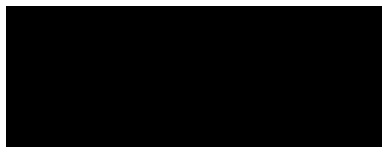




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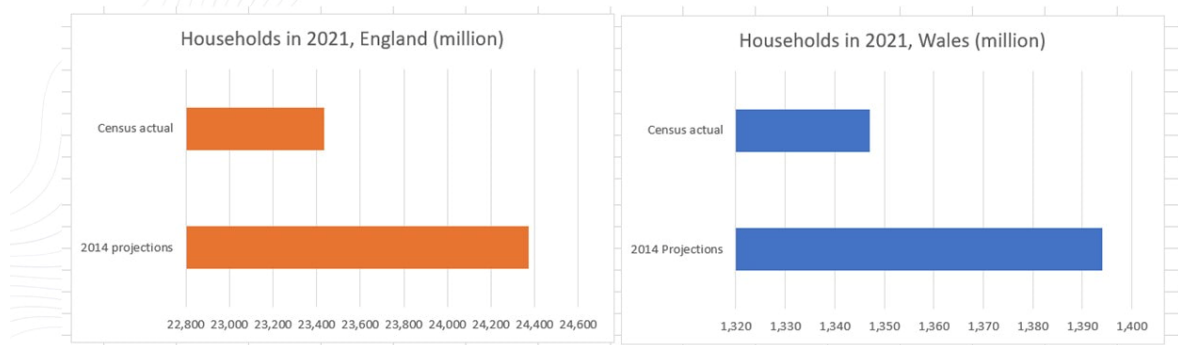
CONTRIBUTION TO CONSULTATION ON CHICHESTER DISTRICT COUNCIL LOCAL PLAN 2021-2039

Thank you for the opportunity to comment on the Draft Chichester District Local Plan 2021-39. We would suggest that there has been insufficient public consultation to date. We commented on the draft Local Plan for 2015, on the Preferred Options in 2019 and there have been many changes in Government policy and commitments since then to include Climate Change, Net Zero and commitments made at COP 26 and 27 to include reducing methane emissions etc. With regards to this consultation we recognise the importance of a plan-led system and support Chichester District Council's (CDC) desire to produce a comprehensive Local Plan. CPRE Sussex wishes to contribute to policies concerning landscape, rural areas, communities, environment and wildlife drawing on evidence and local knowledge.

CONTEXT

1. Examining the previous government consultation which closed on March 2nd, ie the [Levelling-up and Regeneration Bill](#) including some aspects of the National Planning Policy Framework, NPPF, there are some issues which would impact on this Local Plan and need consideration.
 - 1.1 That consultation included important changes to the way in which the 5 year housing land supply is calculated, and the timetable for making Local Plans. They are of significance to local councils, especially those with Neighbourhood Plans. Some measures will take effect almost immediately through an update to the existing NPPF in Spring 2023. Others will follow later in the year or in 2024. Surely such consultations should be better phased to make plan development more logical and access to consultations easier?
2. **Communities:** Our group welcomed the overall shift in emphasis towards communities. Mind you, while the word is used 121 times in the Prospectus it does not appear in the draft NPPF! We would expect much more emphasis on the importance of communities in any forthcoming consultations. Earlier and more effective engagement with communities could help to lead to a less confrontational planning system with an emphasis on active participation.
- 3 **Time required** – a lot of time is needed to understand and implement such policies and a searchable on-line version would be very helpful; and, consideration also needs to be extended to those people in the community who are not computerised.
- 4 We take the word “sufficient” with regard to housing numbers to be equivalent to that which is “needed” and the current Standard Method does **not** establish that figure. Our MP, the Rt Hon Andrew Griffith, Arundel and South Downs, referred to the approach to developing housing numbers as a mutant algorithm.
 - 4.1 Specifically, the changes to housing targets, to make them ‘advisory’, are welcome. However, we should remind you that the

Government continues to insist on using out-of-date projections (2014). The current ONS population estimates are **1 million less** people in the population than allowed for in the figures used to so that the reliance on the 2014 figures is completely out of date. The emphasis should always be on using current up to date evidenceand to use those out-of-date figures produces the wrong results



and does not conform with the need to use up to date information. In addition, this would require an immediate change to the guidance to insist (as previously) on the most up-to-date projections.

4.2 We also recommended a review of the Standard Method, which does **not** make housing affordable and simply supports developers to build market homes where they want to. The graph above illustrates the gap between projection and current population figure provided by the Community Planning Association.

4.3 Local Planning Authorities, LPAs, were also given an opportunity to put forward alternatives to the Standard Method and to name the specific constraints faced. Our contribution to that consultation referred to the:

- Reduction of land available to the CDC given the creation of the South Downs National Park, SDNP
- English Channel
- SDNP itself

- Range of internationally important designated sites
- Rare species and habitats
- River flood plains
- Water neutrality in part of the District
- Nutrient neutrality in the Solent
- Sea Level Rise
- Inadequate infrastructure – roads/lanes and local transport; sewage treatment; community facilities such as medical centres, shops; and

4.4 There have already been large housing commitments, loosely put on “flat green land” around Chichester and now CDC is eyeing the “empty” north of the District with allocations being made for Loxwood and an increase in the number of houses being sought in Wisborough Green. Such land supports wildlife which often may not be under recorded as it is private land. Areas in both of those Parishes has been “cleared” of biological interest but the BNG established a baseline of 2020 and google maps can show the state of the environment at that date. The commitment to safeguarding biodiversity needs to be pursued carefully and consistently.

COMMENTS ON THE CDC LOCAL PLAN 2021-2039
REG19 proposed submission comments: the comments
cite the para and/or Chapter number

5. At this phase in the local plan process the scope of the invited representations is limited to whether the Plan that has been produced is:
- a) **legally compliant** (i.e., whether it meets the legal requirements); and
 - b) **sound** (i.e., whether it has been positively prepared, is justified, is effective and is ***consistent with national policy***)
and I would **ADD** whether it is forward thinking enough as it is planned to last until 2039.

5.1 The plan area is split in to three areas, each with different characteristics, landscapes and access to services:

- a) • The **East-West Corridor**, running across the width of the plan area, is varied in landscape with the inclusion of both larger settlements (including the city) and rural villages. It has the best transport connections and access to facilities in the plan area with the A27 and railway running through-out.
- b) The **Manhood Peninsula* MP**, located in the south of the plan area, **jutting out into the English Channel**, is rich in coastal landscapes with the majority of the area covered by environmental designations. It also includes some of the plan area's *larger settlements* which rely heavily on limited road accessibility to the north towards Chichester city.
- c) The **North of the Plan Area** is primarily rural in character with diverse landscapes, rich cultural and heritage assets and a number of dispersed settlements, some of which are relatively isolated and served by narrow lanes with limited public transport

***NB** The population on the MP is dispersed in a rural landscape and equals that of Chichester. The description for the North section could just as easily have been used for the MP.

Chapter 2 and Local Plan Vision

These Objectives will need to underlie every aspect of the document.

5.2 P 23: Para 2.25 Replace the word "site" by "area" and insert forming part of a diverse set of wetlands (Ditches, Rifes, Ponds, Saline lagoons and a small section of Canal).
Info: The Medmerry site is no longer the largest eg having been overtaken in area by the Steart Marshes, Somerset.

5.3 Include mention of rare habitats and species and the role of Selsey Bill in facilitating arrivals and departures of bats, butterflies and birds. That's its USP,

6.1 P 25 Local Plan Vision and Strategic Objectives p 30

Objective 1: CLIMATE CHANGE

This section does *not* reflect the urgency of the issue nor the vulnerability of parts of Sussex. Many scientists are pointing to Sea Level Rise, SLR, speeding up and some of them cite a 10 year window in which to act ie so that before this Local Plan has run its course, areas on the coast including the coastal plain and the Manhood Peninsula could well be adversely affected. This would have an immediate impact on housing, facilities and transport links and could lead to the local population having to move.

6.2 Actions related to this particular objective need to be included in all the following objectives. The south of the District is very vulnerable and the rest of the District will experience very intensive rainfall, water shortages (NE/EA 2013 report) and hot summers.

6.2 Policies need to include ***not*** building on areas below 5m high Water Level. The CDC Climate Change officer should host meetings to consider potential plans for putting houses on stilts, moving people to land safe from flooding and re-directing roads, cycle ways and footpaths to facilitate future access.



6.3 Evidence: See the Surging Seas and NASA websites for prediction of Sea Level Rise. Need to include reference to the ***UK Climate Resilience Programme*** jointly led by UK Research and Innovation, UKRI, and the Met Office which was set up to fund research “to help understand how to quantify the risks from climate change and build climate resilience for the UK, This research should produce “usable outputs” to “directly support decision-making” by government, local authorities, communities and other stakeholders

6.3.1 Every area of UK society will feel the effects of climate change and, as global emissions continue to rise, preparing for life in a warmer world is crucial. Findings were discussed last week by the UK ranging from assessments of elderly people overheating in care homes through to building community-run water storage.

6.3.2 Every area of UK society will feel the effects of climate change and, as global emissions continue to rise, preparing for life in a warmer world is crucial.

6.2.2.i In early March, UKTI and Met office researchers involved with the programme gathered to present and discuss their findings. They ranged from assessments of elderly people overheating in care homes through to building community-run water storage. These items and website need to be referenced in the evidence section.

6.3.3 The key points are intended to help businesses and policymakers adapt to climate change.

6.3.4 Many focused on "[climate services](#)" defined as involving the "**production, translation, transfer and use of climate knowledge and information in climate-informed decision making**".

6.3.5 Climate services could be an important tool for adaptation because they can provide people with the relevant information to prepare for climate change.

6.3.6 Representatives from the Met Office laid out their [recommendations](#) for **a UK National Framework for Climate Services**. And said they wanted to provide a "driving force" for the nation's climate services community and help ensure that "adaptation action actually does get done".

6.4.7 UK 'SSPs'

"[Shared socioeconomic pathways](#)" (SSPs) are tools used by researchers to explore how society will change in the future. This can help them to answer important questions about climate change.

As there were no UK-specific versions of SSPs available to complement the UKCP18 climate projections

Ref: The importance of Adaptive Resilience Solutions in the Face of Climate Threats.

Recommendation: This report needs to be drawn on and form part of the evidence base.

7.1 Objective 2: NATURAL ENVIRONMENT

Work with site managers of the Designated Sites and NGOs in the wider environment. This objective is vitally important and welcome and its importance needs to be reflected in all parts of the plan to include Wildlife Corridors, Biodiversity Net Gain and the Nature Recovery Network.

“It may sound frightening, but the scientific evidence is that if we have not taken dramatic action within the next decade, we could face irreversible damage to the natural world and the collapse of our societies.”

7.1.1 The emergency concerning Biodiversity also needs to be communicated.

Para 2.32: Agree – this (climate emergency) is the most urgent issue facing us all together with the Biodiversity Emergency (declared by IPBWS, 2019).

7.1.2 Info: The ESPACE project European Spatial Planning: Adapting to Climate Events (ESPACE) was a four-year project funded by the European Commission's north-west Europe INTERREG IIIB programme and the ODPM. It produced a Climate Action Plan for the Manhood Peninsula in 2008 and not much action has followed to implement this. Perhaps it needs dusting off and re-visiting and including within the Local Plan?

7.2 Add policy:

PROPOSED Ecosystem Services Policy

7.2.1 CPRE Sussex considers that the Chichester Local Plan 2021 - 2039 should include a policy specifically for **Ecosystem Services** for the following reasons:

1. NPPF para 174. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland

7.2.2 'Natural capital' refers to the elements of nature that produce value to people –whether directly or indirectly. Our natural capital 'assets' are the stocks of renewable and non-renewable natural capital such as our soils, freshwater, farmland, forests, atmosphere, oceans, ecological processes and the natural processes that underpin them. The flows of ecosystem services and benefits that our natural capital provides can be very obvious such as food, fuel, clean air, clean water, and opportunities for recreation. Others are much less visible, such as climate regulation, flood defences provided by natural vegetation, the billions of tonnes of carbon stored by peatlands and other habitats and the pollination of crops by insects'.

(Sussex Local Nature Partnership
<http://sussexlnp.org.uk/natural-capital/>)

7.3 Accordingly, we propose an Ecosystem Services policy (an adaptation of South Downs Park Authority's Core Policy SD2: Ecosystem Services'), be added as follows:

- 1.** Development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services. This will be achieved by means of high-quality design, and by delivering all opportunities to:
 - a) Sustainably manage land and water environments;
 - b) Protect and provide more, better and joined up natural habitats;
 - c) Conserve water resources and improve water quality;
 - d) Manage and mitigate the risk of flooding;
 - e) Improve the District's resilience to, and mitigation of, climate change;
 - f) Increase the ability to store carbon through the retention of existing woodland, new planting or other means;
 - g) Conserve and enhance soils, use soils sustainably and protect the best and most versatile agricultural land;
 - h) Support the sustainable production and use of food, forestry and raw materials;
 - i) Reduce levels of pollution;
 - j) Improve opportunities for peoples' health and wellbeing;and

k) Provide opportunities for access to the natural and cultural resources which contribute to the District's special qualities.

2. The Environment Act 2021 will require the production of a Nature Recovery Network and more locally a Local Nature Recovery Strategy. The Strategic Wildlife Corridors in Chichester District will be integral components of that local network. The importance of local networks in Nature Recovery Networks is highlighted in NPPG

7.3.4 Policy NE 4 Strategic Wildlife Corridors

CPRE Sussex supports this policy, Strategic Wildlife Corridors as part of the Local Plan process, conform with section 179 of the NPPF 2021 which is well-evidenced. However, CPRE Sussex wishes to question the size of the corridors ie the width/

Information provided in the 2021 consultation appears to demonstrate that these areas have been downsized such as those put alongside the East of the City Corridor, it appears that there has been a narrowing of the Strategic Wildlife Corridor around the location of the proposed allocations of **A8, Chapter 10: Strategic and Area Based Allocations Land East of Chichester** and potential **A7, Land at Shopwyke**. The Corridor to the East of Chichester was proposed for connectivity and functional links to the area for the rare and European Protected Species of Barbastelle Bats. It is shown on CDC technical consultation documents as a bat network

This does not conform with the Natural Environment & Rural Communities Act, NERC, 2006 and Section 40 subsection 3a as it would destroy a habitat over which the Barbastelle Bat has been recorded, a Section 41 species. And it is the DUTY of the Local Authority to safeguard these species. There should be NO recreational use in the buffer zones.

8. Green Infrastructure: p 160 and Policy P 14 d Submission (Regulation 19)

8.1 Local Green Space

6.82. The NPPF includes the concept of Local Green Space designation. This is a discretionary designation and sites may

be identified and included in either local or neighbourhood plans. The designation should only be used as defined by the criteria in the NPPF where the land is not extensive, is local in character and reasonably close to the community; and, where it is demonstrably special, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife. Any areas which fall outside a neighbourhood plan area and where such designation is sought, will be considered by the subsequent Site Allocations DPD that will cover the remainder of the plan area. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

8.2 Parishes should be encouraged to look into such areas to be included in Neighbourhood Plans.

9. Renewable Energy: General policy

9.1 Housing p 103:

CPRE Sussex considers that the Chichester Local Plan should include a policy requiring all new-build homes to be equipped and sold with solar PV panels, roof or wall mounted.

9.2 Although the Chichester District Local Plan, at **Para 6.15**, states that 'Design proposals should respond to the opportunities a site presents to make best use of solar gain where this can be achieved without compromising good urban design or creating issues of overheating', there is no requirement in any of the plan's policies for new-build homes to be equipped and sold with roof or wall mounted solar PV.

9.3 Note that West Sussex County Council has advised in their *Solar Together* initiative that "*By generating electricity from the sun, you could reduce your annual carbon emissions by approximately one tonne each year and help West Sussex to become carbon neutral*".

Note, too:

<https://solartogether.co.uk/westsussex/blog/best-ways-to-increase-solar-self-consumption>

- 9.4** `“According to the [University of Oxford findings](#), UK households with solar PV self-consume 45% of their own solar generation on average and reduce annual electricity demand from the grid by 24%. With additional adjustments, this reduction of 24% can be increased to over 35%”.
- 9.5** `New-build homes in Chichester District should therefore be equipped with solar P V panels. We question the statement in **Para 6.15** that ‘solar gain’ could create ‘issues of overheating’. Surely this can be prevented by good design?
- 9.6** There are additional opportunities for solar installations on school rooves (Brighton Sustainable Energy Co-op has many examples), car parks, industrial buildings et al.

10.0 Renewable Energy: Specific location

Wisborough Green 75 additional houses. Unacceptable – see *CDC Capacity Study sub sections 166+167*. Limitations – Ancient woodland; wildlife – rare habitats and species, river floodplain; Water neutrality; HRA with reference to the Mens Ancient Woodland and presence of European Protected Species, Barbastelle Bats flight paths and foraging across the parish. See Natural England report Site Improvement Report and reports by Frank Greenway, 2008 et al.

- 10.1** See **Page 84**: In the north of the plan area, properties within Southern Water’s Sussex North Water Resource Zone are supplied with water from a groundwater abstraction at Pulborough which is currently subject to environmental investigations to ensure there is no adverse impact on environmentally designated sites in the Arun Valley. This may impact on the available supply and alternative sources may need to be considered by Southern Water. Natural England published a position statement in September 2021 requiring developments within the Sussex North Supply Zone to be water neutral – this means that the use of water in the supply area after the development is the same or lower than before. A Water Neutrality Strategy had been prepared jointly with other affected authorities. Natural England’s Position Statement sets out an interim approach based on minimising water use in new builds and offsetting the water that is used

- 10.2 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 (lppd) by 2040, a lower figure than the current most stringent Building Regulation target of 110 lppd and not that level which could be required for water neutrality.
- 10.3** The Local Plan is weak on impacts especially from the largest concentration of caravans at Selsey on Medmerry.
- 10.4** There is no wildlife corridor running east to west along the Manhood Peninsula ie Pagham to East Head and this undermines the importance of a positive barrier zone to protect the habitat. CDC have used the corridors for this barrier purpose possibly more than as a pathway throughout other parts of the plan.
- 10.5** Nutrient neutrality exclusion of a large area of the Peninsula from the protection zone is illogical as the same conditions exhibited in Chichester harbour (in the zone) exist at Pagham.
- 10.6** There is a 'tool' - "nutrient budget calculator March, 2022 version" - which gives an "n" factor for instance to discharges from WWTW. There is no direct mention of its use at Chichester harbour and as the data on Pagham Harbour has yet to be made public, the role of Sidlesham WWTW has not been referred to. The "N" factor would probably be more restrictive on outflows from WWTW than the total discharge permits - and shows a lack of coordinated approach between the Environment Agency and Natural England.
- 10.7** There are two reports due to be published this month - the West Sussex Coast and Gt Brighton Board and Southern Water overall plan for drainage and waste water-the timing of the LP - is thus unable to take these two influential inputs into account and may have implications for the 'Soundness' of the plan as it moves forward.
- 10.8** No mention is included of Sidlesham WSTW which is operating at and beyond capacity resulting in new housing on

the Manhood Peninsula dealing with waste water in gardens, in houses etc.

Pages 87 and 88: Paras 4.112 and 4.113 are contradictory.

Appendix F Monitoring Framework

Early in 2020 attended a Public Inquiry representing the Manhood Wildlife and Heritage Group and presented evidence about an application at Easton Farm where the implementation of an application had not been followed up, which had expanded like Topsy and which potentially could damage the Medmerry coastal realignment site with its runoff. CDC had not been on watch possibly through lack of staff and/or a lack of enforcement staff. The site had grown without permission. This section requires a firm commitment to monitoring and reporting back, not just a paper one.

Thank you for your attention.
Yours faithfully,

Jill
Jill Sutcliffe, Dr
On behalf of Sussex CPRE