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17 March 2023

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Chichester Harbour Local Plan Consultation

Administrator: Nicky Horter

Dear Leader,

Please consider this letter in support of our consultation response on the Chichester Local Plan.

The Chichester Harbour Trust is a charity regulated by the Charity Commission. Our principal objects are to protect and improve the environment of the Chichester Harbour AONB, principally, by acquiring environmentally sensitive land around the Harbour, but also by trying to ensure the right strategic policies are implemented by the relevant authorities to protect the natural environment. We are one of the largest landowners in the AONB. I attach a copy of our latest annual review together with a recent press release we have issued regarding our concerns with the Local Plan.

At the outset we would like to say that we believe this consultation is wrongly configured. We have responded through the online consultation on a limited number of issues, but the format and the three specific questions or tests do not address the real issues within the plan. We are therefore writing this letter, which we would like to ensure reaches the Inspectors. We are happy to provide the evidence for our comments; although we believe the evidence will be available to the inspectors in any event.

On the three questions:

- We do not believe the plan has met the legal requirements (see below)
- We do not believe it has been positively prepared or is justified, effective and consistent with national policy (See below)
- We do not believe that Chichester District Council has engaged or worked effectively with neighbouring authorities or statutory bodies - nor with local communities and the public. In practice we have seen little or consultation or discussion of this plan since the 2018 Preferred Approach consultation.

Patrons

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Lord Lieutenant of Hampshire
The Duchess of Norfolk
The Duke of Richmond and Gordon

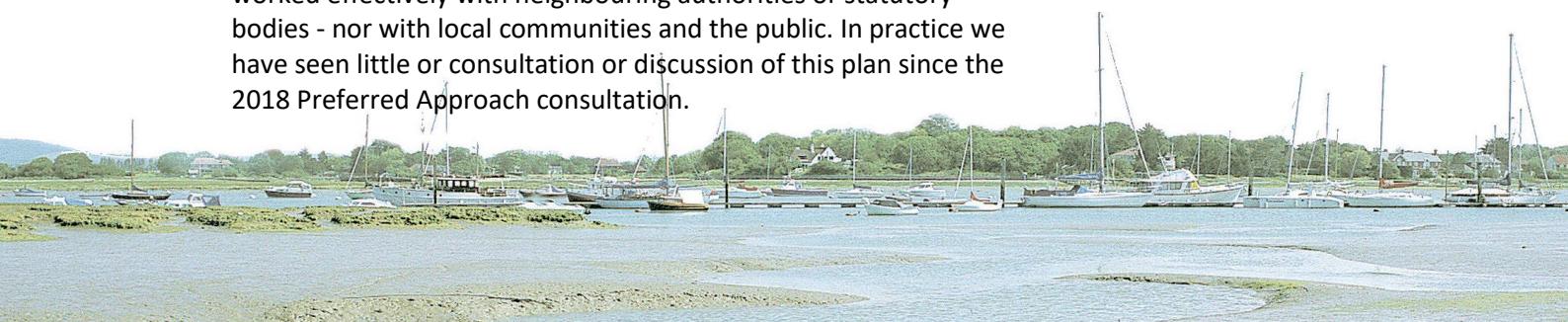
Trustees

John Nelson CBE DL (Chairman)
Nicholas Backhouse
Patrick Green
Trevor James
Amanda Jupp
Fiona MacFarlane
Christopher Newell
Harriet O'Sullivan
Stephen Smyth
Andrew Winch

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The Local Plan's long preamble running to over 100 pages sets out laudable ambitions for the environment generally, the Harbour, infrastructure, wildlife, botany, water quality, landscape, and transport - which we support.

But then the housing strategy for the Plan itself conspicuously bypasses all of these vital elements by proposing an unsustainable level of development.

1. Dwellings

The plan calls for over 10,000 new dwellings squashed into the narrow strip between the Harbour AONB and the South Downs National Park. The district is already overcrowded and has been subjected to substantial overdevelopment during the last 10 years. The resulting increase in population will be equivalent to the population of the city of Chichester. Over 8,000 of these new dwellings are planned for the east - west corridor, of which 3,225 are between Chichester and Southbourne, running along the northern boundary of the Harbour. This plan is not practical given the impossibility of providing the necessary infrastructure. There are no specific plans to provide this.

2. Transport

The Chichester area is already traffic gridlocked for much of the working day and at weekends and peak visitor season especially. There are no plans to provide the necessary capacity. This will have serious consequences for local businesses and subject the local population to impossible travel restriction.

3. Water quality

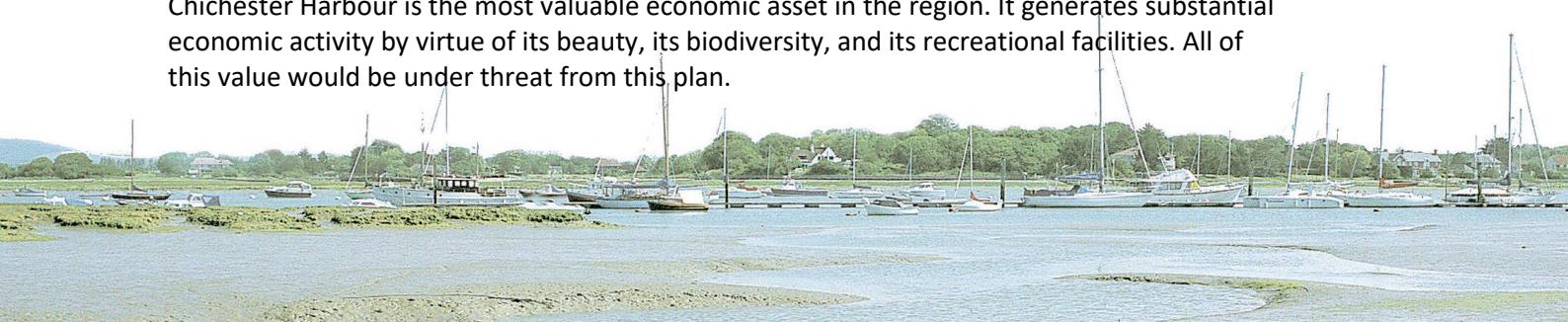
The statistics on raw sewage being pumped into Chichester Harbour are well known and have been a growing problem for some years. The extent of this pumping is now at a quite extraordinary level. This is having a major effect on public health, public recreation, wildlife, botany and therefore the local economy. There are no specific plans to address this. We estimate, for example, that the water treatment capacity needs to be doubled to cope with existing demand, before the impact of the local plan is considered. In practice it would never be possible to provide the capacity in the Harbour for this level of development, without turning the Harbour over to a permanent sewage discharge facility.

4. Landscape and biodiversity

Chichester Harbour is one of the largest and most beautiful natural harbours in the U.K. It is one of the most important biodiversity sites in the country. Its bird population both year-round and migrating, its growing mammal population, its extraordinarily diverse botany and its landscape are already suffering from overdevelopment, water pollution, and poor air quality in the north of the Harbour. The strategic wildlife corridor proposals are designed to help wildlife. However, in the plan it is clear they are inadequate, lacking in ambition and status.

5. Local Economy

Chichester Harbour is the most valuable economic asset in the region. It generates substantial economic activity by virtue of its beauty, its biodiversity, and its recreational facilities. All of this value would be under threat from this plan.



6. Flood risk

Independent mapping of the area for land at flood risk (caused by climate change) shows that, by 2050, virtually all of the areas earmarked for development will be subject to flooding risk. Although this has been referred to in the plan and mitigation and control measures outlined, we do not believe these measures could possibly deal with the natural threat of climate change and sea level rise. This phenomenon also makes it highly unlikely that sufficient infrastructure, both water treatment and transport, could ever be provided. In the Harbour we at the Chichester Harbour Trust are already planning for the rise in sea levels and we are already seeing the rise occurring.

Against this background we do not believe this local plan can meet any legal test of soundness. It presents a threat to local communities and to the environment. It is certainly not in line with national policy on the environment, and it pre-empts the outcome of the NPPF consultation.

We believe the plan should be withdrawn and significantly revised.

[Redacted signature box]
John Nelson CBE DL
Chairman, Chichester Harbour Trust

