

<b>Client</b>	Welbeck Strategic Land IV LLP		
<b>Project</b>	Chichester Local Plan		
<b>Document</b>	Hearing Statement – Matter 3	<b>Revision</b>	A
<b>Date</b>	13 September 2024		
<b>Author</b>	S Sykes	<b>Checked</b>	H James



These representations have been produced by ECE Planning on behalf of **Welbeck Strategic Land IV LLP** in response to the Inspectors' Matters, Issue and Questions on Chichester District Local Plan Examination. The statement addresses Matter 3.

### **Matter 3: The Spatial Strategy**

**Issue: Is the spatial strategy positively prepared, justified, effective and consistent with national policy?**

#### **Q.13: What is the justification for the proposed distribution of development in the plan area?**

The current spatial strategy is fundamentally flawed as it disproportionately focuses on the east-west corridor around Chichester while neglecting highly sustainable areas within the Manhood Peninsula. This narrow focus exacerbates the pressure on the A27 and disregards the Peninsula's potential to accommodate sustainable development, addressing socio-economic needs specific to that area. By concentrating growth in and around an already congested Chichester, the plan perpetuates the status quo instead of exploring alternative, more balanced development strategies.

The justification provided by the Council rests on the assumption that Chichester, with its wider range of services and employment opportunities, is the most sustainable location for development, thus reducing the need for travel (Submission Local Plan 2023, paragraph 3.8). However, this assumption overlooks the Peninsula's potential for growth, which could enhance the area's sustainability while alleviating the overburdening of Chichester's infrastructure.

The failure to allocate development in the Peninsula also overlooks its specific socio-economic challenges, such as:

- An aging population, impacting the viability of local services like schools (refer to Figure 1).
- Relatively low levels of out-commuting, indicating the potential for self-sufficiency.
- Significant affordable housing needs, coupled with low average incomes and high housing costs.

This first point was made within our Regulation 19 representations. The impact of the local age profiles (example of East Wittering provided in Figure 1) creates specific challenges not least with regards to ensuring communities are mixed and balanced but also with regards to ensuring that local infrastructure is sustainable and efficiently used in the long term.

A good example of this relates to school provision, which in the Manhood Peninsula. The Planning School Places 2024 document produced by West Sussex County Council (published in February 2024) considers the historic pattern and capacity of schools with the District of Chichester. Figure 2 identifies capacity in 2023 of Chichester Primary and Secondary Schools (in and around the City) compared to the Manhood Peninsula / Witterings. This demonstrates the already over capacity nature of schools within the City vs under capacity nature of schools in the Peninsula.

## Profile preview



Source: Office for National Statistics - Census 2021

Figure 1: Age Profile East Wittering and Bracklesham

Provision Type	Location	Surplus Places	% of Capacity in Use
Primary Provision	Chichester	23	96%
	The Witterings	21	74%
Secondary	Chichester	-2	100%
	Manhood	15	87%*

Figure 2: School Capacity Chichester vs Manhood Source: [www.westsussex.gov.uk/media/20269/planning\\_school\\_places.pdf](http://www.westsussex.gov.uk/media/20269/planning_school_places.pdf)

\* Note that the Selsey Secondary School reduced their Admissions from 150 in 2022 to 120 in 2023 due to, we assume, historic under occupancy of the school.

This is a particular issue for the Secondary School position. Historic admissions vs capacity of the Secondary school within Selsey has been a persistent issue over time. Conversely, the opposite is true within and around Chichester. Development in the Manhood Peninsula location would therefore be highly beneficial in supporting such services and in balancing out school occupancy across the district. Section 6 of the National Planning Policy Framework (The Framework) supports the sustainable growth and expansion of local businesses, facilities, and services. By excluding the Peninsula from further planned development over the Plan period, the Council risks the long-term sustainability of local services such as schools, which are already underused.

Year	PAN Year 7	Pupils in Year 7	Surplus places	% of Capacity in use <sup>1</sup>
2017	630	614	16	97%
2018	630	623	7	99%
2019	630	630	0	100%
2020	630	620	10	98%
2021	630	575	85	87%
2022	630	610	20	97%
2023	630	632	-2	100%

<sup>1</sup> We aim to create a minimum 5% buffer as per the National Audit Office report on Capital Funding for new school places published in 2013.

Figure 3: Secondary School Capacity Chichester [https://www.westsussex.gov.uk/media/20269/planning\\_school\\_places.pdf](https://www.westsussex.gov.uk/media/20269/planning_school_places.pdf)

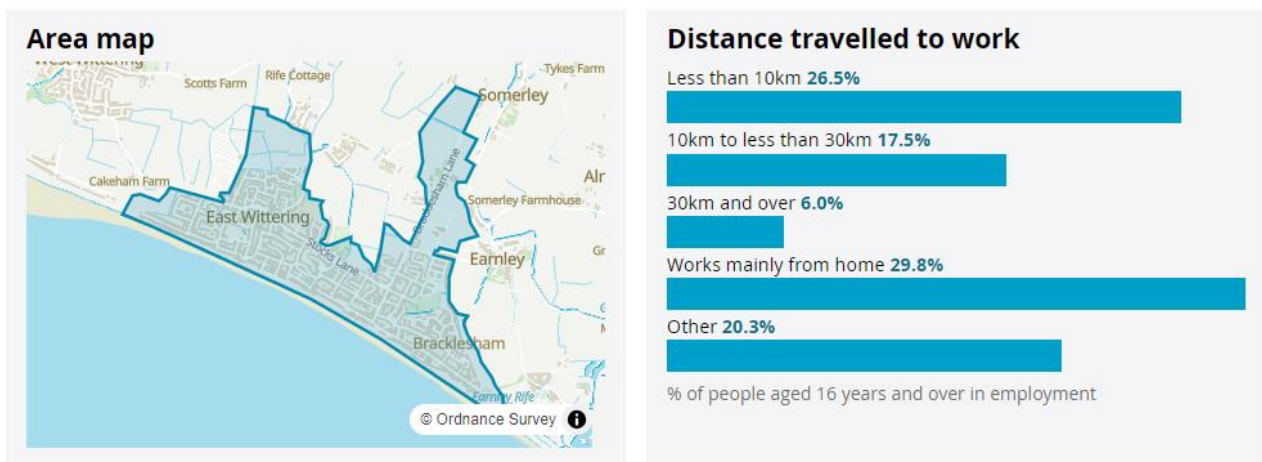
Year	PAN Year 7	Pupils in Year 7	Surplus places	% of Capacity in use <sup>1</sup>
2017	150	65	85	43%
2018	150	81	69	54%
2019	150	104	46	69%
2020	150	91	59	61%
2021	150	97	53	65%
2022	150	95	55	63%
2023	120	105	15	87%

<sup>1</sup> We aim to create a minimum 5% buffer as per the National Audit Office report on Capital Funding for new school places published in 2013.

Figure 4: Secondary School Capacity Manhood [https://www.westsussex.gov.uk/media/20269/planning\\_school\\_places.pdf](https://www.westsussex.gov.uk/media/20269/planning_school_places.pdf)

With regard to the second point on working age population, the spatial strategy fails to acknowledge the changing nature of commuting for work particularly in relation to the Manhood peninsula. Figure 5 for instance demonstrates that for the built-up area of East Wittering and Bracklesham:

- 30% of working age residents work mainly from home
- 26% travel less than 10km (Chichester is over 12km distance)
- 23% travel more than 10km



Source: Office for National Statistics - Census 2021

Figure 5: East Wittering Distance Travelled to Work

These patterns of travel do not suggest significant out commuting for day-to-day employment needs to Chichester or beyond (only 26%). The Settlement Hub of East Wittering / Bracklesham is considered in fact to be a highly sustainable location (second only to Chichester) which is relatively self-contained for day-to-day needs. In not allocating any development here, the Council is ignoring development potential in one of the most sustainable locations within the District.

The approach to exclude the Manhood Peninsula from any form of strategic housing allocation is equally a failure to acknowledge the significant issues associated with house price affordability and needs associated with affordable housing. Table 6.11 of the Housing & Economic Development Needs Assessment (2022) sets the needs out starkly with the Manhood Peninsula suffering from the second highest proportion of people unable to afford market housing.

**Table 6.11 Estimated Current Affordable Housing Need (for social/affordable rented housing)**

	In unsuitable housing (taken forward for affordability test)	% Unable to Afford Market Housing (without subsidy)	Revised Gross Need (including Affordability)
Chichester City	574	51.9%	298
EW Corridor	307	55.6%	171
Manhood	416	64.1%	267
Plan Area North	76	66.9%	51
SDNP	423	59.1%	250
<b>TOTAL</b>	<b>1,797</b>	<b>57.7%</b>	<b>1,037</b>

Source: CLG Live Tables, Census 2011 and Data Modelling

Table 6.6 of the HEDNA demonstrates that the Manhood Peninsula has the lowest median income of any area in the District whilst having amongst the highest cost housing (excluding the north part of the District and the SDNPA). This is well illustrated by Table 6.7 of the HEDNA.

**Table 6.7 Estimated Household Income Required to Buy and Privately Rent by sub-area**

	To buy	To rent (privately)	Income gap
Chichester City	£54,000	£28,600	£25,400
EW Corridor	£59,600	£31,200	£28,400
Manhood	£59,200	£29,600	£29,600
Plan Area North	£90,800	£42,800	£48,000
SDNP	£69,400	£34,800	£34,600
<b>District-wide</b>	<b>£61,000</b>	<b>£31,000</b>	<b>£30,000</b>

Source: Based on Housing Market Cost Analysis

The HEDNA also notes that there is an annual affordable housing need of 76 dwellings within the Manhood Peninsula (Table 6.16).

It is our view that in allocating no new housing in this location, the Council is not positively and adequately planning for the needs of the area and this is a significant failure of the Local Plan, contrary to approach advocated by Paragraph 60 of the Framework.

The Council has identified constraints with the Manhood Peninsula (flooding, highways, environmental designations). The weight the Council has applied to such matters has entirely stymied any potential for development. We do not consider that the Local Plan has adequately considered development in this location, either as an alternative to the spatial distribution identified in the Local Plan or in addition to this planned development.

As noted within our Regulation 19 reps, we do not consider the constraints identified to be a constraint to development here in relation to highways or flooding. We have noted within our reps that there are fundamental flaws in the way that the distribution of housing has been assessed within the Spatial Strategy both in terms of assumptions about highways impact, the SFRA and treatment of flooding assumptions and with regards to the SA process.

Overall we do not consider the distribution of housing is **justified, positively prepared or consistent with national policy.**

**Q.14: In assessing the transport impacts of housing growth, what reasonable alternative levels of housing growth were considered for the southern plan area and why were they discounted?**

Appendix V of the 2023 Sustainability Appraisal states (p92):

*The final two settlement hubs – East Wittering and Selsey – are both located at the southern extent of the Manhood Peninsula, such that they are relatively poorly connected in transport terms (see Section 5.2), which serves as a broad strategic argument against higher growth, relative to Chichester Parish, Tangmere and Southbourne.*

*There is a strong argument to suggest that committed growth is sufficient, given that:*

- *committed growth is close to - and may exceed - the level of growth directed to East Wittering at the Preferred Approach (PA) stage, when the proposal was for a higher growth strategy across the southern plan area;*
- *there is now understanding that Stockbridge and Whyke junctions are unlikely to be upgraded in the plan period, and there has generally been an evidenced shift towards an increased focus on the east-west corridor;*

In our view, the first bullet point does not provide a reasonable basis for dismissing further investigation into additional development within what is a highly sustainable location. The precise level of growth that the Manhood Peninsula can accommodate before highway impacts become "severe" is not clearly defined. Furthermore, it remains unexplored whether a more balanced distribution of development—allocating more growth to the Peninsula and reducing it in the east-west corridor—could yield better outcomes in transport terms.

Section 9 of the Framework promotes sustainable transport, including ensuring that development is located where it can reduce the need for major infrastructure upgrades and where residents can access services and facilities locally. The assessment for the Manhood Peninsula dismisses it as "poorly connected" without considering that settlements like East and West Wittering are, in fact, highly sustainable in terms of local services, employment opportunities, and low levels of out-commuting.

With respect to settlements within the Manhood Peninsula, it is important to emphasise that the main settlements of East and West Wittering are well-served by a range of local services and facilities that meet most day-to-day needs of the existing population. In a recent appeal decision concerning land to the west of Church Road, West Wittering (APP/L3815/W/21/3286315), the Inspector similarly recognised the adequacy of these facilities in supporting local residents:

The village has an **impressively varied range of local facilities for a settlement of its size**, owing to the local tourist trade. I note that future residents would have to travel into Chichester to visit a private dentist, or to access a larger supermarket. Nevertheless, I am of the view **that the available facilities in East Wittering would meet the day to day needs of most residents.**

The Local Plan process appears to have unreasonably discounted highly sustainable settlements, particularly in the Manhood Peninsula, partly due to concerns over highways capacity. In reality, settlements within the Peninsula, such as East Wittering and Selsey, function in a more self-sustaining manner than many of the other areas being considered. While junctions like Stockbridge and Whyke may face capacity issues due to other development proposals in the Local Plan, these concerns are unrelated to the Peninsula's capacity to accommodate additional housing.

The National Planning Policy Framework (NPPF) requires Local Plans to be based on a robust and proportionate evidence base, which includes assessing all reasonable alternatives in spatial strategies. The failure to adequately consider higher housing growth in sustainable settlements within the Manhood Peninsula undermines this requirement.

In our view, the Plan has not properly assessed the reasonable alternatives, and as a result, **it cannot be considered justified.**

**Q.17: Is the proposed Settlement Hierarchy justified?**

In our view, the hierarchy is justified. The approach to housing allocations, which entirely ignores some of these highly sustainable locations (such as East Wittering/ Bracklesham) is however **not justified.**

---