



EAST WITTERING & BRACKLESHAM PARISH COUNCIL

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Chichester District Council
Planning Department
East Pallant House
Chichester
West Sussex

11 January 2019

Response to the Local Plan Review Consultation

Dear Sir

Please find below the comments from East Wittering and Bracklesham Parish Council to the Local Plan Review consultation.

The council submitted an extensive response to the Local Plan consultation in 2014 (appendix 1, attached), expressing our concerns in a number of critical areas;

- Traffic impacts on the local road network
- Lack of capacity at the A27 Stockbridge Road junction
- Air quality impacts for Donnington residents
- Impact on the rural nature of the area
- Damage to the unique character of the village, which would adversely impact the tourism sector
- Lack of capacity in local primary schools
- Lack of secondary school and further education facilities
- Limited capacity within the sewerage and foul water network

We still feel that all of these objections remain valid and unaddressed. With the recent announcement that improvements to the A27 have been scrapped for the foreseeable future, we feel that they are even more pertinent.

In addition, we have significant concerns about the minimum indicative housing numbers allocated against the Parish. According to the 2011 census, there were 2,255 households in East Wittering & Bracklesham. Since that time, we have already seen a number of new developments completed, adding over 200 new properties to the village. An additional 350 homes will mean that we have experienced population growth of over 25% within a time period of less than 10-15 years. Such a large influx of people without corresponding infrastructure improvements and dedicated community development support risks the fundamental character, nature and cohesion of the community.

We also question the methodology used when assessing sustainable locations for strategic development. East Wittering & Bracklesham is designated as a settlement hub, largely for historic reasons that no longer apply. We no longer have any banks (having previously had four), all of our major local employers (including Richardsons Holiday Park and Credowan Engineering) have closed and there are now no significant local employers within the Parish. We have one medical centre, which is shared with West Wittering residents, and one primary school, as do the neighbouring villages of West Wittering and Birdham. The village centre incorporates the Parish boundary with West Wittering, splitting retail businesses across the two parishes. We contend that we are now no more than a large service village, with no greater or lesser advantages than other adjacent villages within the area.

We think that on this basis, the presumption that East Wittering and Bracklesham is the most sustainable location on the South-West Manhood is unsound. There are potential viable developments sites within the Southern Manhood that should be considered ahead of greenfield development within East Wittering & Bracklesham. The site of the former Earnley Concourse has been falling into ever greater dereliction and disrepair for several years and provides a viable brownfield development site, which could contribute significant housing numbers within the local area. There are also numerous green fields to the West of Church Road in West Wittering which have currently not been included within the HELAA, which could be suitable for additional development.

Whilst we appreciate that the District Council have to find space for new housing within very constrained circumstances, we do not support the current approach, which will see large-scale development fundamentally changing the nature and character of our community, when there is scope to mitigate the impact by more equally sharing the load across all communities. If there was a sustained focus on incorporating affordable, secure-tenure rental property within a wider range of developments it would provide the added benefit of increasing the vitality and sustainability all villages on the Manhood by supplying essential housing for local residents and young people who are increasingly forced out of their communities by a lack of affordable housing.

Yours Sincerely

Brian Reeves
Chairman

Appendix 1: East Wittering & Bracklesham Parish Council Response to Local Plan Consultation 2014

Local Plan Review – Issues & Options Consultation

Commentary on East Wittering/Bracklesham as a location for strategic large scale development (500+ dwellings) per section 3.5.5 of the consultation questionnaire.

East Wittering and Bracklesham Parish Council object most strongly that any such proposal for further large scale development would be unsustainable and the objections that we made to the Clappers Lane development are even more significant now in relation to this review. We pointed out at that time the transport and traffic implications and these issues will continue to be problematic until improvements to the A27 are put in place. The dearth of local jobs in the area can only be detrimental to the transport issues.

Severe Traffic Impact

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

Both suffer from long tailbacks at peak times and at peak summer weekends due to traffic for the popular beach at West Wittering. Traffic backing up here can and does impact upon the safety and operation of the strategic road network, in particular the A27/A286 Stockbridge Roundabout. Any further development in the parish will increase severely the problems of this well known local bottle neck.

Traffic leaving and entering the Manhood Peninsula on the only A road (the A286) is already at “severe” levels during peak hours as confirmed by the WSCC Highways Authority (Appendix 1 to the Clappers Lane appeal - APP/L3815/15/A/2219554). This is in addition to the horrendous levels of congestion and gridlock experienced throughout the peninsula on fine days in the summer, with large volumes of traffic heading for West Wittering beach and with locals trying to avoid this by using the minor back lanes.

The inspector, Sue Turner, who approved the adoption of the Local Plan, made clear in her report (para 109) that CDC were right, largely on transport grounds, to limit the Local Plan housing allocation for East Wittering/Bracklesham to 180 dwellings. She looked to the government to include the major A27 upgrade in their latest Road Improvement Strategy. However, this has been cancelled and so we are now in a worse position than when the inspector approved the allocation of 180. East Wittering/Bracklesham has already met this 15 year allocation with 186 dwellings either complete or in construction.

We believe that none of (now cancelled) proposals from Highways England for major upgrades to the A27 would have helped with traffic leaving and entering the Manhood Peninsula. The proposals favoured the flow of through traffic, which makes up nearly half of the total.

The western area of the Manhood has lost approximately 400 jobs in the past few years Cobham in Stocks Lane Closed two or three years ago with the loss of local jobs and the land has now been used for retirement dwellings.

In addition there have been closures of:

Earnley Concourse

Castle Printers

Blakes Off Licence.

Bramber Nurseries.

Southerley formerly North Shore Yachts.

(Units at Birdham Pool being converted to holiday accommodation)

Royal Oak Public House

Southdown Holiday Village

The latter has been acquired by Seawards who are in pre- application discussions with the planning authority for an additional 74 dwellings. What jobs that remain are largely in the lower paid areas of horticulture, tourism, retail and care, many of which are either part time, temporary or both. It is therefore clear that any new residents will have to travel off the Manhood Peninsula for sustainable employment.

A survey of some 2,000 job adverts in the local press or online showed that the overwhelming number were in Chichester or in areas to the west or east of Chichester. Details of this survey (carried out over three time periods) were presented at the appeal hearing for the 160 dwellings on Clappers Lane and are available for inspection.

Both the Local Plan and West Sussex Transport Plan refer to the need for residents in the western Manhood to travel to Chichester for shopping, leisure and other key facilities, including, in particular, daily trips to secondary schools in Chichester.

At the appeal hearing for the proposed 160 dwellings on Clappers Lane, both the transport consultant representing Wates, the appellant, and the transport consultant representing the Consortium of Western Manhood Parish Councils agreed that traffic levels would be very severe at the end of the Local Plan period in 2029, even with the proposed upgrade to the A27 junctions underpinning the Local Plan and with optimisation of traffic signals to favour local traffic (itself a risk). With regard to the Stockbridge roundabout, the proposal is to convert this into a 4-arm traffic signal controlled junction. The upshot would still be queues stretching back 1.6km during the morning peak hours from the Stockbridge junction of the A27 southwards along the A286 and average delays of some 10 to 12 minutes as well as significant queuing east and west on the A27. Such queues would mean that the “Selsey Tram” roundabout, some 400 metres south on the A286, would be completely blocked (negating any benefits from converting to a lights controlled junction), blocking also the traffic from the Selsey area which accesses the A27 via the B2201 and the A286. Detailed numbers supporting these predictions were presented at the Clappers Lane appeal and accepted by the inspector. The numbers are based on detailed junction modelling carried out for Highways England (then the Highways Agency) by their consultants, Parsons Brinkerhoff.

This work has been corroborated by the Jacob’s Transport Study commissioned by CDC. This study also concluded that, even with the mitigation measures proposed in the Local Plan (including transport “smart choice” measures), congestion would continue to increase on the A286 with no significant reduction for the Manhood as a whole (6.5.2 page 57)

In support of our case, it is worth quoting in full section 33 of the Clappers Lane planning inspector’s decision letter:

The analysis demonstrates that the development envisaged in the emerging Plan would, in spite of all the junction improvements financed through contributions, result in very

significant queues and delays at the end of the Plan period (in this context modelled as 2031). During the morning peak hour, queues on the A286 are modelled (assuming optimisation of the installed traffic signals) to extend southwards from the Stockbridge roundabout for some 1.6km (across the Selsey Tram roundabout) with average delays of some 9 minutes; queues in both directions on the A27 would be around 1.5km in length with tail backs blocking adjacent junctions to the east and west and incurring delays of 10 to 12 minutes. Such conditions would exacerbate the existing queues and delays, already described by the Highways Authority as “severe”. It follows that the modelled conditions at the end of the Plan could reasonably be described similarly and, consequently, that any measurable additional effect (even otherwise “unnoticeable” ones) might also be “severe”.

It is true that the inspector accepted (section 35) the appellant’s claim that “a technical solution” to the traffic problems will emerge, citing in particular Highways England’s plan for a major upgrade to the A27, subsequently cancelled.

However, no such transport solution is in sight at the moment and therefore any proposal to site further large scale housing development in the area of East Wittering & Bracklesham would be unsustainable and in clear contravention of para 32 of the National Planning Policy Framework, which states that schemes should be refused on transport grounds where the residual cumulative impacts are “severe”. In addition, even were such a transport solution to be found, any large scale development in the area of East Wittering/Bracklesham would, because of the near total lack of suitable employment opportunities and other key facilities, completely fail to meet the stated objective of minimising the need to travel.

It could be argued that similar considerations would apply to the proposal for large scale development in Selsey, where the current Local Plan housing allocation has already been exceeded.

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

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

There have been many significant developments on the West Manhood peninsula over the last five years, that are either actually being built or are planned, all of which require movement through the Stockbridge roundabout.

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

There is therefore no likelihood of an improvement for commuters from the West Manhood to Chichester and beyond. Every addition to the population in this area increases the problem.

Air Quality

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

Future development

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

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

Character of the area

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

East Wittering and Bracklesham Parish and Village is located in the south west area of Chichester District Council on the West Manhood Peninsula within the county of West Sussex. Close to the historical market town of Chichester itself, seven miles distant, the village is located in a relatively isolated and tranquil seaside rural area of the county, the nearest main roads being the B2198 and A286 with main line railway stations being located some 8 miles distant at Chichester. Bracklesham is normally reached via a seven mile "cul de sac" country road as it is not on any through road to any other place of significance. East Wittering has official recognition as a tourist area of peace and tranquillity.

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

The National Planning Policy Framework States:

"The planning system should contribute to and enhance the natural and local environment by:protecting and enhancing valued landscapes ... ,preventing developments contributing to ... unacceptable levels of soil, air, water or noise pollution.." (para 109, pages 25,26)

“Planning policies and decisions should aim to: - avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development – identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason” (para 123, page 29)

Primary School

East Wittering Community Primary School, which has better performance than West Wittering, Birdham, and Sidlesham in terms of pupil attainment currently, has the capacity to accept in the region of a further 75 pupils without the need to add any new buildings.

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

However further possible impact upon the school will obviously arise when the cumulative effect of housing on the Manhood is taken into account because all of the other schools on the Manhood are full. They are virtually full and they have little or no space on their sites to expand for the erection of temporary buildings. The result will be that no spaces will be available at any of these other schools for parents resident in our parish who would prefer not to use East Wittering School. This will obviously also apply to parents resident elsewhere on the Manhood peninsula. They face funding and arranging their own transport to another school which will most certainly be off of the peninsula, or have to accept a place at East Wittering School. It is obvious therefore that placing a further 500 dwellings in this parish will impact on East Wittering School because the surrounding schools are already full.

The National Planning Policy Framework (NPPF) states:

“Where practical, particularly with large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties” (para 38, page 10)

It also states:

“Planning permission will be refused for proposals which would adversely affect highway safety, including in relation to access arrangements, internal road design, cycle facilities and footpaths. Proposals will also be refused if they result in the generation of traffic, which by its amount or type would overload the highway network” (TR6 page 133)

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

Secondary Schools

There is no secondary school in the West Manhood. All secondary age children have to travel at least to Chichester or Selsey. School buses have to leave this Parish before 8am to arrive in time for school at 9am, with young children spending considerable time on the school bus sitting in traffic jams.

It is not appropriate to expand the number of family houses in an area with no secondary school.

Sewerage

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

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

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

It is clear that the sewerage system is, at present, unable to cope properly with the current load it is expected to take. An unreferenced statement in Wates' Design and Access Statement Document 02, Page 13 para 2.6 states *“The foul drainage from the new homes would go to Sidlesham Wastewater Treatment Works. This treatment works could accommodate the new homes”*. This did not tell the whole story. Although the sewage and waste water pipes in East Wittering and Bracklesham have recently been renewed/replaced, the capacity has not been increased as the pipe diameter is unchanged. So although *“The treatment works could accommodate the new homes”*, the pipework cannot. The problem is getting the waste to the treatment works.

A the letter from Southern Water concerning original development of 50 houses dated 20 July 2012 states: *“Following initial investigations, there is currently inadequate capacity in the local network to provide foul sewage disposal to service the development. The proposed development would increase flows to the public sewerage system, and existing properties and land may be subject to a greater risk of flooding as a result.”*

Bracklesham Caravan and Boat Club in East Bracklesham Drive and South Down Holiday Village both suffered severe problems with sewage and the pipework not coping with the demand put upon it – Southern Water are aware but have not done anything to improve the system.

Because the pipe network is of insufficient diameter and thus capacity, Waste water does not arrive fast enough to the Sidlesham Wastewater Treatment Works. Back pressure will build up and lead to flooding. Increasing the number of houses will only exacerbate the problem.

Sustainability

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

The National Planning Policy Framework on Page 2

Achieving sustainable development states:

“International and national bodies have set out broad principles of sustainable development. Resolution 42/187 of the United Nations General Assembly defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The UK Sustainable Development Strategy Securing the Future set out five ‘guiding principles’ of sustainable development: living within the planet’s environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly”.

The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system.

There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

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

The Local Review Plan fails on all the above as it does nothing to support growth and innovation and particularly fails to take account of the poor infrastructure.

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

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

This Local Review Plan fails on these points because it fails to contribute to protecting and enhancing our natural, built and historic environment;

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

Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to): making it easier for jobs to be created in cities, towns and villages; moving from a net loss of bio-diversity to achieving net gains for nature;⁶ replacing poor design with better design; improving the conditions in which people live, work, travel and take leisure; and widening the choice of high quality homes.

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

This Local Review Plan fails on the above because it fails to take the local circumstances into account particularly the fact that the several major employers in the area have closed!

The South East Plan

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

“Focusing development on regional hubs”

and

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

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

Part of the **National Policy** on page four is:

“Social progress that recognises the needs of everyone”

“Effective protection of the environment”

Conclusion

The Local Plan Review is in contravention of a number of planning regulations and recommendations. It suggests major development on agriculture land impacting on the rural nature of the community. There are major considerations concerning the environmental impact to the area regarding flooding, road safety, traffic, sewage, economy and landscapes of historical significance.

The proposal to place 500 homes in this parish is based on several fallacious arguments in our view. Sustainability is difficult to justify given the rural nature of the location, particularly

given the large number of houses being made available to first time buyers and those on low incomes by implication needing work locally. Another 500 will not be sustainable.

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