



## SAVE OUR SOUTH COAST ALLIANCE

# COMMENTS ON CDC DRAFT INTERIM POLICY STATEMENT FOR HOUSING DEVELOPMENT SUBMITTED BY SOSCA

By

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### 1. Background

**1.3 The CLPKP will continue to form part of the statutory development plan until the LPR is adopted, however Planning Practice Guidance<sup>1</sup> makes clear that where local plans have been adopted more than 5 years ago, the housing target against which the housing supply and delivery will be assessed should be derived from the Government's standard methodology for assessing housing need. From the 15 July 2020 (five years from the date of adoption of the CLPKP), the Council's housing supply and housing delivery will be assessed against the figure of 628 dwellings per annum, rather than the previously adopted housing target of 435 dwellings per annum. The housing supply position will be reviewed at that time, but there is a risk that the Council will not be able to continue to demonstrate a robust five-year supply of housing land as required in national policy, and the presumption in favour of sustainable development set out in the NPPF will apply. The position is different in parishes which have a made neighbourhood plan which allocates land for housing. In that case, the Council will need to be able to demonstrate a three-year supply of housing, but this only applies if the neighbourhood plan was made within the past two years.**

**Comment 1: Note: 'Government's standard methodology for assessing housing need':** this is a centralised method of assessment, which is neither based on an actual local assessment of need, nor on the amount of land available, nor the suitability of large-scale development in respect of harm to environment and wildlife it supports. The Government has required that CDC build 12500 housing units in the next phase of planning which ends 2035.

Within the Chichester District area 73% of its land is occupied by the SDNP (South Downs National Park), and a further 3.5% is occupied by the CHAONB (Chichester Harbour Area of Outstanding Natural Beauty)<sup>1</sup>.

Although building does go on within these protected areas both areas have been ruled out of providing any of the land required for building for the housing development contained in the CDC's Local Plan. This leaves less than 25% of land available to accommodate these housing developments.

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<sup>1</sup> Measurements of SDNP and AONB within CD calculated by Nick Pyke, qualified Landscape Architect, MLI (retired) 2020



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But given that this remaining area already contains considerable existing development and infrastructure, it leaves very little land that is both available and suitable to accommodate these housing developments.

**Comment 2:** Neighbourhood Plans made five years ago should still be valid and not discounted as it has not been possible to update/redo NPs due to the uncertainties of the now suspended LPR. Moreover, some developers have held back deliberately on consents given in the intervening period in the expectation of even bigger development sites

### **2. Approach to boosting housing supply**

**2.3 This statement aims to provide interim guidance which will apply until the Council considers it has a five-year supply of housing in line with Government guidance. The intention is for the Council to be able to guide development to appropriate and sustainable locations using this document to assist in the consideration of planning applications. It 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.**

**Comment 1: Sustainable locations** need to be defined as sustainable for the long-term. The Environment Agency advises local authorities to plan for flood and coastal risk up to 2065.<sup>2</sup> NPPF states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).” The coastal and harbour settlements in Chichester District will face significant flood risk by 2065. In October 2019, the House of Commons Environment Food and Rural Affairs Committee urged local authorities to take a more proactive approach to planning in coastal areas and avoid inappropriate development in areas at risk from future flooding or erosion.<sup>3</sup>

**Comment 2:** these terms 'appropriate and sustainable' are open to a wide variety of meaning unless they are defined.

SUSTAINABLE LOCATIONS should mean that they are able to provide LONG TERM housing. To be sustainable only up to 2035 is not long term. The Environment Agency advises Councils to plan for floods and coastal risk up to 2065. The NPPF states that development in areas of risk is INAPPROPRIATE and should be avoided.

### **2.4....'prioritising progress on delivery of known sites including West of Chichester..'**

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<sup>2</sup> <https://www.gov.uk/government/news/environment-agency-publishes-new-evidence-to-plan-for-flood-and-coastal-risk-up-to-2065> <https://www.gov.uk/government/publications/flood-and-coastal-risk-management-in-england-long-term-investment/long-term-investment-scenarios-ltis-2019>

<sup>3</sup> <https://publications.parliament.uk/pa/cm201920/cmselect/cmenvfru/56/56.pdf>

<https://www.parliament.uk/business/committees/committees-a-z/commons-select/environment-food-and-rural-affairs-committee/inquiries/parliament-2017/coastal-flooding-and-adaptation-to-climate-change-17-19/>



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**Comment 1:** this implies that a 'known site' is an 'approved' site. The site in Bosham (AL7) still needs to be approved.

**Comment 2:** will the numbers of houses developed under this 'speeded-up' process be included in the number subsequently required in the LPR when it is approved?

### **3. Planning Policy Context**

**3.1 The National Planning Policy Framework (NPPF) (February 2019) is a material consideration in planning decisions. At the heart of the NPPF is a presumption in favour of sustainable development. For decision-taking (paragraph 11) this means: (there follows a list of criteria including:**

**'NPPF policies that protect areas or assets of particular importance provides a clear reason for refusing development'....**

.....and

**' any adverse impacts of doing so would demonstrably outweigh the benefits...'**

**Comment 1:** Chichester Harbour is designated an SSSI status, is a RAMSAR site and recognised as having internationally important wetlands. It is designated as a Special Protection Area which carries with it a 'zone of influence' of 5.4km. Pagham Harbour has a 3.5 k zone of influence. Failure to recognise these do so would contravene the CDC's own Key Policy 50, and contravene the Conservation of Habitats and Species Regulations 2017.

**Comment 2:** Historically the SDNP was linked to the harbour and coastal flood plains. The habitat fragmentation between them and between the coastal wetlands is an ecological threat to wildlife. preventing species migration.

**Comment 3:** The reduction of future climate mitigation flexibility both on the site and in the wider area will be regarded as an **adverse impact** of development. No new development should be permitted on sites which could be inundated due to rising sea levels within the next 100 years – such sites are no longer considered sustainable by most scientists. Chichester District Council should use high climate change allowances (++) to evaluate housing developments which will face much higher risk in the future.

**3.2 Consideration should be given to footnotes 6 and 7 of the NPPF, as well as other relevant paragraphs of the NPPF.**

**Comment 1: Section 6 and 7 of the NPPF** specifically mentions Sites of Special Scientific Interest; irreplaceable habitats, and areas at risk of flooding or coastal change. Due to the known vulnerability of the Chichester coastline to sea level rise, sites close to the harbour or within one mile of the open coast or lower than 7 m above sea level should be precluded from development until an updated Strategic Flood Risk Assessment of the Chichester District has been undertaken factoring in predicted sea level rise over the next 100 years. The area's existing wetlands are of national and international importance both because of their biodiversity and their high capacity to absorb CO2.



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Sea level rise will result in coastal squeeze and loss of irreplaceable wetland, development near to the coast or adjacent to coastal settlements will exacerbate coastal squeeze and hinder migration of species and settlements.<sup>4</sup>

**Comment 2:** In light of CDC’s declaration of a Climate Change Emergency and recent advice by the Environment Agency, the government, and the Committee for Climate Change that local authorities prepare adequately for climate change, all NPPF paragraphs on climate change and flood risk should be given particular consideration together with the most up to date scientific information on sea level rise. This includes paragraph 148 which states that the planning system “*should help to **shape places** in ways that contribute to radical reductions in greenhouse gas emissions, **minimise vulnerability and improve resilience.**”*

NPPF paragraph 149 which states that “*plans should take a **proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes.**” In addition, “policies should support appropriate measures to ensure the **future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.**”<sup>5</sup>*

NPPF paragraph 155 which states that “***inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).**”<sup>6</sup> The coastal and harbour settlements in Chichester District will face by far the most catastrophic flood risk in the district.<sup>7</sup>*

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<sup>4</sup> <https://www.carbonbrief.org/restoring-soils-could-remove-up-to-5-5bn-tonnes-of-greenhouse-gases-every-year>

<sup>5</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

<sup>6</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

<sup>7</sup> Joseph Lockwood, Department of Geoscience, Princeton University, USA; Department of Atmospheric and Oceanic Science, McGill University, CA, *Future Sea Level Rise and Flood Risk in Chichester District*, 2020. [https://5d0e6579-f20c-40a0-acbf-8c4ac274613b.filesusr.com/ugd/dae4df\\_bc46d604a4ae4965a574ea0054fd1582.pdf](https://5d0e6579-f20c-40a0-acbf-8c4ac274613b.filesusr.com/ugd/dae4df_bc46d604a4ae4965a574ea0054fd1582.pdf)



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### **4 Local Context**

#### *Deliverable*

**4.2 Given that the Council is concerned about the potential shortfall in housing supply, sites put forward under this approach should be “deliverable” at the time that the site is put forward for planning permission. They should not be, for example, dependent upon delivery of significant off-site infrastructure; and should be fully in the applicant’s control**

**Comment 1:** Off-sets for nutrient emissions from new developments should not be dealt with by remote re-balancing. Any off-sets must be within the catchments defined by Natural England for the Solent (March 2020). Assessments of nitrate budgets for new developments must be independently performed by qualified parties.

#### *Locational Sustainability*

**4.5 Sites should be sustainably located in relation to existing settlements, with access to the facilities and services that are generally likely to be required by new residents. Policy 2 of the CLPKP, and emerging policy S2 of the LPR, sets out the settlement hierarchy which will inform consideration of any proposed site.**

**Comment 1: Settlement hierarchy** needs to be adjusted to reflect the fact that Chichester’s coastal and harbour communities will face materially increased, possibly catastrophic, flood risk by 2065. CDC may need to consider relocation of some communities in the future so should significantly restrict any expansion of coastal and harbour communities.

**4.6 Sites should be of a scale and density appropriate to the adjoining settlement. Smaller scale sites, that provide for the gradual growth of settlements, are more likely to be suitable than sites that would significantly change the character of a place. Developments adjoining smaller settlements will be expected to be smaller in scale than those that might be suitable for the extension of Chichester or the Settlement Hubs, with their larger sizes and range of facilities. The Council may support higher density development in settlements with greater facilities and accessibility.**

**Comment 1: Density levels** should also reflect the physical ability of the site to absorb/drain flood water, whether ground water, surface water, fluvial or coastal flooding. Developers need to account for the fact that sud systems become compromised on sites where water tables are high, a notable problem throughout the coastal plain from Chichester both toward Selsey and toward Emsworth.

**Comment 2:** Is there to be a system for scaling development like the Dutch A, B, C system and will this apply to all levels in the settlement hierarchy including service villages? How big will be the radii for different densities and will this be scaled for convenient walking and cycling? See **also 6.2.2.:**  
**....'The scale of the proposed development is appropriate having regard to the settlement's location in the settlement hierarchy'**



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**4.7 Sites should also be acceptable in all other respects, e.g. highways access, flood risk, contribute to affordable housing and open space requirements, and should reflect the needs of local communities, in relation to the amount, size, type and mix of housing tenures proposed. It is important that any proposed development also complies with environmental standards as identified in Policy 40 of the CLPKP.**

**Comment 1: Highways access** needs to consider where residents likely will be working and/or seeking higher education/training and what other commuter choices are available including different road options, congestion issues, public transport and cycling facilities and distance. Settlements with no higher education/training facilities and low employment and accessed from only one direction (such as coastal settlements) should be considered as isolated and remote. This reflects the fact that the 2014-2029 CLP limited housing numbers due to traffic access and congestion issues on the coastal peninsula. These access constraints were confirmed as valid by the Government Planning Inspectors Report on the 2014-2029 Local Plan and have not changed.<sup>8</sup>

**Comment 2: Flood risk** needs to take into account the most recent scientific and planning research. The EA currently predicts sea level rise of up to 1.6 metres for the south east coastline by 2125 but it states that predictions will have to be constantly be revised. US based Climate Central predicts sea level rise of up to 3 metres by 2110 at current CO2 emission levels. Either of these predictions would result in continual inundation of sea water for settlements lower than 7 m above sea level.<sup>9</sup> It is clear that local protection is low by international standards. Under current practice in developed countries, acceptable levels of coastal flood risk are often based upon specific flood return periods, such as the 100-year (with 1 % annual expected probability of occurrence [AEP]). Most developed countries build to protect against an AEP of 1%. The majority of coastal and tidal defences in the Chichester District, however, currently provide a standard of protection against an event with an AEP of 4% or 5%. A Swedish lidar study warns that future inundation in the coastal areas of the South East of England needs to be factored into a long-term planning strategy. The study includes the Chichester coastal plain, which is especially vulnerable.<sup>10</sup>

Even under moderate carbon emission scenarios (known as the RCP4.5 emission projections), without adaption or wide scale defence infrastructure, by 2050, some low lying settlements in the Chichester district will fall below mean sea level.. When the annual flood event is considered, most regions south of Chichester city will be inundated regularly by 2100. Additionally, standards of protection are low in the Chichester region and are unlikely to be improved.<sup>11</sup>

<sup>8</sup> <http://www.chichester.gov.uk/CHttpHandler.ashx?id=24307&p=0>

<sup>9</sup> <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances#table-3>  
[https://ss2.climatecentral.org/#12/50.7693/-0.8715?show=satellite&projections=1-K14\\_RCP85-SLR&level=3&unit=meters&pois=hide](https://ss2.climatecentral.org/#12/50.7693/-0.8715?show=satellite&projections=1-K14_RCP85-SLR&level=3&unit=meters&pois=hide)

<sup>10</sup> <http://lup.lub.lu.se/luur/download?func=downloadFile&recordId=8937311&fileId=8937312>

<sup>11</sup> [13] R. E. Kopp, R. M. Horton, C. M. Little, J. X. Mitrovica, M. Oppenheimer, D. J. Rasmussen, B. H. Strauss, and C. Tebaldi, "Probabilistic 21st and 22nd century sea-level projections at a global network of tide-gauge



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### *Relevant evidence*

**4.8 This Interim Statement does not set out in full the range of relevant national and local planning policy and practice which will be applied when considering planning applications for residential development. It has been prepared to provide further guidance for applicants but should be read alongside other relevant national and local policy.**

**Comment 1:** As a council that has declared a Climate Change Emergency, CDC will be taking significant note of emerging planning policies and guidance relating to climate mitigation particularly regarding flood risk and CO2 emissions.

### **6 Interim Housing Policy Statement**

6.1 The Council recognises the presumption in favour of sustainable development as set out in the National Planning Policy Framework and its application where the Council is unable to demonstrate a five year housing land supply. While the presumption applies, the Council will seek to ensure that planning applications for good quality housing developments of an appropriate scale and in accessible locations are supported.

**Comment 1:** Locations must be safe so add...“in accessible **AND SAFE** locations.” Development proposals shall be in accordance with the Council’s declaration of a Climate Change Emergency and latest scientific, government and Environment Agency advice. Safety from future flood risk is a critical planning aspect which needs to be included in the Interim Housing Policy Statement due to Chichester District’s particular vulnerability to catastrophic flood risk from rising sea levels. In 2001 Dutch and British planners and water/coastal engineers described all land below 5 metres on Chichester’s coastal hinterland as ‘unsafe’ for development due to fluvial and coastal flood risk.<sup>12</sup> Since 2001 predicted sea level rise has increased significantly. The EA’s current advice is for local authorities to plan for flood and coastal risk up to at least 2065 and for global mean temperature increases of up to 4°C.<sup>13</sup> The Committee for Climate Change has also stated that “it is prudent to plan adaptation strategies for a scenario of 4°C, but there is little evidence of adaptation planning for

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sites," *Earth's Future* , vol. 2, no. 8, pp. 383-406; Chichester District Council Level 1 Strategic Flood Risk Assessment; M. Buchanan, R. Kopp, M. Oppenheimer, and C. Tebaldi, "Allowances for evolving coastal flood risk under uncertain local sea-level rise," *Climatic Change* ,vol. 137, 10, 2016; Joseph Lockwood, Department of Geoscience, Princeton University, USA; Department of Atmospheric and Oceanic Science, McGill University, CA, *Future Sea Level Rise and Flood Risk in Chichester District*

<sup>12</sup> *Going Dutch on the Manhood Peninsula*, West Sussex County Council and Nirov, the Netherlands Institute for Planning and Housing, 2001, p 27

<sup>13</sup> <https://www.gov.uk/government/news/environment-agency-chair-calls-for-new-approach-to-flood-and-coastal-resilience>  
<https://www.gov.uk/government/news/environment-agency-publishes-new-evidence-to-plan-for-flood-and-coastal-risk-up-to-2065>



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even 2°C.”<sup>14</sup> Even just 2°C increase in global mean temperature would create severe flood risk on land lower than 7m above sea level on Chichester’s coastal plain, according to current scientific modelling.<sup>15</sup> Until a comprehensive and updated Strategic Flood Risk Assessment has been undertaken for the district in line with current predicted sea level rises and expected planning guidance changes, only sites above 7 metres above sea level should be considered as sustainable sites for new development.<sup>16</sup>

Allowances for climate change over the lifetime of a proposed development must be made in line with the latest guidance for climate change. Chichester District Council's existing Strategic Flood Risk Assessment has separate high climate change allowances (referred to as high++) that only apply in assessments for developments that are very sensitive to flood risk, for example large scale energy generating infrastructure, and that have lifetimes beyond the end of the century.<sup>17</sup> Until an updated SFRA is completed Chichester District Council should use these high climate change allowances to evaluate all proposed housing developments which will face much higher risk in the future.

**6.2 To provide clarity for applicants and other parties, the following criteria set out what the Council considers good quality development in the Chichester Local Plan area, with reference to adopted and emerging Local Plan policy and evidence.**

**(6.2) 2. The scale of development proposed is appropriate having regard to the settlement’s location in the settlement hierarchy**

**Comment 1:** In the absence of a Local Plan, settlement hierarchy must take into account CDC’s declaration of a Climate Change Emergency, recent advice from the Environment Agency, Parliament and the Committee for Climate Change about the need for long term flood risk planning, and the reduced sustainability of any settlements which face significantly increased flood risk this century. The Environment Agency advises local authorities to plan for flood and coastal risk up to 2065.<sup>18</sup> NPPF states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).” The coastal and harbour settlements in Chichester District will face significant flood risk by 2065.

<sup>14</sup> <https://www.theccc.org.uk/wp-content/uploads/2019/07/CCC-2019-Progress-in-preparing-for-climate-change.pdf>

<sup>15</sup> <https://seeing.climatecentral.org/#12/50.7830/-0.7689?show=lockinAnimated&level=4&unit=feet&pois=hide>

<sup>16</sup> <https://www.climatecentral.org/news/ipcc-predictions-then-versus-now-15340>;  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/827611/Exploratory\\_sea\\_level\\_projections\\_for\\_the\\_UK\\_to\\_2300\\_-\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/827611/Exploratory_sea_level_projections_for_the_UK_to_2300_-_report.pdf);

<sup>17</sup> Chichester district council level 1 strategic flood risk assessment; Joseph Lockwood, Department of Geoscience, Princeton University, USA; Department of Atmospheric and Oceanic Science, McGill University, CA, *Future Sea Level Rise and Flood Risk in Chichester District*.

<sup>18</sup> <https://www.gov.uk/government/news/environment-agency-publishes-new-evidence-to-plan-for-flood-and-coastal-risk-up-to-2065> <https://www.gov.uk/government/publications/flood-and-coastal-risk-management-in-england-long-term-investment/long-term-investment-scenarios-ltis-2019>



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**(6.2) 3. The impact of development on the edge of settlements, or in areas identified as the locations for potential landscape gaps, individually or cumulatively does not result in the actual or perceived coalescence of settlements, as demonstrated through the submission of a Landscape and Visual Impact Assessment.**

**Comment 1:** The concentration of development along the A259 has already compromised the distinctiveness of the villages along there and the ribbon development proposed along this road further closes the gaps between villages.

**(6.2) 4. Development proposals make best and most efficient use of the land, whilst respecting the character and appearance of the settlement. The Council will encourage planned higher densities in sustainable locations where appropriate (for example, in Chichester City and the Settlement Hubs). Arbitrarily low density or piecemeal development such as the artificial sub-division of larger land parcels will not be encouraged.**

**Comment 1:** the best and most efficient use of existing grade 1 and 2 agricultural land should be for no change of use. The country requires greater food security and reduction in 'food miles'. Turning good farming land over to housing estates make no sense. Two of CDC's strategic land allocation proposals breach this principle.

**Comment 2:** we do not object to higher densities in principle if it means using brown field sites rather than green fields, building close to city or village centres in small developments, building small units as starters for young people or downsizes for elderly. We do object if it means cramming more identikit houses on to green field sites.

**(6.2) 5 Proposals should demonstrate consideration of the impact of development on the surrounding townscape and landscape character, including the South Downs National Park and the Chichester Harbour AONB and their settings. Development should be designed to protect long-distance views and intervisibility between the South Downs National Park and the Chichester Harbour AONB.**

**Comment 1:**  
Developments will impact on the landscape and views of both AL6 and AL7.

**Comment 2:**  
Also include views from the coast and coastal plain, especially Medmerry, Pagham Harbour and Chichester Canal. Chichester Cathedral is the only medieval cathedral visible from the English coast. Long distance views of the cathedral and the Downs from the coast and coastal plain are part of the area's heritage and tourism product.

**(6.2) 6. Development proposals in or adjacent to areas identified as potential Strategic Wildlife Corridors as identified in the Strategic Wildlife Corridors Background Paper should demonstrate that they will not affect the potential or value of the wildlife corridor.**

**Comment 1:** Wildlife connectivity between the SDNP and CHAONB and the other wetlands of the coastal plain is essential for the survival of species. Survival of species is essential for the survival of humankind.



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Efficient wildlife corridor must be created along the areas encompassing chalk streams and rifes to ensure species migrations between habitat zones.

**Comment 2:** Wildlife corridors need to be wide enough and connect with both streams and hedgerows. The CDC's plan to provide only a 200m buffer zone around their proposed wildlife corridors is not enough. Given that the SDNP, the CHAONB, Pagham and Medmerry have nationally and internationally significant status for environmental protection, linking these sites is of national significance (Glover Review). The scale of protection therefore should be on the Regional Scale of 500m and not the local scale of 200m.

**Comment 3:** Wildlife does not confine itself to defined areas so to genuinely protect wildlife a larger adjacent zone is required. The U.K. Report on Biodiversity states that, 'the land around the core (protected) site needs to be under sympathetic land management practices'. The importance of the outlying areas between the SDNP, the CHAONB, Pagham and Medmerry have been documented by the Sussex Biodiversity Research Centre, Forest Research UK, Natural England, Sussex Ornithological Society, the Manhood Wildlife & Heritage Group as part of CDC's local biodiversity plan.

**Comment 4:** The designation of additional corridors should acknowledge the contribution made by existing bridges, culverts and wildlife crossing points of the A27, the South Coast main railway line and the A259. It should also include areas identified under CDC's Biodiversity Mapping Project. Without this we would expect further habitat fragmentation and reduced species gene pool.<sup>19 20</sup>

**Comment 5:** Strategic Wildlife Corridors should include allowance for corridors allowing species to move between wetlands as sea levels rise. Chichester district's wetlands are of national and international importance both because of their biodiversity and their high capacity to absorb CO2. Sea level rise will result in coastal squeeze and loss of irreplaceable wetland without the ability for it to move inland. Development adjacent or close to coastal and harbour settlements will exacerbate coastal squeeze and hinder the opportunity for species and settlement migration.<sup>21</sup>

**(6.2) 7. Development proposals should set out how necessary infrastructure will be secured, including, for example: wastewater conveyance and treatment, affordable housing, open space, and highways improvements.**

**Comment 1:** These aspects of infrastructure should be carried out prior to development, as too cycle and footpath linkages and children's play equipment. Promises to allocate space for community facilities should be accompanied by legal documents indicating that providers and maintainers of such facilities have a reasonable prospect of being delivered at the time of completion of the housing elements.

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<sup>19</sup> An example of Roe Deer habitat de-fragmentation  
<https://www.sciencedirect.com/science/article/abs/pii/S1439179115001188>

<sup>20</sup> or more generally a sweep of the literature of studies of wildlife corridors in Europe:  
[https://link.springer.com/chapter/10.1007/978-1-4613-0059-5\\_6](https://link.springer.com/chapter/10.1007/978-1-4613-0059-5_6)

<sup>21</sup> <https://www.carbonbrief.org/restoring-soils-could-remove-up-to-5-5bn-tonnes-of-greenhouse-gases-every-year>



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**Comment 2:** Necessary infrastructure should include flood mitigation and flood defence infrastructure that will be required for the lifetime of the development. In the case of housing this should be for at least 50 years and ideally 100 years, in line with the Council's declaration of a Climate Change Emergency and the Environment Agency's and Committee for Climate Change's recommendation for long term flood planning.

**(6.2) 8. Development proposals shall not compromise on environmental quality and should demonstrate high standards of construction in accordance with the Council's declaration of a Climate Change Emergency. Applicants will be required to submit necessary detailed information within a Sustainability Statement or chapter within the Design and Access Statement to include, but not be limited to: (list followed)**

**Comment 1:** Standards proposed for building should be aimed at being carbon neutral. Levels being currently achieved are too low at present<sup>22</sup>. Items such as solar panels and water butts should be compulsory along with high standards of insulation. As we move to the higher energy standards required by Part L 2020 and the Future Homes Standard, there may be no need for local authorities to seek higher standards and the power in the Planning and Energy Act 2008 may become redundant. However in the meantime CDC should commit to requiring energy efficiency standards for new homes to be higher than the energy requirements of Level 4 of the Code for Sustainable Homes (equivalent to a 19% improvement on the Part L 2013 standard)

**Comment 2:** Developments should be about 'place making' where communities can be accessed by walking and cycling for most daily activity, and reduce dependence on cars and travel outside.

Comment 3: Additional developments in the service villages, should respect our dark skies policies of SDNP and CHAONB and have only down lights and no or very limited street lighting.

Comment 3: Developers must include in the Sustainability and Design and Access statements evidence that the development site will be free from flood risk until 2065 in accordance with EA recommendation.<sup>23</sup>

**(6.2) 9 Development proposals shall be of high-quality design that respects and enhances the existing character of settlements and contributes to creating places of high architectural and built quality. Proposals should conserve and enhance the special interest and settings of designated and non-designated heritage assets, as demonstrated through the submission of a Design and Access Statement.**

**Comment 1:** we endorse this, but this has not been the experience of recent developments approved by CDC, where volume builders use pattern book housing plans. Guidance at pre-application stage needs to take into account 'distinctiveness', 'accessibility', 'proximity', 'walkability', 'convenience', 'connectivity', 'harmony', 'inclusivity'. What we see being rolled out across the whole of the District

<sup>22</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/835536/Future\\_Homes\\_Standard\\_Consultation\\_Oct\\_2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835536/Future_Homes_Standard_Consultation_Oct_2019.pdf)

<sup>23</sup> <https://www.gov.uk/government/news/environment-agency-publishes-new-evidence-to-plan-for-flood-and-coastal-risk-up-to-2065>



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are masses of cheap pattern book housing from stock drawings that developers paste together without serious reference to existing urban form, styles, topography or habitat.

**(6.2) 10. Development should be sustainably located in accessibility terms, and include vehicular, pedestrian and cycle links to the adjoining settlement and networks and, where appropriate, provide opportunities for new and upgraded linkages.**

**Comment 1:** Pedestrian and cycle routes should be fully protected from motor vehicles. Motor vehicle speeds should be limited to 20 mph in residential streets.

**Comment 2:** Development should be located with reliable vehicular and public transport or cycle accessibility to Chichester or the nearest settlement with employment and higher education/training facilities.

**(6.2.) 11. Development must be located, designed and laid out to ensure that it is safe, that the risk from flooding is minimised whilst not increasing the risk of flooding elsewhere, and that residual risks are safely managed. This includes, where relevant, provision of the necessary information for the LPA to undertake a sequential test, and where necessary the exception test, incorporation of flood mitigation measures into the design (including evidence of independent verification of SUDs designs and ongoing maintenance) and evidence that development would not constrain the natural function of the flood plain, either by impeding flood flow or reducing storage capacity. All flood risk assessments should be informed by the most recent climate change allowances published by the Environment Agency.**

**Comment 1:** All flood risk assessments should be informed by the most recent climate change allowances and sea level rises published by the Environment Agency. For sites close to the harbour or within one mile of the open coast a precautionary approach will be needed to allow for variance in sea level rise predictions. Avoid new development in areas at risk of inundation and increase regional standards of protection to levels approximating an annual expected probability of occurrence of 0.01%. Until a strategic Local Plan has been produced which fully accounts for the latest sea level rise predictions on the south coast and in line with CDC's declaration of a Climate Change Emergency, sites close to the coast and less than 7m above sea level should be considered inappropriate for development and avoided as not being sustainable in the long term.<sup>24</sup> Chichester District Council will use high climate change allowances (++) to evaluate housing developments in locations which will face much higher risk in the future.

<sup>24</sup>[https://coastal.climatecentral.org/map/11/-0.8529/50.7595/?theme=sea\\_level\\_rise&map\\_type=coastal\\_dem\\_comparison&contiguous=true&elevation\\_model=coastal\\_dem&forecast\\_year=2100&pathway=rcp85&percentile=p95&return\\_level=return\\_level\\_0&slr\\_model=kopp\\_2017](https://coastal.climatecentral.org/map/11/-0.8529/50.7595/?theme=sea_level_rise&map_type=coastal_dem_comparison&contiguous=true&elevation_model=coastal_dem&forecast_year=2100&pathway=rcp85&percentile=p95&return_level=return_level_0&slr_model=kopp_2017)  
<https://www.google.co.uk/amp/s/www.carbonbrief.org/interactive-what-will-2c-and-4c-of-warming-mean-for-global-sea-level-rise/amp>  
<https://www.nature.com/articles/s41467-019-12808-z>  
<https://www.nytimes.com/interactive/2019/10/29/climate/coastal-cities-underwater.html>  
<https://www.reuters.com/article/us-climate-change-sealevel/far-more-people-at-risk-of-rising-seas-than-feared-climate-study-idUSKBN1X81YV>  
<https://www.scientificamerican.com/article/sea-level-could-rise-at-least-6-meters/>



## SAVE OUR SOUTH COAST ALLIANCE

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**Comment 2:** Fluvial flooding, and surface water flooding is a more frequent result of due to new meteorological conditions, producing prolonged and more intense spells of rain. Suds have been shown to be of limited effect where there is a very high water table.

**Comment 3.** Building flood defences to protect properties that have been built in areas likely to flood now runs into millions of pounds. In 2013 after floods in East Anglia the cost was £90m. Earlier this year (2020) Storm Clara destroyed the sea defences at Clymping and flooded land towards Littlehampton. Trying to keep back the sea is becoming an increasingly difficult and increasingly expensive endeavour, which is one reason it is not wise to build on known flood risk areas. It is also becoming increasingly difficult for residents to get insurance for flooding risk because of the extent and costs, which leaves home owners who have bought in these developments at serious risk of losing their homes. There is a whole question of morality as to whether homes should be built and sold to people looking for homes in these high-risk areas without any warning.

**(6.2) 12. Where appropriate, development proposals shall demonstrate how they achieve nitrate neutrality in accordance with Natural England’s latest guidance on achieving nutrient neutrality for new housing development.**

**Comment 1:** Off-sets for nutrient emissions from new developments should not be dealt with by remote re-balancing. Any off-sets must be within the catchments defined by Natural England for the Solent (March 2020)<sup>25</sup> and in any case must meet the requirements under para 4.2 (off-site infrastructure deliverability). Assessments of nitrate budgets for new developments must be independently performed by qualified parties.

CC, JB + DP for SOSCA  
18/06/20

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<sup>25</sup> <https://www.push.gov.uk/wp-content/uploads/2020/03/Advice-on-Achieving-Nutrient-Neutrality-for-New-Development-in-the-Solent-Region-March-2020.pdf>