

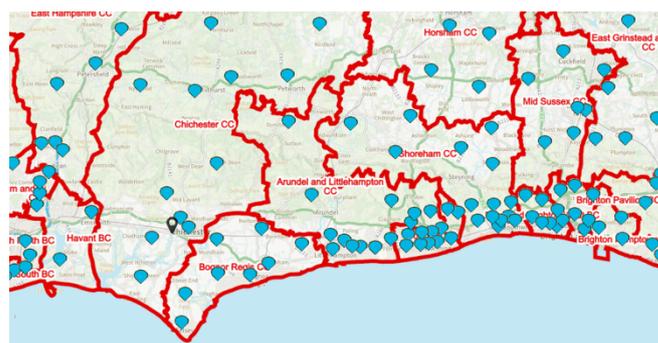


## NEWS BULLETIN N°9 WINTER 2022

### INTRODUCTION

It has been an eventful few months with the ending of Covid only to be replaced with the appearance of the variant Omicron. Mercifully with the vaccine rollout and the waning of the virus we are thankfully now able to hold meetings face to face. Whilst the alternative via zoom was hugely helpful in being able to keep momentum it is never as convivial or as successful for brain storming. There has now been a greater return to linking up with real people and sharing ideas and energies on issues which so many of us are concerned with. The strength of SOSCA is that by being a lobbying group we hope to be of support to all groups on as many issues as possible. We also continue to challenge government departments and their policies.

### URGENT - BOUNDARY CHANGES



### HOW DEMOCRATIC ARE THE PROPOSED BOUNDARY CHANGES IN SUSSEX?

The Boundary Commission is proposing to change several constituency boundaries within Sussex, a move that is disturbing some communities. One of the most controversial proposals is to divide the Manhood Peninsula into two separate constituencies. The peninsula to the south of Chichester is a single unit, geographically, economically, socially, and administratively. As a result, the proposal to move the eastern residents of the peninsula into a new Bognor Regis constituency, with residents on the western side of the peninsula remaining within the Chichester constituency seems contrary to the commission's own guidelines and principles.

The peninsula is surrounded by the English Channel, Chichester and Pagham Harbours, and the city of Chichester. As a result, all roads and bus routes lead to Chichester and residents across the peninsula access most of their facilities in Chichester, including trains, schools, further education, shops, cinema, library, and medical treatment. Moving Selsey and other parishes on the peninsula to a Bognor Regis constituency is a divisive move when anyone needing to travel by public transport from anywhere in the peninsula would have to go to Chichester and change buses. The nearest railway station is in Chichester and Selsey residents must drive to Chichester before reaching any A road. The geographical configuration of the peninsula means there are very few social, economic, or administrative links between the peninsula and Bognor Regis.

There is only one senior school serving all on the peninsula school and it has no sixth form. Secondary pupils who do not go to Selsey for schooling, attend secondary schools in Chichester. Children on the peninsula do not attend schools in Bognor Regis due to the difficulty getting there. Dividing the peninsula into two separate constituencies will leave a significant number of families living in a different constituency to the one in which their children attend school. This would result in a democratic deficiency as residents would have less ability to raise schooling issues with the relevant MP.

Because of its geographical shape and location, the Manhood Peninsula has operated as a single administrative unit linked to Chichester for centuries.

Today the entire peninsula is located within Chichester District, administered by Chichester District Council. There are no plans to change this. As a result, residents across the peninsula go to Chichester for essential services such as housing, citizens advice, employment advice and medical treatment. No Manhood Peninsula resident is served by Arun District Council so moving Selsey,

Sidlesham, North Munham and Hunston to a Bognor Regis constituency would produce a material democratic deficiency for these residents.

There are also many organisations, commercial and non-commercial, with Manhood in their name, that cover the entire peninsula. These include administrative and volunteer bodies that deal with common issues and problems encountered by all on the Manhood, such as the Manhood Peninsula Forum, representing all the parish councils on the peninsula, the Manhood Peninsula Partnership and the Manhood Wildlife and Heritage Group.

The main economic sectors of the peninsula are farming and tourism. Both these sectors regard the peninsula as a whole entity. Several farms and farming contractors would find their businesses in two constituencies rather than one. Tourism operators promote the whole peninsula to their clients as one visitor destination.

The public consultation on the boundary changes ends on April 4. To find out more visit <https://www.bcereviews.org.uk>

## DEMONSTRATION



The frustration of having to cancel what was to have been a successful demonstration by communities across our Chichester Coastal Plain last year was brought to fruition on January 29th with a far larger turn out than expected. The numbers were around the 600 mark and one of the largest demonstrations that had ever been held in our city of Chichester.

It was brought together by the combined efforts of The Manhope Group, The Manhood Peninsular, and the Harbour Villages. It was a demonstration of the anger and frustration with the relentless developments of housing that is unwanted by communities who were all declaring that what was urgently needed was affordable housing. The situation is not helped by the latest statistics saying that the average UK house price had risen by £27,000 in 2021.

There was also a petition signed by 5000 constituents that was shown and later delivered to Michael Gove setting out in plain language the huge pressures being placed on our communities.

The event was recorded in The Guardian, The Chichester Observer, and the West Sussex Gazette. It was also a headline news on BBC South. There is a copy of all of these in our Events section on our web site.

## SOUTHERN WATER



There is hardly a day that goes by without some reference across the nation of the widespread and depth of pollution in our waters be it rivers or seas. Whilst we have MPs who declare their horror at such a relentless situation their words are but crocodile tears for there have been opportunities to call the Public Utility companies to account, but none have taken them.

The Environment Bill was just such an event. Yes, they did at least admit it was the private companies who should be doing more but conveniently let them off the hook by not stipulating a time penalty to actually at last invest their huge profits into updating the infrastructure. Yes, there have been the odd fines, but they are a mere slap on the wrist which are soaked up by the rise in their customers' bills. So, our environment continues to be kicked back in importance in spite of all the blah blah at COP26.

Southern Water was privatised in 1989. Since 2007, the utility Southern Water has been owned by a consortium of infrastructure investors through a complex multi-layered structure involving 12 intermediate holding companies and whose ultimate parent is Greensands Holdings, which is incorporated in Jersey. The largest shareholder in Greensands Holdings was until September a Cayman Islands registered infrastructure fund, advised by JPMorgan.

### Southern Water's history of fines:

2008: Shortly after Greensands bought the company, Southern was fined £20.3m by the regulator Ofwat for "systematically manipulating information to conceal its true performance over an extended period of time".

**2013:** Southern was fined £200,000 for a raw sewage spill in Kent in 2011 that led to beach closures in Thanet. It appealed against the conviction. An appeal court judge rejected this noting the company's "persistent record of criminality and offending".

**2015:** A £160,000 fine came for discharging raw sewage from East Worthing works into the sea.

**2016:** The company was fined £2m for discharging raw sewage from Margate wastewater treatment plant in 2012.

**2019:** Ofwat imposes a £126m penalty for the "shocking" failures at sewage treatment sites in Kent and Hampshire that are the subject of the latest criminal prosecution.

**2021:** July The Environment Agency fines SW £90 million for illegal discharges between 2010 and 2015  
The Guardian July 2021

"A significant contributory cause of the problem is that house builders have an automatic right to connect rainwater drainage to the sewage system. I will focus on that for the Minister. The Government need to bring into force schedule 3 to the Flood and Water Management Act 2010, which removes developers' automatic right to connect rainwater drainage to combined sewers, which can put additional storm water pressure on our sewage works' capacity. What plans do the Government have to tackle that piece of legislation, which is still unenacted?"

House of Commons Water Companies: Sewage Discharge Volume 703: debated on Monday 15 November 2021 Ian Paisley in the Chair

#### **Article:**

Southern Water is planning a major advertising campaign, spending £12.8m on a TV, radio, and press push. Advertising agencies are pitching now, the brief being that customers need to help Southern put by

saving water. Two weeks later the chief executive Ian MacAulay nonetheless received a £550,900 bonus." Private Eye (1584) 7 Jan 2022

Kate Bayliss, research associate at Soas University of London and an infrastructure finance expert, said: "Bill payers were right to be angry. "Water is an incredibly predictable and safe investment. These owners have essentially mortgaged the assets, resulting in hefty financing costs — which customers are paying — while none of the individuals who have benefited have been held to account."

And while Southern said its pay packages and returns were among the lowest in the sector, Ian McAulay, chief executive since 2017, received total remuneration of £1.08m in 2021, including a £550,000 bonus, even though the Environment Agency singled out the company this year for being "again" one of the "worst for environmental performance".

But an investigation by Ofwat published two years ago found that a lack of "necessary investment" had led to a host of maintenance failures in the company's 350 pumping stations and 53,000km of pipes in the seven years to 2017. These included clogged equipment, mechanical breakdowns and tanks being allowed to turn septic rather than being treated as required by law, leading to raw sewage being tipped into the sea. Wanting to conceal its problems, Southern manipulated water samples and deliberately misreported data. In some cases, it used tankers to shift wastewater from problematic sewage plants to avoid punitive readings."

Kate Bayliss, SOAS University of London

These are just a few of the articles we have researched on Southern Water. There are more.

MEDIA



The Times, 5th February 2022

It was interesting that the journalist Lucy Bannerman approached SOSCA for views on the Office for National Statistics data. The ONS found that when people around the UK were asked about their life satisfaction and whether they felt life was worthwhile Chichester scored the worst marks out of ten on both counts.

The headlines came as a surprise to so many people mostly to those who were either visitors or to second homeowners. To the communities that lived here who were fighting to safeguard their AONB and other protected areas, to halt the pollution across the whole environment from over development and lack of infrastructure, it was a welcome article.

SOSCA gave details on a whole slew of issues that this area was facing that was not being addressed by government or our representatives. Whilst we were not mentioned, nor indeed other action groups, our views were threaded throughout the article. That it was highlighted in a respected national newspaper was even more welcome for it brought to the fore the damage to the Chichester Coastal Plain to a wider audience.

Parable TV

SOSCA has been approached by a producer from this television company which specialises in environmental matters. They had become aware of all the issues facing our AONB and the growing anger amongst the area's communities. We were able to provide a raft of data with maps and an overview of the situation. They expressed their surprise as to the depth and reach of so much damage being done to our environment. We are hoping that the journalist will be able to encourage the Directors to look into our situation more thoroughly with the possibility of putting together a documentary in a Despatches type format. They were very interested and have indicated that they will be in touch for further information.

West Sussex Gazette

Our latest article based on Biodiversity and saving Planet Earth was printed on 2nd March. A copy can be found up on our Media section of our web site.

SOLENT UNIVERSITY



For some time SOSCA has been compiling maps and data on the many and various issues that we are facing. The Solent is the arts film and media branch of Southampton University and so we approached them to see if they would be interested in helping us put a series of images together to best explain what is, and what will, happen across our Chichester Coastal Plain. We were delighted to come away from the meeting with a promise that they would be very interested to engage with their students and see whether a workable solution could be found. Then the next step would be to convince the Course Professors to put the idea into fruition. It was

agreed that the lead would be The Solent with SOSCA as a subsidiary.

## CONSERVATIVE SUSSEX AREA CONFERENCE 2022

The Conference was held at Hickstead on 12th February and SOSCA attended. There was the usual array of items presented and various introductions to those participating. It then came to the time when we were introduced to a panel to whom the public were able to ask questions.

SOSCA aired the concerns over the Government's demand to build thousands of homes across the Chichester Coastal Plain whose numbers were based on debatable data and whose impact was devastating the highly protected AONB and polluting our rivers and seas. The question was put to Maria Caulfield MP for Lewes. Apparently - ".....the government is very active in conserving local democracy and implementing local infrastructure. The calculations of the housing numbers were a GUIDE – not a target. 700 homes a year does not need to be delivered if there are mitigating circumstances and that we should have more faith in the Planning Inspectors because they are listening."

It appeared from the reaction of those in the hall that this was news and completely contrary to the experience constituencies had endured.

The last speaker was Rebecca Pow MP for Taunton Deane and Parliamentary Under Secretary of State for Environment, Food and Rural Affairs.

On 19th January she said, "Bosses of polluting companies should face jail".

The EA chief would like to see the threat of jail, huge fines, and more enforcement under-takings for environmental polluters, as part of a vision for a new regulatory framework.

At this meeting on 12th February, she praised the government's progress made on environmental

matters across the country and how they were fulfilling all the declarations made at COP26. As an example, to show how committed they were to the environment especially to wetlands she mentioned Medmerry and how proud they were that it had been chosen out of only 4 nations at the Conference. What of course she conveniently omitted to mention was the ongoing devastation to all the other wetlands across the Chichester AONB and surrounding estuaries. The very wetlands that the government had lauded as being so crucial to the nation's policy of carbon capture and which government policies are killing through pollution.

## OED OFFICE FOR ENVIRONMENT PROTECTION

The OED has finally become a national statutory office legally created in November 2021, under the Environment Act 2021.

However, campaigners fear that the legal body designed to protect the environment as promised by the government after Brexit on matters legal on air, water, and waste, and policed by the OEP would in fact be undermined by the UK Government.

Previously these laws were enforced by European courts which prosecuted EU governments that breached the rules. Whilst Ministers promised it would be independent there were fears that they would want to re interpret the statutes in order to 'advise' the new body. Critics fear that this 'advise' by minister may in fact be to counsel the OEP against taking the government to court if it breached the law i.e., not so independent after all. Echoes of the promises made at the creation of the Environment Agency now so denuded of funds it is but a shadow of its former self.

According to its official site its mission it to protect and improve the environment by holding government and other public authorities to account. These bodies will include government departments, government ministers, regulators, local authorities,

and some private bodies such as water companies – but only in respect of their public powers and duties.

Areas of where The Environment Act gives them powers includes enforcing against failures to comply with environmental law.

“Our enforcement functions encompass a wide range of investigatory and enforcement powers and duties. Together they allow us to take action in relation to suspected failures by public authorities to comply with certain laws intended to protect people and the environment.

We can, amongst other things, receive complaints from members of the public, conduct investigations and take court proceedings regarding serious failures.”

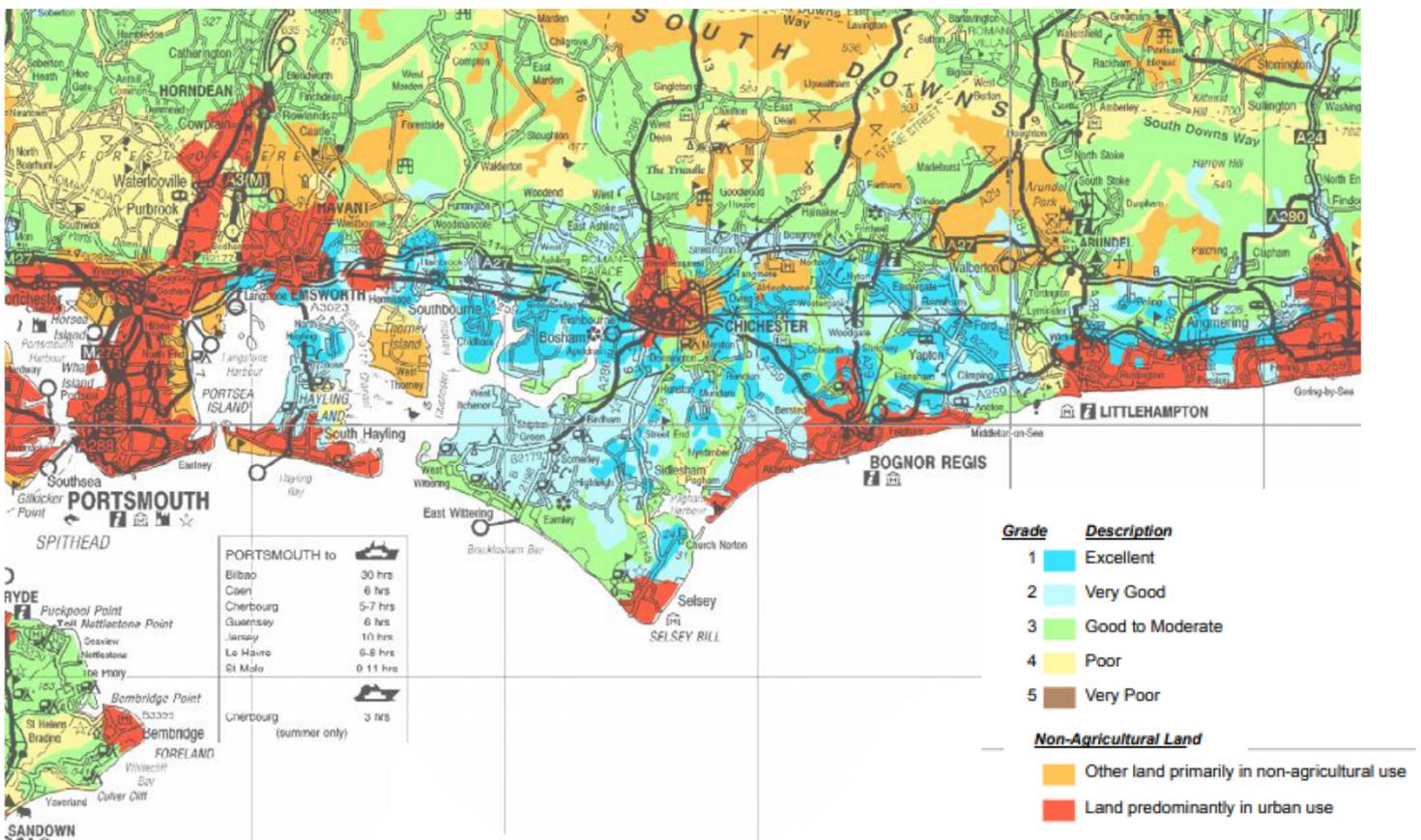
Dame Glens Stacey, Chair OEP

SOSCA intends to challenge these assertions.

## FOOD SECURITY

own home-grown food supply. This is to be welcome.

The reality is of course very different. The map above shows the stark reality of the ill thought through and dysfunctional thinking that seems to be a regular occurrence emanating from our Ministries. As can be clearly seen the last areas where our most valuable agricultural land in the southeast of the country is exactly where the government has decreed, we concrete over with developments. The southeast is blessed with a Mediterranean climate, it is home to the nation’s most productive and highly acclaimed vineyards and innovative horticultural products. The government has rightly set about to encourage a levelling up across the nation but then, in the next breath, insists upon pouring more and more housing in the most densely populated part of the nation hemmed in by London and the coast.



The terrible events across Ukraine have brought into sharp focus the much-vaunted declarations by the government that they recognise the need for food security. This would entail being less reliant on overseas food chains and an urgency to protect our

This whole area is already under a huge strain from these developments as the increase demands for fresh water are outstripping the supply. This also will impact the agricultural industry and ergo our food

security. At present the Ukraine is the largest grower of winter wheat and sunflowers for the oil. This will all change with the horrors that they are having to endure. This will also have a significant impact upon our capability to make up the shortfall of wheat that will be needed in the UK. It is time the government woke up.

## HOUSING



The number of Planning Applications continue to pour in across the whole of our Chichester district.

### To give a few examples:

**Fishbourne:** Hybrid Planning & Development Ltd (the latest name the company behind it has created) has put in an application for 230 homes on Bethwines Farm. This is the latest in a series of attempts during the past 14 years to build on Bethwines. It is well known that this company has a long-term policy to eventually cover the entire farmland up to the Bosham Parish border with 1000 homes.

**Bosham:** Are fighting an application for 300 homes in the north which would be a step nearer to creating a coalescence (something the Conservative government have declared should not happen) with the bordering Parish of Fishbourne thus making two distinct and ancient communities' part of one concrete sprawl.

**The Manhood Peninsula:** Has many battles on several fronts viz:  
70 homes at Church Road. If this goes ahead there would be plans for 156 more.

100 homes in Clappers Lane on the last remaining green field in Earnley. They have already had their green fields destroyed by 190 houses.  
320 houses on Stubcroft Farm. Apparently, developers are trying to get this through without an Environmental Impact Assessment.  
65 homes west of Bracklesham Lane which could very well grow to 300.  
Lichfields is a registered company that gives planning advice. They produced a graph to illustrate the methodology of the government's Standard Method Analysis of housing numbers across the southeast.

### For Chichester:

Current Local Plan requirement	435
Average delivery (last 3 years)	630
Current Standard Method	753
Proposed new Standard Method	1,120

This of course will create a huge impact on the level of traffic across the A259 and down to Selsey – already at significant levels. It doesn't help that the Local Plan Review uses a national ration of 0.5 cars per household when the evidence shows that it will be 1.65.

### Contact

If you have any comments or ideas on the above, please do get in touch. We welcome any input, any links, any connections.

Email us via [contact@sosca.org.uk](mailto:contact@sosca.org.uk)