



## EAST WITTERING & BRACKLESHAM PARISH COUNCIL

Robert Jenrick, MP  
House of Commons,  
London,  
SW1A 0AA

13th April 2021

### **Re. Chichester District Council Local Plan**

Dear Mr Jenrick

I am writing to you to alert you to the considerable difficulties currently being experienced by East Wittering and Bracklesham Parish Council due to combined threats of the lack of an up-to-date Local Plan and underlying weaknesses in the existing NPPF to ensure that adequate infrastructure is in place to support new development.

In July 2020, the Chichester District Local Plan lapsed and subsequently our local planning authority have been unable to demonstrate a five-year land supply. This has created an extremely favourable position for developers, keen to take advantage of the situation and bring forward speculative and unsuitable development sites.

I must begin by pointing out that our parish is by no means against development. In the previous local plan we were given a housing allocation of 180 properties and within the plan period actually delivered sites and permissions for over 320 properties. We appreciate that development is necessary for our community to continue to grow and thrive and began preparing a Neighbourhood Plan in 2016 but have been unable to complete this work due to the ongoing delays in the development of the Local Plan and the constantly changing numbers of new houses we will be expected to accommodate, which have to date ranged between 1,000 and 0.

East Wittering and Bracklesham are currently besieged by a number of major developers with options for up to 1,650 houses on sites in or adjacent to the parish that have been identified in various Housing and Economic Land Availability Assessment (HELAA) maps which have been through multiple iterations over the past five years leading to confusion over which sites are actually viable and now provide an opportunity for developers to cherry pick whichever maps best suit their aims.

We currently have three active planning applications in the area, which could grant permissions within the next few months for up to 250 houses. These will be scattered across a number of sites, all artificially subdivided into smaller land units than their acknowledged final development capacity, leaving us vulnerable to piecemeal development that minimises developer contributions via CIL and S106 to improve community infrastructure and delivering the community the worst of all worlds. If we are expected to accommodate significant additional development (and an extra 250 homes would be a

Bracklesham Barn, Beech Avenue, Bracklesham Bay, East Wittering, PO20 8HU  
Telephone: 01243 673588. [enquiries@eastwitteringbrackleshampc.org.uk](mailto:enquiries@eastwitteringbrackleshampc.org.uk)

VAT reg. no. 135837105



## EAST WITTERING & BRACKLESHAM PARISH COUNCIL

10% increase on our community size), then we would like to have say as a community in how and where this is delivered.

At the same time, supporting infrastructure in the area has not been upgraded to support the 320 properties already delivered, let alone a further 250 homes.

The waste water treatment works for the area is already running above capacity and local residents frequently have to contend with sewage backing up into their homes in times of even moderate rainfall. Southern Water, who are responsible for waste and sewage in the area are currently subject to an ongoing complaint investigation from Ofwat due to their failure to invest in the local network and have previously advised a neighbouring parish that to address the capacity issues “... *a large input of capital is required in order to resolve the problem, ... However, I’m unable to provide a timescale of scheme approval.*”.

Southern Water have consistently discharged raw sewage into local watercourses and beaches as a result of the inadequate infrastructure, discharging for 895 hours from Sidlesham Waste Water Treatment works in 2020 directly into the SPA/SSSI/Ramsar nature reserve at Pagham Harbour. With no plan from Southern Water to upgrade network capacity or undertake the significant investment needed to accommodate even existing demand, this problem will only become worse and risks breaching our responsibilities under international environmental treaties and obligations.

The local road and traffic network is also subject to excessive strain and has little capacity to absorb substantial numbers of additional housing. This is largely due to the cancellation of improvements to the A27 trunk road, originally planned under the Road Investment Strategy (RIS2) which severely affects onward journeys for residents, who must either join or cross the road to access local employment and education facilities. At present, the much-needed upgrade to the A27 is indicated as a potential project within RIS3, meaning that delivery of any improvements will not likely happen until at least 2030, almost 10 years from now.

In 2014 a planning application for 160 homes in the parish was dismissed at appeal (ref. APP/L3815/A/14/2219554) with the inspector citing traffic Impacts on the road network as a major consideration in his decision, commenting that;

*“The analysis demonstrates that the development envisaged in the emerging Plan would, in spite of all the junction improvements financed through contributions, result in very significant queues and delays at the end of the Plan period (in this context modelled as 2031).... Such conditions would exacerbate the existing queues and delays, already described by the Highway Authority as 'severe'...*

*...In any case, far more than the limited junction improvements envisaged as being financed through developer contributions are now in the offing. Upgrading the junctions on the A27 around Chichester (announced in 2013) is now part of a £350m investment programme to transform the A27 into a single strategic route 'to support the development of the local economy' and to remove 'notorious congestion hotspots' (as announced in this autumn's statement)... it would be inconceivable that a technical solution to the traffic problems currently experienced or identified here would not emerge over the next 17 years. Indeed,*

Bracklesham Barn, Beech Avenue, Bracklesham Bay, East Wittering, PO20 8HU  
Telephone: 01243 673588. [enquiries@eastwitteringbrackleshampc.org.uk](mailto:enquiries@eastwitteringbrackleshampc.org.uk)

VAT reg. no. 135837105



## EAST WITTERING & BRACKLESHAM PARISH COUNCIL

*both the Highway Agency and the Highway Authority are already engaged in exploring possibilities. And, although this has been a long-running saga often floundering on environmental constraints in the past, I find it difficult to believe that an environmentally appropriate technical solution would remain beyond the ingenuity of all concerned throughout the Local Plan period*

Unfortunately, following the cancellation of the Chichester A27 upgrade in 2015, and with the ongoing failure of the County Council to deliver any of the additional junction improvements to the local road network, however 'inconceivable', there is now no likelihood of significant improvements being delivered before 2030. 250 additional homes have been delivered since that appeal ruling, with 250 more still awaiting decisions.

Within the emerging Local Plan Chichester District Council have acknowledged the unsustainable impact of increased housing development on the local road network and are currently investigating the potential requirement for a new southern link road to enable more housing. There is currently no agreed route for the proposed road, which would cross environmentally sensitive SSI, SPA and AONB areas and no indication of how the estimated construction costs of £70m would be met. Delivery of the link road is not anticipated until the end of the plan period. If it requires funding via S106 contributions and developer agreements then this will be impossible to achieve if piecemeal delivery of smaller sites (less than 100 units) is allowed to run unchecked in the intervening period.

As we have already highlighted, our community is by no means against sustainable development, but we have reached a point where due to the lack of an up-to-date local plan, we risk unchecked and inappropriate development in the community, leading to significant adverse impacts for our residents and our environment.

We would like to request a moratorium on all significant new developments south of the A27 on the Manhood Peninsula until Chichester District Council have completed their Local Plan Review and addressed the many significant issues around infrastructure and traffic. Local communities can then use the neighbourhood planning process to positively plan for sustainable new housing allocations in a way that enhances rather than damages the life of the community.

I look forward to receiving your response.

Kind regards

Brian Reeves

Chairman East Wittering & Bracklesham Parish Council.

c.c. Gillian Keegan, MP, Thangam Debbonaire, MP, Eileen Lintill, Leader, Chichester District Council, Paul Marshall, Leader, West Sussex County Council, Rob Booth, Social Affairs Editor, Guardian Newspapers, Bex Baxstable, Editor, Chichester Observer.

Bracklesham Barn, Beech Avenue, Bracklesham Bay, East Wittering, PO20 8HU  
Telephone: 01243 673588. [enquiries@eastwitteringbrackleshampc.org.uk](mailto:enquiries@eastwitteringbrackleshampc.org.uk)

VAT reg. no. 135837105