



SAVE OUR SOUTH COAST ALLIANCE

WHAT CAN CHICHESTER EXPECT FROM THE FORTHCOMING REFORMS TO THE NATIONAL PLANNING SYSTEM? WHAT CAN CHICHESTER DO TO AMELIORATE ITS WORST EFFECTS?

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Chichester faces the final and irrevocable destruction of its character and its appeal. Chichester's coastline is precious and distinctive, as the only stretch of unurbanized coastline on the south coast between Southampton and Newhaven. But within a few years it could become just another part of the suburbanised sprawl that characterises much of the Sussex and Hampshire coastline.

The government's simplistic model of *build/build/build* based purely on supply and demand is presented as the solution to a perceived national housing shortage which it claims is the cause of unaffordability. But in areas such as Chichester the building of more and more market housing will not result in more affordable housing. Land prices in areas not in the SDNP or Chichester AONB will continue to rise and more homes will be bought as second/weekend or holiday homes. The already failing infrastructure including transport and drainage will be stretched further and new suburban-style homes will not increase employment opportunities in an area where tourism and food growing are the two main economic sectors. Flood risk will worsen due to overdevelopment and climate change and the area's special landscape and environmental qualities will be lost. What can be done?

Our District needs to go on the front foot, anticipating and resourcing to protect our communities against the worst that is yet to come. We do not need box-tick lazy planning, we need courageous and inventive solutions to the challenges of this dive into free-market spatial development.

SOSCA believes that the following issues need urgent thought, plans and resources.

- Zoning
- Building back better and more beautiful
- Vision
- Land use and development value
- Planning for Flood Risk
- Local discretions
- Making it easier for all scales of builders



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Zoning

Where local people see huge variety in our district – scattered settlements, coastal villages, open countryside, winding lanes, arterial roads, housing estates, industrial zones, shopping clusters, out-of-town retail parks, ribbon development, compact settlements, wooded slopes, commercial woodland, copses, spinneys, river valleys, pools, pebble and sandy beaches, wetlands, and harbours; central government planners will see only designations of ‘growth’, ‘renewal’, and ‘protected areas’. The emerging new planning policies will require our local government to see it that way too. There is little room for local discretion at local level. Discretion has been the hallmark of British planning from its earliest developments at the beginning of the last century and confirmed in law in 1947. This is to be swept aside. Why? Developers, especially the very largest half dozen, want to plan their profits over a longer period and on a bigger scale. Their biggest challenge is local discretion and so their wish to have it swept aside is to be granted by a government with a sizeable majority in the Commons and a strengthened block in the Lords. This has been called ‘zoning’. So, it seems inevitable. What can this gem of a district do in the face of such overwhelming force?

We have written elsewhere of the dangers to local democracy of the new proposed approach to a planning system¹. The first thing to understand is that not all countries that have a zoning rather than a discretionary system have such enfeebled local government. The French and the Dutch have strong local powers and make their zoning systems work for them. We could do that in Chichester. The trouble is that this ‘reform’ has been labelled as a simplification process and so the expectation is that it will reduce the role still further of local planning and move us further into the tick-box approach to planning to which we have become accustomed. Comparative studies of French zonal planning and British discretionary planning show that there is in practice no differences in time taken in the planning process. This is because the French ‘front-load’ their planning work and designate potential land uses in a detailed prescriptive way. In that way they aim to achieve appropriate and detailed land use designations². Moreover, evidence has now emerged that contests the claim that zoning produces more expeditious outcomes than the present UK system³.

Has Chichester started gearing itself up for the kind of detailed planning that would achieve a visionary, sustainable, appropriate distribution of land uses throughout the District? Many in our area fear that the lazy solution will be taken, setting aside the National Park area and the Area of Outstanding Natural Beauty as ‘protected areas’ (70% of the District) with the residual 30% to be allocated between ‘growth’ and ‘renewal’. Since self-evidently our harbour and Manhood villages and scattered settlements are hardly in need of renewal, it would seem that they will, by default, become targets for developer-led growth. This would be an extremely

¹ Drowning in Development: The Planning White Paper and the full-scale attack on local democracy, Richard C.J.Pratt, 2020.: https://5d0e6579-f20c-40a0-acbf-8c4ac274613b.filesusr.com/ugd/dae4df_d5ce50dc068d4c9e99e9b56a25fc8fff.pdf

² Booth, P. (1989) ‘How effective is zoning in the control of development?’, Environment and Planning B,16, pp.401-415.

³ Sebastian Dembski and Phil O’Brien ‘The Myth of Zoning – the European Experience’ in Town & Country Planning, August 2020, Vol 89, No 8.



SAVE OUR SOUTH COAST ALLIANCE

blunt instrument and would result in the sort of amorphous suburban sprawl seen in the coastal strip between Newhaven and Littlehampton in the 1930s, before Britain introduced a statutory planning system. Is this what Chichester wants, deserves, needs? Continuous urban sprawl along the entire south coast would be the result. Our distinct villages would be engulfed in a tide of speculative development to satisfy the insatiable desire for retirement, holiday, second-homes and 'working-from-home' demands in the post-Covid era. It does nothing for either the 'levelling up' or the 'Rebalancing Britain' agendas.

Moreover, will Chichester be simply accepting that there are no 'growth' or 'renewal' requirements within either the SDNP or CHAONB? We already see derelict and abandoned agricultural sites and even shipyards within these areas. But the tick-box approach to zoning admits for no discretion on these matters.

If our District planners do not proactively engage with the emerging new planning rules, we shall see this tick-box approach roll out and engulf the Manhood peninsula and the East/West corridor. Any mention of the 'settings' of the Harbours and the Downs will not be admissible and developers will be able to grab land and build right up to the boundaries of the so-called 'protected areas'. This is the opposite of sustainable organic design and development.

A harbinger of what is to come was the example of the fate of the Bosham Parish Neighbourhood Plan in 2015-16. The neighbourhood plan team, in close consultation with farmers and other landowners, identified sufficient land within the AONB to accommodate 62 new homes, albeit with a minor addition of the corner of a productive arable field to make a worthwhile development. The plan had several benefits: it favoured small-scale organic extensions to the existing settlement area, it was popular with local residents, it facilitated additional walking and cycling nearby access to local services and public transport hubs. Despite offering 62 homes, whilst the village allocation at that time was 50 and 40% were to be 'affordable', it was struck down by a planning inspector on the grounds that the developments were within the AONB, even although up until that point Chichester planners had considered its compliance with existing national, local and European planning guidelines. It also had the effect of freezing in aspic all potential development within the protected area with the exception of 'garden grabbing'.

If the purpose of the 'reforms' is to 'streamline' planning, then we can expect extremely tight deadlines by which local planning authorities are expected to come up with the definitions of the three zones. Will they have time and the capacity to do anything other than the skimpiest scoping analysis for the zones? It is quite obvious to all in the profession that the design capacity of local planning authorities has been hollowed out through resource starvation, natural wastage, de-prioritisation and demoralisation. Chichester is no exception and long ago lost the capacity for local area master-planning, relying on developers' own expertise or very limited outside consultancy. Unless the District invests in the development of a team tasked with finely tuning allocations between 'growth', 'renewal' and 'protection', we will have mega free-for-alls in 30% of the district whilst 70% of the district is in frozen protection zones of the District. Will this mean that development opportunities will continue to be missed in agricultural land use areas within the National Park and AONB experiencing dereliction of buildings and abandonments? At the very least a new memorandum of understanding between CDC and SDNP should be agreed.



SAVE OUR SOUTH COAST ALLIANCE

There is a need for detailed assessments and understanding of the environmental significance of the areas outside the nationally designated areas before any particular sites are allocated. A start has been made in that the current draft Plan is based on a series of studies. One of the studies undertaken is a Landscape Capacity Study undertaken by Terra Firma in March 2019. This assesses broadly-cast Character Sub Areas. In a number of instances, the sections on Conclusion and Recommendations of the sub-area state:

“it is possible that a very small amount of built development may be accommodated within existing clusters of settlement or building conversions provided it is informed by further landscape and visual impact assessment and sensitively integrated into the landscape, respecting the historic settlement pattern and locally distinctiveness. Great care would need to be taken to avoid any landscape or visual harm.”

This further assessment work has not been undertaken and is an essential part that is missing from the present assessment in the local plan process and this will be further diminished with the proposed changes in the planning system.

The Landscape Institute / IEMA Guidelines for Landscape and Visual Impact Assessment (2013) (GLVIA3)⁴ was used in the preparation of the Terra Firma Landscape Capacity Study. GLVIA3 recognises that landscape value is not always signified by designation: *‘the fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value’*⁵.

The significance of this is emphasised in the recently published Technical Guidance note 02/21 by The Landscape Institute ‘Assessing Landscape Value Outside National Designations’⁶ which stresses *“the importance of assessing the landscape value of areas outside national landscape designations because these areas may contribute to the setting and quality of nationally designated landscapes and have their own intrinsic and local value which should be taken into account in any allocation.”*

Building back better and more beautiful

Having now witnessed two or more years of building in the open spaces between our hitherto distinctive settlements, people are increasingly asking where is the variety, the elegance, distinctiveness, and sheer joy of architectural expression and place-making? Instead what we have rolled out is a set of pre-set pattern book housing to minimal environmental standards with scant regard to connectivity, the public realm and contextualising landscaping. ‘Ticky tacky little boxes’ as in the Pete Seeger song, seems to be the refrain. Even for some valiant attempts at creating public and semi-public areas, the on-going maintenance can be problematic unless tied by legal obligations.

⁴ Guidelines for Landscape and Visual Impact Assessment (2013) published by The Landscape Institute / IEMA

⁵ Assessing landscape value outside national designations Technical Guidance Note 02/21 published by the Landscape Institute (paragraph 5.26)



SAVE OUR SOUTH COAST ALLIANCE

These houses have been built and continue to be built subsequent to an important industry and profession report (2019) called “Housing Design Audit for England”.⁷ It concluded that the large majority of housing developments are still ‘mediocre’ or ‘poor’. As may have been expected the south-east region showed most improvement reflecting the higher value of land and the built development. But some of the criticisms reflect continuing criticism of the schemes rolled out around our own district. Developments with little distinguishing personality, little ‘sense of place’, with public and play spaces poorly designed and poorly located to encourage interaction. Housing units are frequently of an obvious standard type with little attempt to create something distinctive. The report also noted the persistent performance gap between the ‘designed’ and ‘as-built’ energy performance in the new homes. Overwhelmingly those assessed were far from contributing biodiversity net gain.

Unsurprisingly local councillors in this survey were aware of these deficiencies but felt powerless to affect outcomes whilst design quality was often dumbed down during the development process. Weakening the discretion of local planning committees will do nothing to address these concerns unless at an initial stage of land use zoning, local authorities are able to lay down enforceable design codes appropriate to the scale and context of development sites. Can CDC build this capacity to set the frameworks for developments that the area deserves and demands?

In the current NPPF, refusal of development can be fully justified on grounds of poor design. *“Permission should be refused for development of poor design that fails to take the appropriate opportunities available for improving the character and quality of an area and the way it functions.”*⁸ We could legitimately ask for a review of CDC’s experience of attempting to do this. Any planning authority that seeks to challenge developers’ design goals which lack any aspirations for far better standards of design might need to reflect upon the authority’s own competences in this field or else risk losing an appeal.

Perhaps we should ask to what extent if any the following summary by Mathew Carmona of the Audit report’s conclusions apply to our own district?

*“For some housebuilders, as long as there is a ready market for poor-quality design, and they can continue to get this product through the palming system, there is little incentive to improve. For some planning authorities, the short-term imperative to deliver new homes may continue to trump the long-term negative impacts of the environments that are being built. For some highway authorities, the very notion of good place-making is, as yet simply not on the radar. Collectively, as the results of the audit show, we need to significantly raise our game if we are to create the sorts of places that future generations will feel proud to call home.”*⁹

⁷ <http://placealliance.org.uk/research/national-housing-audit>

⁸ National Planning Policy Framework CFP48 Ministry of Housing, Communities and Local Government, Feb 2019 para 130
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

⁹ Mathew Carmona ‘Housing Design Quality – Auditing England’ in *Town & Country Planning*, February/March 2020, Vol 89, No 2/3.



SAVE OUR SOUTH COAST ALLIANCE

For many people already living in the district and especially those living here for some time, that pride has been tangible. But will it continue as we go forward?

Will CDC embrace opportunities offered in the National Model Design Code¹⁰? The Code states: *“The National Planning Policy Framework (NPPF) makes clear that local planning authorities should ensure that visual tools such as design codes and guides are used to inform development proposals to provide maximum clarity about design expectations at an early stage and reflect local character and preferences. They should provide a framework for creating high-quality places, with a consistent and high-quality standard of design to inform development proposals”*. However, it also says that it is guidance rather than policy and hence is not a statutory requirement. Within CDC there is currently no institutional capacity for such assessment of development proposals let alone the production of locally refined and tailored ones which is also a part of this guidance. CDC currently believes that it is up to the developer to provide design codes and development briefs, but CDC has no in-house expertise to evaluate such proposals. The only design brief used by CDC in recent years was for the Southern Gateway which was completed by consultants. A proposal by a neighbourhood plan team that proposals for a large peripheral estate outside a village settlement boundary should be subjected to detailed design guidance was rejected. The District simply did not see it as part of its role as a planning authority. The new design code should be widely disseminated to our planning professionals including all those involved in both forward planning and development control as well as members of the council engaged in development decisions. Is this being done?

Within our District we have a number of Conservation Areas, some of which are covered by the extra level of protection afforded by Article 4 Directions which strip away certain permitted development rights in the interests of conservation and historical legacy. But under the new Use Class E, these article 4 Directions may be removed unless they are re-made. What is the District’s anticipated approach to this challenge?

With the roll-out of mile after mile of pattern-book designs we also see obsolescence of thermal -inefficiency being baked in. Where is the commitment to zero-carbon, zero-nitrate, waste-minimisation approaches? Where are the photo-voltaics, air/ground source heat pumps, the passive heating systems, the grey-water harvesters, even the bike sheds? Where are the electric car charging points? Retrofitting these features several years down the line, is not ‘sustainable housing’. In short where is the future proofing? The existing stock of thermally inefficient housing is already huge in our district without adding to it. Just because higher standards are coming through building regulations so slowly, does not mean that the District as a whole must accept this snail-paced process of improving house construction standards. Current planning applications for the most part suggest that everything seems to be left for the next generation to solve.

¹⁰ National Model Design Code. Ministry of Housing , Communities and Local Government, Jan 2021
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957205/National_Model_Design_Code.pdf



SAVE OUR SOUTH COAST ALLIANCE

Vision for the countryside

A series of promises were set out in a Rural White Paper in 2000 of an integrated, sustainable countryside. This had followed on from John Gummer's White Paper for the Conservatives in 1996¹¹. Since that time rural planning has been in a backwater with the notable exception of a new National Park across the South Downs with statutory planning powers and charged with creating a vision of the designated rural area. The creation of the Chichester Harbour AONB in 1964 and subsequently and uniquely from 1971 its management structure in the form of the Chichester Harbour Conservancy with its now routine reviews of its vision and mission has matched the SDNP in terms of rural vision. Sadly, this leaves 30% of our district relatively rudderless in terms of vision, goals, mission and competencies. This has led many early critics of the creation of the SDNP to feel vindicated, but it does not assist the other parts of rural district that have limped along with their conservation areas, neighbourhood planning and design statements.

There was a short-lived hope that the impetus given to localism by Greg Clark and other senior Conservative politicians through neighbourhood planning and the encouragement to develop village design statements would create positive planning policy outcomes for our rural parishes. But both neighbourhood planning and village design statements are demanding and time consuming and deemed out of date within two years of being finalised. Exceptional and audacious achievements like the Medmerry realignment scheme have largely taken place despite the planning policy context rather than because of it.

There is now a danger that in the absence of vision for the rural parts of the district not covered by nationally recognised protective designations these areas will be viewed by the statutory authority as a convenient dumping ground for places to accommodate centrally imposed housing numbers to meet the latest algorithm dreamed up by the Ministry. The future of farming, importance of food production, the growing attraction of the area for outdoor based staycation holidays, the value of the area's coastal biodiversity, environment and its carbon capturing wetlands all need to be factored in to a vision and comprehensive evaluation of the currently unprotected areas within the district.

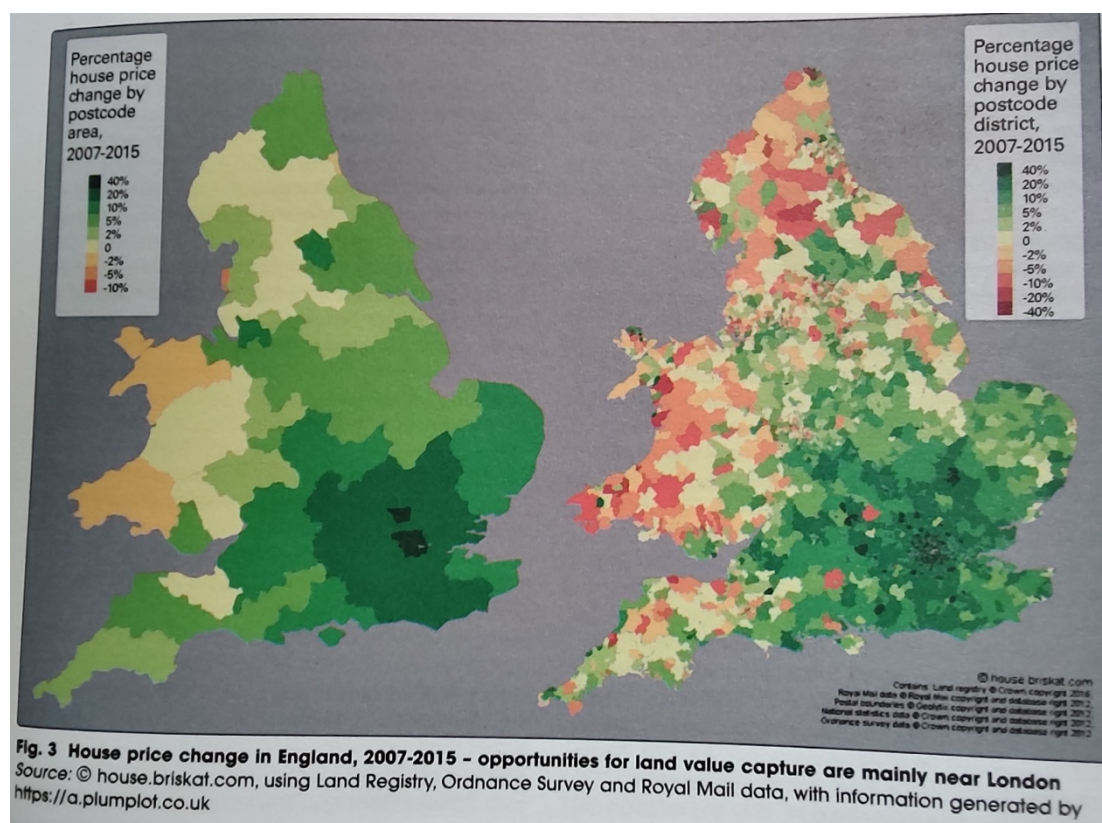
In anticipation of the requirements for growth and renewal in the emerging zonal-based national policy, our District needs to articulate a vision and coherent policy for the 'left-over 30% areas' that goes beyond the weak and ineffectual 'anti-coalescence' policy that tripped at the first hurdle in 2018 and was soon completely undermined by the District's own strategic housing allocations and diminutive wildlife corridor designations.

¹¹ For a recent overview of the state of rural planning see: Trevor Cherrett 'Whatever happened to rural Planning' in Town & Country Planning, March/April 2021, Vol 90, No 3/4.

SAVE OUR SOUTH COAST ALLIANCE

Land use and development value.¹²

The relationship between increasing housing numbers and reducing housing costs is not straightforward and the government’s simplistic approach in determining housing quotas will have damaging consequences for many areas such as Chichester. Housing is not a simple commodity that responds well to a supply/demand model of pricing. When one considers the particularities of our district, with its 70% land area afforded special protection, the proximity of London with its high salaries, the currently high esteem in which the Downs, the Harbours and the beaches of the south coast are held, the demography of retirement, and the sustained surge in ‘working from home’; then the predictive ability of a centrally imposed algorithm becomes highly problematic. Discounting inflation, house prices have gone up fivefold since 1955. But the price of the land needed to put houses on has increased in real terms by 15-fold over the same period. A much wider questioning of neo-liberal economics is taking place in the context of resource limits and the climate crisis.¹³ Ironically, it is much easier to build truly affordable homes in protected areas such as the SDNP because land prices are kept artificially low due to restricted planning, opening the way for the ‘exceptions’ policy to be applied which means that all the uplift value above agricultural land value can be captured for community benefit. But with the new zoning policy land prices are likely to increase further in environmentally attractive areas such as the Chichester coastal plain. The greatest house prices have been concentrated in areas of London, but beyond the metropolis, areas of good communications and high environmental quality have seen similar increases in value.



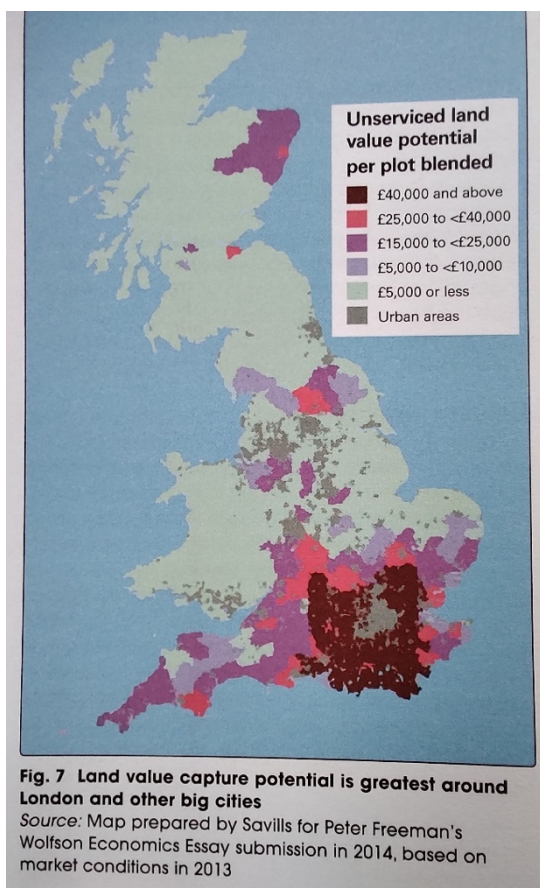
¹² Much of this section is informed by the Town & Country Planning Association’s ‘Tomorrow Series Paper 20’ August 2019 (Nicholas Falk, Sharing the Uplift in Land Values)

¹³ See for example Kate Raworth ‘Doughnut Economics: Seven Ways to Think Like a 21st-century Economist (Random House Business, 2017).

SAVE OUR SOUTH COAST ALLIANCE

Plumplot mapped the changes between 2007 and 2015. They continue to monitor and map at local scale.¹⁴

More generally consenting to change of use from agriculture to housing will confer ten times the value. In our district it is more. So while the costs of actual construction are very similar for similar types of houses across the whole country, the costs of housing vary enormously, even between locations within one district.¹⁵ It is hardly surprising therefore that houses for the open market that can be built adjacent or within either the SDNP or the CHAONB can command premium prices yet yield few affordable homes. It is worth commenting that the last comprehensive provision for affordable housing for rent in these locations was the post war council housing schemes built to Parker-Morris standards in the 1950s. If we were serious about providing such housing we would do the same again and fund it through a strengthened tax on betterment¹⁶ or uplift value on providing land use changes. To most people it seems strange to consent construction of many high-priced homes in order that a few more 'affordable' units are supplied.



Unlike the big infrastructure investments like the electrification of the southern region rail network, the Channel and Hindhead Tunnels or the construction of Gatwick airport which preceded and hence raised land values in our area, most infrastructure that is now funded from the taxes on planning gain (S106 and CIL) only come after housing developments have taken place. Chichester must find a way of funding infrastructure ahead of development otherwise current residents' dissatisfaction will increase.

Opportunities are being squandered along the south coast. Peter Freeman submitted an economics essay with maps supplied by Savills for the Wolfson Prize Competition in 2013-14. He showed that greatest potential for land value capture was on the edge of London and along the south coast based on market conditions in 2014. Why, when such uplift values are on tap are we struggling with providing adequate sewerage and transport infrastructure?

¹⁴ <https://www.plumplot.co.uk/West-Sussex-house-prices.html>

¹⁵ See for example Paul Cheshire 'Turning housing into gold: the failure of British planning'. LSE British Politics and Policy, May 2014. <https://blogs.lse.ac.uk/politicsandpolicy/turning-houses-into-gold-the-failure-of-british-planning/>

¹⁶ The term came into national planning policy with the publication of the Uthwatt Report in 1942. It also identified the first use of the principle in this country in 1427, but it is used in Germany to this day.



SAVE OUR SOUTH COAST ALLIANCE

Chichester's land economics may be likened to Oxford's, while acknowledging that a world-class university and a larger historic core makes some difference. Building on green fields on the edge of Oxford was calculated by URBED could create enough uplift value to fund better infrastructure and a whole new tram line for 20% social housing at 30 dwellings per hectare and homes for a total of 50,000 people. This would also take into flooding and congestion fears. The secret was to tap into the 'unearned increment' of land values uplifted by consenting the developments.

Source:

http://urbed.coop/sites/default/files/20140815%20URBED%20Wolfson%20Stage%202_low%20res3.pdf

Planning for Flood Risk

The promised planning 'reforms' are supposed to offer an opportunity to address emerging flood-risk problems. But will they? It is essential in our District that all those involved in assessing prospective sites for potential development have a very good grasp of flood risk whether it be tidal or fluvial, climate-change related or determined by shorter term meteorological conditions. Tidal and coastal changes must invariably be based upon modelling and predictive techniques, whilst fluvial threats are related to the amount of rainfall whose intensity and duration is likely to be affected by longer term climate change. Particular localities will be affected by groundwater conditions, soil types, drainage patterns and maintenance. Riparian obligations and their observation have significant local implications. Hugh Ellis has warned of the muddle at the heart of government institutional arrangements with both assessing flood risk and also the science of adaptation.¹⁷ Furthermore the Chartered Institute of Water and Environmental Management in responding to a request for written evidence to the Environment, Food and Rural Affairs Committee's Coastal Flooding and Adaptation To Climate Change Inquiry¹⁸ drew attention to the far from adequate current arrangements to address coastal flood risk.

We have featured elsewhere the particular risks of sea-level rises along our stretch of coast.¹⁹ Although the planning process has a duty to pay regard to flood risk, the advice and evidence provided for our District seems confusing, not transparent, and complacent as consents continue to be given in areas where long term risks are not being properly considered. Moreover, Southern Water is currently not planning long-term for the relocation of its waste water treatment works, that are particularly vulnerable to sea-level rises.

The lack of joined-up government thinking on planning for flood-risk between DEFRA and MHCLG makes it essential that our district gets ahead of the curve and achieves an integrated and long-term approach that our situation demands. It is a long way past the time when all the agencies can play pass the parcel. The Environment Agency published its new advice Food Risk

¹⁷ Hugh Ellis 'Planning for Flood Risk' in *Town & Country Planning*, June/July 2020, Vol 89, No 6/7.

¹⁸ www.ciwem.org. April 2019

¹⁹ SOSCA website: https://5d0e6579-f20c-40a0-acbf-8c4ac274613b.filesusr.com/ugd/dae4df_bc46d604a4ae4965a574ea0054fd1582.pdf
And https://5d0e6579-f20c-40a0-acbf-8c4ac274613b.filesusr.com/ugd/dae4df_be9385cdb9894fb19c4e37f87709d62a.pdf



SAVE OUR SOUTH COAST ALLIANCE

Assessments: Climate Change Allowances in March 2020.²⁰ It includes an upper-end estimate of 105% cumulative increases in river flows in the South East for the period 2070 to 2115. For the sea level rise the cumulative upper-end estimate between 2000 and 2125 is 1.6 metres for the South East. Rainfall intensity may increase by 40% by the period 2070 to 2115. Flood Risk Zone 3 will therefore change, but CDC is still not applying sequential testing on sites that will almost certainly face flooding within the next 100 years, i.e. within the lifetime of any development. Proper assessments should be based upon the expected life of the development and not the life of the plan. CDC as the local planning authority has a duty to ensure the safety of new developments and their future residents, so should be requiring sequential testing for sites which could face severe flood risk in the future, even in the absence of an objection from the Environment Agency.

Local discretions

On 17th May 2021, SOSCA brought together people from parishes across the entire Chichester coastal plain in a Zoom/webinar Information Exchange Forum.²¹ Representatives from 13 separate parishes within the district and from Selsey town were each given three minutes to identify their principle planning challenges. A remarkably common set of themes emerged – the insensitivity of planning decisions, the lack of infrastructure (especially roads and waste water treatment arrangements) to support the targeted housing numbers in allocations, the pinioned position of neighbourhood plans, and the monumental loss of discretion afforded to localities in determining the number, style, tenure and quality of houses they will be getting.

All of this comes before the proposed changes to the planning system. Some parishes are in open revolt, some seething with resentment at being bossed around, some just quietly simmering with discontent. These sentiments were undoubtedly expressed in the result of local government elections at the county level in May 2021, even although the county has only minerals and highway planning responsibilities. Parishes feel let down by local government officers and elected members and defenceless against the carpet-bombing approach of the volume builders.

The failure of the system to yield truly affordable housing for younger people who want to stay close to their roots whilst beginning to make their way in the world was probably the single loudest message. Residents representing their areas are not NIMBYs, they are responsible people who want to see their communities thrive and be renewed, whilst still preserving their settlements' identities and strong sense of community. Politicians take this for granted at their peril. Providing second homes, holiday lets, weekend pads might be desirable, but it is not a necessity, especially if it undermines local communities as we have seen in parts of Wales and other English coastal settlements. Providing more of these types of accommodation will certainly do nothing to reduce the costs of housing which is the purported aim of the planning 'reforms'.

What was striking was that the parishes' Information Exchange Forum for the most part exhibited a vision of their area that played to the strength of a valued environment for

²⁰ Environment Agency 'Food Risk Assessments: Climate Change Allowances' March 2020
<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

²¹ the report of the meeting is lodged with SOSCA as agreed by participants



SAVE OUR SOUTH COAST ALLIANCE

recreation, leisure, tourism and hospitality. Their local knowledge was impressive and the environmental, landscape, ecological, drainage, transport consultants employed by the volume builders would do well to heed the information available from these citizen-scientists and wildlife experts. Above all they were aware that CDC is essentially trying to squeeze 100% of its housing target into 30% of the land area - a land area that also includes significant future flood risk, the environment needed for wetland roll back and species migration, as well as supporting the district's main economic and employment sectors of agriculture, horticulture and ecotourism.

If the scope for local consultations on planning applications are indeed swept away and any scoping studies that CDC may have done on prospective sites within areas designated for 'growth' or 'renewal' did not throw up any issues which subsequently emerge, then the loss of input from local people may result in mistakes, for which there is no recovery. It has been quite clear that statutory consultees, whilst they may claim competences, can only be as good as the information they receive and record. SOSCA has come across several cases where the contribution of local knowledge has not been recorded by the statutory consultees, despite being locally established by communities such as evidence of flooded property, roads and fields; and loss of biodiversity.

The death of local democracy is nigh. Hugh Ellis (TCPA) notes that "It has taken the best part of 70 years for these national politicians to make their local colleagues irrelevant to most planning decisions".²² Is this the future that our District wants? The future is stark. Will our councillors destroy that which gives our district its distinctive settlements, connections, spaces between places and turn us into a megalopolis suburbia serving as adjuncts to the sprawling conurbations of Southampton-Portsmouth to the west and the Brighton-Littlehampton continuous urbanism to the east?

Making it easier for all scales of builders

The industry practice with well-resourced volume builders is to utilise Land Banks as a hedge against adverse planning decisions, market fluctuations, increase certainty of land prices and assure the maximising of development gain for the housebuilder and the original land owner. This has undoubtedly resulted in the current situation where a million homes have been consented, but not built. Land-banking is only an option for the large builders, being denied to the medium and small local builders. This is a problem for districts such as ours who are offered a limited palette of standard designs by national house-builders.

Whilst we do not have a breakdown of which builders dominate the district new-build housing market, it was apparent from the list of companies expressing an interest in sites across the District at the last Examination in Public for the District-wide Local Plan that the biggest builders dominate possession of options on the land between Emsworth and Chichester and on the coastal plain. This leaves the smaller builders to contribute to work nominated by individual architects or operate within the very small design-and build sector. If the District were to parcel up development opportunities on sites of more than 20 homes, it would give a far greater chance to foster our local smaller builders.

²² Hugh Ellis 'The Spirit of '47' in Town & Country Planning, May/June 2021, Vol 90, No 5/6.



SAVE OUR SOUTH COAST ALLIANCE

Treating 'Windfall Sites' as a mere statistical convenience for calculating district-wide build rates, means that the small builders are not seen as contributing much to the target numbers of houses, yet their contribution should be recognised and encouraged.

Similarly, in drafting neighbourhood plans there has been a tendency for the District to minimise the significance of the contribution of small sites. This mindset should change as a closer relationship of communities and local builders would benefit the development of local jobs and skills.

A number of tenures miss out in the current approach taken by the District. For the strategic allocations, there are no community land trust set-asides, no encouragement for self-builds nor organic, small-scale, incremental village extensions. In short small builders only get small jobs e.g. garden grabbing developments and other 'in-fill' or 'back-land' opportunities.

The District needs to address the following concerns:

- Zoning – bring a fine-grain assessment to the Manhood and the east/west corridor respecting best and most versatile agricultural land, strategic gaps, hitherto unprotected landscape features, wildlife corridors, existing vistas, pocket parks and neighbourhood recreational needs.
- Building back better and more beautiful by increasing the District's design capability and producing design briefs for selected sites and raising environmental performance standards of all new-builds, recommitting to resist developments outside a 15-minute walking distance of local public transport and services. Re-adopt all Article 4 Directions in relation to Conservation Areas to ensure that the widened range of permitted development rights does not undermine our legacy locations.
- Establish a vision for the countryside by understanding the relationship between Downs and Harbours and the coast, between distinctive villages and our cathedral city and promoting parish pride and give much more prominence to the settings of the national park, the AONB and the coast.
- Land use and development value – finding ways to capture more of the development value of granting consents thereby to properly funding social and affordable housing and place infrastructure installation ahead of building houses.
- Planning for Flood Risk – work on worst case scenarios, plan for the life of the development, not merely the life of the plan and require infrastructure providers to demonstrate long term resilience for items like sewer pipes and waste water treatment works.
- Local discretions – establish or confirm the importance of neighbourhood plans and village design statements as a cherished contribution from our local communities and not treated as a labour of Sisyphus, to be endlessly repeated to no effect.
- Making it easier for all scales of builders by positively identifying through the HELAA process opportunities for different scales of development within the grasp of small and medium-size enterprises, housing associations, community land trusts and local authority-led social housing.

CC + RP for SOSCA
24/06/21