

Birdham Parish Council

Response to the Local Plan Review 2019 - 2035

Birdham Parish Council objects to the following aspects of the Local Plan Review 2019-2035.

1. This plan is based on building 650 houses per year, 609 for the Plan Area, and 41 from the South Downs National Park. Not a single sentence in the entire plan tries to justify the increase from the Adopted Plan figure of 435, to this new figure, an increase of 49%. The adopted plan explained at length the difficulties of balancing the environmental and infrastructural constraints with the need to build houses. Considerable justification should be needed to increase the housing requirement so much, and none is provided. This figure must be revisited.
2. This plan is based on a figure of 609 houses per year, an uplift of 40% on the current annual delivery, which is the maximum allowed, as Chichester District Council have an Adopted Local Plan. If an Adopted Local Plan had not been in place the HEDNA (GL Hearn) calculates the District increase in housing for demographic growth to be 517 houses p.a, based on the 2014 Household Projections. This figure includes the South Downs National Park. There has been an updated 2016 based Household Projection, which decreases the forecast housing required nationwide over the next 25 years by 24%. This means that the latest available household growth projection growth over the plan period is likely to be in the order of 392 houses p.a. The South Downs National Park are planning to supply 84, leaving 308 needed for demographic growth in the Plan area. Even adding the ridiculous 51.5% multiplier for earning/house price ratio still only gets to 466 houses per year. It is most unlikely that 609 houses are going to be needed every year until 2035. The Plan should be more realistic and reflect this fact.
3. There is a fundamental unfairness in the Local Plan Review, in that the South Downs National Park is treated as more worthy of protection than the Chichester Harbour AONB, Pagham Harbour SPA and Medmerry designated SPA, which has led to an imbalance in the way the whole plan has been developed. This is made very clear by the proposal to accept an allocation of 41 houses per year from the South Downs National Park. This proposal should be rejected. The South Downs National Park covers 1796 sq. km, has 39 villages and towns listed in its local plan, including substantial towns like Petersfield, Midhurst, Lewes and Petworth, The National Park needs to build its own share of houses, otherwise it will become fixed in a time warp. The Duty to Co-operate should work both ways.

4. A Plan housing figure of 650 houses p.a. will make it extremely difficult to show a 5 year land supply. CDC have only just managed to prove a 5 year supply based on 435 houses p.a. Without a 5 year land supply, the whole point of a local plan is moot.
5. Strategic site AL6 is situated immediately adjacent to the Chichester Harbour AONB. This cannot possibly meet the requirements of Policy DM19. The commercial part of this site is located between the Fishbourne and Stockbridge roundabouts, two of the most congested and polluted roundabouts on an already congested road, which contravenes Policy DM8: Transport, Accessibility and Parking. The location of this site should be moved to the east of the city, where there are already substantial commercial developments. Another possible location is around the Goodwood Race Track, which would act as a noise barrier to protect local housing in the area.
6. This disregard for the Chichester Harbour AONB is further evidenced by the proposal to build a link road between the Fishbourne Roundabout and the A286. This road will be within 300 metres of the AONB and will be elevated because of the low lying ground which it crosses. This will ruin the view of the Cathedral from the harbour and generate large amounts of noise and pollution, thus disturbing the harbour, and further cut off the harbour from the city.
7. Birdham Parish Council objects to the housing allocation proposed for the Western Manhood Peninsula generally (the section of the peninsula accessed by the A 286), and Birdham in particular. The Adopted Local Plan 2014-2029 states in Para. 4.9 “More limited new development is proposed for the Manhood Peninsula, in recognition of the significant transport and environmental constraints (including flood risk) affecting the area. Policies for the peninsula follow the principles of Integrated Coastal Zone Management, which seeks to protect the area’s sensitive environment and adapt to climate change.” For these reasons, the total number of houses for the Western Manhood was set at 330 by 2029, a target that has already been greatly exceeded. Now, another 600 houses (Donnington 100, Birdham 125, West Wittering 25, Bracklesham 350) are proposed, and the transport and environmental constraints, which have not changed in the slightest from the adopted plan, are simply ignored.
8. These environmental constraints are:
 - i. Proximity to the Chichester Harbour AONB, Pagham Harbour SPA and Medmerry designated SPA.

ii. There are no accepted proposals to improve traffic flow on the A27, apart from some improvements to junctions. Proposals very similar to these were roundly condemned during the Highways England A27 consultation process. The improvements which will have to be funded by the developers will take 15 years to complete at a rate of one junction every 3 years.

This means 15 years of disruption and delays.

iii In addition, the A286 is an extremely busy road at all times, but especially during the summer, when it becomes completely gridlocked. There have been 2 traffic fatalities in Birdham on the A286 in the last 2 years. There has been a considerable loss of jobs from the peninsula over the last few years, so most residents of newly built houses will be using the A286 to travel to work, increasing the burden on the road. In addition, the majority of secondary school pupils need to travel into Chichester, using the A286. All that attend Sixth Form College from the Peninsula have to travel into Chichester. This accounts for in all at least 1000 students.

iv There is considerable pressure on primary (junior) school places on the peninsula.

v The sewerage network is close to capacity, with sewerage overflows not uncommon in wet weather.

9. The Western Manhood's requirement for affordable housing is fully met, we understand.
10. In the first 4 years of the adopted Local Plan Birdham has provided 94 (79 in Neighbourhood Plan, 15 windfall) houses built, under construction, or with planning permission, 88% more than our requirement of 50. If we are required to build another 125, we would have a total increase of 220, which is an increase of about 33% on our pre Adopted Plan housing total. The total district requirement, using the proposed figures, seems to us to be about 20% for the whole district. It seems to us as unreasonable that Birdham should accept more than its share of the District burden, especially as these houses would have to be built within a few hundred metres of the Chichester Harbour AONB, a very small AONB already under enormous pressure. It seems to us that a reasonable number of houses for Birdham to be allocated in the review period would be 50, as that would keep our village's growth in line with the district as a whole.
11. Para 17 of the Adopted Local Plan 2014-2029 stated that because the Tangmere Water Works upgrade would only be operational from 2019, the proposed strategic allocations in the Chichester/Tangmere area were not expected to be deliverable until after 2019. To compensate for this, the Plan strategy sought the early release

of housing land in areas where wastewater capacity was available, i.e. the Manhood Peninsula. Building on the Peninsula was front loaded for this reason. In the event that it is decided to retain the proposed numbers in the Plan Review, the requirement to build should be deferred until there improvements to the A27 have been implemented.

Conclusion

Birdham Parish Council object to the proposal to build 650 houses per year in the Plan area. The request to take 41 houses from the SDNP should be refused.

In addition, the Plan figure of 609 should be revisited in the light of the 2016 Household Projections, and the environmental and infrastructural constraints highlighted in the Adopted Plan.

Site AL6 should be moved, and any plans to build a link road should be abandoned.

Birdham Parish Council objects to the proposal to build 600 houses on the Western Manhood Peninsula, due to the lack of a credible plan to improve the transport network, and environmental constraints outlined in the 2014 Plan.

Additionally, we object to the proposal to build 125 houses in Birdham, on the grounds that this is a greater share of the overall burden than average, in an environmentally sensitive area that straddles the AONB border.