-year maintenance and management plans to accompany the soft landscaping proposals.
10. Trees proposed for landscaping and replacement planting should be selected from a diverse range and variety of native species to help provide long-term resilience to pests, diseases and climate change.

Once again how can compensation mitigate against the loss of irreplaceable habitats (2). How will the district council ensure hedgerows are not destroyed ahead of development commencing – Scant Road Cala Development (7). Why is the maintenance period only 5 years – trees can live for 100+ years (9)? Accountability needs to be clear and measurable. It is not acceptable to remove established trees that are net reducers of CO2 and replace them with housing, hard landscaping and trees that will take decades to become established.

**Canals – Policy NE9 – No comment**

**The Countryside – Policy NE10**

Settlement boundaries have been reviewed through the preparation of the Local Plan unless this was undertaken through preparation of a neighbourhood plan or subsequent development plan document. Settlement boundaries are as defined on the Local Plan policies map. The methodology for determining the boundaries is set out in the Settlement Boundary Review Background Paper.

The key points of which are –

1. All of the settlements in the plan area which are classified in the settlement hierarchy
as Service Villages or above are defined by settlement boundaries
2. There is a presumption in favour of development if land is within a settlement
boundary and therefore land should only be included within the boundary if that is
where development is considered acceptable in principle
3. There is a judgement to be made as to whether other development or
areas adjacent to but outside the current settlement policy area relates more to the
built environment than to the surrounding countryside.
4. Settlement boundaries should be expanded to include new development adjacent to
the existing settlement boundary. This includes sites that have been developed
following allocation in the adopted Local Plan.
5. New schools, existing and proposed peripheral playing fields, environmental space,
allotments, car parks, local green space and community gardens should not be
included within the settlement boundary.
6. The starting point for reviewing the settlement boundaries is with the adopted Local
Plan, the Site Allocation Development Plan Document and ‘made’ Neighbourhood
Plans. Where an area has a ‘made’ Neighbourhood Plan, this will identify, in all
likelihood, the most up to date settlement boundary.
7. The settlements where the Council proposes to amend the settlement boundary and do include Chidham and Hambrook.

Chidham and Hambrook given its Service Village status means it is defined by its pre-existing settlement boundaries (1). However, the policy allows for sites adjacent to existing boundaries to be consider part of the boundary (4). We are going to depend upon some officer determining whether a site relates more to the built environment rather than to the surrounding countryside (3). As the Parish does not have a Made Plan our position is weaker in regard to this policy. It is yet again another “Ah but” – the site is outside the settlement boundary but is adjacent to it…

Our only salvation may be “Proposals need to conserve and enhance the key features and qualities of the rural and landscape character of the countryside setting”.

**The Coast – Policy NE11**

Since its designation as an AONB, Chichester Harbour, almost half (46%) of the saltmarsh has been lost, with the remainder of poor quality. There have been dramatic declines in many over-wintering and breeding bird species and an increase in opportunistic macro-algae in the inner parts of the harbour covering mudflat habitat, indicating high nutrient enrichment levels affecting water quality.

When considering development proposals, the opportunities for habitat protection, restoration, creation and enhancement, and where relevant, the compatibility with identified habitat schemes, must be considered.

The policy does not sufficiently address the impact of building property in close proximity to the area surrounding the harbour, something acknowledged by the Harbour Conservancy in a published report in 2018. All of the organizations that CDC are saying that they are working in collaboration with to remedy the decline in the harbour’s condition are failing to implement the actions necessary in a reasonable timescale. Once again CDC are putting the cart before the horse when looking at the problem with their de facto position being that many of the actions necessary are outside of the planning system and as such not dependent on Local Plan policies. This should be a key element to their Climate Change Emergency Plan and so help form their policies.

**Development Around the Coast – Policy NE12**

The particular character of the plan area's coast, small coastal villages and hamlets should be protected and enhanced.

**65% of the perimeter of the District of Chichester is coastal in nature**. The remainder being land facing.

The council therefore requires new buildings to be set back at least 25 metres to safeguard the building and its users, unless the development is a marine based business with a clear functional need to be closer to the water. No new residential uses would be appropriate within this zone.

This seems to be a sensible policy. However, from a Climate Emergency Action Plan perspective it is but a nod in the right direction. Strategically where is the district planning a “Managed Retreat” and where will it “Hold the Line”. In the absence of the answer to this question the policy formed NE12 could well result in development in the district which is wholly inappropriate.

Planning permission will be granted for development on the coast where it can be demonstrated that:

1. There are no harmful effects on or net loss of nature conservation or areas of geological importance, within the Chichester and Pagham Harbours and Medmerry Compensatory Habitat (including no adverse effects on the associated European designated sites);
2. The development provides recreational opportunities, that do not adversely affect the character, environment and appearance of the coast and Chichester Harbour Area of Outstanding Natural Beauty or result in adverse effects of integrity to European designated wildlife sites;
3. A high quality and inclusive design of new buildings in coastal locations has been achieved in accordance with other relevant design and historic environment policies;
4. There are measures in place to mitigate any detrimental effects including where appropriate the improvement of existing landscapes relating to the proposal. What are these measures? How are they assessed? Clear accountability and objectivity is needed to ensure that detrimental effects are clearly defined as well as the mitigating measures.
5. Where appropriate, opportunities have been taken to upgrade existing footpaths and cycle paths, enhance the England Coast Path and ensure that public access is retained and provided to connect existing paths along the waterfront; What is the definition of “opportunities have been taken”?
6. Where relevant, the development would result in improvements to or redistribution of moorings, marine berths or launch on demand facilities (dry berths) in the harbours; and
7. The development would not be detrimental to infrastructure for, and quality of, water-based recreation, or to the safety of navigation.

A strip of land of at least 16 meters immediately behind the landward edge of the existing or proposed sea defence or coast protection works should be kept clear to allow access for maintenance or repair. In principle a sensible approach. Albeit in the context of certain properties may lead to land being built upon that has never been built upon. Additionally, and more importantly, is this a smart move as long term sea water levels predict an inundation of land throughout the harbour?

Around the open coast, new buildings should be setback at least 25 metres from the landward edge of the existing or proposed sea defence or coast protection works in order to prevent storm damage to buildings.

Around Chichester Harbour and Pagham Harbour the 25 metre setback should be measured from the mean high water level to allow for future erosion.

Does not address the impact of small/medium/large scale developments within a 1km of the coast.

Does this address the current impasse re Natural England’s demand that all development be subject to managed retreat v hold the line whereby harm to the habitat in close proximity to the SSSI/RAMSAR sites cannot be mitigated.

**Chichester Harbour AONB – Policy NE13**

The impact of individual proposals and their cumulative effect on Chichester Harbour AONB and its setting will be carefully assessed. Planning permission will be granted where it can be demonstrated that:

1. The natural beauty and locally distinctive features of the AONB are conserved and enhanced;
2. Proposals reinforce and respond to, rather than detract from, the distinctive character and special qualities of the AONB as defined in the Chichester Harbour AONB Management Plan;
3. Either individually or cumulatively, development does not lead to actual or perceived coalescence of settlements or undermine the integrity or predominantly open and undeveloped, rural character of the AONB and its setting, including views into and from the South Downs National Park;
4. The development is appropriate to the economic, social and environmental well-being of the area or is desirable for the understanding and enjoyment of the area;
5. The development is consistent with the policy aims of the Chichester Harbour AONB Management Plan and Joint Chichester Harbour AONB SPD; and.
6. New development is set back at least 25m from the mean high water level in line with Policy NE12, with replacement buildings set further back whenever possible.

The NPPF sets out that great weight should be given to conserving and enhancing landscape and scenic beauty in protected areas including AONBs, meaning the scale and extent of such development should be limited. Where development is likely to have an adverse impact, there may be a requirement to demonstrate which alternatives have been considered and that developing the proposed site outweighs the landscape value of the area. Yet again another get out of jail card. Accountability needs to be clear and the language here is not unequivocal – “may”. Alternatives need to be clearly demonstrated and explained using a standard framework in order to remove subjectivity.

**Integrated Coastal Zone Management for the Manhood Peninsula – Policy NE14**

**Not reviewed**

**Flood Risk and Water Management – Policy NE15**

In principle a sound approach

There are serious concerns about the impacts of flooding, both in respect of current properties at risk but also the long-term management of the area. These issues are key factors in determining the scale and location of development. It is important that inappropriate development is avoided in areas currently at risk from flooding, or likely to be at risk as a result of climate change, or in areas where development is likely to increase flooding elsewhere.

The NPPF, along with national level guidance, sets out the requirement for site-specific flood risk assessment. Currently this requirement applies to development in Flood Zones 2 and 3, sites of 1 hectare or more in Flood Zone 1, land identified by the Environment Agency as having critical drainage problems, land identified in a SFRA as at increased flood risk in future, or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use (NPPF para 167).

Flood and erosion risk will be taken into account at all stages of the planning process to avoid inappropriate development in areas at current or future risk of flooding, from any source. Development will be directed to areas of lowest flood risk applying the sequential test and where relevant the exception test. What are these tests, what do they measure? Why is there a need for an exception test – does it apply or doesn’t.

**Development should not increase the risk of flooding elsewhere, taking into account the cumulative effects of other development, and should seek to achieve a reduction in flood risk for existing communities on and off site. Wholly appropriate.**

All development proposals must demonstrate that:

1. New site drainage systems are designed to cope with events that exceed the normal design standard, such as by considering flood flow routing and using temporary storage areas;
2. There is no increase in either the volume or rate of surface water run-off leaving the site. Where development is on a brownfield site, run off rates should be reduced to match those of greenfield sites wherever possible; and
3. Development would not result in or exacerbate coastal squeeze of any European site or prevent managed realignment necessary to protect the European sites.
4. For vulnerable development, finished floor levels should be no lower than:
	* 300mm above average ground level of the site

Where development is necessary in a location at risk of flooding, and has passed the sequential test, then the exception test must also be passed. Good, that there is a specific test that needs to be passed but what is the sequential test.

Around the coast, including the harbours, new buildings should be set back at least 25 metres in line with Policy NE12 (Development Around the Coast). Good long term thinking

Elsewhere, new development should be set back at least 8m from fluvial watercourses and 16 m from tidal watercourses to allow easy access for maintenance and repair. Good long term thinking

Development will only be allowed in flood risk affected areas where, in light of this assessment, and the sequential and exception tests as applicable, it is clear that:

1. The proposal addresses the specific requirements of the site, including adaptation and mitigation measures to reduce flood risk, locating the most vulnerable uses in the area of the site with lowest flood risk, and where a residual flood risk remains, incorporates protection, resilience and resistance measures which are appropriate to the character and biodiversity of the area;
2. The development will be safe, including access and egress, without increasing the flood risk elsewhere, and where possible, will reduce flood risk overall. A site-specific flood warning and evacuation plan will be required where residual flood risk remains;
3. In the event of a flood the development could be quickly brought back into use without significant refurbishment;
4. The development would not constrain the natural function of the flood plain, either by impeding flood flow or reducing storage capacity, and that consideration has been given to opportunities for natural flood management.
5. Where strategic flood defence or adaptation measures are necessary within the site, these are designed as an intrinsic part of the scheme.

All these would appear to be sound criteria to be met.

**Water Management and Water Quality – Policy NE16**

**Water Supply:** The Environment Agency has identified the areas supplied by Portsmouth Water and Southern Water as at serious water stress and so the tighter target applies to the Chichester plan area.

Why exacerbate that issue by increasing demand by following a policy of inward migration to the area, as the local need for property is nowhere near the housing supply determined by central government’s target for our district?

**Treating wastewater:** It is clear that upgrades to wastewater infrastructure will be necessary to manage the increased wastewater from housing growth over the plan period whilst maintaining and improving the water quality of receiving waters.

The Surface Water and Foul Drainage SPD is a material consideration when assessing planning applications. It would appear that this is not material enough presently to prevent approval of planning applications in areas of the district severely constrained by infrastructure capacity and capability.

This policy helps to reduce the flow going to WwTW by requiring that all new dwellings achieve the tighter building regulations water consumption target. It is noted that both Portsmouth Water and Southern Water have targets to reduce water consumption to 100 litres per person per day by 2040. CDC is not taking accountability for its part in this equation. Instead, it is relying on the water companies to hit their targets. This, politely, can be described as a challenge: Southern Water cannot manage their business to invest in the infrastructure necessary to cope with the existing housing stock; sewage discharges in January 2023 EXCEEDED the total discharges in 2021 (Beachbuoy, genuine sewage discharges into Chichester Harbour). It also requires property developers to be part of the investment process which will drive their construction costs up and reduce their profits. How will this be enforced to show clear evidence and accountability?

A position statement to manage development in the Thornham Wastewater Treatment Catchment where headroom is environmentally constrained was agreed in November 2021. What does this mean in relationship to Policy NE16? What does this mean in practice? If we took the HELAA map, which sites are no longer viable based on this position statement?

Development proposals will be permitted that demonstrate:

1. the development has no adverse impact on the quality of water bodies and groundwater, nor will it prevent future attainment of favourable conservation status, taking into account agreed mitigation measures where necessary;
2. the development contributes positively to the water environment and its ecology and does not adversely affect surface and ground water quality; There is already damage being done to our chalk streams and watercourses locally; how does this play out in the future?
3. no surface water from new development will be discharged to the public foul or combined sewer system; where will this water go?
4. development is phased to align with the delivery of new or improved wastewater infrastructure where this is required; Southern Water’s investment cycle means that any new plans will begin to be initiated from 2027 at the earliest. No further housing should be allowed to be built in areas where there is a severe waste management processing capability. The Local Plan should state that housing development should be deferred until such times as the appropriate infrastructure is in place.
5. the provision of water infrastructure is not considered detrimental to the water environment, including existing abstractions, river flows, water quality, fisheries, amenity and nature conservation;
6. compliance with position statements that may be agreed with partners in relation to wastewater; and
7. compliance with the Surface Water and Foul Drainage and Wastewater Management Supplementary Planning Document or future replacement.

**Water Neutrality – Policy NE17**

Relates to all development within the Sussex North Water Resource Zone (WRZ)

**Source Protection Zones – Policy NE18**

Policy NE18 is designed to assist in the protection of groundwater and controlled waters by ensuring the risk to water within source protection zones is managed and where appropriate mitigated. This complements the powers and duties of the Environment Agency, the statutory body responsible for the protection of groundwater in England, and the catchment management approach being taken by water companies. This approach aims to address pollution at its origin in the catchment to prevent deterioration and improve the quality of water in the chalk aquifer, supporting abstraction for public water supply.

**Nutrient Neutrality in Chichester Harbour – NE19**

In February 2018 the Chichester Harbour designated Site of Special Scientific Interest (SSSI) was downgraded from 'Unfavourable – recovering' to 'Unfavourable – no change'. Further assessment during 2019/20 found that more than 3000ha of the intertidal parts of Chichester Harbour were now 'Unfavourable – declining'. A specific policy is therefore required to address this issue. Nitrates finding their way into the Harbour (from a variety of sources) cause algal growth which is harmful to wildlife. **Although the proportion of total nitrogen originating from new development is very small**.

However, increasing the housing stock in the Local Plan period by some 10000 houses must have a sequential impact upon the harbour. The Harbour is degrading.

To ensure there is no net increase and where possible a net reduction in nutrients to the Harbour, all relevant developments within the Solent catchment, which includes Chichester and Langstone Harbours SPA/Ramsar, will need to demonstrate that they are nutrient neutral, either by their own means or through contributions to an agreed nutrient mitigation scheme, for the lifetime of the development. There is that word again Mitigation=Fudge. Stop the nitrates by investing in the infrastructure, and until the infrastructure is in place do not build more houses. Fix the problem and see the SSSI improve before adding to the problem. The Harbour is already degrading. It is not enough to only consider the impact of net new developments.

Relevant policies of the [South Marine Plan](https://www.gov.uk/government/publications/the-south-marine-plans-documents) should also be considered. Policy S-WQ-1 of the South Marine Plan requires that:

*Proposals that may have significant adverse impacts upon water environment, including upon habitats and species that can be of benefit to water quality must demonstrate that they will, in order of preference:*

1. *avoid*
2. *minimise*
3. *mitigate significant adverse impacts*

It is not necessarily one individual development that contributes to the decline of our harbour, but the hundreds of developments that have occurred over the last three decades whilst abjectly not investing in the infrastructure necessary to support said housing and avoiding and minimising damage to the environment. The harbour like **climate change is manifestly driven by the impact of human beings. (World Economic Forum Report 2023).**

**Accountability and measures need to be unequivocal and transparent in order to ensure that the actions are purposeful and meaningful. The harbour is degrading and we need to be responsible for what we do now to stabilise and fix it.**

**Pollution – Policy NE20**

Development proposals must be designed to protect, and where possible, improve upon the amenities of existing and future residents, occupiers of buildings and the environment generally.

Development proposals will need to address the criteria contained in, but not limited to, the policies concerning water quality; flood risk and water management; nutrient mitigation; lighting; air quality; noise; and contaminated land.

Where development is likely to generate significant adverse impacts by reason of pollution, the council will require that the impacts are minimised and/or mitigated to an acceptable level

What are the acceptable levels? How will the impacts be assessed and measured over time? Who is accountable?

**Lighting – Policy NE21**

Light pollution caused by excessive brightness can lead to annoyance, disturbance and impact wildlife, notably nocturnal animals. The design of lighting schemes should be carefully considered in development proposals to prevent light spillage and glare.

In principle this policy is sensible.

**Air Quality – Policy NE22**

Development proposals will be permitted where it can be demonstrated that all the following criteria have been addressed:

1. Development is located and designed to minimise traffic generation and congestion through access to sustainable transport modes, including maximising provision of pedestrian and cycle networks; In our Parish the road infrastructure has not changed in 30 years, likewise there is no vision for safe pedestrian or cycle networks.
2. Development that creates or results in pollution including particulates, dust, smoke, pollutant gases or odour is designed to minimise and mitigate impact on the amenities of users of the site and surrounding environment including wildlife habitats to an appropriate level; CDC’s HEELA desk top assessment of sites suitable for development completely and utterly fails to consider this element of the policy.
3. Where development is close to an existing use that has potential to impact on the amenity of the proposed development through dust, particulates, pollutant gases and/or odour then an air quality assessment will be required to identify the potential impact on the area and detail the mitigation measures required;
4. Where development is likely to have a negative impact on an Air Quality Management Area, or other areas of poor air quality, then an air quality assessment will be required. The air quality assessment will need to identify the potential impact on the area and detail the mitigation measures required to avoid, reduce and where appropriate, offset the identified impact.

The council will consider development proposals against the requirements and standards contained in legislation and current local and national guidance.

The air quality in our Parish, in particular that of the Broad Road area, will increasingly suffer from more and more air pollution. The increase in vehicular traffic created by new dwellings will continue to impact air quality for all residents along the East / West corridor. The move to electric cars will take much longer than is currently predicted.

**Noise – Policy NE23**

Looks like a sensible policy.

**Contaminated Land – Policy NE24**

Re-use of land affected by contamination can reduce pressure on greenfield sites and make efficient use of previously developed land.

Development proposals requiring the remediation of contaminated land will be supported where it is demonstrated that the following criteria have been addressed:

1. An appropriate site investigation has been completed to identify and quantify potential sources of contamination within the site; and
2. A risk assessment of the site investigation data has been undertaken and used to inform any necessary remediation measures so as to achieve an acceptable level of risk of contamination for future users of the site, the surrounding area and the environment.

This should be actively promoted by the District Council, as the district as per the 2021 HEELA has capacity on brownfield sites for some 4500 homes.

## **Chapter 5: Housing**

5.1: Objectively assessed housing need: 638 dpa

5.2: Constraints, particularly capacity of the A27 leads CDC to suggest reduced target of 535dpa in non SDNP area and 40dpa in the northern plan area making a TOTAL OF 10,350 IN THE PLAN 18 YEAR PERIOD. No unmet need from SDNP can be met by CDC.

**Comment:**

**OBJECT:** The very significant space constraints on the plan area must be taken into account. The standard methodology need no longer apply where there are exceptional circumstances and we are certain that the Chichester area should be treated as a special case because of the developable land area been severely reduced by the South Downs National Park (SDNP) to the north and the unique marine AONB of Chichester Harbour to the south. A target of 535dpa is way too high. This number should be reduced to reflect the fact that only 30% of the area can be developed and much of that is rural/semi-rural land which provides essential connectivity for wildlife via a number of wildlife corridors running between the SDNP and the AONB. Excessive housebuilding will do irretrievable damage to the environment and lead to a significant deterioration in quality of life for all who reside within the East West corridor.

5.3 No other councils offering to assist CDC re their unmet need (638-575 = 63dpa for 18 years)

5.4 CDC collaborating across West Sussex and with the Greater Brighton Strategic Planning Board…….refers to para 1.27 and suggests that only NOW are they commissioning study looking at “potential longer term needs”

**Policy H1**

Overall target: 10,350

This total includes:-

* 1,600 W of Chichester carried fwd from 2015 LP (A6)
* 245 at Highgrove Bosham (A11)
* 1,050 Southbourne (A13)
* 300 Chidham and Hambrook (no mention of Nutbourne East)

**Comment:**

**OBJECT:** Should the recommendations within Policy H1 be followed it is absolutely clear that the total plan period number of new homes set at 10,350 is neither viable nor deliverable.

We do not trust the use of the phrase “*exceptional circumstances’* within this Draft plan – it is too open-ended and provides a get-out-of-jail free card to developers and it could very well lead to stated and sensible Policies being overridden. 87% of all the homes it is suggested need to be built lie in the ‘sandwich area’ between the SDNP and the AONB, the latter already being in substantial decline. This is madness and will see our area being suburbanised if not totally urbanised with a parlous lack of infrastructure and everyday living services.

5.6 makes it clear that:-

***“If draft NP making provision for at least the minimum housing numbers of the relevant area have not made demonstrable progress, CDC will allocate sites within a development plan document (DPD) in order to meet the requirements of this Local Plan”***

**This little phrase is the Sword of Damocles which it seems clear CDC will deploy – irrespective of the absence of services/amenities/improved wastewater treatment capacity/medical/dental/educational resources – and in Chapter 10 it is very clear that even modest improvements to the A27 cannot be guaranteed because of lack of funding**.

**Policy H2**

**OBJECT:**

The housing numbers are excessive. 2000 new homes are planned from Fishbourne to Southbourne along one ‘resilient’ road the A259. This is absolutely not sustainable and will lead to coalescence, suburbanisation on a large scale, traffic congestion, reduced air quality, a much reduced quality of life for residents and have a disastrous effect on the landscape, unique long-distance views, the AONB of the harbour and the environment in general.

5.10. Some flexibility may be allowed for minor amendments to housing numbers for individual parishes subject to the detailed investigation and assessment of potential sites through neighbourhood plans and in the subsequent Site Allocation DPD. Developments of 6 or more dwellings will be counted against the parish housing requirements. **Developments of less than 6 dwellings will not count against the parish housing requirements as they are already taken into consideration in an allowance made for future delivery from windfall small sites.**

**OBJECT:**

Housing developments of any size must count. There is no fairness or justification in NOT INLCUDING ANY DEVELOPMENT OF LESS THAN 6 HOUSES. This approach must stop. It is disingenuous to exclude these numbers from parish housing requirements.

In our parish we see every week homeowners applying to maximise available space on individual plots and we also see old homes being demolished 2 for 1 homes being crammed into a single site. Upwards into the eaves expansion is also now much more frequent because of the ever-rising cost of property in this area of West Sussex. However global economic and UK specific economic factors *could* lead to a significant house price adjustment during the plan period. Climate change could accelerate more quickly than predicted – it already is according to the UN Secretary General – and nowhere in this Draft LP is there any mention of the **adaptation risk** which will need to be addressed as homes either fall into the rising sea or get inextricably damaged by windstorms, cyclones and storm surges and homeowners have to be rehoused. Where?

5.11. This Plan considers the development needs of the plan area up to 2039. Beyond the Plan period additional planned provision for housing will be required. **During the course of preparing this Plan, it has become apparent that it may not be appropriate in the longer term to continue to rely completely on similar sources of supply such as urban extensions and urban intensification given their cumulative environmental, infrastructure, landscape and historic character impacts.**

19)

 Proposed Submission (Regulation

2039:

Para 5.11 suggests an air of realism may have crept into the minds of the authors of this Draft Plan. The term **“*suburbanising”*** appears elsewhere and it is this unplanned urban creep that seems to be driving the thinking with regard to the East West Corridor.

If the A27 cannot and will not be funded for significant and meaningful improvements during the Plan period, the pressure on the limited number of alternative routes in the coastal strip between the SDNP and the AONB of the harbour will rise inexorably.

The A259 is classified as a **“resilient road”**. When the A27 is shut due either to RTA incidents or extreme rainfall – we shall see more and more of such events with accelerating climate change – it can be gridlocked. The more northern B2146 is today a much used rat run and it will join the A259 as “an accident waiting to happen” road very soon. It is impossible to imagine that the motorised vehicle will disappear during the period of this LP. It will not if only because electric vehicles will not come down in price fast enough and the UK’s charging network should be in place well ahead of actual need – we must not delay infrastructure installation until the demand is there. We must anticipate demand and install ahead of time.

5.12. In order to be in a position to update this Local Plan within the next five years the Council will need to consider future population and household growth. At the same time, the requirement for sufficient homes to house a local workforce without relying on excessive **in-commuting** to the District’s workplaces will need to be considered. The continual evolution of National Planning Policy also presents challenges as in what national, regional, sub-regional and plan area strategic planning context any future reviews of this plan may be undertaken.

Yes indeed. The last commissioned HEDNA 2022 should be updated as it was not based on 2022 data. We seem to have to wait a long time for Census results being interpreted and shared in detail with Parish Councils.

## General feeling is that despite all the delays with this Draft Local Plan – 8 years since the last 2015 plan – this draft has been produced and put out to consultation for a mere 6 week period, with elections at the forefront of the authors’ minds. Too little, too late and some of the holistic, bigger picture thinking that is suggested and desperately needed has simply not happened. There is a very clear need for visionary external consultants to be employed to deliver an exciting, visionary masterplan for the City of Chichester and for this unique part of West Sussex.

Responding tamely to any Government’s imposed housing target number is simply not acceptable for local residents.

The very small reduction in the number of dwellings per annum from 638 to 535 should be significantly greater. **The absence of working infrastructure is reason sufficient for Chichester District to be treated as an EXCEPTION. Why has CDC not achieved this?**

**AFFORDABLE HOUSING**

**Policy H4**

5.17. The HEDNA 2022 identifies a need for approximately 200 social and affordable rented houses per annum for the plan area (to 2039). To help meet this need, the provision of affordable housing will be required as set out in in Policy H4.

**COMMENT**

This suggests that 37% of the annual target of 575dpa has to be either first homes or affordable. This may well be the need, but developers who are obliged to build these homes which must be identical in quality to all the other homes on developable sites have to be sold at at least 30% less than market price. **We do not believe this is achievable. This is not real world thinking.**

5.24. In relation to market dwellings, the HEDNA (2022) sets out that the parameters for housing mix should be as follows:

* 1-bedroom: 5-10%
* 2-bedrooms: 30-40%
* 3-bedrooms: 35-45%
* 4+-bedrooms: 15-20%

**COMMENT**

We are not convinced that the area West of Chichester, being in the main semi-rural in character is the right location for many 1 bedroom dwellings. It is already recognised that the UK and specifically Chichester District has an ageing population and that this segment of our demographic profile will increase during the plan period.

Developers will continue to focus on larger, market-priced family homes in the area West of Chichester.

We do not believe the targets for affordable/social rented and first homes will be met.

There is no guarantee that affordable housing once built will be accessible to local people first. Developers may state this but will equally happily sell houses as second homes.

5.22 The council will seek to ensure that new housing reflects the need and demand of the plan area’s existing and future communities and provides an improvement to the quality and mix of new market and affordable housing in the plan area.

**COMMENT**

Para 5.22 reads well and maybe this reflects an acknowledgement by CDC Planning that the quality of several recent developments around Chichester has not added at all to the built environment.

The obligation to build, build, build has led to cheap, ticky-tacky housing developments containing a mix of sizes and shapes of dwellings but very little added value or quality.

Close attention to the actual quality of what will be built and we would suggest several site visits to gauge, hands-on the actual quality not just of the homes, but also the overall built environment before any planning application is debated or approved. Very few things – and this sadly includes houses of all sizes and shapes are built with long-life expectancy quality as the overriding requirement. We should not forget that scattered across our District we have many unique heritage buildings that have, in the main, stood the test of time and have weathered well. Homes built in the past fifty years will never achieve such compliments.

**POLICY H5**

**COMMENT:**

We do not hear much at all about the Housing Register so where is the transparency and indeed how accurate are the housing need figures?

CDC outsources housing need studies to paid, professional consultants.

No statistics are published (or if they are they are not shared widely) which reveal the speed of uptake of new homes built and the housing market in 2023 and perhaps for several years hence is very likely to be less buoyant than it has been for decades.

We need to be certain that CDC is not chasing shadows created by an annual housebuilding target of 300,000 homes per annum – a target that has not ever been reached if CPRE’s findings are correct.

**Do we really want to destroy this unique part of the South Coast just because we have an unrealistic and inaccurate target set?**

**Let’s remind ourselves that in Michael Gove’s own words:**

“…*the standard method [for assessing local housing need] does not provide a housing target. […] it is used by councils to inform the preparation of their local plans, which local authorities are required to have.* ***Councils decide their own housing requirement*** *once they have considered their ability to meet their own needs in their area. This includes taking* ***local circumstances and constraints, such as Green Belt and Areas of Outstanding Natural Beauty, into account*** *[…] This recognises that not everywhere will be able to meet their housing need in full*.”

**POLICIES H6 through H14 are very specific to individual categories of home-building and home owning need.**

**POLICY H8**

**COMMENT:**

The demographics of our area are different from other areas and it is recognised that our ageing population will grow during the plan period.

It is also clear that more specialist accommodation will be needed in our area for both married and single pensioners.

We support the outlined policy

Paras 5.53 – 5.58 suggest that CDC’s Planning team will have a significantly greater workload if they are to vet these applications for delivery on the essential detail. Are they sufficiently resourced? Do they have planners with this specialist knowledge?

**CHAPTER 6: Place-making, Health and Well-being**

6.1. The council is committed to securing a high-quality environment and wishes to secure design which is inspired by and reinforces the individual character of the settlements within the district. Irrespective of the approach to architectural style taken development of all scales should be attractive and interesting, enrich the locality and improve the quality of people’s every day architectural experiences.

**COMMENT**

A commendable opening paragraph but how will this be achieved?

6.2. Achieving high standards of design is vital for ensuring that the district retains and enhances its character over time. Development needs to be designed to be successful over the long-term, whether that be in terms of being able to adapt to changing circumstances or only using appropriately durable materials. Securing good quality design is key to delivering sustainable development through the creation of successful places and civic pride. It raises the quality of our environment, can discourage crime, improves the quality of life and can help attract investment.

**COMMENT**

More ambitious words but what we have seen in the district in developments in recent years goes NO WAY to achieving this aim. In fact, we are not creating happy communities at all. Rather the opposite, and loading more houses on a district that is lacking in so many areas of infrastructure and services is putting the cart before the horse.

Para 6.3 goes on to say:-

Achieving good design, particularly for larger scale proposals, will require early engagement with relevant statutory bodies and wherever possible public involvement.

This Draft Local Plan has been published without any respect being paid to a number of Statutory Consultees despite significant and repeated attempts to get Michael Gove’s DLUP team and now Thérèse Coffey’s team at DEFRA to proceed with making ALL WATER COMPANIES Statutory Consultees on larger developments. This remains a massive lacuna in the current planning system – who have made comments to CDC when consulted. Parish Councils struggle to get responses from CDC which is an organisation that appears to be seriously under resourced. Public involvement is made more difficult by GDPR and the harsh reality that many pensioners are simply never going to be IT savvy and indeed do not wish to be – so they need paper copy based consultation.

**POLICY PI Design Principles**

**COMMENT: Admirable content, full of aspiration. Achievable? Demands substantial ongoing monitoring in real time.**

6.7. No development site exists in isolation, it is important that proposals of all scales consider the wider context of their setting. The settlements and wider landscape within the district have considerable and unique character. It is important to maintain the separate distinct identity of different settlements and a clear transition between built up areas and the countryside. In order to retain and enhance distinctiveness, proposals should identify local characteristics at an early design stage and use these to inform the development of designs.

**COMMENT:**

This is all great to read. Coalescence is a real and not an imaginary threat to the well-being of innocent, often elderly long-term residents of small communities that, with CDC’s imposed housing targets in this Draft LP through to 2039, will hit them hard. There must be wide, clear Settlement Gaps which where possible should embrace sufficiently wide (not less than 100m width) dedicated, protected from development within them, Wildlife Corridors. Transition gaps are essential.

**POLICY P2 Local Character and DistinctivenessPolic2 Local Character a**

7. Respects the existing natural features of the site, including landform, trees, hedges, and biodiversity;

1. Retains and where possible enhances or creates vistas, panoramas and views of natural and built landmarks and protected landscapes;

**COMMENT:**

Again lots of positive parameters but neither developers nor their contractors are sufficiently policed in respect of their actions at site.

**Enforcement** should be statutory and not a cost laid at the door of underfunded local councils.

Sites which are cleared of hedgerows and trees BEFORE planning applications are lodged should see the offenders fined when this is discovered.

We have a live example locally of a significant landowner having installed vicious barbed wire fencing and removed many hundreds of metres of mature undergrowth very recently and posted large signage suggesting that the land now fenced off is a nature conservation area.

Points 7. And 8. within Policy P2 will require serious policing if they are ever to be achieved.

**POLICY P3 Density**

**OBJECT**

Density of 35 dwellings per hectare is absolutely not appropriate in semi-rural areas.

The absence of any reference in the 7 point policy to the importance of both wildlife and biodiversity is absolutely shocking.

Regrettably, without some compulsory purchase orders to secure land for dedicated cycle routes and footpaths, the repeated message in this Draft Local Plan that homeowners must forego their cars and take to a bicycle or their feet will just not happen.

Our area is already crowded and vehicular traffic is growing and WILL NOT REDUCE until and unless regular, affordable rail and bus connections are IN PLACE. Wonderful idealistic thinking but very far removed from reality.

**LAYOUT AND ACCESS**

**Policy P4**

1. Provide safe, direct and attractive conditions for inclusive access, egress and active travel between all locations and provide good links to integrated public transport.

**COMMENT**

We can only reiterate our earlier comments. The District is nowhere near in a position to provide an integrated public transport solution to its residents. There is no evidence in this Draft Local Plan of Future-Proof masterplan for the City of Chichester or the District. Policy P4 is thus unsound and smacks of Mission Impossible.

**Chapter 7: Employment and Economy**

*7.1.  The Local Plan objectives support a strong, thriving and diverse economy, improving employment opportunities for all skills whilst moving to a low carbon economy. This reflects the Plan vision and the main priorities identified in the council’s Economic Development Strategy. This in turn reflects the key priorities of the Coast to Capital Local Economic Partnership (LEP) and the West Sussex County Economic Strategy. A key element of the Economic Development Strategy for the district is a targeted approach supporting the growth of indigenous businesses, whilst encouraging inward investment.*

*7.2.  The Local Plan will assist the creation of new jobs in a variety of ways, most obviously through the allocation of land for employment uses, but also by less direct means, for example, by promoting town centre regeneration, supporting local services in rural areas, enhancing visitor facilities, supporting expansion of education and training, building new dwellings and facilitating improvements to transport and telecommunications.*

*7.3.  The Local Plan also seeks to maintain an attractive environment through protecting the landscape and heritage assets which will encourage tourism and inward investment from businesses that wish to locate here.*

**COMMENT**

The above three paragraphs read well but are, as is the case elsewhere within this Draft Local Plan, contradictory.

Protecting existing landscapes and in particular the long-distance views which exist today West of Chichester between the AONB and the SDNP are threatened with disappearance due to planning applications and / or Appeals.

The City Centre of Chichester is increasingly depressing with so many shops and buildings boarded up. The Romans must be turning in their graves.

Online retail shopping is here to stay. Fact. So what visionary plan does CDC have for the 4 main, mostly pedestrian streets of the 4 points of the compass.

It has to be hoped that the redevelopment of the desolate Army & Navy store building will be sensationally creative and provide a sensible mix of retail and residential space.

Tourism cannot revolve solely around a plethora of eateries – too many pizza/Italian options already – and a threatened CINEWORLD complex – the children’s’ Air Arena has already died – and that location is hardly central.

If the decline of the AONB of the harbour continues, Chichester will lose out on significant tourism income.

The theatre is a continuing success but our City has no multipurpose concert/event hall and no nightclub.

What thinking has been done? How broad has the consultation been with local residents?

7.8*.  In addition, provision is made within some of the new strategic site allocations (Chidham and Hambrook and Land East of Chichester) for flexible working space to be provided within local centres/community hub buildings,*

COMMENT:

This is interesting. The CALA Homes development in the north of Chidham & Hambrook Parish is under way and should be finally completed in June 2025. The site has already caused flooding and damage to the Ham Brook – one of a very small number of chalk streams in the world.

Yes a potential ground floor convenience store which requires a tenant operator is under construction, but will such an occupier be found. It is completely illogical to build this combined convenience store with flexible community space on the first floor at the start of a 6 phase 118 home development. This phasing suits the developer who will use the space to accommodate site management staff.

*7.9.  Elsewhere, planning policies will:*

|  |
| --- |
| *• Safeguard existing employment sites from unjustified loss to other uses, whilst providing some flexibility to allow for leisure and community uses where clearly*  |
| *justified; and* * *Encourage refurbishment and intensification of existing employment sites*
* *Provide for new employment sites within existing settlement boundaries*
 |

**COMMENT:**

We are deeply concerned that CDC Planning have not refused a planning application within the parish of Chidham & Hambrook which, if successful on Appeal, would see the loss of two specialist businesses which contribute significantly to the local tourist economy.

Just because small entrepreneurial businesses have chosen to set themselves up in a discreet location which in no way impacts the AONB, is it fair for the landowner to submit his land for housing development without any prior consultation with his long-term tenants? Where is the moral compass to be found in that?

Para 7.16 in the Draft Plan would seem to favour the existing tenants

*7.16.  Where planning permission is required for a change of use to a non-employment generating use, applicants will need to provide evidence that the site is no longer required for employment. In particular, applicants will need to provide supporting evidence on the viability of the site for continued employment use (guidance is set out in Appendix C) including the availability of employment land/floorspace in the local area and demonstrating that genuine attempts have been made over an extended period to market the site for commercial or similar uses.*

And this is further endorsed in Policy E2:-

*Existing employment sites will be retained to safeguard their contribution to the local economy.*

We endorse and support the measures proposed to support horticultural needs and employment. These positive steps should be extended to the semi-rural communities sited within the East West Corridor where good quality agricultural land will be lost forever if current housing target numbers are not drastically reduced.

If CDC has failed to establish appropriate relationships with landowners this must surely be an area for specific and urgent focus. If farmers wish to retire for whatever reason, surely CDC and the relevant Parish Council and community should be the FIRST TO KNOW THIS and not the last. Developers land grab intelligence cannot be faulted. Land is being stolen under the eyes of those likely to be most affected. A desperately sad situation when the world is in a global food and climate change crisis.

**POLICY E6 Chichester City Centre**

**COMMENT:**

Full of laudable aspirations and objectives. However, the Chichester Vision document dates back to 2017 and requires a very rapid 2023 update.

Much has changed in people’s lives since 2017. Our view is that any Vision has to be the product of a competitive tendering process and there has to be a substantial budget allocated to this process.

We are not aware of any visionary architects, landscape and environmental planners being in full-time employment of CDC. If they are there, why do we not hear from them?

Chichester should be the jewel in this part of West Sussex’s crown but it is increasingly a tarnished jewel.

City centres will need to become safe places for more people to live – and the accommodation will not be large, terraced or detached homes, but tastefully designed apartments.

There will be a need to establish a much better system of volume parking. Have underground car parks been considered?

Has ground floor parking with accommodation above been adequately used?

The Vision for Chichester 2023 should be the TOP PRIORITY for the newly elected District Council.

**POLICY E8 Built Tourist and Leisure Development**

It is true that our district has a great deal to offer but there are massive holes in the fabric.

Infrastructure – roads, rail, bus, entertainment venue(s), hotel and other accommodation – all are lacking and are not up to the level of need or expectation of all ages of our demographic population.

There is no surprise that AirBnB has so successfully penetrated the tourism sector.

We do not yet know what will become of the former Army & Navy store but we have to hope and pray that the new use will be inspirational and not solely retail.

**POLICY E9 Caravan and Camping Sites**

This is an important sector for tourism. Glamping is the most modern development and should surely be encouraged within the District in appropriate locations.

Water supply issues and the need for a region-wide water supply study will need to be seen as a top priority. Water for drinking etc. is a finite supply item and tourism inevitably loads the strain on our water supply network, particularly, if as is widely predicted global temperatures will rise much faster than predicted.

Quality of sites and their services is critical.

**POLICY E10 Equestrian Development**

It is of deep concern to the residents of Chidham & Hambrook that CDC Planning has not applied the good intentions stated in Policy E10 when it comes to the proposal to develop the Willowbrook Riding School and Stables located at the north of our Parish.

To access this site, the developers will have to create a two vehicle wide bridge over the unique Ham Brook chalk stream. Only 2 of the proposed dwellings will actually be located in Hambrook BUT all the new homes will only be accessed via roads within the parish. The site for development lies extremely proximate to the connective Wildlife Corridor linking the harbour AONB with the SDNP. Our view is that the planning application should have been refused at the outset for these and many other reasons.

Equestrian activity is of great benefit to both fully fit and severely disabled people of all ages. It is a great community asset and Willowbrook should not be lost to greed.

**Chapter 8: Transport and Accessibility**

**Transport Infrastructure**

* 1. Transport is a key issue for the plan area. The Portsmouth-Brighton rail corridor and the A27, part of the strategic road network, both run east-west through the southern part of Chichester District. These strategic routes are supported by a network of local roads as well as bus, cycle and pedestrian routes which enable people to move around by both car and alternative modes of transport.

COMMENT:

Another fine broad brush statement. To be attractive to businesses, residents and economically essential tourists, efficient, affordable, smooth-running and frequent rail and bus services are absolutely essential.

Regrettably our plan area is not well served by rail or bus services – but this is as much a national as it is a local issue.

We would not agree with the suggestion that we have adequate cycle and pedestrian routes. There has been a stop/start process on dedicated cycle routes along the A259 between Fishbourne and the Havant Borough border. It is a fact that seems not to be willingly acknowledged that the A259, whilst categorised as a ‘resilient road’ (because it is the only viable alternative which exists to take the traffic from the A27 when that vital transport artery – dual carriage road – is out of action (which is not an infrequent occurrence)

We would contend that in parts the A259 is too narrow to allow for separate pedestrian and cycle routes. It is very clearly dangerous to have cyclists riding at 20+mph on the same route as pedestrians of all ages and very often mothers with buggies.

This is the UK and not Holland. So to suggest we have a viable cycle network is ambitious and a gross exaggeration.

8.4.  The Local Plan Transport Study shows that in many parts of the plan area, the road network is operating at or close to designed capacity. At a strategic level, mitigation is required to increase capacity on the A27 and manage additional demands on the highway network. This could be delivered through junction improvements and sustainable transport infrastructure as well as through non-physical measures such as travel planning to encourage sustainable travel choices. The cost of the junction improvements is estimated at approximately £ 90 – 135 million and cannot be met through developer contributions alone.

**COMMENT:**

The road network is very clearly at capacity already. Journey times, particularly at peak times, are much longer in 2023 than they were and must be attributed to the numbers of new homes built in recent years both along the A259 and to the East of Chichester.

It cannot be a valid justification to build thousands more houses to raise additional CIL money from developers to provide essential road improvements WHICH SHOULD BE IN PLACE BEFORE ANY FURTHER BUILDING IS APPROVED. Cart before the horse thinking.

8.6.  In the first instance, development will be directed to the most sustainable locations where the need to travel is reduced or there are suitable alternatives to the car. Development will also be phased to align with future transport improvements planned to support development over the plan period.

**COMMENT:**

This paragraph is frankly nonsensical. Most of the areas designated for significant percentage increases in numbers of residences per parish under this Draft Local Plan are NOT SUSTAINABLE LOCATIONS.

Due to the lack of frequent, affordable rail and bus services, the only means of efficient transport will be the car. And we will not be all buying electric cars for some years to come when the unit price has dropped to more affordable levels and sufficient rapid-charging stations are located throughout the UK – we are light years behind our European neighbours.

We suggest much greater focus on Chichester City – their allocation is a mere 270 homes in the next 18 years. That is less than a service village (with MINIMAL SERVICES) with a high percentage of elderly residents and transport solutions which offer no workable alternative to the private car. **Put more homes in locations where walking and cycling and buses can offer a workable solution.**

8.8.  Increasing the capacity of the road network is key to supporting growth in the Local Plan. However, there is also a need to reduce demand for road transport to achieve net zero in greenhouse gas emissions by 2050 as highlighted in the council’s Climate Emergency Action Plan and Strategic Objective 1. In aiming to achieve the ambitions of the action plan, all development is expected to demonstrate how it will support four key objectives to create an integrated transport network which will alleviate pressure on the road network, improve highway safety, encourage sustainable travel behaviours and help reduce transport related impact on air quality, by:

1. Avoiding or reducing the need to travel by car;
2. Enabling access to sustainable means of travel, including public transport, walking and cycling;

3. Managing travel demand; and

1. Mitigating the impacts of travel by car.

**COMMENT:**

Para 8.8 contains wishful thinking targets which, with 2000 new homes planned along the West of Chichester corridor will never be achieved.

Walking along the A259 with cyclists sharing the footway is unsafe. Public transport options offer zero solution as already commented.

Point 3 highlighted above: WHAT DOES THIS MEAN? HOW will people’s travel be managed?

Point 4: There is no possible mitigation for the polluting emissions from non-electric cars. None. So this is just a meaningless and unachievable objective.

This may explain why in para 8.9 4 objectives are reduced to 3?

Para 8.10

The district council has undertaken several transport studies of both the proposed development sites and strategic housing numbers set out in this Plan, and also a greater quantum of development, to understand the impacts on the highway network in the plan area and surrounding area. The studies have identified that a number of potential highway improvements will be required to mitigate the impact of the development now planned in this Local Plan, particularly in relation to junction improvements on the A27 Chichester Bypass, as set out above. There will also likely be a need to supplement physical highway improvements with sustainable transport initiatives. The council has worked with National Highways and the county council to identify a coordinated and deliverable package of transport measures and principles on which to identify further mitigation proposals, that will be considered through the ‘monitor and manage’ approach to mitigate projected traffic impacts resulting from new housing and other development over the Plan period.

**COMMENT:**

The *‘monitor and manage’* approach appears here for the first time. Absolutely no explanation as to how this approach will work and be an improvement upon ‘*predict and provide’.*

It is very clear to everyone that the through traffic issue created by a dual carriageway road with too many dangerous roundabouts must be and indeed is an impediment to all future growth of both Chichester City and the entire district of the plan area. The fact is that it is more often quicker to go through the city centre than use the by-pass: “the by-pass that doesn’t”.

We have a pitifully painful and slow approach to major road infrastructure projects. Car ownership shows no sign of diminishing – indeed because of the magnetic attraction of Goodwood, we would suspect that the level of car ownership in this area is well above average.

We find it hard to believe that no funding can be found to ensure the A27 infrastructure gets the improvements it must have BEFORE MORE NEW HOMES ARE BUILT. It will destroy this part of West Sussex if the A27 challenge is not addressed as a matter of national interest. It is not a long-term, credible strategy to have to rely upon developer contributions to deliver piecemeal roundabout improvements on 2 critical and dangerous roundabouts which put the fear of God into many elderly drivers.

10,350 homes in the plan period will see the A27 and other roads such as the A259 being nose to tail gridlocked polluting nightmares. **Time for CDC and WSCC to stand up and fight for us all up in Westminster.**

Para 8.14

Whilst is it recognised that based on the current forecasting, junction improvements are also required at Stockbridge Roundabout and Whyke Roundabout, the provisional mitigation schemes (converting the roundabouts to signalised crossroads) would ban right turn movements from the A27 to Chichester and the Manhood Peninsula. This would then trigger the requirement for the Stockbridge Link Road mitigation scheme, in order to replace right turn movements onto the Manhood Peninsula. This package of works would be between £57.23 and £82.79 million to deliver in full and would not be capable of being funded by development contributions alone. There have not been any external sources of funding identified that would be able to deliver the scheme. This, combined with concerns about the deliverability of the Link Road, means that it is unable to be delivered as part of the Local Plan mitigation measures. However, if during the monitor and manage process, it is found that any alternate scheme could remove the need for the restricted movements, then these will be assessed by the TIMG and will inform any further review of the Plan.

**COMMENT:**

This paragraph is an admission of the fact that the A27, due to contents of this Draft Local Plan, will not be able to cope. Honesty is to be appreciated but your district residents do not deserve to be the victims of this impossible situation. Minor roads and country lanes are already used by those who cannot have their journey times delayed. The 10,350 homes target must be reduced very significantly. Residents of the Shopwyke development cannot get out of their development at peak times to access the A27. The same will be the case for all the developments due to pouring impatient vehicles on to the A259 if 2,000 homes are built during the plan period. A serious rethink is needed to come up with more options.

8.17.  In terms of public transport, the council will be working with Network Rail, train operators and local stakeholders to facilitate improvements to the accessibility of railway stations. The council also works closely with bus operators to improve their services in and through the plan area.

**COMMENT:**

This leads us to question exactly how much regular dialogue CDC has with essential transport providers. CDC must surely realise that without significantly improved rail and bus services, expansion cannot be achieved. District residents expect to be told on a regular basis the content and status of discussions with organisations such as Network Rail and Stagecoach. The housing numbers contained in this Draft Local Plan should be based on known (now!) deliverable improvements in train and bus services. The inference here is that CDC have not been doing this essential work and without efficient, regular bus and train services the dream will become a living nightmare.

**POLICY T1**

For all the reasons already cited, this Policy is not only unsound it should have been sorted before the Local Plan was put out for consultation.

The locations and numbers of new homes proposed will not reduce the need to travel by car. In fact, the opposite. The A27 improvements must be in place before all these new homes. Public transport requires increased capacity, frequency, improved infrastructure and obviously substantial investment. How and when will Southern and Stagecoach deliver this? The West Sussex Bus Plan does not, we believe, deal with this issue. As a community, we should not be reliant upon developer contributions to make our everyday lives work. **Developers build houses. They have no regard for anything else other than the profit they achieve once homes have been built.**

Paragraphs 8.20- 8.22 give little assurance to the reader and the resident enduring slow journeys around Chichester today and every day. The improvements to the dreaded Fishbourne and Bognor roundabouts seem to be entirely dependent upon developer contributions – but not all the developments have planning approval. **It would most definitely not be a good outcome were it to be found that planning approvals are granted purely to secure developer funding.** And the estimated costs in this draft are more than likely to be found undercooked when final tender prices are concluded if the global economic environment does not improve. None of this reads well and CDC do not come across as being driving any of these negotiations.

**POLICY T2**

**COMMENT:**

This policy is full of Utopian statements:-

Proposals for new development will be required to contribute towards a safe, sustainable, connected and accessible transport network by addressing the following criteria:

a)  Ensure that major development is designed to avoid and/or reduce the need to travel by car and incorporates measures where possible, that decrease traffic speed and flows;

b)  Maximise opportunities for sustainable travel connecting to either the existing network or providing new infrastructure or public transport services, to reduce reliance on the private car and work towards achieving net zero in greenhouse gas emissions by 2050;

c)  Promote active travel by incorporating safe and coherent pedestrian and cycle routes within major development sites and ensure connectivity to existing cycle routes and relevant planned cycle routes located within proximity to the site, to enable access to local services by foot and bicycle;

d)  Ensure major development is located to enable the use of public transport to access local services and facilities including employment, leisure and education facilities;

e)  Provide safe access to the highway for all users;

f)  Ensure that the layout and design of the site provides sufficient space for all vehicles to manoeuvre without compromising the safety of pedestrians and cyclists or the ability to provide an appropriate level of landscaping across the site;

g)  Provide parking in accordance with Policy T4;

h)  Where possible, connect to existing car sharing clubs in accessible locations and/or depending on the scale of the proposed development, provide new car sharing clubs;

i) Ensure that where new accessing or servicing is required in connection with commercial premises, where possible, it is located to the rear of premises and does not result in obstructions on the highway or on pavements while loading/unloading takes place;

j.) Provide site-specific transport mitigation measures outlined in the Local Plan transport mitigation plan, Local Plan site allocation policies or neighbourhood plan policies.

Traffic issues are already significant in the plan area. The proposed East West corridor new homes numbers are going to cause many more traffic problems and much more frequent congestion BEFORE any recognised as essential improvements will be delivered. Being massively dependent on developer contributions is a strategy fraught with risk. The highlighted phrases in the T2 objectives reveal a distinct lack of local knowledge. More direct, on site visits by all those people in CDC who seem to suggest they know the plan area in detail, must be a condition ‘sine qua non’ of being employed in the CDC planning team. Many of the semi-rural villages do not have any viable transport alternatives to their car. Increased congestion means further deterioration in pollution of the air and the environment.

**POLICY T3 Active Travel – Walking and Cycling Provision**

This Policy is weak. Cycling in cycle lanes is essential. Cyclists currently do not feel safe without the protection of dedicated and clearly demarked cycle lanes. There has been much noise about the CHEMROUTE Project but in parts the A 259 from Fishbourne to the Havant Borough is never going to be wide enough to provide safe and separate routes for both cyclists and pedestrians.

**POLICY T4 Parking Provision**

**COMMENT:**

There is a great deal of land in and around the City of Chichester which is given over to car parking, none of which is underground or located underneath other office or residential buildings. As the take-up of electric cars develops, underground car parking for non-hydrocarbon fuelled vehicles should be envisaged. Fewer small car parks and a daily Park and Ride (using electric or hydrogen buses supplied by CDC) facility is surely envisage-able.

The harsh fact is that the Vision for Chichester needs urgent and rapid revision and the ideas of those with experience in actually designing and delivering on time and on budget major big picture urban regeneration schemes has to be taken forward, urgently.

Parking in Chichester is ever more expensive but increasing prices will not drive people from their cars – BECAUSE THE CURRENT TRAIN AND BUS OPTIONS ARE TOTALLY INADEQUATE. It is cheaper to drive into Chichester and park than take the bus.

**Chapter 9 – Infrastructure**

This section of the Local Plan is summarised in 2 pages. This is surely indicative of the importance it has in the overall scheme of things.

The Infrastructure Delivery Plan that accompanies the Local Plan does not have a link to said Plan.

 A key element of the Local Plan is for new development to be coordinated with the infrastructure it requires and to take into account the capacity of existing infrastructure. Infrastructure delivery will be secured through a combination of developer contributions, public sources of funding and delivery by other organisations and bodies. The type of infrastructure that this policy covers includes:

* Transport facilities (Road, Bus, Rail, Cycling and Walking);
* Education (Further and Higher, Secondary, Primary, Early Years, and Special Educational Needs and Disability);
* Health (Acute Care and General Hospitals, Community and Mental Health facilities, and Primary Care facilities);
* Social Infrastructure (Social and Community facilities, and Sports and Leisure facilities);
* Green Infrastructure (Open spaces and Parks, Natural Environment, Flood Defences, Rivers and streams);
* Public and Community Services (Emergency services, Libraries, Cemeteries and Crematoria, Waste Management and disposal);
* Utility Services (Wastewater Treatment and Sewerage networks, Water supply, Electricity and Gas distribution, and Telecommunications/Digital infrastructure).

What this policy fails to say is that if none of the above deliverables cannot be delivered ahead of or in tandem to the delivery of any housing when there is a clear need for this infrastructure in order to make the development sustainable then the DC reserves the right to reject said application. There is a desperate need to return to proper urban planning which creates capacity first ahead of demand for such services and infrastructure. If there is no capacity in the system for more housing due to infrastructure limitations, then housing development should be deferred until such times said infrastructure is in place. Build the pipes before you turn on the taps.

**Policy I1 Infrastructure Provision**

The council will work with partner organisations to coordinate infrastructure provision to ensure that individual and cumulative development is supported by the timely provision of adequate infrastructure, facilities, and services.

This is not strong enough as all that will happen is a reoccurrence of the past whereby developers will develop make their profits and the lack of delivery of promises made will be to the detriment of the general populous and ultimately harm to the district over the long term. Clear accountability and inspection is essential.

9.1 The Infrastructure Delivery Plan (IDP) that accompanies the Local Plan identifies programmed infrastructure provision from both the public and private sector in addition to that delivered through the development process. It provides an overview of the strategic cumulative infrastructure requirements and where known, who is responsible for delivery and a broad indication of phasing, costs and funding mechanisms at the local level. Capacity in infrastructure and services will be monitored through updates of the Infrastructure Delivery Plan and future infrastructure need assessments via the five- year rolling Infrastructure Business Plan (IBP).

9.2.  The provision of infrastructure is necessary to support development. It can range from strategic provision, such as the provision of a new road or school, to the creation of a local play space, community facilities, a country park, or improvements to telecommunications for example. A key element of the Local Plan is for new development to be coordinated with the infrastructure it requires and to take into account of the existing infrastructure. Infrastructure delivery will be secured through a combination of developer contributions, public sources of funding and delivery by other organisations and bodies.

**COMMENT:**

It is tragically ironic that Infrastructure comes in the penultimate chapter of this Draft Local Plan that has been years in its making.

The theme throughout commentary is consistent and there is nothing closer to the truth than CDC’s opening sentence in para 9.2: ***“The provision of infrastructure is necessary to support development.”***

The truth is that Infrastructure in its broadest is not merely necessary, it is ESSENTIAL for the well-being, health and longevity of the residents of the plan area and also of those essential visitors and tourists who boost our local economy.

Policy I 1 is not as strong as it should be. Timely provision of much improved and more capacious WWT works is now absolutely critical to serve the needs of all local residents and all the new homes that are already either completed or under construction. It is SIMPLY UNACCEPTABLE THAT SOUTHERN WATER HAS HAD TO USE TANKERS TO EVACUATE WASTE FROM NEW DEVELOPMENT SITES.

**Would the authors of this Draft Local Plan be willing to move into a new home redolent with promises of a much improved quality of life to find that their waste evacuation system relied on a fleet of tankers? We think not!**

It is only in para iv of Policy I1 that the ALL-IMPORTANT term FUTURE-PROOF is found in this Draft Local Plan.

iv. Future-proof infrastructure provision to take account of the impacts of climate change such as flooding events from heavy rainfall, rivers and rising sea levels, increased drought, sustained and high wind speeds and extremes of temperature and water scarcity;

We as the Mayday Action Group are very concerned indeed that too much of the content of this Draft Local Plan pays only passing lip service to our absolute responsibility for not just our everyday lives in 2023, but **the future of West Sussex and Chichester and its environs for centuries to come.**

We do not believe CDC should be tortured by unachievable Central Government demands to make an excessively significant annual housing contribution to an annual target of 300,000 homes.

We absolutely do believe that CDC has every right to reduce the annual dwellings per year down to a much more modest number, based on what can be learned from not just the 2021 Census but also from the businesses, retailers, wholesalers, educationalists and others including local residents and organisations.

It is critical in our opinion that it is a broader pool of knowledge and talent that is called upon to amend this Draft Local Plan which in any event may well have to be amended once/when the changes to the NPPF are known.

**Chapter 10: Strategic and Area Based Policies**

**Chichester City Development Principles – Policy A1**

Chichester city is the most accessible location in the plan area and offers the widest range of services and facilities. For these reasons, the Local Plan directs a significant amount of new development to the city and its surrounding area.

In which case why is the city only earmarked for 450 additional properties, 1300 including Minerva Heights, of which 800 are in the process of being completed. Why are more of the Brownfield sites throughout the city not being earmarked for development and regeneration - to add the aspired green spaces, entertainment and leisure facilities, business. The Local Plan needs to be more ambitious than just saying that elsewhere within the city, there are a number of sites and locations which may have potential for redevelopment in the future, subject to the relocation or rationalisation of existing uses.

It is intended that new development will contribute to improving the city's infrastructure and enhancing its range of facilities. At the same time, it is acknowledged that new development needs to be planned sensitively with special regard to the unique character of the city's historic environment and setting. There is potential to provide new residential development; enhancements to the townscape, streetscape and public space; and improved cycling and pedestrian access to the city centre from the south.

Why is this ambition limited to the south of the City. The aspiration should be the same as the drive throughout the whole of Europe who foresee urban planning in the form of the 15 Minute City.

**Strategic Housing Location Policy – Policy A2 Chichester City**

As the primary area of focus for new housing development for the plan area, the Local Plan sets the requirement for approximately 270 dwellings to come forward in the city over the Plan period

How can it be the primary area of focus for new housing development when 270 house represents only 2.6% of the total housing need as set out in Chapter 5.

How many brownfield sites are there within the City as identified in the 2021 HELAA?

**Southern Gateway Regeneration Area – Policy A3/A4/A5**

The Southern Gateway is a broad area on the southern side of Chichester city identified for regeneration. The area includes several different sites with opportunity for redevelopment and regeneration. Close to the city centre, to the north of the railway line, the opportunities include the bus station and depot, currently leased to Stagecoach, and Basin Road car park, all owned by the district council. Further south the opportunities include a former police playing field. Opportunities for regeneration on other sites, such as the Royal Mail Delivery office, the law courts, some additional land at the High School on Kingsham Road and some land around the railway may become available in future.

The availability of included parcels in the designated area of land has changed – the courts have come back into use due to Covid delays to court proceedings nationally and the upper floors of the government offices have been redeveloped for residential uses. The Railway land and the Royal Mail sorting office are not currently available for development.

Is all of the rest land available, are there sites declared in the above statement that are no longer available? It would appear that the redevelopment of this area in a wholly coordinated manner consistent with sound urban planning outcomes is aspirational at best. What other Brownfield sites exist within the confines of the City?

**Land West of Chichester – Policy A6**

The site is 2 km from the city centre. The site is bounded by Centurion Way to the east, the railway line to the south and Old Broyle Road to the north. This strategic site of around 120 hectares has capacity to deliver a minimum of 1,600 dwellings in two phases, of which 800 are in the process of being completed.

The lack of infrastructure and in particular sewage means that waste water is being tinkered out of this location on a daily basis. It is incomprehensible that infrastructure will be retrospectively put in place after development has taken place. Consequently, it will undoubtedly cost more, cause increased pollution in the short term. **IT IS cart before horse THINKING and is typical of a lack of vision for our City.**

Nowhere within the account of the site-specific requirements, does it consider the provision of safe cycle and pedestrian routes into the city centre and secure facilities to leave cycles in the city centre.

 **Land at Shopwyke (Oving Parish) – Policy A7**

The site has a generally low level of landscape sensitivity and is not prominent when viewed from within the South Downs National Park. However, there are views of Chichester Cathedral spire from parts of the site which should be protected. There are no water courses on site.

What does this mean for Chidham and Hambrook, as our landscape sensitivity is high and there are significant issues of views to and from the South Downs. Additional, there are environmentally sensitive chalk streams in our parish.

Following agreement of reserved matters on the original planning application, a more detailed layout enabled an increase in the density of the site, and a further 85 dwellings have been granted planning permission increasing the allocation capacity to 585 dwellings.

Did the local residents have any input on this?

###  **Land East of Chichester – Policy A8**

The East of Chichester development location is planned as an extension of Chichester city. The site is identified for 680 dwellings, subject to detailed consideration of design and layout including the potential impact of any proposals on the strategic wildlife corridor lying to the east of the site and a buffer to the lake/water body that lies beyond the site to the southeast.

The land in the south of the site accommodates a restored landfill site. Landfilling ceased some time ago and evidence will be required to demonstrate there is no significant risk to human health through site investigations and any required remediation strategy will need to be provided to address any pre-existing land (soil, gas and water) contamination on any existing or adjacent land

The site lies adjacent to the Pagham to Westhampnett Strategic Wildlife Corridor. As well as a range of wildlife interests the corridor includes one of the few remaining parcels of woodland to the east of the city, foraging areas and commuting routes for a variety of bat species including the rare barbastelle bat.

This site has the potential to be harmful to the local environment and be a risk to human health. **Work has already commenced on this site to develop it. What if after investigation evidence demonstrates risk to the environment and the general populous – Investigate first to understand the scale of reparations rather than develop first then find something nasty.**

Appropriate buffers will be required to the strategic wildlife corridor – What is appropriate, not definition? This needs to be explicit particularly when linked to prior points.

**Land at Westhampnett/North East Chichester – Policy A9**

Located to the northeast of Chichester city extending to Westhampnett village in the east and close to Goodwood Motor Racing Circuit/Aerodrome in the north.

The allocation has a number of advantages for development – the sites are located close to the A27 as well as near to potential employment opportunities, including Rolls Royce, Goodwood Estate and retail and industrial businesses on the eastern side of Chichester. Development would be expected to provide improved access and transport links to the city, particularly by sustainable forms of travel such as public transport, cycling and walking.

Why is it only expected to provided access and transport links to the city – IT MUST HAVE IMPROVED ACCESS and TRANSPORT LINKS.

**Land at Maudlin Farm – Policy A10**

The site, of approximately 13.4 hectares, comprises arable land and adjoins the hamlet of Maudlin. It is bound to the south by the A27, with residential development and a solar farm to the west and the Rolls Royce manufacturing plant to the northwest.

It is justified on the basis of being in close proximity of Westhampnett, which is described as being a Service Village on the basis it has a primary school and is accessible to public transport.

The South Downs National Park is approximately 1km to the north of the site and the council's Landscape Capacity Study has identified that there is the potential for this area to be visible in views from and towards the National Park.

No development should be permitted whereby it impacts the visual amenity or changes the landscape between South Downs and the Chichester Harbour AONB.

**Land at Bosham – Policy A11**

Bosham is predominantly located within the Chichester Harbour AONB. An area of potential development lies north of the A259 and the AONB along the east-west corridor, south of the railway line, and approximately 4 kilometres west of Chichester city.

 The Local Plan identifies Bosham as being capable of accommodating further sustainable growth to enhance and develop its role as a service village. The village is host to a good range of facilities and services, including a primary school, community facilities, local shops and a GP surgery.

The site is in a high sensitivity area in terms of landscape and visual amenity, with inter-visibility issues between to the South Downs and Chichester Harbour AONB to be considered – which the policy fails to properly address in terms of how this would be protected. The facilities within the parish are already at capacity. Without proper infrastructure investment, additional development will worsen the current situation.

**Land at Chidham and Hambrook – Policy A12**

The Parish of Chidham and Hambrook is located to the west of Chichester city along the east-west corridor. The parish is located close to Chichester Harbour and consideration must be given to the potential impact of development in terms of disturbance on the Chichester Harbour SPA/SAC/Ramsar.

The text describes Chidham and Hambrook as a village. But then states that Hambrook and Nutbourne East is a Service Village. The Parish is made up of three villages which share one railway station. The parish has two public houses, a single form entry primary school and a small sub post office that opens part of the week doubling up as a convenience store. The only recreational facility for young people is a child’s very small playpark on Broad Rd.

Since the last made Local Plan the area has absorbed 242 houses against an established target of 25.

Financial contributions will also be required towards provision of early year and school places in the area.

The current primary school is over-subscribed and West Sussex County Council has no plans to create a new two form entry school. Additionally, school collection and drop off in Chidham Lane is a ticking time bomb before someone is seriously hurt – the road infrastructure has not changed in decades and there is no capacity to change.

There are a number of specific issues that need to be taken into account in planning development for the area - protecting views to the South Downs National Park and Chichester Harbour Area of Outstanding Natural Beauty and their settings and creating opportunities for new views.

You create views by removing obstacles (buildings) you do not create opportunities for new views by building on land that has uninterrupted views of the landscape.

Respecting the setting of historic trees and hedgerows, providing sufficient space between them and new development.

In the current development by Cala Homes at the top of Broad Road we have witnessed the wholesale destruction of historic hedgerows and trees.

The vast majority of the new 300 properties designated within the proposed Local Plan as needing to be built in the Parish over the plan period will be located on or in close proximity to Broad Road, 132 already being built by Cala at the top of Broad Road. This is in addition to the 240+ houses already built since the last made plan the majority of which have resulted in the coalescence of Hambrook and Nutbourne East along the length of Broad Road. In this time Road and Transport infrastructure and accessibility have not changed and are not planned to be changed. The harm and risk to the local community grows by the day, with a degradation to the wellbeing of the local community. Local services – the school, doctors, dentists are beyond capacity. The village cannot service itself therefore should not be called a service village.

Ensure that allocations and policies accord with the sequential approach to flood risk, and that development will be safe for its **lifetime**, taking account of climate change impacts.

How has the council's latest Strategic Flood Risk Assessment been shaped by the council’s Climate Change Emergency Action Plan? How will this Local Plan ensure development will be safe for its lifetime? What infrastructure is needed to be put in place to make this goal achievable? When will the Solent Management Plan reach Chichester Harbour. What plans are being considered to mitigate the risk of flooding through identifying sites where a Managed Retreat Strategy can be adopted.

The development/s will need to be phased in such a manner as to ensure that sufficient wastewater disposal capacity is available to accommodate the requirements resulting from development/s.

Capacity at Thornham given recent development approvals in both Havant DC and Chichester DC must have been exceeded. Who is accountable for connecting the dots from Southern Water and CDC Planning? Who bears responsibility for planning decisions that add to the houses using Thornham? Why are any applications being approved, as Southern Water by their own admission cannot even start any new investment in infrastructure until 2027, with potential true additional capacity somewhere around 2030? If this can even be believed as water treatment companies throughout the UK are stating that to create the capacity and level of service to ensure our environment will not be harmed will cost £56bn. Given the scale and the timeframe over which it would need to be delivered, combined with a lack of government or the water companies’ appetite to fund this, there should be an immediate moratorium place on development, until such times as proper infrastructure can be put in place to protect the environment and treat waste water properly.

Why has Southbourne been afforded development during the latter part of the plan period and Chidham and Hambrook has not, given the level of housing (*more than 200 new dwellings*) already absorbed since the last made plan.

**Land at Southbourne – Policy A13**

Southbourne is the largest settlement in the west of the plan area and is defined as a settlement hub within the settlement hierarchy. Southbourne acts as a service centre for the surrounding villages, providing a variety of community services and facilities, including shops, a library, doctor's surgery and a range of education facilities.

Southbourne has been identified as a suitable location for strategic development during the later part of the Plan period, with a target of 1050 homes plus commercial property.

This equates to the current number of homes in the Parish of Chidham and Hambrook, before the current building ongoing. Local services will suffer, with the population in the surrounding villages suffering harm as a direct result as constraints in the supply of said services. Southbourne surgery is already seriously under pressure with long wait times to make an appointment. With an aging population and increasing population, the situation will get worse.

Southbourne is located close to Chichester Harbour and any opportunities for development must give consideration to potential impact in terms of recreational disturbance on the Chichester Harbour SPA/SAC/Ramsar site, particularly for the area to the south of the A259 which also falls within the AONB. Certain areas outside those designated sites functionally support species for which the sites are designated and consideration will need to be given as to whether there are likely to be any significant impacts on the functionally linked sites and the avoidance measures or mitigation that may be required.

Regard will need to be paid to landscape considerations, particularly the setting of the AONB and protecting views to the South Downs National Park. Development will also need to ensure that the separate identity of neighbouring settlements along the A259 is maintained, with consideration being given to defining the precise boundaries of landscape gaps as required by Policy NE3 (Landscape gaps between settlements).

Given the scale of building proposed in addition to the houses already built or in the process of being built, inter-visibility has already been effected and will become increasingly effected, resulting in a degradation to the character of the area.

**Land West of Tangmere – Policy A14**

Tangmere is the largest village in the area to the east of Chichester city, with a range of local facilities, including small shops, primary school, GP surgery and village hall, and good road accessibility via the A27.

The development location is situated around the western and southern edges of the village, south of the A27 and north of Tangmere Road. The site comprises approximately 73 hectares of land predominantly used for agriculture.

Yet again more Grade 1&2 farmland turned over to development, when food self-sufficiency for the UK is becoming more important as each year goes by.

**Land at Loxwood – Policy A15**

The Parish of Loxwood is located in the northeast of the District.

he Wey and Arun canal runs east/west through the southern part of Loxwood Parish. There are bus services serving the village and providing connections to larger towns such as Billingshurst, however, services are limited. The Local Plan defines Loxwood as a service village with local facilities and services.

Yet another example of a village being called a Service Village, when actually the services available to the general populace are minimal.

**Land at Goodwood Motor Circuit and Airfield – Policy A16/A17**

An Assessment of Motor Circuit and General Aviation Noise Criteria Evaluation for Future Development for Chichester District Council' concluded that, taking into account the complex combination of noise-generating activities taking place within the site, a 400m buffer between the site and any proposals for noise-sensitive development should be maintained.

Within the 400m buffer, a general presumption against noise-sensitive development should be maintained unless it can be clearly demonstrated that the development will achieve acceptable appropriate internal and external amenity standards with regard to noise and disturbance experienced, taking into account the particular characteristics of the noise emanating from the site.

When is a rule not a rule? When there is an exception. Rules exist to provide benefits to society at large. Why take the recommendations from a report which you have paid for and ignore its findings and conclusions?

###  **Land at Thorney Island – Policy A18**

Thorney Island is a peninsula extending into Chichester Harbour with a singular vehicular access from the A259. Much of the island is covered by a Ministry of Defence military base and airfield occupied by the Royal Artillery. The Island is low-lying and thus at risk of flooding and its salt marshes and grasslands are important habitats for wildlife.

If for any reason the existing military use ceases, any future use will need to be planned sensitively through the preparation of a masterplan, developed with the local planning authority in conjunction with the local community.

This is a very low lying area and is extremely environmentally sensitive. It has been earmarked as a zone for being suitable for a Managed Retreat in mitigating against flooding from raising sea levels. It would be incomprehensible to allow any development in this part of the AONB. Additionally, the seawall that protects the peninsula is nothing more than an earth bund with building rubble dumped along lengthy sections of the seaward side of the wall. The singular access to Thorney Island is at its intersection with the A259 is reduced to one lane due to residential parking, therefore is not a long term solution.

**Employment Allocations -Tangmere Strategic Employment Land –**

* + 1. **Land at Chichester Business Park, Tangmere – Policy A19**
		2. **Land South of Bognor Road – Policy A20**
		3. **Land East of Rolls Royce – Policy A21**

**No Comment**