

Comments prepared for the Itchenor Society and the WIPC upon:

CDC Draft Local Plan Key Policies – Preferred Approach (DLPKP) published in March 2013

A) Overview

1) Policy 1 (page 30) Presumption in Favour of Sustainable Development.

The approach as defined in Policy 1, namely to “work proactively with applicants...to find solutions... *wherever possible*” on page 30 is, in our opinion, poor guidance. It is almost always ‘possible’ to grant permission. It is in the nature of Local Plans to contain a wide range of policies which could almost always both support an approval or justify a refusal. This policy 1 appears to derive from the National Planning Policy Framework paragraph 14 but NPPF 14 does not include the words *wherever possible*. We believe they should be omitted from Policy 1. NPPF 14 does however refer to a restriction on the ‘presumption in favour of sustainable development’ where the application is on land within an AONB but Policy 1 makes no such reference and we think it should. This restriction is in footnote 9 to NPPF paragraph 14 and this should be carried over into Policy 1.

2) The DLPKP needs more Policy protection for the Chichester Harbour AONB.

It seems to rely via Policy 10 (page 71) ‘Environment Strategy’ on the further Policies numbered 45,46,47,48 and 50. In recent years we have been reliant on ‘saved policies’ from the 1999 Plan to afford protection to this area but all those policies will disappear when the DLPKP is adopted. We believe that the Chichester Harbour AONB needs its own Policy which should clearly state that adequate protection is given to this area. It was one of the first AONB’s to be announced in the UK some 50 years ago. The New Local Plan, recently adopted by Havant Borough Council, has such a policy (see CS12 on page 69 of the Havant Plan) and we believe that the DLPKP should as well.

3) Greater prominence should be given to the Chichester Harbour AONB Management Plan 2009-14.

This is an excellent set of policies produced by the Conservancy that is up to date and are kept up to date. They need much greater prominence in the DLPKP. We suggest that they are incorporated into the new policy (see above) to protect the Harbour.

4) We believe that there are no adequate replacement policies covering development in what is currently (i.e. from the 1999 Plan) known as ‘The Rural Area’, and the ‘Coastal Environment’

We, as a waterside village, rely especially on these old ‘saved policies’. These will all be lost with the abandonment of 1999 Local Plan. West Itchenor lies within the ‘Rural Area’ as defined in the 1999 Plan and so do other large areas of the District. We are particularly concerned to lose:

- a) RE1 which defines development in the Rural Area. Its replacement is Policy 45 ‘Development in the Countryside’ which is likely to give a very broad approval to schemes meeting just three criteria (see page 183). Similarly,

Policy 44, 'Development around the Coast' is once again widely and subjectively drawn (page 181).

- b) RE4 which protects the AONB (see above point 2)
 - c) B5 which covers extensions to business, industrial and warehouse buildings in the Rural Area.
 - d) H12 extensions and replacement dwellings in the Rural Area.
 - e) We are concerned that the existing 'Coastal Environment' policies in the 1999 Plan (the 'C' policies) seem to have been replaced by Policy 44 but are inadequately drafted and many established policies are simply not there. As a waterside village, we rely on these for, among other matters, protection for waterside development (the old policy C1), and the protection of our boatyards (C7). But the 'C' policies haven't been transferred into the new policy.
 - f) BE14 Wildlife habitat, trees, hedges and other landscape features
- All these established policies need to be redrafted into the DLPKP.

5) Apuldram Waste Water Treatment Works (WWTW)

On Page 81 paragraph 12.16 there is comment on the Apuldram Waste Water Treatment Works (WWTW). The comment is made that it is subject to environmental constraints which restrict capacity to accommodate future development. We note from the response made by Southern Water to The Housing Numbers and Location Consultation of 2011 that they had concerns about Apuldram when they said:

"Chichester (Apuldram) WWTW releases treated effluent into Chichester Harbour. Due to the environmental sensitivity of the Harbour, the capacity that can be provided at the works is limited.

The Chichester catchment is also suffering from high levels of groundwater infiltration into the sewer network during periods of wet weather, which leads to unusual storm overflow events at the works. As a result, the EA is currently advising CDC to limit development to a level which will not significantly increase the net flow to the sewer network. This means that strategic development sites are excluded until a sustainable solution can be found. SW are undertaking a study to investigate the feasibility of reducing infiltration to the sewerage system in the catchment which should be completed by June 2012"

In the 'Strategic Growth Study WWT Options for Chichester District' dated 17th August 2010, the Apuldram WWTW was studied by MWH UK Ltd. On page 67 the 3rd Option was stated as the only 'solution currently appearing viable'. This option is the construction of a Long Sea Outfall (LSO) at a cost of £36+million extending from Apuldram to the sea beyond Selsey, a distance of about 13 kilometres which will take the sewage out to sea by pump.

In the light of the problems identified, should further connections be made to the Apuldram WWTW until a solution is achieved? We believe that no further connections should be made into it until that is resolved.

6) Traffic and roads

On page 61 paragraph 8.3 traffic congestion is acknowledged along the A27 Chichester Bypass and to/from the Manhood in the peak travel periods. It is also a serious problem on summer weekends causing major delays to tourism traffic to and from the beaches on the Manhood. Future development on the Manhood which would result in an increase in traffic should be resisted until Highway measures to alleviate the congestion have been implemented.

7) Proposed housing allocation at East Wittering/Bracklesham

On page 126 in paragraphs 13.13, 13.14 and 13.15 despite the DLPKP having raised the traffic problem, the DLPKP state that East Wittering and Bracklesham are considered as having 'potential for some housing and employment growth'. The stated problems of traffic congestion (see comment above) combined with surface water drainage and the need for pipe work replacement to the sewers in the area indicate to us that the area is not suitable for additional houses, and certainly not 'at the earliest opportunity' as expressed in paragraph 4.12 on page 33.

8) Phasing of new housing starts compared with phasing of road improvements

On page 62 paragraph 8.6 the A27 and other road improvement schemes are reviewed. The document reveals that the 2010 government spending review suspended payments on improvements to the A27 by Highways Agency in order to save money.

Chichester state that one of the most important objectives in producing the DLPKP as set out in the list on page 6, is the ability, if adopted, for CDC to raise a Community Infrastructure Levy (CIL) in order to pay the cost of community investment including improvements to the A27 (page 33 paragraphs 4.13 and 4.14). In paragraph 4.14, the DLPKP states that

“development will be required to provide financial contributions towards coordinated transport measures to mitigate projected traffic impacts resulting from proposed housing and other development (that are) planned. Development contributions will be used to fund a package of proposed improvements to the six junctions on the A27 Chichester Bypass, linked to further measures to reduce congestion and promote sustainable modes of travel in and around Chichester city. Phasing of development in and around Chichester city will need to be coordinated in conjunction with delivery of these proposed transport improvements.”

We have very few commercial schemes proposed by the DLPKP and so most of the CIL will come from consents for new houses.

Because the majority of the new houses that are planned in the DLPKP area lie to the east of Chichester and will connect into the Tangmere WWTW, they won't be built until after 2019. This is because the DLPKP states that the upgrade that is needed at the Tangmere WWTW won't become operational until 2019. Therefore, the DLPKP emphasises the need for the early release of housing sites in the smaller settlements of

Southbourne, Selsey, East Wittering/Bracklesham; however, without CIL funds there won't be any improvements to the A27 or any other roads until sometime after 2019.

Can the present road system support these further houses in Southbourne, Selsey, East Wittering /Bracklesham? We think it will create more traffic congestion and have an impact on tourism which is so important for our local economy.

Christopher Mead-Briggs 9th April 2013