**Submission by SOSCA on CDC’s Local Plan – March 2023**

**LOCAL PLAN**

**Chapter 2**: **Vison and Strategic Objectives**

**Social characteristics**

Para 2.9 – ‘Good quality of life’ -

The ‘good quality of life’ is being consistently undermined by centrally imposed housing numbers from government that are unsustainable.

Developments are creating flooding that imposes restrictions on insurance and mortgage valuations. They are creating upsurges of sewage in new built homes as Southern Water is unable to cope.

There is a wide spread horror at the amount of poisoning going on in our seas which deters swimmers, kayakers, and sailors.

There is a constant fear that access to doctors will be delayed due to oversubscribed surgeries.

Likewise access to schools as they too are oversubscribed. This has led to a rise in the instances of home schooling. And frustration with public transport and the irregularity of the rail service.

**Economic Characteristics**

Para 2.14 – ‘Foster qualified and highly skilled workforce’ –

There is no mention of provision of affordable housing.

There is no recognition of over subscribed schools, surgeries whose lists are full, lack of housing within the centre, or lack of communal work space or child care nurseries.

There is no mention of how to retain successful candidates from our excellent university and college. There should be systems in place that encourage them to stay and use their skills to promote the city and its environs.

**Environmental Characteristics**

Para 2.27 – ‘High quality and value of its historic environment’ –

The roads into the city of Chichester are narrow and reflect the historical build of its centre. These are under huge stress from the outlying developments most especially from the large Whitehouse Farm development along the A2178. And for all the communities trying to cross the A27 from the south.

Para 2.27 – ‘Chichester City Centre has a rich heritage’ –

Our rich heritage is being constantly undermined by empty shops, lack of trees, broken paving, and little night life across its centre.

The city centre should be brought to life with a greater encouragement of housing above shops and within large buildings that could be converted into dwellings.

There should be a greater push to encourage the young to live in the city by providing space for business hubs and nursery/childcare facilities, and entertainment.

**Chichester City and East West Corridor**

Para 2.1 – ‘This highly accessible transit corridor’ –

The A27 is nothing but a huge barrier preventing the communities from accessing their city and its amenities and creating gridlock at the roundabouts.

The A259 is under growing stress from the rise in households along its length making accessing the A27 at Fishbourne roundabout a daily hazard.

The air pollution levels rise, the buildings suffer from heavy vehicles, and the designated national path of Emperor’s Way taking walkers to and from the Marshes to the village is a daily stressful safety hazard. The 30mph is regularly ignored and because the village is approached through a bend the pedestrians are out of sight until too late. .

The A259 is also the relief road for when the major strategic road A27 is blocked.

**STRATEGIC OBJECTIVES**

**Objective 1 – Climate Change –**

‘To mitigate and adapt to climate change…..The potential for future sea level rise and erosion will be fully considered’ –

New developments on the Manhood Peninsula are creating flooding where none existed prior to their build. This is in complete defiance of the government’s NPPF decree that new development should not increase flood risk elsewhere.

In the Plan’s Policy NE12 planning permission will be granted for development on the coast where it can be demonstrated there are measures in place to mitigate any detrimental effects. Bracklesham, Medmerry, Pagham, Bosham and Fishbourne have all suffered coastal erosion. The policy for these is ‘Hold The Line’ and since there is no or little funding for mitigation the erosion will continue thus jeopardising all developments along the shoreline and behind.

In Para 4.75 you state that the Council will require new buildings to be set back from the shore line by 25 metres. This will not be sufficient to safeguard life nor structure from the growing strength of our storms and sea level rise.

**Objective 2 – Natural Environment**

‘To protect and enhance the natural environment….’

In the Plan’s Policy N11 it states that CDC will continue to ‘protect and enhance the Plan’s coastal areas and support ongoing protection, restoration and enhancement’. The Clean Harbours Project is a science led project to investigate the true state of our coastal environment. It is producing evidence that all our waters are now deeply contaminated with layers of pollution now containing E Coli and other harmful organisms.

This situation will continue for many years to come as the levels of sewage discharges are beyond the capabilities of the natural environment to recover from constant damage thus undermining the integrity of our AONB - a national and statutory protected nature reserve. This is in direct opposition to the statements made by the government at COP26. It stated that we must protect our protected areas especially our wetlands as they are hugely important to the stability of the world in their ability for carbon capture.

It is not only the flora that is being so undermined – it is also our wildlife. The area is notable for providing over-wintering and nesting for many species of birds whose numbers are falling. Local dog walkers are also saying that the state of our seas is creating a health hazard for their pets. The few wildlife corridors that have been established have no statutory protection and with more developments, more traffic, their very existence will become obsolete.

The River Ems is often mistakenly described as a winterbourne. This is because most of the time instead of a beautiful free flowing unique chalk stream it is a barren ditch of gravel as a result of over abstraction for potable water. There has been no forward planning on how to service all these developments with drinking water so the water company takes the easy option of destroying a local much loved river instead.

The biodiversity of the entire fragile environment of the Chichester Coastal Plain will be wiped out as coastal erosion and flooding will eventually push the wildlife further inland. It will then face the barrier of all the housing developments and so fail.

**Objective 3 – Housing**

‘To deliver suitable, well designed, energy efficient and affordable housing to meet local needs’ –

The average price of a home in Chichester according to Rightmove is £437,828. This is unachievable for the young who having been brought up in the area and wish to earn and remain. It will result in an exodus of young aspiring professionals.

There is no indication that any of these houses being built have efficient energy systems incorporated such as solar panels or charging points for electric cars.

According to Local Government Inform there are approximately 2,405 people on the waiting list for affordable homes in the Chichester area. It is therefore possible to conjecture that the developments awarded planning permission are not fulfilling their ‘affordability’ quota. (Only sites of 10 homes or fewer are exempt from providing affordable homes.)

All planning applications that allow development on green agricultural land should be refused. All developers should be forced to build out on their land banks. All new housing should be forced to seek out brown field sites.

**Objective 4 – Employment and Economy**

‘To support the delivery of a strong, thriving and diverse economy’ –

One of the largest forms of employment is in horticulture. The government and NFU are constantly saying we need to bolster our food security in light of the war in Ukraine. The Chichester coastal plain is blessed with rich soil and a Mediterranean climate. The land is Grade 1 through to 3. It is an important national asset to the GDP of the nation and yet year on year the green field land is being destroyed forever by yet more developments.

The other great source of local economy is tourism. Much of this is dependent upon the many camp sites which in high summer create huge employment for locals. It also contributes to a wider dispersal of incomes through all the outdoor activities through the many sailing clubs, access to beaches, and the historic hinterland. But these are slowly but inextricably being demolished and replaced with new developments that create a year long disruption to traffic, extra flooding, and cancel out influx of funds for tourism.

**Objective 6 - Design and Heritage – Ensuring Beautiful Places**

The Levelling Up and Regeneration Bill that is under consultation stresses the importance of engaging with local communities as to the design and location of new builds. The other point they stress is that the desire to build beautiful should be a high priority. There is no indication in any of the planning applications or in the Local Plan that these points are taken into account.

**Objective 7 – Strategic Infrastructure**

‘…to ensure the timely delivery of key infrastructure….’

Every edition of the NPPF has said ‘infrastructure before development’. It is a known fact the Water Companies are unable to cope to connect the sewage discharges. In order to counter the lack of capacity the water company has been forced to use more and more tankers that criss-cross narrow country roads carrying raw sewage as they seek to disperse their load.

The legal permission for the water companies NOT to admit their inability to service the sewage levels should be broken. The right for water companies to self regulate is a travesty and should be stopped.

The lack of road infrastructure to accommodate the increase in housing has not been addressed. The Stantec assessment confirms this situation in its assessment at points 11.2.1. The Local Plan states that there is no guaranteed upgrade to the A27 even though its states it is ‘well over capacity’ already.

This situation is replicated along the A259 where 84% of housing is planned along the East-West corridor. The Fishbourne roundabout was identified in the Stantec report as being the most in need of mitigation. Peak time delays to access the Fishbourne roundabout have been modelled to be 29 minutes.

The lack of infrastructure and the growing developments exacerbates the already declining access to schools, surgeries, etc. which is doubled during the influx of tourists during the summer months.

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“ SOSCA believes Chichester District is in desperate need of a strategic local plan because of the large number of geographical constraints it faces. However, it considers the amount of housing allocated in the plan is unsustainable and that significant infrastructure improvements in drainage and transport need to be made in advance of new development.”

**SOSCA (Save Our South Coast Alliance)**

Libby Alexander March 2023