Response from West Wittering Parish Council to Chichester District Council’s Interim Policy Statement for Housing (IPC).

West Wittering Parish Council thank Chichester District Council for the opportunity to respond to the above important consultation. At its meeting on Thursday July 2nd, 2020 the Parish Council agreed the following response.

The Parish Council understands the need for an Interim policy for Housing and appreciates the opportunity to comment. Housing development is a major issue for the Peninsula for a number of issues highlighted below. It would be unfortunate if development was to continue without these issues being addressed in a timely manner as it will store up major problems for the future that could be avoided with some planning and targeted actions. This is even more important now that the target figure for housing for Chichester District has increased by 44%.

Although the main areas for delivering this housing fall outside the West Wittering Parish Council boundary, due to the geographical nature of the Peninsula the impact is likely to be significant. The Parish Council is also concerned that settlement boundaries are different to Parish Boundaries and feel that the Parish Boundary is the legitimate boundary to be used. This is particularly important regarding the settlement boundary of East Wittering and Bracklesham which includes a part of West Wittering Parish.

Paragraph 2.3 states that the draft IPC will help to ensure that housing proposals that may be submitted in advance of the Local Plan Review are assessed in a consistent manner against national and local planning policies, with the aim of ensuring that the most appropriate development comes forward in the most suitable locations.

The Parish Council recognises that the NPPF contains a presumption in favour of sustainable development but believes that there are various significant planning issues which are highly relevant and indicate that the Manhood Peninsular is not an area which can accept any significant further development without creating a level of harm which is unacceptable in planning terms despite the recognised need for increased numbers of houses within the district.

The draft IPC then sets out criteria for the determination of whether such a site is considered a “good quality development” in paragraph 6.2.

Although the Parish Council recognises that the IPC cannot be used to develop new policies, it feels that more should be made of the key issues facing this geographical area of the District. It is the view of the Parish Council that these issues are as follows: -

1. Wastewater – there is no spare capacity at Sidlesham WTW. The reference to wastewater conveyance and treatment in 6.2.7 should be expanded. There are already problems at peak times of year such Summer and Christmas and this situation is unlikely to improve without action being taken. The Parish Council does not believe that the Manhood Peninsula has an adequate or sustainable drainage system to support an increased number of dwellings.
2. Schools – there are no secondary schools or sixth form colleges on the West Manhood peninsula resulting in increased need for private car travel to Chichester on already congested roads. With the exception of East Wittering Community School all Primary Schools on the Peninsula are either full or oversubscribed.
3. Roads – given the impact on the Peninsula of the current road network and increased traffic volume, especially at peak times, paragraph 6.2.7 should be expanded to ensure clarity for developers that applications will only be accepted if they are deliverable in terms of infrastructure as described in paragraph 4.2. Any lack of clarity on this topic will not support the aims of this document. The length of time before any mitigating factors will be present should be acknowledged to strengthen this point. The Parish Council does not believe that it is possible to create a sustainable transport network on the Manhood Peninsular as required by Chapter 9 of the NPPF if further development is to be supported.
4. Jobs – employment opportunities are very limited with most people needing to commute off the Peninsula. Although Paragraph 6.2.8 considers environmental impact, including Dwelling Emission Rates it does not mention the impact of car travel to work. It is positive to see that in paragraph 6.2.10 refers to cycle links to adjoining settlement but this is probably unrealistic for commuting from Witterings to employment opportunities in Chichester and beyond and certainly many years off but the Parish Council would like to see some priority given to the development of joined up cycle routes.
5. Tourism – large scale development could destroy jobs in this sector as housing replaces fields and the rural appeal of the area is lost. The impact of any development on the economy and tourism should be a factor that is included in this draft policy as required by paragraphs 82 and 83c of the NPPF.
6. Climate change – flood risk is referred to in paragraph 6.2.11 but not in respect of projected levels of sea rise. Paragraph 6.2.8 refers to the Council’s Climate Change Emergency calls but not on the consequence of Climate Change on flood risk. The impact on climate change and the environment of any new development, whatever the size, should be expanded in line with comments from Dr Carolyn Cobbold BSc Mech Eng. FRSA. The Parish Council also believes that these important issues cannot be ignored as they are required by Chapter 14 of the NPPF.
7. Types of housing – any development, whatever the size, should have a suitable mixture of housing types to accommodate local needs.

8 Protected Habitats and Biodiversity – A significant area of the Manhood Peninsular is designated SSSI, SPA, SAC and RAMSAR. The area of coastal waters is also heavily protected from the damaging impacts of further development. There is a zone of influence around these areas of 5.6km. There is therefore a requirement to carry out an Appropriate Assessment of further development within the zone of influence to establish whether alone or in combination with other plans and projects it is likely to have a significant effect on these protected areas. The draft policy is silent on this statutory requirement. Any proposed development would need to comply with this requirement and the guidance given in para 175 NPPF.

West Wittering Parish Council

6/07/2020