

The Rt Hon Robert Jenrick MP
Secretary of State for Housing, Communities and Local Government
Fry Building
2 Marsham Street
London
SW1P 4DF
United Kingdom

16th October 2019

Dear Sir,

We the undersigned, representing all political affiliations, parishes, environmental and community groups, assert that the National Policy Planning Framework standard method for housing calculations is flawed in determining Chichester District's future housing need for its Local Plan.

The NPPF capped local planning need dictates 13,000 houses required in the District from 2019 to 2039. We contend that, for the reasons given below, District housing numbers should be reduced.

Section 5 P.60 of the NPPF CP-48 states that, *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals."*

Chichester District has several 'exceptional circumstances' that justify an alternative approach:

1) Lack of infrastructure to effectively accommodate 13,000 houses

The GL Hearn South East Plan report 'Housing Study (Duty to Co-operate) Executive Summary' says of Chichester District that the maximum housing delivery considered achievable, excluding the National Park, is 470 houses per year. "Areas in the sub-region are vulnerable to fluvial, coastal and groundwater flooding and there are coastal management issues. The sub-region also suffers from poor quality transport infrastructure and services." It also states, "a level of {housing} required to meet the development needs of the area cannot be achieved in light of significant environmental, landscape and infrastructure constraints to development which exist."

Little has changed since this report was published in May 2013, with no A27 relief road in place, and no marked improvement in critical infrastructure across the Chichester District.

2) Chichester District land area and environmental constraints to accommodate new housing

Chichester District is formed of a diverse population mix of mostly coastal villages and small inland communities and 67% of the area of the District is in the South Downs National Park. In addition, a further 6% of land area is the Chichester Harbour AONB. At 74km² it is the smallest AONB in the South East region, yet one of the most intensively used, offering a unique mix of sea, coast and land, and of international importance for its wintering bird populations.

Chichester District also contains many other sites of national importance including Heritage Coast, Ramsar sites, SSSIs and areas of ancient woodland, and is in a Nitrate Vulnerable Zone.

The GL Hearn South East Plan report says, "Given its geography and high quality environment and infrastructure deficiencies, the Sussex Coast is not a sub-region that should be expected to make a substantial contribution to meeting wider needs in the South East. This is a function of the geography of the sub-region, much of which forms a narrow intensively developed coastal strip which falls between the South Downs National Park and the English Channel."

3) Lack of capability for Chichester District coastal plain to manage future climate change

Unlike many other coastal areas, Chichester District coastline comprises of mostly sand, shingle and mud. This coastal structure is unable to be effectively protected against the 4.7 metres of sea level rise related to 2 degrees Celsius of global climate change, the upper limit adopted by the European Union Council of Ministers in 1996, the G8 in 2008, the UN in 2010 and in Paris in 2015.

The IPCC 2014 report projected high-end estimate of global sea level rise is 90 cm (3 feet) by 2099, but other later studies concluded that a global sea level rise of 200 to 270 cm is 'physically plausible'. Current estimates suggest there is a one in a hundred chance of our planet avoiding a 1.5 degree Celsius temperature increase. Two degrees Celsius equates to a 4.7m sea level rise, which would put 42,000 to 54,000 current homes in the Chichester District under water.

4) National Policy Planning Framework restrictions in place relevant to Chichester District

NPPF 149 on climate change - 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 landscape. 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 relocation of vulnerable development and infrastructure.

NPPF 157 on climate change and flood risks - Plans should apply a sequential, risk-based approach to the location of development taking into account current and future impacts of climate change. Where climate change is expected to increase flood risk so development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (existing or future).

NPPF 166 on coastal areas - In coastal areas, planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Integrated Coastal Zone Management should be pursued across local authority and land/sea boundaries, to ensure effective alignment of the terrestrial and marine planning regimes.

NPPF 167 on coastal change - Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. They should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and: a) be clear as to what development will be appropriate in such areas and in what circumstances; and b) make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere

We urge you to consider these legitimate concerns about the application of the NPPF standard method to calculating the future housing needs of Chichester District, and to come to an agreement on a reduction to the NPPF housing target to a number that is practically achievable for the District.

Yours sincerely,

Andrew Kerry-Bedell and other local signatories overleaf



Chichester District signatories to the open letter to Robert Jenrick, Secretary of State for Housing

Philip MacDougall – Chairman, Chidham and Hambrook Parish	Susan Bramwell Smith
Marie Gilby - Chidham and Hambrook Parish Councillor	Janine de Smet
Peter Bolton - Chidham and Hambrook Parish Councillor	Peter Badham
Dr Jacky Sheppard - Chidham and Hambrook Parish Councillor	Andrew Sargent
Rachel Perry - Chidham and Hambrook Parish Councillor	Beth Buss
Jane Towers - Chidham and Hambrook Parish Councillor	Nicky Hales
Geoff Hand - Chairman, Fishbourne Parish Council	Linda Tanner
Mike Lander - Fishbourne Parish Councillor	Kay Lander
Nicola Swann - Clerk and RFO, Donnington Parish Council	Liz Dinnage
Michael Neville – Bosham Parish Council	Nicky Dessent
Jenny Morris - co-chair Bosham Association	Keith Gorman
Dick Pratt - co-chair Bosham Association	Graham Salmon
Amanda Tait - Southbourne Parish Councillor	Joan Margaret Elliot
Joan Foster - Manhood Peninsula Action Group Lead	Charlotte Bond
John Nelson - Chairman, Chichester Harbour Trust	J I Gawen
Richard Craven – Director, Chichester Harbour Conservancy	Richard Hales
Professor Dan Osborn – Chair, CPRE Sussex	Roger J. Leek
Kia Trainor - Director, CPRE Sussex	R.P. Gould
Graham Ault - CPRE Sussex	Tim Towers
Dr Carolyn Cobbold FRSA	Ruth Keeley
Caroline Sitwell MBE	Bernard Timbers
Dave Moore MIRPM	R.A. Gawen
Noreen O'Sullivan-Theobald	Stephen Page
Kathleen Gorman	Paul Lynch
David Hetford	Sue Harrison
Peter Dessent	Charlotte Cowlshaw
Gary Mason	Lynda Hunter
Linda Dimon	Michael Carroll
Andrew Relf	Chris Gallagher
Marilyn Carroll	Cliff Archer
Alan Hay	Sarah Hill
Simon Bond	John D’Arcy
Tim Hill	Cilla Page
Sue Gallagher	Keith Dimon
Amy Towers	Rob Walder
Simon Loveday	Susan Kerry Bedell
J A Killeby	Nick Cowlshaw
Patrick Lowry	Petrina Milliam
Kate D’Arcy	Justin Shergold
Mike Dinnage	Douglas Hall
Steve Tanner	HP Greeff
Pauline Ashwood	Richard Hall
Louise Goldsmith – West Sussex County Councillor	Margaretha Lowry