

**CHICHESTER LOCAL PLAN REVIEW 2016 – 2035**  
**RESPONSE FROM SIDLESHAM PARISH COUNCIL**

**INTRODUCTION – strategic and local importance of A27 improvement**

The PC is concerned that the strategic context of the Plan, whilst making reference to the importance of the A27 trunk road, fails to realise the impact of the lack of the implementation of a scheme has on the future sustainability of new development proposed, let alone the completion of those proposed under the current plan.

Reliance on S106 and CIL contributions to mitigate, for instance increased traffic, will have little impact on alleviating the problem that the current A27 represents to communications and, importantly, the city of Chichester's future economic viability.

The plan makes little attempt to future proof Chichester and its hinterland with its continued reliance on relatively low paid employment in tourism, horticulture and areas such as retail. The Coastal West Sussex and Gt Brighton Local Strategic Statement makes strong reference to the Inter-relationship between the Bognor Regis northern bypass on the A259, the Arundel bypass and the A27 improvement at Chichester – the impact of these two schemes on Chichester, already apparent at the Bognor roundabout, could be catastrophic congestion.

**Comments on Main policies.**

**S4 Meeting housing need**

The Manhood Peninsula is expected to deliver 1993 units during the Plan period. Of this figure, 600 are in Selsey, East Wittering and Hunston, 175 as parish housing requirement in Birdham and North Mundham. It is not clear what proportion of the residual 1208 fall into the category planning permissions, committed or made as of 2017 and what are expected to be small windfall sites. Without this breakdown the potential impact on parishes such as Sidlesham, that are deemed unsustainable for housing, cannot be assessed. This is particularly important in Sidlesham where, due to prior consent approvals through the conversion of agricultural / horticultural buildings there is potential for 100 plus new units. This potential that would appear to be categorised as “windfall” obviously does not fit the definition, especially as to date (32 approvals in Sidlesham and Earnley), none are social housing but all are full market and some, costing £600k, are beyond any prospect of meeting the needs of first time buyers. The parish considers the majority of the conversions inappropriate and the potential scale of the number of conversions challenges the District's sustainability definition that is well founded for the parish. Whilst the Parish Council appreciates that the guiding legislation stands outside the local plan process, the potential distortion the developments, which are essentially on the ex Land Settlement Estate, needs to be specifically addressed in the local plan. Additionally, there are implications for policies S11 and DM15.

**S6 Affordable Housing, DM4 Affordable Housing Exception Sites (S12 Infrastructure Provision)**

The policy and supporting text gives too great a flexibility to developer, especially in terms of the economic viability of development. The renegotiation by developers of the proportion of social housing post original consent appears to have characterised many developments arising from the existing plan and consents that were granted prior to its approval. The fact that the plan seeks to control the artificial sub division of sites to avoid the social housing “trigger” gives a strong indication of many volume builders' reluctance to truly engage in meeting the true scope of overall housing demand. Whilst the hybrid of shared ownership meets a particular aspect of overall demand, it fails

to address the increasing necessity of proper social housing. The true economic viability of sites needs rigorous independent assessment and, if not viable as market led development, the appropriateness of the site for development should be reassessed or its consideration for acquisition by, for instance, a community land trust scheme or compulsory purchase to provide social housing should be considered.

Policy S12 is welcomed, but the range of provision to be supported, especially if whole life costs are to be met will place great demands on funding streams such as S106, CIL and other funding streams and there must be doubt as to whether your council's Infrastructure Development Plan can be fully met.

#### S7 Gypsy and Travellers and Travelling Show People, DM5 Accommodation for Gypsies

It is noted that separate provision is required in the 5yr housing supply for this category. The eligibility for inclusion is that the individual still has an itinerant life style, ie travelling from place to place. Many of the gypsy families/individuals that seem to qualify under this category patently do not exhibit this form of life style. Local experience fully supports this position with gypsy communities simply using their caravan homes as a base to engage in trade, with the site often becoming the builders' type yard for the storage of materials or the waste from their trade. This form of occupation does not distinguish the use from any other individual living in an area and consequently should not qualify for any special recognition; in fact, in many cases such use under normal planning powers would be contrary to policy.

This "special treatment" causes a great deal of resentment in local communities especially where there is a social housing need – that is most areas - and where school places are under pressure. The qualifying criteria must be fully investigated and a change in status over time reviewed as many sites, originally for itinerant use, simply become settled locations and do not therefore meet the criteria. It seems that the process from itinerant to settled status is a common progression and has the result of the "need" for new pitches continually increasing.

The substantial increase from the 2015 plan requirement to the 90 plus gypsy pitches now identified illustrates how the process is being used to bypass Planning that would restrict the provision of such "housing" if it were built development and that areas become favoured by gypsy communities as other gypsies are already located there and a sub community established. The criteria for assessment of eligibility must be reviewed together with the transition to settled status and additionally the degree to which concentrations of gypsy and other travellers are occurring in specific areas – this is considered to be the case in Sidlesham.

#### DM6 Accommodation for Agricultural Workers

The reintroduction of this qualifying criteria is welcomed. However, there is a major issue with enforcement and the policy needs to be strengthened to ensure the occupant continues to be employed in agriculture or horticulture. The change away from agricultural/horticultural occupation is often not declared and after the requisite elapse of time, ELD status is applied for. The need to register agricultural/horticultural occupation on an expiry time basis that would exclude qualification under ELD should be considered in the policy and/or the surrounding text. The subdivision of land and the separation of the original accommodation from the land is an increasing aspect of land holding in areas such as Sidlesham. On many sites an agricultural viability assessment is made as to whether a subdivided holding is viable and whether a constant presence on site is required to maintain the use and therefore accommodation required. However, this potential position should be a consideration at the original point of separation and a condition made that the subdivided land

should not benefit from a subsequent consent for another house/residential caravan. This subdivision has and continues to be a trait on the ex LSA estate and, particularly within the HDA's, undermines their priority for horticultural production. At least in the HDA's the approval of agricultural worker accommodation should be restricted and perhaps limited to a residential caravan on a temporary consent and not lead to a progression to a permanent building as currently happens.

### S11 Horticultural Need, DM15 Horticulture

There appears to be a weakening of the distinction between what in the 2015 Plan were termed "hub" sites at Runcton and Tangmere and the other HDA sites in Sidlesham and Almodington. Para 7.92 is particularly troubling ". It is not expected that large scale glasshouse development (228,000 sq m required) will occur in Sidlesham and Almodington HDA's to the same extent as at Runcton and Tangmere. The statement introduces doubt over the distinction between large scale industrial type of production and what is termed "market garden" horticulture expected at Sidlesham and Almodington.

The statement about "land adjacent to an HDA" previously related to Runcton and Tangmere. Its extension to Sidlesham and Almodington again introduces doubt over your council's true intentions about the scale of the industry envisaged outside the old hub sites and undermines the strong position it took on large scale such the Madestien proposal in Almodington. Your council stresses the importance of the HDA but continues to allow the break-up of the land within the smaller ones through conversion of buildings to residential and the take of land for gardens under "prior consent" as mentioned above. This approach is contrary to the proposed policy and will lead to further fragmentation and inefficient use of the land that remains. This approach could lead to requests for land outside the current smaller HDA's and bring glasshouse development into conflict with the overall environment. Many of the largest glasshouse developments are outside the HDA's but in established glasshouse areas and lead to the possibility that the HDA's need review and at least two new areas established based on the Fletchers Estate and Jakes Nursery and on Street End Lane. These area are equal or probably exceed production in many parts of the two HDA's.

### S23 Transport and Accessibility

The strategic need for a solution to the A27 has already been mentioned but the impact locally cannot be overstressed in respect of the Manhood Peninsula. The high levels of out commuting for employment and many services are all dependent on a functioning A27 and further development in reality can only aggravate a non-functioning situation.

The cul-de-sac position of Selsey presents major problems for the town – the second largest in the district - in terms of emergency services and, for instance, the levels of congestion when heavy domestic traffic flows are combined with the summer tourist traffic that swells the population to approaching four to five times its winter levels. The sustainability of this situation in terms of environmental impact, the economic viability and overall acceptability must be doubtful. This is apparent to the road users but increasingly the areas that the road passes through, such as Sidlesham, suffer pollution from exhaust emissions, noise, unacceptable delay in access from adjoining roads and properties, just simply crossing the road by pedestrians is made almost impossible as traffic is so often two way with no gaps. This situation cannot be ignored and just allow the road to be loaded with more traffic. The carrying capacity of the B2145 must be seen as a limiting factor in any future development in Selsey. This situation is mirrored on the A286 with The Witterings and Bracklesham.

It will be important that development in Selsey contributes to traffic management on the B2145 and that the whole of the road is eligible for any S106 and CIL contributions and not just the immediate locality of Selsey. The overall intention should be to improve safety, ensure speed is observed and allow safe road crossing. These factors will be considered within the Sidlesham Neighbourhood Plan.

Pollution is an increasing concern and in line with the Plan's policy objectives for greening of the environment, structural tree planting will be proposed within the B2145 corridor. The plan makes reference to sustainable transport but there are no specific proposals. It is suggested that for the Manhood Peninsula the proposed Greenway Selsey to Chichester is part of a specific policy that seeks to protect the adopted route and that Neighbourhood Plans for Hunston, Sidlesham and Selsey then adopt the route into their plans.

#### S24 Countryside, DM22 Development in the countryside, DM31 Trees, hedgerow and woodland, DM29 Biodiversity

These policies and accompanying text is supported and will form the basis of Sidlesham's Neighbourhood Plan. Para 5.39 indicates conversions of existing buildings will be favourably considered where they lead to uses needed to support the rural economy and create 'rural affordable housing'. Currently, many conversions do not meet these criteria, especially the latter where often large upper market houses are developed way out of the range of meeting any local social need. The policy needs to reflect this problem with more specific criteria covering what is acceptable within the scope of any conversion.

The identity of the rural areas is an important consideration in maintaining their character if they are not to become just the spaces between larger settlements. This is particularly important on the Manhood Peninsula and in the countryside associated with the transport corridors of the A286 and B2145. The open countryside along these routes with their small settlements are in danger of encroachment by development and urbanisation. A specific policy is suggested to protect such areas and enhance their character by schemes of tree planting, improvement to the roadside environment and strong traffic management. Again, this approach will feature in the Neighbourhood Plan. Whilst it is appreciated that agriculture is currently in a state of uncertainty, a policy that seeks to promote the balance between agricultural production, the environment and amenity would be welcome as a basis for whatever system of agricultural subsidy eventually is formulated. Particular emphasis should be placed on the protection of high grade agricultural land (grade 1 – 3a), biodiversity, and for instance structural tree planting for drainage and co2 reduction. A positive approach to recreational access in support of green tourism should also form part of a strengthened countryside policies.

#### S25 The Coast, S30 Strategic Wildlife Corridors

The policy makes reference to Chichester Harbour Management Plan but should also make reference to the Pagham Harbour Management Plan – although this currently only covers the period to 2018, the RSPB can be expected to bring forward a new plan for the next 5-10yr period. The significant changes to the Pagham Spit over a relatively short period of time could have significant impact on the drainage of the harbour and particularly the surrounding land and including the R. Lavant flood relief channel. The importance of the Harbour's drainage function should be reflected in a specific policy that balances the significance of the habitat with the land drainage issues.

The Medmerry Scheme has created a significant change in the coastal geography creating a significant new coastal habitat extending westward from the margins of Pagham Harbour to within a short distance of the edge of Chichester Harbour AONB. An important corridor for wildlife is developing over the short distance between the two and should be considered as a designated area under policy S30.

### S27 Flood Risk Management

The plan makes reference to flood risk but does not fully realise its significance to the Manhood Peninsula and the constraints it places on development, the future of its economy and the resilience of its communities.

Whilst SUDS has its uses in localised drainage it often simply drains an area into a downstream network that has to cope with the additional run off. The Peninsula has an extremely high water table for the majority of the year that makes most soakaway drainage ineffective. An integrated network utilising the existing ditch system and augmenting this with attenuation areas with good clear outlets to the sea must be developed and maintained.

Many new housing developments rely on SUDS but simply only cover the development site. Developers have to be responsible for the water they produce from the point of generation to its disposal to the sea or main river. This should form a requirement of any planning agreement and a policy within the plan should reflect and formalise this responsibility. Realisation of the true infrastructure cost of drainage should be fully reflected in the site evaluation process and its economic viability. The development of many coastal locations or those on flood plain may be proven uneconomic if the real cost for drainage were realised and not the passing on of the problem downstream as currently occurs.

Reference is made to Surface Water Management Plans. It is the responsibility of the lead strategic flood authority (in this case WSCC) to produce and maintain these plans. As a material consideration there should be policy and text to ensure the plans are kept up to date and that priorities identified in plans are brought forward for action and funding such as CIL directed to their implementation.

### S31 Wastewater Management and Water Quality

Southern Water needs to have information on future demand foul drainage – detailed discussions with SW have shown that the levels of development known to them, especially in respect of Sidlesham Waste Water Treatment Works, do not appear to reflect the development levels and question the capacity of the facility. Additionally, the size and overall functioning of the pipe network is very troublesome, for example, the “trunk main” from the Witterings. It would appear that calculations are primarily based on dry flow rates where much of the pre 1960’s housing on the Peninsula has mixed drainage and the foul system suffers from ground water inundation. The Parish requests that a clear reappraisal of the wastewater capacity of SWWTW and of the network is made and the infrastructure costs of a system that has the required headroom and a network that will support existing and any new development is made and factored into the plan.

### DM35 Equestrian Development

The parish is concerned about the high level of horse related development that is occurring on the Peninsula, especially on the settlement boundary margins, within the ex LSA estates, and associated with gypsy sites. Much of this development is often deemed as “agricultural use” when it is really a “change of use” as the livestock are not supported by grazing of the land. The use for “horse culture” often removes high quality land from agricultural/ horticultural use, despoils the land

creating a strong visual intrusion often close to residential areas. The Plan policy should ensure that the change of use is properly applied and enforced. Clarity should also be sought as to the true recreational nature of much of the horse keeping and as there is no bridleway network on the Peninsula how often large numbers of horses kept on a small acreage might be exercised.