

Chidham and Hambrook Neighbourhood Plan Submission (Regulation 16)

Chichester District Council Response – October 2015

Page 5: Para 4) – typo in line 1 delete the word 'it' (...neighbourhood plan ~~it~~ does not preclude'); typo in line 8 amend 'an' to 'a' ('Where ~~an~~ a NP is in place.....')

Page 7: Title of map should be amended to read 'Map of Chidham and Hambrook Neighbourhood Plan Area'.

Page 13-15: Policy LP1 Requirement for homes

The policy would benefit from some redrafting to include criteria for what development is supported in settlement boundaries and what will be resisted outside settlement boundaries. The requirement in the Chichester Local Plan: Key Policies for 25 dwellings in the Parish has been met and it may help for this to be in the policy (para 43). LP1 should include reference to the settlement boundary identified in Map 2.

Wording in the text at paras 39, 45 and para 94 could be included in Policy LP1, possibly as criteria, similarly Page 26 makes reference in the 4th bullet point to discouraging coalescence; this could also be included.

Para 39 - reference to 'local environmental, economic and sustainability criteria' and wording in para 94 'additional development will need to demonstrate a special need before consideration' - these should be consistent and include criteria to define what is a special need.

Policy LP1 – 2nd bullet point – should refer to 6 units not 10.

Page 17: Policy EM1 Management of sea and flood defences, streams and surface water drainage

Policy needs to be clear it relates to applications within areas known to be at risk of flooding. Second para of policy – amend to read 'All **new** housing.....'

Final para – There may other solutions rather than SUDS that are acceptable therefore the text should refer to 'financial contributions **or mitigation**'.

Page 19: Policy EM2 Protection of Chichester Harbour conservation areas and related areas of special environmental value

Amend second sentence to read:

'.....will conserve and enhance the designated or potential **candidate** special protection areas, designated or candidate areas of **Special Areas of Conservation**, Sites of Special Scientific Interest.....'

Need to define 'other areas of special environmental or ecological value'.

Para 52 – second sentence - mitigation measures can be requested but reference to protection of adjacent/nearby areas may not be achievable.

Page 20: Policy EM3 Protection and enhancement of landscape, habitat and biodiversity
First sentence - Amend to read 'Any **new** housing'; delete space before 'enhance'.
Second sentence - Insert comma after 'orchard'.

Page 21: Section 3.3 Community Development Policies – not clear what is meant by this

Policy CDP1: The use of S106 Agreements and CIL to support community development

Second para, it is not realistic for every scheme to first be agreed in writing with the Parish Council. One means would be to identify a process for setting out and confirming priorities for 'community objectives' through the IDP/IBP.

Second para, last line has a cross reference to para 103 that does not exist. If this is meant to refer to para 100 on Page 38 this should be amended.

Para 57, and also Page 38 para 100 – no indication/policy of how the new village centre would be delivered, nor is there any consideration of its viability. If this is required then it would need a policy identifying where and what is to be included (eg community building, shops, public realm, public transport hub etc).

Page 22: Policy CDP2 The Local Economy

Para 58 – Last sentence – it is not clear what this refers to?

Policy CDP2 – First sentence - Reference to Plan area – should this refer to **settlement boundary**?

First bullet point - reference to Plan area - is this meant to refer to **Parish** area? The phrase 'in keeping with' is very general and needs clarification.

Policy does not provide criteria for large scale commercial proposals; as worded the policy would simply provide support.

Page 23: Section 3.4 Housing

Policy H1 (Local occupancy conditions of affordable housing) and H2 (Diversity of housing to meet the local need) overlap and the policies need to be revised to be clear in their intentions to deliver a range of dwelling types and sizes, including affordable housing.

Para 60 – Following the adoption of the Chichester Local Plan: Key Policies 2014-2029 (CLP), the following reference "a requirement to provide 30% affordable units, on sites of more than 5" should be removed. CLP Policy 34 seeks on-site affordable housing contributions on developments of 11 or more units, and a commuted sum will be sought on developments of 6-10 units if a scheme lies within the AONB. Without additional evidence the policy should reflect Chichester Local Plan Policy 34.

Policy H1 would be improved by inclusion of text or part thereof of para 60; the policy can not be used to control the provision of market housing only for local people.

Is the Plan area the Parish area?

Page 24: Policy H2 Diversity of housing to meet the local need

Amend first sentence to refer to 'new residential **housing** development....'

Part of the text of para 64 which relates to bungalows / sheltered accommodation may also be included in Policy H2.

Page 25: Policy H3 Impact on infrastructure

Should this refer to '**housing**' rather than 'any new' development?

The policy overlaps with CIL. If the intention is that the policy is related to waste water treatment (as suggested by para 65) then it should be specific. Otherwise it is not realistic to require an application to identify the impacts identified in the policy as worded.

Page 25-26: Design

Policies DS1 (Development) and DS2 (Encouraging quality design) need to be amended. Either one policy should be included with two parts: i) criteria for all housing development (including extensions) and ii) new housing schemes, or, alternatively, two separate redrafted policies. Revisions could include text from paras 67, 69 etc.

First bullet point (Page 26) replace 'blends in' with 'takes account of the character and appearance of the rural.....'

As stated above (under Page 13-15: Policy LP1) – fourth bullet point may be better placed in any revised LP1. A policy to resist coalescence between Hambrook and Nutbourne may be feasible but the Plan can not control areas beyond its boundary (Southbourne and Bosham).

Page 27: Policy DS3 Provision for car parking

The WSCC parking calculator makes allowance for on street parking. Amend first sentence on Page 28 to refer to 'should be designed to ensure road access is not impeded' rather than 'facilitate unimpeded road access'. Policy could be amended to resist on street parking unless justified and then parking would be in accordance with WSCC standard.

Page 28: Reference to Code for Sustainable Homes should be removed due to changes in Government policy (March 2015).

Page 29: Policy DS5 Retention of areas of natural habitat/biodiversity

Amend first sentence to read 'All new residential **housing** development areas.....'; delete comma after landscaping.

Page 32: Para 85 amend to read '...living in **the** Plan area....'

Page 34: Heritage assets

Para 87 – amend first sentence to read '... conserve significant **designated and non-designated** heritage assets....' Amend final sentence 'Heritage Assets **include**ing'

Page 34: Assets of Community Value

Para 89 - makes reference to Policy AP3 that does not appear in the document. Is this meant to refer to AP2?

The document suggests that each asset should be included in CDC's Register of Community Assets. This would require each asset to be separately nominated creating a capacity issue if all 20 identified assets were pursued. A better approach would be to consider the inclusion of a statement of intent about resisting change of use to all identified and prioritising those which should proceed through the separate registration process.

Page 37: Monitoring and delivery

Para 92 – what is meant by the 'right' private sector investment?

Para 94 and 95: See comments above under Page 13-15: Policy LP1

Page 38: para 97 some of wording could be used in Policy CDP2.

Para 98 – amend ‘role out’ to ‘roll out’.

Page 38: Aspirations - Other adjacent and contiguous parishes contain aspirations for greater connectivity and recognition of this as an aspiration for this Parish would benefit and maximise the possibility of such wider networks. Para 101 makes reference to additional routes and this could be enhanced to recognise the need for wider connectivity. (For example a local group is working on linkages from Emsworth to Chichester).

CDC is aware of proposals for further improvement to the existing Chidham and Hambrook Village Hall through the IDP/IBP that should be referenced here. Apart from cycle lanes, better parking facilities and traffic calming, the other items listed do not appear on the IDP/IBP and need to be reviewed. Again there is no apparent mechanism for their delivery.

Page 38: Para 100 - see comments above re. new village centre under para 57.

Exercise of Delegated Authority - Head of Planning Services

I hereby exercise my delegated power in accordance with Chichester District Council's Constitution:

‘to make formal comments on a draft Neighbourhood Plan at Pre-Submission stage and Submission stage’

AND DETERMINE THAT, the above comments are the formal response made by Chichester District Council on the **submission stage** of the **Chidham and Hambrook Neighbourhood Plan** in relation to comments made under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended by The Neighbourhood Planning (General) (Amendment) Regulations 2015):-

Signed:



Head of Planning Services

Date: 7/10/..... 2015

Note: The deadline for making representations should not be less than 6 weeks from the first day the draft plan was publicised.