

Site Allocation Proposed Submission Development Plan Document – Consultation Responses

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4. Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
Consultation ID Number SAPS26 (Please refer to additional attachments – Electronic only)													
Policy SA1	Mr	Zappala	Dominic Lawson Bespoke Planning			Eurequity Ltd & D C Heaver	No	No	Positively prepared Consistent with National Policy	<p>Chichester District Council (“the Council”) argued during the Local Plan’s examination in public that there were a number of constraints preventing it from planning to meet its objectively assessed housing need. This resulted in the inspector allowing the Local Plan to be adopted with a sub-objectively assessed housing need target, but with a commitment to an early review within five years to ensure that objectively assessed need is met.</p> <p>However, since the Local Plan has been adopted, some of these constraints have significantly lessened. In particular, it has been confirmed by Southern Water that the Tangmere Wastewater Treatment Works upgrades will be completed by the end of 2017 and the government has announced a package of improvements to the A27 starting in March 2019 which will also allow for a greater level of housing growth and capacity than previously planned.</p> <p>The Council needs to recognise that there are sites which have previously been discounted for allocation, which should now be re-assessed and proposed for allocation if suitable. This is required if this Sites Allocation DPD is to be considered to be positively prepared.</p> <p>The current version of the Site Allocation DPD treats the housing target in the Local Plan as an upper limit, and is not therefore taking the opportunity to plan to meet a larger proportion of the District’s objectively assessed housing need (OAN). We have sought Counsel’s opinion which shows that there is no cogent national policy reason for the Council to set its face against sustainable development which would provide housing that would take supply over the minimum to meet the current constrained OAN figure.</p> <p>Oving Park (Land at the corner of Oving Road and A27, Chichester) should therefore be allocated in this Site Allocation DPD so that it can be delivered as quickly as possible to meet the urgent housing need (including affordable housing) in Chichester. The Council’s current approach of rejecting acceptable, sustainable development that would bring it nearer to meeting its OAN is not consistent with its duty to be consistent with national planning policy.</p> <p>Therefore, we consider that this Site Allocation DPD is not sound as it is neither positively prepared, nor consistent with national policy as required by the National Planning Policy Framework.</p>	To achieve soundness, the Council needs to review those sites that it has previously decided not to allocate and carry out a further sifting exercise to allocate those which are now acceptable, sustainable and deliverable as a result of the lessening of the infrastructure constraints, including the Oving Park site. This would demonstrate that the DPD has been positively prepared by showing that the Council has sought to meet objectively assessed development and infrastructure requirements.	Yes, I wish to speak to the Inspector at the hearing sessions	Having appeared at the hearing on the local plan, and having made representations on our site with no positive response from the Council, we would value the opportunity to make our case directly to the Inspector. This would also give us the opportunity to put our case to the Council through the Inspector, and answer any questions directly in the examination process.
Consultation ID Number SAPS27 (No attachments)													
Policy SA1				Mr	Minerva	Berkeley Strategic Group	Yes	No	Effective	Chichester council has an identified a 5 year housing requirement of 3,023 new homes (605 per annum) with proposed allocations making up a total identified housing supply of 3,362 dwellings. The council has a projected housing supply of 5.8 years, which includes the delivery of housing at Tangmere SDL (1,000 dwellings) and at West Of Chichester (1,250 dwellings), both of which are strategic locations. The given timing of completion for these projects is	To provide more flexibility and security in the land supply throughout the plan period, additional small scale allocations are required. The housing supply is reliant on large strategic sites such as the Tangmere SDL (TG086) and the West of Chichester SDL	No, I wish to communicate through written representations	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>viewed as being optimistic, and subsequently makes the nature of the 5-year housing supply very fragile. This is problematic for the council and concerning as it shows a heavy reliance on these large schemes being delivered efficiently and on time. Subsequently this has a significant knock down effect on the 5 year housing supply, making it fragile. Therefore because of this trajectory, the council should consider the allocation of additional smaller sites to ease the heavy reliance on the larger developments and lower the risk of under delivering due to the lead-in time for the development of these larger schemes.</p> <p>The robustness of the 5-year housing supply would be improved through the allocation of smaller sites which are capable of delivery in the early part of the plan period. The plan as it has been drafted is ineffective and unsound as it risks failure to deliver an adequate supply of housing throughout the plan period.</p>	<p>(ZV244). The considerable time frame that comes with the delivery of developments such as these puts added pressure on the council to meet their housing requirements. The allocation of smaller and more easily deliverable sites deemed 'safer option' would reduce reliance on the delivery of the strategic sites and provide more flexibility in the 5-year housing supply.</p> <p>It is suggested that:</p> <p>Lawrence Farm (9.1 acres) identified as a site with "potential for future development in the SHLAA (Ref:CC08209A) should be considered for allocation. The size of the site would make it suitable location for early development either as a standalone site or as part of a wider allocation, easing pressure on the delivery of the strategic sites.</p> <p>Lawrence Farm is a 9.1 acre site controlled by Berkeley Strategic and available for development. Located South-West of the Chichester main settlement and just off the A27 Chichester by-pass, the site is ideally situated and appropriate for development. The 2014 SHLAA document produced by the council supported this view that the site is appropriate by stating that the land has "potential to be developed at a future date", however the site is still yet to be allocated. Lawrence farm is particularly capable of delivery early within the plan period. It should be allocated in order to reduce reliance on larger sites and to provide more flexibility in the land supply. If the allocation of additional sites is not considered appropriate then an early review of the plan is necessary. The slow delivery of the larger allocations risks the maintenance of the Chichester 5-year housing supply.</p>		
Consultation ID Number SAPS29 (No attachments)													
Policy SA1				Mr	Jackson	MJ Gleeson Strategic Land	Yes	No	Positively prepared	This DPD should aim to provide more flexibility and security in the land supply throughout the plan period, additional small scale allocations, including those with existing Neighbourhood Plan Areas are required. Constraining the opportunities for deliverable sites is not NPPF compliant. The housing supply is reliant on large strategic sites such as the Tangmere SDL and the West of Chichester SDL. The time frame that comes with the delivery of developments such as these puts added pressure on the council to	Allocation of sites around the District, including opportunities in Neighbourhood Plan areas that offer opportunity to deliver the strategic aims of the Council outside the current Neighbourhood Plan framework. This approach would help deliver a level of housing beyond the constrained OAN	Yes, I wish to speak to the Inspector at the hearing sessions	To assist the Inspector in considering the options that are available for a greater level of sustainable housing growth

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>meet their housing requirements.</p> <p>The allocation of smaller and more easily deliverable sites reduces reliance on the delivery of the strategic sites and provide more flexibility in the 5-year housing supply.</p> <p>The current version of the Site Allocation DPD treats the housing target in the Local Plan as an upper limit. It fails to take the opportunity to plan to meet a larger proportion of the District's objectively assessed housing need (OAN). The plan is not consistent with national policy reason for the Council seeking to preclude sustainable development which would provide housing that would take supply over the minimum to meet the current constrained OAN figure.</p> <p>This Site Allocation DPD should consider a broader range of sites so that housing can be delivered as quickly as possible to meet the urgent housing need (including affordable housing) in Chichester.</p> <p>The Council's current approach of rejecting acceptable, sustainable development that would bring it nearer to meeting its OAN is not consistent with its duty to be consistent with national planning policy.</p> <p>The Site Allocation DPD is not sound as it is neither positively prepared, nor consistent with national policy as required by the National Planning Policy Framework. To achieve soundness, the Council needs to review those sites that it has previously decided not to allocate including those in Neighbourhood Plan Areas and carry out a further sifting exercise to allocate those which are now acceptable, sustainable and deliverable. This should include sites such as Land West of Clay Lane, Fishbourne (SHLAA ref FB08275) which is available for immediate delivery and will provide access to land for community benefits such as allotments as referred to in the Neighbourhood Plan.</p>	number in a sustainable manner.		in the District in line with National Policy.
Consultation ID Number SAPS30 (Please refer to additional attachments – Electronic only)													
Policy SA1	Mr	Neame	Neame Sutton Limited			Crayfern Homes Limited	Yes	No	Positively prepared	<p>The Council identifies the policy context against which the Allocations Plan is being prepared and cites the Local Plan as setting out the requirements for the District and how these will be met. These paragraphs are however misleading because they fail to acknowledge the fact that the Local Plan openly under provides in terms of housing when assessed against the OAN set out in the SHMA from 2014. As set out above the consequence of the approach being taken by the Council in the adopted Local Plan is two-fold. Firstly the Council is required to undertake an early review of the plan within 5 years of the adoption date in July 2015 i.e. to have a new Local Plan in place by July 2020. Secondly all of the housing requirement figures in the Local Plan are expressed as minimums.</p> <p>Acknowledging these points in the Allocations Plan is of vital importance because it sets the scene for the production of the document and in particular the approach to be taken in the allocation of sites.</p> <p>These paragraphs should therefore be amended to reflect the</p>	<p>New Housing Allocation – Land West of Fredrick Road, Chichester – Site Reference: CC08260:</p> <p>As set out above there is an urgent need for the allocation of further land on sites around Chichester to make up the shortfall in housing required to meet the minimum housing requirement set out in the Local Plan.</p> <p>Neame Sutton has already put Land West of Fredrick Road, Chichester forward for the Council's consideration on behalf of Crayfern Homes' predecessors (Bellway Homes (Wessex) Limited).</p> <p>The site (Location Plan attached at Annex 3) has been considered by the</p>	Yes, I wish to speak to the Inspector at the hearing sessions	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4. Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										position set out in the Local Plan.	<p>Council as part of its site options analysis in the lead up to the publication of the Allocations Plan.</p> <p>Appendix 1 of the Allocations Plan confirms that the only reason the site was not allocated is because of the fact that the Council preference is towards brownfield sites within Chichester city. In other words there is no other reason or technical constraint that would affect the allocation of the site.</p> <p>Furthermore the SA confirms within its site options scoring matrix that the site scores as well as Option 1 (land at Tesco) and better than Option 5 (117 The Hornet) both of which are locations that have been proposed for allocation by the Council. The site is therefore regarded by the Council as being equally sustainable if not more so than some of existing proposed allocations.</p> <p>The only drawback identified by the Council in the SA at Section 2.2.3 is the proximity of the railway in terms of noise.</p> <p>The site has been the subject of a detailed planning application during which the matter of road and rail noise was explored with the Council's Environmental Health team. It is clear from the discussions that took place that the matter of noise could be addressed through a combination of site planning/layout considerations and in built mitigation. This point has also been demonstrated by the fact that consent has been granted by the Council for the Tesco site (student accommodation), which the SA confirms has the same drawback as the promotion site. A copy of the Planning,</p> <p>Design and Access Statement for the detailed planning application on the site is attached at Annex 4.</p> <p>In the context of a need for further housing land allocations the Council's own evidence based confirms that there is no reason not to consider the allocation of Land West of Fredrick</p>		

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
											Road, Chichester favourably. The site should therefore be allocated for housing with an indicative capacity of 40 dwellings to help the Council meet its minimum housing requirement set out in the adopted Local Plan.		
Consultation ID Number SAPS33 (Please refer to additional attachments – Electronic only)													
Policy SA1	Mr	Neame	Neame Sutton Limited	Mr	Harman	Southcott Homes Limited	Yes	No	Positively prepared Effective	<p>Southcott Homes Limited (“Southcott Homes”) raises concern regarding the approach the Council has taken in excluding those Parishes where a Neighbourhood Plan is in progress but not yet made from its allocation of housing sites. In particular relation to Westbourne Parish the Neighbourhood Plan has only just gone through its pre-submission consultation and is therefore still the subject of unresolved objections. As a consequence the Council cannot be certain that the proposed allocations in the Neighbourhood Plan will be carried through or indeed that the Plan will be made. It is not therefore reasonable for the Council to rely on the Neighbourhood Plan to deal with the settlement specific allocation (A minimum of 25 dwellings) as set out in the Local Plan Part 1.</p> <p>Southcott Homes therefore considers that the Allocations Plan should make provision for specific allocations of land in line with the emerging Neighbourhood Plan to ensure that in the event the Neighbourhood Plan fails that there isn't a policy vacuum whereby neither Plan deals with the settlement specific allocation.</p> <p>As confirmed in Southcott's representations at the earlier stages of this Plan (copy attached) land north of Long Copse Lane, Westbourne offers an ideal opportunity to provide the total 25 dwelling allocation for the settlement. The first 16 dwellings already benefit from detailed planning consent that is currently in the early stages of being implemented by Southcott Homes. The remainder of the site can provide for a further 9 dwellings thereby completing the minimum housing requirement for the settlement.</p>	<p>The Allocations Plan should be amended to include provision for the Parish of Westbourne to ensure that a policy vacuum does not arise if the Neighbourhood Plan was to fail.</p> <p>Land north of Long Copse Lane, Westbourne presents an ideal opportunity to provide all 25 dwellings for the settlement with the first 16 dwellings already benefitting from detailed planning consent.</p>	Yes, I wish to speak to the Inspector at the hearing sessions	<p>To be able to explain in detail to the Inspector the approach set out in these representations regarding the need to allocate land as a safeguard against the event where the Neighbourhood Plan fails.</p> <p>To explain the merits of the Council allocating land north of Long Copse Lane, Westbourne to provide a total of 25 dwellings.</p>
Consultation ID Number SAPS38 (No attachments)													
Policy SA1	Mr.	Dyson	Bailey Dyson International Consultants Ltd.	Mr.	Oliphant-Hope		No	No	Positively prepared Justified Consistent with National Policy	<p>Acting on behalf of the owner of No. 41 Terminus Road, Chichester:-</p> <p>The Development Plan Document (DPD) does not identify enough deliverable purpose built student accommodation sites to satisfy proven demand.</p>	The DPD should be amended to permit a scheme at 41 Terminus Road for more ground floor employment use than currently exists on the site, above which purpose built student accommodation will be provided	No, I wish to communicate through written representations	
Consultation ID Number SAPS43 (Please refer to additional attachments – Electronic only)													
Policy SA1	Ms	Terry	Vail Williams LLP	Ms	Smith	CALA Homes South Homes Counties	Yes	No	Justified Consistent with National Policy	It is not adequately justified in that there has been no real assessment or comparison of the sites available for allocation and the sustainability assessment for sites is flawed. Additional details of the site comparisons have been requested from Chichester District Council with no response, and with no details on the Council's website, it must be assumed that this assessment has not been undertaken. The DPD is also considered to conflict with national planning policy in that it does not take full account of the neighbourhood planning process and undermines the principles	Delete proposed site and replace with land at Broadbride Farm, Delling Lane	Yes, I wish to speak to the Inspector at the hearing sessions	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										and direction of the Bosham Neighbourhood Plan. The conclusions within the detailed landscape assessment undertaken by fabrik demonstrate that the rejection of land at Broadbridge Farm as a potential allocation site for housing is premature, with the site at Highgrove resulting in more visual harm to the AONB and undermining its objectives, despite not being located within its boundaries. In light of these issues, the document cannot be said to be positively prepared or effective. It is argued that the current preferred site at Highgrove Farm is not an appropriate site for allocation and for the document to be 'sound' land at Broadbridge Farm should be reinstated as the preferred allocation in Bosham. This site is able to integrate up to 50 dwellings into the AONB in an appropriate manner, is more sustainable and accords with the principles and direction of the Bosham Neighbourhood Plan. Changes to Policy BO1 are therefore proposed:			
Consultation ID Number SAPS45 (Please refer to additional attachments – Electronic only)													
Policy SA1	Mr	Neame	Neame Sutton Limited			Seaward Properties Ltd	Yes	No	Positively prepared Justified Effective Consistent with National Policy	Seaward Properties land interest at Maddoxwood, Lavant comprises a previously developed site within the Chichester city area. The site is proposed for allocation in the submission draft Neighbourhood Plan for Lavant for 10 no. dwellings despite its location adjacent to Chichester city. In this respect the site comprises a suitable and sustainable location for accommodating residential development that is recognised by Lavant Parish as such in the emerging Neighbourhood Plan. The site should however be identified in the Allocations Plan in line with the Council's development strategy for the identification of brownfield sites that can and will make a helpful contribution to the minimum housing requirement for the city. In the alternative the site should at least be included within the defined settlement boundary for Chichester city as part of the Proposals Map amendments to be made given that the Council's own assessment of the site contained within Appendix 1 of the Site Allocation: Proposed Submission Development Plan Document 2014 – 2029 Methodology and Assessment (December 2016) confirms it would be treated as a windfall. Therefore both the Parish Council and District Council concur that the site is a suitable and sustainable location for accommodating residential development. A site location plan is attached to these representations for the Inspector's information	Section 5 of the Allocations Plan should be amended to either include the allocation of land at Maddoxwood for 10 no. dwellings or the settlement boundary for Chichester city should be amended to include the site so that it can come forward as a windfall as identified by the Council in its site assessment.	Yes, I wish to speak to the Inspector at the hearing sessions	To be able to explain to the Inspector why Seaward Properties wish to have this site included in the Allocations Plan in the context of the housing requirement for the city, which is expressed as a minimum.
Consultation ID Number SAPS47 (No attachments)													
Policy SA1				Ms	Palmer	Boyer Planning	Yes	No	Consistent with National Policy	Paragraph 182 of the NPPF explains that a Plan will be examined by an Inspector whose role it is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is 'sound' – namely that it is: <ul style="list-style-type: none"> Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, 	Land at Chantry Hall, Foxbury Lane, Westbourne This site is one of the three draft allocated sites within the emerging Westbourne Neighbourhood Plan. The site comprises 3.21ha of rough pasture located to the immediate east of Foxbury Lane. The site is currently	Yes, I wish to speak to the Inspector at the hearing sessions	It is necessary to be part of the hearing sessions to further discuss the content of the representations.

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</p> <ul style="list-style-type: none"> • Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; • Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and • Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. <p>Site Allocation Development Plan Document Strategy</p> <p>The overarching strategy of the Site Allocation Development Plan Document is to allocate sites within each Parish, unless the Parish has a Neighbourhood Plan at an advanced stage of preparation with paragraph 1.10 of the Plan stating that Parishes who have undertaken pre- submission consultation of their Neighbourhood Plan will not be included in this DPD.</p> <p>Following the pre-submission consultation on the Neighbourhood Plan, a Neighbourhood Plan is still subject to consultation run by the District Council, an Examination (either by written representations or a Hearing) and finally a referendum. While the pre-submission consultation does indicate the Neighbourhood Plan is at an advanced stage, it does not guarantee that the Neighbourhood Plan will be submitted, or that it will satisfy the basic conditions and be made.</p> <p>Should a Neighbourhood Plan fail to come forward or not be made during any of the final stages highlighted above, according to the consultation Site Allocation Development Plan Document, no sites would have been allocated within that Parish. This will either result in a shortfall of housing against the numbers in the Chichester Local Plan 2015, or allow speculative applications to come forward in those Parishes potentially against the wishes of the local residents.</p> <p>To prevent this situation from occurring, we submit that this Plan should incorporate those draft allocations within Pre-submission Neighbourhood Plans. The draft allocations have undergone scrutiny and reflect the intentions of the Neighbourhood Plan Groups. By incorporating those sites within this Plan, it ensures that sufficient housing numbers are allocated to meet the numbers in the Local Plan.</p>	<p>used for grazing but this is a temporary use and as such poses no constraint to the potential future development of the site.</p> <p>As part of the preparation of the Westbourne Neighbourhood Plan, the Neighbourhood Plan Group has thoroughly assessed the merits of the site and considers it suitable for development.</p> <p>The site abuts existing residential development to the west of the site along Foxbury Lane and Chantry Hall and represents a natural extension to the settlement.</p> <p>The emerging Westbourne Neighbourhood Plan, when discussing the allocation of this site, highlights the sustainable location of the site due to its close walking distance to the school and central village services. Indeed, the site is within 350m, 5 minutes' walk, of existing shops, services and community facilities.</p> <p>The site has been allocated for 6 dwellings. Boyer, on behalf of Taylor Wimpey, submitted representations to the Westbourne Neighbourhood Plan in their recent consultation period ending on 6th January 2017. Whilst we support the work of the Westbourne Neighbourhood Plan Team in preparing a Neighbourhood Plan, we submit that due to the size and location of the site, it has the potential to accommodate a higher number of dwellings.</p>		
Consultation ID Number SAPS55 (Please refer to additional attachments – Electronic only)													
Policy SA1	Mr	Knott	Barton Willmore	Mr	Payne	Martin Grant Homes	Yes	No	Positively prepared Consistent with National Policy	The adopted KPLP makes provision, within Policy 4, to deliver 7,388 new homes over the period 2012- 2029. This equates to an average housing delivery figure of approximately 435 dwellings per annum (dpa). The Local Plan was adopted despite not meeting the Council's OAHN as it was recognised by the Examination Inspector that delaying the adoption would (i) undermine the	We therefore recommend that the SADPD should take more positive steps to increase housing provision wherever possible. This could be achieved by introducing flexibility to bring forward additional (non-	Yes, I wish to speak to the Inspector at the hearing sessions	Martin Grant Homes is directly interested in the policies in the Proposed

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>positive momentum in the preparation of Neighbourhood Plans and (ii) delay the area's planned delivery of infrastructure priorities (A27 Highway Improvements) weakening the Council's ability to ensure development is sustainable (IR; para 55).</p> <p>In the scrutiny and assessment of housing delivery, the Council will be aware that the Examination Inspector concluded that the now adopted Local Plan's requirement figure fell "far short" of the full objectively assessed need of 505 dpa for the district (IR; para 49). Notwithstanding this, the Inspector concluded that the Plan could be adopted with a commitment to undertaking an early review within the first five years of the Plan period. This commitment is expressed in the supporting text to Local Plan Policy 4 (LP Para 7.9) and a review is therefore required by July 2020.</p> <p>Because the SADPD has been prepared in conformity to the KPLP and with no increase in housing provision it does not meet the OAHN. It therefore already fails the positively prepared test of soundness as set out within paragraph 182 of the NPPF. The key policies Local Plan must be reviewed by 2020 with a Plan that better meets OAHN.</p> <p>The Council's recently published 'Five Year Housing Land Supply Position Statement (November 2016) further states that the Council can presently demonstrate a 5.8 year housing supply for the period 2017-2022, when taking into account the housing delivery target set out within Local Plan Policy. This Position Statement, however, importantly does not recognise the need to meet the established OAHN for the District of 505pa.</p> <p>Additionally, with the Council already identifying a shortfall of 344 dwellings against the adopted housing delivery target from 2012-2017 (as published in the Councils 'Five Year Housing Land Supply Position Statement' November 2016), it is anticipated that the gap between housing delivery and OAHN is only expected to widen.</p> <p>The table below compares the Council's reported Position Statement based on the adopted KPLP requirement with the OAHN figure for the same period. This demonstrates that based upon the OAHN position, the Council can in actual fact only demonstrate a 4.5 year supply of housing for the period 2017-2022. The Council is therefore at risk of future challenge in relation to their five year housing supply based upon the provisions set out within paragraph 49 of the National Planning Policy Framework.</p>	<p>allocated) sites to boost supply or by increasing the amount of land allocated for housing in the SADPD above the housing target in the KPLP so that OAHN will be delivered.</p> <p>We therefore request the inclusion of a clear statement within the introduction to the DPD to clarify that the objective of the DPD is to deliver the remainder of housing set out in the Local Plan. We also suggest clarification within the support text to reiterate that the purpose of the SADPD is (i) <u>not</u> to re-assess the housing requirement established through the adopted KPLP and (ii) not to meet the full OAHN identified through the latest evidence base.</p> <p>The adopted Local Plan document establishes the overall housing requirement for the District which includes an "indicative" allocation of 50 dwellings to Birdham within Local Plan Policy 5. The supporting text for the policy confirms at paragraph 7.28 that 'some flexibility' will be allowed for minor amendments to housing numbers for individual parishes. Notwithstanding this, a Neighbourhood Plan for Birdham has been adopted which provides for development to meet this quantum of housing development and no more which is an error given the issues raised above. Consequently, the Site Allocation DPD does not propose any additional development sites at Birdham.</p>		<p>Submission Site Allocations Document as it has a direct impact upon the level of non allocated housing growth in the District over a period in which the Local Plan is required to complete an early review to better meet OAHN. We consider it necessary to participate in the EiP to assist the Inspector in his / her consideration of the soundness of the Site Allocations DPD and its proposals.</p>
Consultation ID Number SAPS65 (No attachments)													
Policy SA1	Mr	Morris			Hopes	Goodwood Estate Company Limited		No	Positively prepared Justified	<p>This representation on the Site Allocation Proposed Submission Document is submitted on behalf of the Goodwood Estate (Company) Ltd. The Estate has an established association with Chichester and the surrounding area, being a long time steward of the countryside which surrounds the city and which contributes positively to its unique character and underpins its economic base. The Estate is a significant contributor to that economic base and a major commercial driver, a reputation built upon this sound</p>	<p>A final comment considers the lack of new sites included in the document. Additional land is clearly required at Boxgrove, but more generally across the district otherwise the DPD can be considered out of date from the outset. We trust that this information is helpful and we would welcome the opportunity</p>	<p>Yes, I wish to speak to the Inspector at the hearing sessions</p>	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>countryside stewardship. Consequently it has a close interest in the fortunes of the district both at an altruistic and a commercial level and in the manner in which the district is evolving in terms of the form, direction and location of new development.</p> <p>Goodwood's role as a major economic driver in West Sussex is predicated on the successful balancing of the environment and heritage conservation with economic growth and innovation. A sensitive balance of environment, social assets and economics is key to everything that Goodwood stands for and does in terms of its business interests. The Estate is a significant user of and contributor to local goods and services, and a major local economic multiplier.</p> <p>However, the Estate lies within the wide rural hinterland of Chichester and is subject to external influences over which is has little or no control; influences that can enhance or damage the Estate's business and consequently its contribution to the community. The Estate is therefore continually proactive in promoting its requirements to ensure that any development proposed within Chichester's sensitive hinterland will not harm its interests and objectives, nor have any adverse impacts on the local businesses and community interests that rely upon its continued work.</p> <p>The Estate is very concerned, as expressed through representations to the Core Local Plan Examination and to on-going development submissions, that development decisions, particularly those relating to the location of new housing, may be made for expediency rather than sound planning reasons i.e. to meet a short-term mathematical housing target rather than be of benefit to the long term interests of the city and community through a comprehensive and joined up strategy of development growth.</p> <p>As steward of a large landholding on the edge of Chichester for over 300 years, the Estate has over time created a unique and very special landscape that is synonymous with Chichester City and the South Downs area, which led initially to AONB and latterly to National Park status. These designations, together with the special protection offered to Chichester Harbour and its environs, make the district distinctive.</p> <p>This landscape is not simply an attractive area in which to live and work but it contributes towards much of the economic success of the area. The area is a major focus for the horticulture industry, benefitting from the large tracts of relatively flat and fertile land to the south and east of the city. The area also attracts visitors in large numbers to enjoy its environmental and historic heritage, supporting many businesses that offer goods and services to that business sector. Goodwood is a principal business in this role and is a focus for a significant number of visitors each year. This role is supported by a large number of other local commercial interests and these then support other major local employers such as Rolls-Royce Motor Cars. Such activity and businesses are therefore reliant on the perpetuation of the landscape's context adjacent to the cathedral city, but are threatened by inappropriate outward expansion of the urban area. This expansion, if not managed correctly, will erode the very factors that support it.</p> <p>While the District Council must make appropriate provision for future growth needs, and this should be carefully managed to ensure that the elements which make the area distinctive and successful are not harmed. Sustainable growth is all about planning balance and there is a real and significant risk that without a sound and robust policy base, the economics of the region could be irreversibly harmed through insensitive development.</p>	to discuss our ideas with the planning authority in order to deliver a sound document.		

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>At a time of significant housing pressure, where the supply of unit numbers appears paramount, it is vital that this demand is met in the most suitable locations and not unduly constrained by administrative areas. Housing supply, while undoubtedly an important issue, should not always be given primacy over other important material considerations. If planning policy is focussed solely on housing provision over all other matters there is a real danger that an unbalanced planning policy will give rise to a less-sustainable future.</p> <p>In general, the Estate supports the contents of the Submission Document, which seeks to make better use of development opportunities that offer greater protection of the important factors which support the Chichester area economically. It has been a long time supporter of a strategic housing approach that places greater emphasis on the better use of previously developed sites, increased densities and the use of land within urban areas that does not provide any other beneficial community or aesthetic use. Such development is inherently more sustainable than the simple outward expansion of urban areas, which may be more economically attractive to develop, but which increases the dependence on the private car.</p> <p>While in general support, the Estate however considers the Submission Document unsound in a number of areas because it has not been positively prepared (para 4.2) or adequately justified (policy CC4).</p> <p>Within the document, the Estate supports the emphasis on bringing forward brownfield sites where possible – this is appropriate and consistent with Government policy - followed by the identification of appropriate, but not all, edge of city sites. Incursion into the surrounding countryside and the uncontrolled outward spread of the city should be resisted as much as possible in order to retain the quality of the local environment, encourage sustainable travel patterns and protect the setting of Chichester. While the plan goes some way to meeting that goal, it fails to make proper provision for the protection of those areas that are crucial to the long term well-being and setting of the city. It is as important to Chichester to identify where new housing is undesirable as it is to identify sites where it is suitable. Without constraints imposed on important countryside areas, the city will have little defence against developers seeking to exploit any weakness in housing numbers at a significant cost to the community.</p> <p>The plan's approach of seeking appropriate development limits through the requirement that <i>"Development shall...provide appropriate landscaping and screening to minimise the impact of development on the setting of the city and the surrounding area"</i> is welcomed and supported in that it acknowledges the vital need to protect the city's setting.</p> <p>However it does not specify a standard for or approach to the boundary treatment and developers will seek to minimise this requirement, as demonstrated at Madgwick Lane, Westhampnett. In addition, it does not provide any guidance on the purpose for which the boundary is required and to which it should respond. Identification of protected areas would provide guidance on the level of boundary treatment required to be provided by adjacent development. The Estate is concerned that sites are coming forward in isolation and without a full assessment of their consequences rather than in any coordinated manner. Often this is simply because the land is being made available, it has few applied constraints, lies adjacent to the city and will</p>			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>contribute to housing numbers. Consequently any policy such as those included in this Submission Document, which seeks to change that approach is to be welcomed and supported.</p> <p>At Shopwyke for example (Policy CC4) the Estate is concerned that the additional housing allocated at the site will result in increased pressure on this junction of the A27, which forms an important gateway to Goodwood, the South Downs and homes and businesses in that area of the city. However, no junction improvement is sought and development, should it take place, will constrain opportunities to improve that junction in the longer term. The Sustainability Appraisal that considers this site (see the "wider Chichester" table) indicates a neutral effect on travel, however this is not suitably evidenced and it is not clear how the increased housing numbers from the site will be accommodated within the local highway network, how the development will affect the junction directly and indirectly, or whether this has been factored into the consideration of the A27 Chichester Bypass improvement scheme. Although the grant of planning permission must be acknowledged, the Estate questions whether this allocation is adequately considered and justified.</p> <p>The Estate considers that the document is also inconsistent in the way that it presents housing numbers. Page 7 of the document states: <i>"Where planning applications have been granted permission for 6+ units these are taken off the parish housing number"</i> . However at Boxgrove (paragraph 4.2) a planning permission has been granted at appeal under application BX/14/03827/OUT for 25 dwellings (Land east of Abbots Close), yet the site is included as an allocation. This is clearly an inconsistency and any housing numbers from the site should not be identified in this document; instead a suitable alternative site should be identified to accommodate the shortfall of dwellings arising from the omission. Examples such as Shopwyke and Boxgrove suggest to the Estate that the Submission Document is flawed and consequently is not positively prepared, as adequate housing land has not been allocated.</p> <p>In addition, the numbers for Chichester are confusing and in Table 1.1 the numbers do not seem to tally with those listed in the text. This is less of an issue than at Boxgrove, as it is clear that the housing requirements are exceeded.</p> <p>Many parishes are preparing their own Neighbourhood Plans and a number have made significant progress, thereby excluding themselves from consideration in this document.</p> <p>Neighbourhood Plans should not only address their local issues but also take into account wider community interests and needs of the district as a whole, and identify the part the parish plays in that wider goal. Estate Plans for example, encouraged within the South Downs National Park, (which occupies a significant proportion of Chichester District and which contributes to its economic wealth), are encouraged in order to set out the strategic future of estate lands. Some areas offer opportunities for strategic planning to safeguard land or assets and identify strategically important developments, whereas at a local level they can assist in identifying smaller parcels of vacant land that could be used for commercial or housing development, or other community benefit. These initiatives should be encouraged through this document, bringing forward sites in more remote areas as part of a strategic approach. Small scale windfall development on rural plots in or adjoining smaller settlements can provide important facilities or services to the local community, or much needed rural housing in</p>			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										acceptable locations. Past planning strategies that have imposed overly restrictive rural housing policies have given rise to a shortage of suitably priced homes for those who need to live and work in the countryside. Equally they have not made appropriate provision to meet the needs of those who choose to live in the countryside, and who, in doing so price out those that truly need to live there. Rural planning policies should provide a balance in rural housing supply, and the development of estate land, where there is potential to add an element of control through long term ownership rather than speculation, is one way to achieve that. The Submission Document fails to explore this potential and is not therefore a soundly balanced planning approach.			
Consultation ID Number SAPS1 (No attachments)													
Policy BO1					Parish Clerk	Bosham Parish Council	Yes	Yes		<p><i>Site choice:</i></p> <ul style="list-style-type: none"> After extensive consultation with the parish, via the neighbourhood plan process, it is clear that the parish favoured the development of 50 houses on multiple, smaller sites. Of all the sites considered Highgrove Farm was the least preferred. CDC has considered available sites but it is difficult to understand the criteria for rejection. Some sites, north of the A259 have been dismissed for reasons that also apply to Highgrove Farm e.g. flooding risk, highways, remoteness from the settlement etc. The justification for assessment appears inconsistent and inadequate, with no consultation with the residents on these different options. Highgrove is a greenfield site while there are brownfield sites closer to the settlement, village centre and its services and thus better for integration. It should be noted that many of the sites were rejected due to natural, physical constraints such as drainage and size, while other suitable plots south of the A259 were dismissed due to the man-made constraint of the AONB. <p><i>Hospice Site:</i></p> <p>In view of the imminent Hospice development on Walton Lane, regard must be made to;</p> <ul style="list-style-type: none"> Drainage, sewage and flooding conflicts; potential Highway and pedestrian traffic safety; and Safer Routes to School. <p>The A259 is already a difficult road to negotiate and a pedestrian crossing will be vital to the safety of our residents. Likewise, the Parish has prioritised the need for a public footpath in Walton Road for many years and the extra constraint of the Hospice traffic will only exacerbate the need along with proactive parking enforcement measures.</p> <p><i>General:</i></p> <p>Any development in Bosham Parish must adhere to all policies</p>		No, I wish to communicate through written representations	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										contained in the Bosham Village Neighbourhood Plan (BVNP) and the Village Design Statement (VDS). This DPD is a CDC document and Bosham do not want any more housing than their 50 allocation.			
Consultation ID Number SAPS2 (Please refer to additional attachments – Electronic only)													
Policy BO1				Mr	Rees	Domusea	Yes	No	Positively prepared	<p>Whilst the land at Policy BO1 is outside the AONB it is an exposed and prominent site which we consider will have detrimental impacts on the landscape character of the area including views out of the South Downs National Park to the north, in from the AONB to the south, and along the A259. As there are no long-term boundaries to the east there is also the potential for further coalescence with Fishbourne. We consider this visual harm and coalescence should be balanced against the ability for development to be dispersed throughout the village which is also the local preference as expressed in the Bosham Village Neighbourhood Plan (BVNP).</p> <p>The Policy BO1 site also falls on Grade 1 agricultural land, and is a Principal Employment Site as defined by the adopted BVNP. On this basis development on the Highgrove Farm site would seem to be contrary to both Policy 3(a) and Policy 6(vii) of the BVNP.</p> <p>The Policy BO1 site was the least preferred site in BVNP consultations. The local preference is to distribute development in smaller packages throughout the village. There are several preferred sites which can accommodate the housing allocation; however, the District has ignored local representations and dismissed many sustainable and viable sites providing inconsistent and inadequate justifications.</p>	<p>As the Policy BO1 site at Highgrove Farm is not supported locally, and would appear to be in direct conflict with the BVNP we feel it should be removed from the DPD and replaced with land adjacent to Willowfield Farm. The land adjacent to Willowfield Farm abuts the settlement policy area of Bosham to the north of the village. It is a highly sustainable location with direct access to the railway station. The site also falls only 100m from local amenity and shopping facilities.</p> <p>The land adjacent to Willowfield Farm falls outside the AONB on low grade agricultural land. The site is compliant with the BVNP and is set back from the road limiting any potential visual landscape impact.</p> <p>The site has no development constraints and can be delivered for housing over the next 2-3 year period. The site can contribute a minimum of 30 dwellings with the balance of the required housing found on other sites elsewhere at Bosham - although these representations do not comment on the merits of those sites or where they might be.</p>	No, I wish to communicate through written representations	
Consultation ID Number SAPS4 (No attachments)													
Policy BO1				Mr	Williams	Natural England	Yes	Yes		Housing allocation would have to satisfy the interim Solent Recreation Mitigation Partnership strategy for the Solent.		No, I wish to communicate through written representations	
Consultation ID Number SAPS22 (No attachments)													
Policy BO1				Ms	Mayall	Southern Water	Yes	No	Positively prepared Effective Consistent with National Policy	<p>Policy BO1 allocates 50 dwellings on the site known as ' Land at Highgrove Farm'. In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG), we have undertaken an assessment of our infrastructure and its ability to meet the forecast demand for the proposed development. That assessment reveals that additional local sewerage infrastructure would be required to accommodate the proposed development (involving making a connection to the local sewerage network at the nearest point of adequate capacity).</p> <p>Southern Water has limited powers to prevent connections to the</p>	<p>Southern Water is unable to support Policy BO1 as sound because it is not in line with the NPPF and National Planning Practice Guidance, as outlined above. Accordingly, to ensure a sustainable development by facilitating the provision of the necessary infrastructure in parallel with the proposed housing, we propose that the following criterion is added to Policy BO1:</p>	No, I wish to communicate through written representations	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>sewerage network, even when capacity is insufficient. Accordingly, planning policies and planning conditions play an important role in securing the necessary local sewerage infrastructure in parallel with development. The principle relating to the recognition of sewerage requirements in site specific planning policies was tested at the examination of the Ashford Urban Sites and Infrastructure DPD. The Inspector (Patrick T. Whitehead DipTP (Nott) MRTPI) concluded in his report (paragraph 84): ' <i>The NPPF (para.157) makes it clear that local plans should plan positively for the infrastructure required in the area. In the context provided by this new guidance I agree with SW that the requirement to upgrade the existing sewerage infrastructure where necessary should be included within policy wording.</i></p> <p>Our proposed site specific criteria would also be consistent with the approach taken for policies CC1, CC2 and CC3 of this version of the DPD and in line with Policy 9 in the Chichester Local Plan. Without a specific criterion, the site parallel with the development. This lack of policy provision would not be consistent with one of the core planning principles of the NPPF that requires Local Plans to provide a practical framework within which decisions on planning applications can be made with 'a high degree of predictability and efficiency'. Paragraph 21 of the NPPF states that planning policies should recognise and seek to address any lack of infrastructure. Also the NPPG (paragraph 34-001-20140306) specifies that ' <i>Adequate water and wastewater infrastructure is needed to support sustainable development.</i></p> <p>Furthermore, it is important to give early warning to prospective developers regarding the need to connect off-site, as it will add to the cost of development. If the requisite infrastructure is not delivered, the sewers would become overloaded, leading to pollution of the environment. This situation would be contrary to paragraph 109 of the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution.</p>	<ul style="list-style-type: none"> provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider. 		
Consultation ID Number SAPS24 (No attachments)													
Policy BO1				Mr	Myers		No	No	Positively prepared Effective	Bosham neighbourhood plan no longer has any sites designated, however, planning application BO/16/03984/FUL is for 50 dwellings at Highgrove Farm. As there are nearly 100 objections and from the Parish Council, surely the village should have been consulted before coming forward with Policy BO1?	Reduce the number by 21 (as approved for Donnington site after the Hospine moves to Boashm). Consider 2 smaller sites (a) part of field immediately to west of broadbridge (b) Nursey site(s) North of Bosham Railway Station.	No, I wish to communicate through written representations	
Consultation ID Number SAPS36 (Please refer to additional attachments – Electronic only)													
Policy BO1	Mr	White	Genesis Town Planning	Mrs	Scott		Yes	No	Justified Consistent with National Policy	For the SADPD to be justified it has to identify sites that are most appropriate when considered against the available alternatives. We believe the preferred site at Highgrove Farm in policy BO1 is not the most appropriate because it has been selected as it delivers all the housing on one site. However, nowhere in the site selection process in the Site Assessment Methodology or the Sustainability says a concentrated development strategy is preferable to a dispersed strategy. A concentrated strategy flies in the face of local preference as expressed in the Bosham Neighbourhood Plan which was for a dispersed strategy all along.	To ensure the SADPD meets the tests of being 'justified' and delivers sustainable development we therefore request that land at Crede Farm comprising 0.76ha with a capacity of 23 dwellings is included in the SADPD as a housing allocation for Bosham Parish. The existing Highgrove Site should be deleted. The balance of the required housing (27 dwellings) can be found on other sites elsewhere at	Yes, I wish to speak to the Inspector at the hearing sessions	The SADPD as drafted does not meet the tests of soundness and we would welcome the opportunity to participate in the Examination debate to explain this to

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>Highgrove is outside the AONB but again that is not a reason for positively selecting it in preference to sites within the AONB as neither the Council's Key Policies local plan policy 43 or national policy in the NPPF para 115 raise an absolute embargo against development in the AONB. A mix of smaller sites could accommodate the 50 dwellings including land at Crede Farm which has a capacity of around 23 dwellings. In our view this is not major development and would not conflict with paragraph 116 of the NPPF.</p> <p>Highgrove will have significant landscape impact on the setting of the AONB and the setting of the South Downs National park to the north; it has no defensible boundaries to prevent further eastward expansion and the potential for cumulative impact on the landscape in the future is another concern.</p> <p>The scoring matrix in the SA is flawed in any event and has resulted in the benefits of Highgrove being over played and the benefits of others like Crede Farm being under played.</p> <p>Crede Farm would result in a sustainable form of development and would comply with the consistent with national policy test of soundness.</p>	Bosham although these representations do not comment on the merits of those sites or where they might be.		<p>the Inspector. We are familiar with the history to site selection at Bosham having participated in the Neighbourhood Plan preparation process.</p> <p>There are also shortcomings in the evidence base for the SADPD in that the SA has flaws in the scoring methodology. We would like to draw these flaws to the attention of the inspector as well.</p>
Consultation ID Number SAPS48 (No attachments)													
Policy BO1	Mr	Beck	Luken Beck MDP Limited			BDW Southampton	Yes	Yes		<p>On behalf of Barratt David Wilson Homes (BDW) we are instructed to make comments by way of support of the Development Plan Document.</p> <p>It is considered the document is both legally compliant and sound in all respects.</p> <p>Luken Beck made representations to an Inspector, appointed by the Secretary of State, in respect of the Chichester District Local Plan 1999 to allocate land for residential development at Highgrove Farm, Bosham in order that the Council could meet its then Objectively Assessed Needs [OAN] (off policy). Detailed technical reports were submitted to the Inspector including a Transport Assessment, a Landscape Visual Impact Assessment and a Flood Risk / Drainage strategy. Luken Beck supported the Council's then assessment contained in the 2013 SHLAA (Strategic Housing Land Availability Assessment) of the site to support circa 265 dwellings as a strategic housing site; LPA Ref: BB08195. As a result of the Local Plan Inquiry the on-policy OAN was reduced for the District due to certain infrastructure constraints but the settlement of Bosham was given to deliver 50 dwellings (Local Plan Policy 5). This policy indicated that suitable housing sites would come forward in Neighbourhood Plans or in a Site Allocations Document [DPD].</p> <p>The Bosham Neighbourhood plan process culminated in an Examiner's Report dated January 2016 and in respect of Policy 2 – Housing Allocations – the Inspector concluded the recommendation of "the deletion of Policy 2". [Reference paragraph 66] Within the Examiner's report it was stated at paragraph 51 that following the Revised Comparison Report in</p>		Yes, I wish to speak to the Inspector at the hearing sessions	Only if the Inspector would find it helpful to attend given the support for Policy BO1 together with other supporting information.

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>which the results of the sensitivity and value profiling of competing sites were noted, of the 5 categories, the lowest ranked site was Highgrove Farm, it having the least impact on the landscape.</p> <p>Chichester DC meanwhile had already commenced the preparation of a Site Allocations DPD but in June 2016, following a Review of the emerging DPD, included the site at Highgrove Farm in accordance with the requirement set out in the adopted Local Plan; this was in response to the Neighbourhood Plan Examiners Report to delete Policy 2.</p> <p>The November 2016 CDC produced a 'Sustainability Appraisal of the Further Consultation Site Allocation: Preferred Approach DPD' in which a variety of sites in Bosham were analysed. The Table attached within the document considered several sites for housing development but Highgrove farm was considered the most appropriate. These results confirmed the work previously undertaken by BDW but are particularly important because the process demonstrates the objective means by which the Chichester District Council has looked at the options. It also illustrates the robustness of the exercise which shows the process was sound.</p> <p>A further report 'Habitat Regulation Assessment' was updated in May 2016 by AECOM for CDC to consider sites suitable for housing development in Bosham and once again there was nothing identified that might prove an impediment to development at Highgrove Farm.</p> <p>During the summer of 2016 CDC published its 'Further Consultation Site Allocation: Preferred Approach DPD' upon which public consultation was sought. The results of the exercise were reported to Cabinet and to Full Council and in November 2016 the 'Site Allocation: Proposed Submission DPD 2014-2029 - Methodology and Assessment' was published along with the Final 'Site Allocation: Proposed Submission DPD 2014-2029' Again this process demonstrates the soundness of the allocation as well as being legally compliant. The December 2016 CDC document entitled 'CDC Statement of Consultation - Site Allocation: Proposed Submission DPD (incorporating the Duty to Cooperate Statement)' testifies.</p> <p>In conclusion, our analysis shows the DPD has been prepared in accordance with the legal requirements of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) and the Town and Country Planning (Local Planning) (England) Regulations 2012. The Site Allocation DPD complies with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Sustainability Appraisal has been updated several times and reflects previous historical work, albeit updated. From our review of the NPPF, the DPD has had cognizance of policies contained therein particularly with reference to Policy BO1; this includes the extension to the settlement boundary.</p> <p>In terms of soundness, the plan has been positively prepared, is</p>			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										justified, effective and consistent with national policy. On the basis of the above we commend the document to the Secretary of State in connection with Bosham and Policy BO1.			
Consultation ID Number SAPS5 (No attachments)													
Policy BX1				Mr	Williams	Natural England	Yes	Yes		No comment.		No, I wish to communicate through written representations	
Consultation ID Number SAPS21 (Please refer to additional attachments – Electronic only)													
Policy BX1				Mr	Thomas	Bargate Homes	Yes	Yes		Bargate Homes fully supports the allocation BX1 which already has the benefit of an outline consent under reference BX/14/03827/OUT for 22 dwellings. A Reserved Matters Application is currently being prepared and will be submitted shortly. This will be in full compliance with the outline permission and the site allocation criteria, which we have no objection to. We can confirm the site is available and deliverable. Attached is a letter from Southern Water confirming that there is sufficient foul sewage capacity available to accommodate the proposed development/allocation.	Due to the scale of the plan used it is not entirely clear if the 'green' boundary of the allocation correlates with the red line plan of the approved outline planning application. To ensure consistency, we believe the northern boundary of the proposed allocation ought to be extended slightly further north to be adjacent to the boundary of No.49 Priors Acre. Please can Officers check the approved red line under application BX/14/03827/OUT.	No, I wish to communicate through written representations	
Consultation ID Number SAPS58 (No attachments)													
Policy BX1				Mrs	West	West Sussex County Council	Yes	No	Effective	Following the County Council's comments on the Preferred Approach DPD, the Draft West Sussex Joint Minerals Local Plan has progressed and the Proposed Submission Draft (January, 2017) has recently been published for a period of representation. The Proposed Submission Draft Plan includes policies on mineral safeguarding (Policies M9 and M10) and is accompanied by a separate Minerals Planning Guidance, which provides further information on how the policies should be implemented. It is recommended that some minor changes are made to the text to make the proposed housing and employment sites policies more 'effective' to ensure that minerals and waste issues are properly considered when development proposals come forward.	Where reference is made to the presence of minerals, it is suggested that the wording is amended to the following: 'Development shall <i>consider the presence of minerals and the impact of sterilisation, as required by National Policy, and set out in the relevant minerals safeguarding policy. The Minerals Planning Authority should be consulted on development proposals.</i> '	No, I wish to communicate through written representations	
Consultation ID Number SAPS31 (Please refer to additional attachments – Electronic only)													
5	Mr	Neame	Neame Sutton Limited			Crayfern Homes Limited	Yes	No	Positively prepared Effective Consistent with National Policy	Crayfern raises strong objection to the approach taken by the Council in the allocation of sites around Chichester City for a number of reasons, which are set out below: <u>Discrepancies in Housing Numbers</u> The Allocations Plan contains a number of discrepancies or inaccuracies in the housing numbers quoted that has led to confusion over the actual amount of housing the Council contends will be provided. Bartholomews, Bognor Road is identified in Table 1.1 as having a capacity of 57 dwellings. This figure is reflected in draft Policy CC2		Yes, I wish to speak to the Inspector at the hearing sessions	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>but table 5.1 then suggest the capacity is 62 dwellings.</p> <p>The suggested capacity of the land adjacent to Tesco Petrol Filling Station (Policy CC1) is identified as being equivalent to 91 dwellings yet the supporting text at Paragraph 5.9 states that a multiplier of 1 in 4 is to be applied to the 130 student study rooms in the allocation, which would in turn result in a dwelling equivalent of 32 dwellings.</p> <p>There is evident uncertainty in the document as to the accuracy of the dwelling capacity figures created by these discrepancies.</p> <p><u>Reliance Upon Student Accommodation to Provide Housing Numbers:</u> Whilst the principle of using purpose built student accommodation proposals as part of the housing land supply is acceptable and indeed acknowledged in the National Planning Practice Guidance ("NPPG") this source of supply must necessarily be treated with caution for a number of reasons.</p> <p>Firstly where there is an increase in the student population anticipated, as is the case in Chichester (confirmed in the Council evidence base), any new student accommodation will in part increase capacity and in part replace the existing occupation of dwellings in the city by students. The proportion of increased capacity to replacement of existing occupation is not readily definable and will vary depending on the nature and extent of the existing occupation. This immediately leads to a high level of uncertainty in terms of the effective amount of dwelling capacity released by the new student accommodation.</p> <p>The NPPG is clear that any reliance upon student accommodation must be based on robust evidence to demonstrate how the effective amount of dwelling capacity released has been calculated.</p> <p>In this case the Council state at Paragraph 5.9 of the Allocations Plan that 'the calculation of 4 student rooms/units equating to 1 dwelling is used until more specific details are known through the submission of a planning application'.</p> <p>A planning application (Application Ref: 15/04163/FUL) has been submitted and determined by the Council on 09 November 2016 in relation to the proposed allocation of land at Tesco Petrol Filling Station (Policy CC1). In the Case Officer's report to Committee Members were advised that the effective amount of dwelling capacity released by the scheme would be 32 dwellings i.e. 1 in 4.</p> <p>A copy of the Case Officer's report to Committee for the application is attached at Annex 2.</p> <p>The most that this site should therefore contribute in terms of the dwelling requirement for Chichester city should therefore be 32 dwellings and not the 91 dwellings cited in the Allocations Plan</p> <p>There is however no evidence presented by the Council to support the 1 in 4 figure referred to in Paragraph 5.9 of the Allocations Plan</p>			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>or in the Committee Report for the planning application.</p> <p>The extent to which a Council can rely on student accommodation as part of its housing delivery has been explored through the courts. In the case of Exeter City Council v. Secretary of State for Communities and Local Government [2015] EWHC 1663 (Admin) this matter was explored and decided by Hickinbottom J.</p> <p>In circumstances where there is no clear evidence to support the approach taken by the Council in seeking to rely on student accommodation as part of its housing land supply and where there is a known increase in the student population over the plan period Hickinbottom J concluded that a Council could not reasonably rely on student accommodation as a source of housing supply.</p> <p>The same circumstances prevail in the case of Chichester city and in this respect Crayfern does not consider that the Council can even rely on the 32 dwelling contribution from this scheme.</p> <p>An extract of the relevant sections of the above High Court case is attached at Annex 1.</p> <p><u>Apuldram Waster Water Treatment Works (WwTW):</u></p> <p>The Council state in Paragraphs 5.2 – 5.5 that the current capacity in the WwTW has taken into account only the Local Plan (Policy 5) allocation of 50 dwellings for the parish of Fishbourne along with the Chichester city allocation of 235 dwellings together with an allowance for windfalls within Chichester city that equates to 100 dpa (Paragraph 3.6 of the Site Allocation: Proposed Submission DPD 2014 – 2029 Methodology and Assessment – December 2016 document refers).</p> <p>It is on this basis that the Council says it has concentrated on the allocation of previously developed sites within the existing defined urban area of Chichester city rather than seeking to allocate peripheral Greenfield Sites.</p> <p>There are two fundamental problems with this approach. Firstly the Council does not stick to its stated approach because the allocation at Shopwyke SDL is on predominantly greenfield peripheral land.</p> <p>Secondly if the Council already has a capacity allocation at the WwTW for 100 dwellings per year over the Local Plan period 2014 – 2029 i.e. 15 years x 100 = 1,500 dwellings there is no need for it to be allocating land within the urban area on sites that would effectively become windfalls in any event. There is clearly a strong potential for double counting by taking this approach.</p> <p>The intention of Policy 5 in the Local Plan is clear that an allocation of suitable sites will be made in addition to the windfall allowance.</p> <p>The Council's focus for allocations in the Allocations Plan should not therefore be on sites where the principle of development is already acceptable and that can be delivered as windfalls but</p>			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination																														
										<p>rather on the specific identification of additional sustainable sites to ensure adequate delivery through the plan period.</p> <p>This approach would not, as the Council suggest in Paragraphs 5.3 – 5.5, result in inadequate capacity at the WwTW given the allowances already in place for some 1,500 dwellings to come forward on windfall sites within the city.</p> <p><u>The Need for Flexibility:</u></p> <p>The Council already accept that for the purposes of calculating its 5 year housing supply a 20% buffer should be applied.</p> <p>Given this fact and in order to ensure sufficient flexibility the Allocations Plan should be providing for a buffer of at least 20% in the total number of dwellings allocated around Chichester city. No such buffer has been provided within the Allocations Plan.</p> <p>This approach would accord with the overarching objective of significantly boosting the supply of housing nationally together with the fact that the Local Plan housing requirement is expressed as a minimum and that the OAN is openly not being met by the Local Plan targets.</p> <p>Taking all of the above evidence into account the Table at 5.1 (and where relevant the figures in Table 1.1) should be amended as set out below:</p> <table border="1"> <thead> <tr> <th>Location/Address</th> <th>Council (Dwellings)</th> <th>Nea</th> </tr> </thead> <tbody> <tr> <td>Adjacent to Tesco Petrol Filling Station</td> <td>91</td> <td>0</td> </tr> <tr> <td>(student accommodation)</td> <td></td> <td></td> </tr> <tr> <td>Bartholomews</td> <td>62</td> <td>57</td> </tr> <tr> <td>117 The Hornet</td> <td>35</td> <td>35</td> </tr> <tr> <td>Shopwyke SDL</td> <td>85</td> <td>85</td> </tr> <tr> <td>TOTAL</td> <td>273</td> <td>177</td> </tr> <tr> <td>Local Plan Requirement</td> <td>235</td> <td>235</td> </tr> <tr> <td>Requirement Plus 20% Buffer</td> <td></td> <td>282</td> </tr> <tr> <td>Shortfall/Surplus</td> <td>38</td> <td>-105</td> </tr> </tbody> </table>	Location/Address	Council (Dwellings)	Nea	Adjacent to Tesco Petrol Filling Station	91	0	(student accommodation)			Bartholomews	62	57	117 The Hornet	35	35	Shopwyke SDL	85	85	TOTAL	273	177	Local Plan Requirement	235	235	Requirement Plus 20% Buffer		282	Shortfall/Surplus	38	-105			
Location/Address	Council (Dwellings)	Nea																																									
Adjacent to Tesco Petrol Filling Station	91	0																																									
(student accommodation)																																											
Bartholomews	62	57																																									
117 The Hornet	35	35																																									
Shopwyke SDL	85	85																																									
TOTAL	273	177																																									
Local Plan Requirement	235	235																																									
Requirement Plus 20% Buffer		282																																									
Shortfall/Surplus	38	-105																																									
Consultation ID Number SAPS35 (Please refer to additional attachments – Electronic only)																																											
5	Mr	White	Genesis Town Planning	Mr	Heyman		Yes	No	Positively prepared Justified Effective Consistent with National Policy	<p>The Submission SADPD fails to meet the 'positively prepared', 'justified' 'effective' and 'consistent with national policy' tests of soundness.</p> <p>It fails the 'positively prepared' test because it underprovides against meeting objectively assessed housing need (OAN) for Chichester Parish. It doesn't meet OAN because the requirement is for 235 dwellings and allowing for planning permissions and windfalls the residual requirement is 179 dwellings. However the new sites proposed in the SADPD which legitimately count towards the Parish allocation in our view only provides 126 dwellings, a shortfall of 53 dwellings against the residual requirement. However the residual requirement is itself under providing for housing need because it is based on figures in the Chichester District Key Policies Local Plan 2014-2029. This Plan already underprovides for housing need by 70dpa (435dpa instead of 505dpa) and was</p>	<p>We request that policy in the SADPD for development at Chichester City is prefaced with new text to confirm that the Local Plan requirement of 235 dwellings will be a minimum and any over provision will not be resisted in the interests of helping meet OAN in the interim before the next Local Plan Review is completed by 2020.</p> <p>Land at Fairyhill complies with the strategy for locating new residential sites at Chichester Parish. It should be included as a new housing allocation in a new CC policy with a capacity of</p>	No, I wish to communicate through written representations																															

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>only recommended for adoption by the Inspector in 2015 if the Council undertook a prompt review within 5 years.</p> <p>The strategy of the SADPD is to deliver as much of the housing for Chichester on brownfield sites in locations adjacent to the settlement boundary. However land at Fairyhill Old Broyle Road which meets these criteria has been rejected as a housing allocation. In rejecting the site the Council is therefore undermining its own strategy and opens the plan to allegations that the site allocations are not 'justified'.</p> <p>To be 'effective' a plan has to be deliverable and flexible enough to respond to a variety of, or unexpected changes in, circumstances. In our view, the allocation of the Fairyhill site would improve the flexibility of the Plan in securing additional land for housing need. It would also deliver sustainable development and help the Plan accord with the 'consistent with national policy' test.</p>	<p>at least 14 dwellings.</p> <p>The allocation of the subject site would improve the flexibility of the Plan in securing additional land for housing need and deliver sustainable development.</p>		
Consultation ID Number SAPS37 (Please refer to additional attachments – Electronic only)													
5				Ms	Onuh	Thakeham	Yes	No	Positively prepared Consistent with National Policy	<p>The Sites Allocations DPD does not currently look to allocate sites within Loxwood Parish Council on the basis that Loxwood have a 'Made' Neighbourhood Plan (2015).</p> <p>Notwithstanding this, we wish to make representations on the basis that the Site Allocations DPD should be included additional housing allocations in locations where Neighbourhood Plans are in place to allow for sufficient flexibility to adapt to rapid change in accordance with the National Planning Policy Framework (NPPF), Para. 14. We consider that further modifications are required to this document for it to meet the tests of soundness.</p>	<p>Land at Little Farm, Loxwood</p> <p>Thakeham Homes wishes to recommend the site for residential development and as such wish to promote the site for inclusion in the emerging Site Allocations DPD.</p>	No, I wish to communicate through written representations	
Consultation ID Number SAPS6 (No attachments)													
Policy CC1				Mr	Williams	Natural England	Yes	Yes		No comment.		No, I wish to communicate through written representations	
Consultation ID Number SAPS32 (No attachments)													
Policy CC1	Mr	Neame	Neame Sutton Limited			Crayfern Homes Limited	Yes	No	Positively prepared Justified Effective Consistent with National Policy	<p>The Council's reliance on this allocation of Student Accommodation to help meet its housing requirement is inherently flawed and certainly unsound.</p> <p>The allocations should remain but with the removal of any reliance placed upon it towards meeting the Council's housing requirement. The reference to 91 dwellings in the first sentence should therefore be deleted.</p>		Yes, I wish to speak to the Inspector at the hearing sessions	
Consultation ID Number SAPS60 (No attachments)													
Policy CC1				Mrs	West	West Sussex County Council	Yes	No	Effective	<p>Following the County Council's comments on the Preferred Approach DPD, the Draft West Sussex Joint Minerals Local Plan has progressed and the Proposed Submission Draft (January, 2017) has recently been published for a period of representation. The Proposed Submission Draft Plan includes policies on mineral safeguarding (Policies M9 and M10) and is accompanied by a separate Minerals Planning Guidance, which provides further information on how the policies should be implemented. It is</p>	<p>Where reference is made to the presence of minerals, it is suggested that the wording is amended to the following:</p> <p>'Development shall <i>consider the presence of minerals and the impact of sterilisation, as required by National</i></p>	No, I wish to communicate through written representations	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										recommended that some minor changes are made to the text to make the proposed housing and employment sites policies more 'effective' to ensure that minerals and waste issues are properly considered when development proposals come forward.	<i>Policy, and set out in the relevant minerals safeguarding policy. The Minerals Planning Authority should be consulted on development proposals.'</i>		
Consultation ID Number SAPS7 (No attachments)													
Policy CC2				Mr	Williams	Natural England	Yes	Yes		No comment.		No, I wish to communicate through written representations	
Consultation ID Number SAPS63 (No attachments)													
Policy CC2				Mrs	West	West Sussex County Council	Yes	No	Effective	Following the County Council's comments on the Preferred Approach DPD, the Draft West Sussex Joint Minerals Local Plan has progressed and the Proposed Submission Draft (January, 2017) has recently been published for a period of representation. The Proposed Submission Draft Plan includes policies on mineral safeguarding (Policies M9 and M10) and is accompanied by a separate Minerals Planning Guidance, which provides further information on how the policies should be implemented. It is recommended that some minor changes are made to the text to make the proposed housing and employment sites policies more 'effective' to ensure that minerals and waste issues are properly considered when development proposals come forward.	Where reference is made to the presence of minerals, it is suggested that the wording is amended to the following: 'Development shall consider the presence of minerals and the impact of sterilisation, as required by National Policy, and set out in the relevant minerals safeguarding policy. The Minerals Planning Authority should be consulted on development proposals.'	No, I wish to communicate through written representations	
Consultation ID Number SAPS61 (No attachments)													
Policy CC3				Mrs	West	West Sussex County Council	Yes	No	Effective	Following the County Council's comments on the Preferred Approach DPD, the Draft West Sussex Joint Minerals Local Plan has progressed and the Proposed Submission Draft (January, 2017) has recently been published for a period of representation. The Proposed Submission Draft Plan includes policies on mineral safeguarding (Policies M9 and M10) and is accompanied by a separate Minerals Planning Guidance, which provides further information on how the policies should be implemented. It is recommended that some minor changes are made to the text to make the proposed housing and employment sites policies more 'effective' to ensure that minerals and waste issues are properly considered when development proposals come forward.	Where reference is made to the presence of minerals, it is suggested that the wording is amended to the following: 'Development shall consider the presence of minerals and the impact of sterilisation, as required by National Policy, and set out in the relevant minerals safeguarding policy. The Minerals Planning Authority should be consulted on development proposals.'	No, I wish to communicate through written representations	
Consultation ID Number SAPS8 (No attachments)													
Policy CC4				Mr	Williams	Natural England	Yes	Yes		No comment.		No, I wish to communicate through written representations	
Consultation ID Number SAPS23 (No attachments)													
Policy CC4				Ms	Mayall	Southern Water	Yes	No	Positively prepared Justified Consistent with National Policy	We note that the proposals in the Site Allocation DPD are in line with the spatial strategy set out in the adopted Chichester Local Plan: Key Policies. The environmental limits to providing wastewater treatment capacity have therefore been fully taken into account, as assessed by the Chichester Water Quality Group. However, in addition to the environmental limits to wastewater treatment capacity, the capacity of the local sewerage system needs to be considered on a site by site basis. Sewerage in this context is the underground network of sewer pipes in the local	Southern Water is unable to support Policy CC4 as sound because it is not in line with the NPPF and National Planning Practice Guidance, as outlined above. Accordingly, to ensure a sustainable development by facilitating the provision of the necessary infrastructure in parallel with the proposed housing, we propose that the following criterion is	No, I wish to communicate through written representations	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>vicinity of the site that carry wastewater flows from existing properties to the wastewater treatment works for treatment.</p> <p>Policy CC4 allocates 585 dwellings on the site known as 'Shopwyke Strategic Development Location, Oving'. In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG), we have undertaken an assessment of our infrastructure and its ability to meet the forecast demand for the proposed development. That assessment reveals that additional local sewerage infrastructure would be required to accommodate the proposed development (involving making a connection to the local sewerage network at the nearest point of adequate capacity).</p> <p>Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is insufficient. Accordingly, planning policies and planning conditions play an important role in securing the necessary local sewerage infrastructure in parallel with development. The principle relating to the recognition of sewerage requirements in site specific planning policies was tested at the examination of the Ashford Urban Sites and Infrastructure DPD. The Inspector (Patrick T. Whitehead DipTP (Nott) MRTPI) concluded in his report (paragraph 84): 'The NPPF (para.157) makes it clear that local plans should plan positively for the infrastructure required in the area. In the context provided by this new guidance I agree with SW that the requirement to upgrade the existing sewerage infrastructure where necessary should be included within policy wording'. The Inspector's Report can be accessed online at the following link: http://www.ashford.gov.uk/urbansites-dpd</p> <p>Our proposed site specific criteria would also be consistent with the approach taken for policies CC2 and CC3 of this version of the DPD and in line with Policy 9 in the Chichester Local Plan. Without a specific criterion, the site parallel with the development. This lack of policy provision would not be consistent with one of the core planning principles of the NPPF that requires Local Plans to provide a practical framework within which decisions on planning applications can be made with 'a high degree of predictability and efficiency'. Paragraph 21 of the NPPF states that planning policies should recognise and seek to address any lack of infrastructure. Also the NPPG (paragraph 34-001-20140306) specifies that 'Adequate water and wastewater infrastructure is needed to support sustainable development'.</p> <p>Furthermore, it is important to give early warning to prospective developers regarding the need to connect off-site, as it will add to the cost of development. If the requisite infrastructure is not delivered, the sewers would become overloaded, leading to pollution of the environment. This situation would be contrary to paragraph 109 of the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution.</p>	<p>added to Policy BO1:</p> <ul style="list-style-type: none"> provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider. 		
Consultation ID Number SAPS49 (No attachments)													
Policy CC4				Mrs	West	West Sussex County Council	Yes	Yes		Please note an existing temporary waste facility for recycling of inert waste currently operates at the site which is safeguarded by policy W2 (Safeguarding Waste Management Sites and		No, I wish to communicate through written	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										Infrastructure) of the West Sussex Waste Local Plan (2014) and policy M10 (Safeguarding Minerals Infrastructure) of the West Sussex Joint Minerals Local Plan (Proposed Submission Draft, January 2017). The inert recycling facility continues to have a temporary permission for aggregate importation, stacking and recycling with the latest permission being granted in 2015 (ref: WSCC/041/15/O). The facility will continue to be safeguarded until the site is redeveloped. Please note, reference was also made to a second permission for a waste facility (Goss Mini Skips) in the County Council's response to the Preferred Approach DPD consultation (February, 2016). This permission was not implemented and has now expired.		representations	
Consultation ID Number SAPS9 (No attachments)													
Policy CC6				Mr	Williams	Natural England	Yes	Yes		No comment.		No, I wish to communicate through written representations	
Consultation ID Number SAPS17 (No attachments)													
Policy CC6				Ms	Hutson	Sport England	No	No	Consistent with National Policy	<p>Thank you for consulting Sport England on the above named document. Please find herein our formal comments for your consideration.</p> <p>Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.</p> <p>Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our planning objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management; and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.</p> <p>We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local planning policies, and applied in development management. Please see our website for more advice: http://www.sportengland.org/facilities-planning/planning-for-sport/</p> <p>Site allocations</p> <p>Development that would either involve the loss of playing field or prejudice the use of the playing field would be strongly resisted by Sport England. Sites within this document that are a cause for concern include:</p> <p>CC6 – High School, Kingsham Road.</p> <p>It is noted that, while the site allocation does not include the hockey pitch directly to the south of it, this site allocation includes the loss of school buildings which may include the loss of ancillary</p>		No, I wish to communicate through written representations	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>facilities. Playing pitches plus <u>any ancillary facilities required for their use (eg, changing rooms)</u> would be expected to be retained in both the same <u>quality and quantity</u>. Sport England would strongly resist any development that failed to do this.</p> <p>Sufficient measures would also need to be taken in order to ensure that any development directly adjacent to the hockey pitch did not prejudice its use.</p> <p><u>No sites including playing fields should be allocated for development if this would include the loss of playing field or prejudice the use of the playing field .</u></p> <p>Health and wellbeing – Active Design</p> <p>Sport England and Public Health England have recently refreshed our 'Active Design' guide which provides some really useful advice and case studies with clear reference to the NPPF to maximise the opportunities for design in physical activity. Sport England would commend this to you and suggest the concept of 'Active Design' be incorporated into policy and any new developments – please see website extract and link below:</p> <p>Active design</p> <p>We believe that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active.</p> <p>Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities.</p> <p>That's why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design.</p> <p>Ten principles</p> <p>The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.</p> <p>The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often.</p> <p>The Active Design Principles are aimed at contributing towards the Governments desire for the planning system to promote healthy communities through good urban design.</p>			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design. http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design Thank you once again for consulting Sport England. Please do not hesitate to contact me should you have any queries.			
Consultation ID Number SAPS42 (No attachments)													
Policy CC6				Mrs	Lax	Environment Agency	Yes	Yes		We are aware that this site has already gained planning permission but just to note, as raised in our previous comments on the last round of consultation of this document, the site lies within flood zone 3. We recognise that National Planning Policy requires a flood risk assessment to be submitted at the planning application stage but in order to make this policy more robust we would suggest that a specific development criteria could potentially be included that requires a site specific flood risk assessment to be carried out. Considering impacts on flood plain storage and third party flood risk are especially key.		No, I wish to communicate through written representations	
Consultation ID Number SAPS62 (No attachments)													
Policy CC6				Mrs	West	West Sussex County Council	Yes	No	Effective	Following the County Council's comments on the Preferred Approach DPD, the Draft West Sussex Joint Minerals Local Plan has progressed and the Proposed Submission Draft (January, 2017) has recently been published for a period of representation. The Proposed Submission Draft Plan includes policies on mineral safeguarding (Policies M9 and M10) and is accompanied by a separate Minerals Planning Guidance, which provides further information on how the policies should be implemented. It is recommended that some minor changes are made to the text to make the proposed housing and employment sites policies more 'effective' to ensure that minerals and waste issues are properly considered when development proposals come forward.	Where reference is made to the presence of minerals, it is suggested that the wording is amended to the following: 'Development shall consider the presence of minerals and the impact of sterilisation, as required by National Policy, and set out in the relevant minerals safeguarding policy. The Minerals Planning Authority should be consulted on development proposals.'	No, I wish to communicate through written representations	
Consultation ID Number SAPS10 (No attachments)													
Policy CC7				Mr	Williams	Natural England	Yes	Yes		No comment.		No, I wish to communicate through written representations	
Consultation ID Number SAPS53 (No attachments)													
Policy CC7				Ms	Cleaver	Highways England	Yes	No	Effective	Thank you for your correspondence of the 1 st December 2016 consulting Highways England on the Council's Site Allocation Proposed Submission 2014-2029 Development Plan Document. Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.	Having considered the contents of the Development Plan Document we offer the following observations for consideration: Additional clarity around which sites are required to contribute to the A27 Chichester Bypass Local Plan Mitigation schemes would be beneficial. The Councils A27 Contributions – Amendment to Planning Obligations and Affordable Housing SPD gives the appropriate information to prospective applicants	No, I wish to communicate through written representations	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
											<p>on how much contribution per dwelling is to be made at each of the Strategic Development Zones. The calculations were based upon housing allocations of 50 or more. The PDP lists sites such as The Hornet, which has 35 dwellings allocated, but gives no indication as to whether or not this site should contribute to the A27 Bypass Mitigations, with potentially the presumption being that it would not as the site has below 50 dwellings. However, if the site forms part of the total of its relevant Strategic Development Zone housing allocation then a relevant contribution in line with the SPD would be required.</p> <p>As you are aware Highways England carried out an extensive public consultation on the A27 Chichester Bypass Improvements as part of the Roads Investment Strategy back in September last year. A number of options were made available for Public and Key Stake holder consideration and comment. Several of these options included significant improvements to the Fishbourne Roundabout to achieve grade separation at the junction. The Council are advised that some of the land allocated for Plot 12 Terminus Road would, in all probability, be needed in order to deliver such an improvement at the roundabout. It would therefore seem appropriate to defer allocation of the totality of this site for B1, B2 & B8 uses until such time as a Preferred Route Announcement (PRA) has been made. If the land is not required following the PRA, which should be made soon, we would be happy to amend our position on this site.</p>		
Consultation ID Number SAPS59 (No attachments)													
Policy CC7				Mrs	West	West Sussex County Council	Yes	No	Effective	<p>Following the County Council's comments on the Preferred Approach DPD, the Draft West Sussex Joint Minerals Local Plan has progressed and the Proposed Submission Draft (January, 2017) has recently been published for a period of representation. The Proposed Submission Draft Plan includes policies on mineral safeguarding (Policies M9 and M10) and is accompanied by a separate Minerals Planning Guidance, which provides further information on how the policies should be implemented. It is recommended that some minor changes are made to the text to make the proposed housing and employment sites policies more 'effective' to ensure that minerals and waste issues are properly considered when development proposals come forward.</p>	<p>Where reference is made to the presence of minerals, it is suggested that the wording is amended to the following:</p> <p>'Development shall <i>consider the presence of minerals and the impact of sterilisation, as required by National Policy, and set out in the relevant minerals safeguarding policy. The Minerals Planning Authority should be consulted on development proposals.</i>'</p>	No, I wish to communicate through written representations	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
Consultation ID Number SAPS11 (No attachments)													
Policy CC8				Mr	Williams	Natural England	Yes	Yes		No comment.		No, I wish to communicate through written representations	
Consultation ID Number SAPS41 (No attachments)													
Policy CC8				Mrs	Lax	Environment Agency	Yes	Yes		Just to note, as raised in our previous comments on the last round of consultation of this document, parts of this site fall within flood zone 2. We recognise that National Planning Policy requires a flood risk assessment to be submitted at the planning application stage but in order to make this policy more robust we would suggest that a specific development criteria could potentially be included that requires that a sequential approach is adopted on the site. This should ensure built development takes place in the places at lowest flood risk and a site specific flood risk assessment is carried out. Considering impacts on flood plain storage and third party flood risk are especially key.		No, I wish to communicate through written representations	
Consultation ID Number SAPS64 (No attachments)													
Policy CC8				Mrs	West	West Sussex County Council	Yes	No	Effective	Following the County Council's comments on the Preferred Approach DPD, the Draft West Sussex Joint Minerals Local Plan has progressed and the Proposed Submission Draft (January, 2017) has recently been published for a period of representation. The Proposed Submission Draft Plan includes policies on mineral safeguarding (Policies M9 and M10) and is accompanied by a separate Minerals Planning Guidance, which provides further information on how the policies should be implemented. It is recommended that some minor changes are made to the text to make the proposed housing and employment sites policies more 'effective' to ensure that minerals and waste issues are properly considered when development proposals come forward.	Where reference is made to the presence of minerals, it is suggested that the wording is amended to the following: 'Development shall consider the presence of minerals and the impact of sterilisation, as required by National Policy, and set out in the relevant minerals safeguarding policy. The Minerals Planning Authority should be consulted on development proposals.'	No, I wish to communicate through written representations	
Consultation ID Number SAPS12 (No attachments)													
Policy CC9				Mr	Williams	Natural England	Yes	Yes		No comment.		No, I wish to communicate through written representations	
Consultation ID Number SAPS25 (Please refer to additional attachments – Electronic only)													
Policy CC9	Mr	Collins	Phoenix Planning Consultancy			South by East Property Development	Yes	No	Justified Effective	<p>South by East Property Investments Ltd have now undertaken a number of independent site assessments (including Highway and Transportation assessment) in respect of the site and as previously stated they are satisfied (as the owner of the site) that the site allocation CC9 is sound and would enable the required employment site to be delivered in a satisfactory and viable way provided the allocation is changed so that it reads as follows:</p> <p>Policy CC9 Springfield Lorry Park Merston Nr Oving P020 1 EJ:An overall site area of 2.4 ha is allocated for employment land comprising Business Class B1,B2 and B8 uses in accordance with Policy 3 The Economy and Employment Provision of the Chichester Local Plan Key Policies 2014 - 2029. The site will be developed in accordance with the following site specific criteria:</p> <ul style="list-style-type: none"> Up to 9290m2 (100,000ft2) of employment floorspace on 	<p>For clarity the site specific criteria that we request are deleted and our reasoning in bold are set out below:</p> <ul style="list-style-type: none"> investigate developing this site either individually or in conjunction with the adjacent Fuel Depot site to deliver a more comprehensive site; <p>Delete: the site allocation is required, sound and deliverable in its own right</p> <ul style="list-style-type: none"> ensure any significant negative traffic impact is mitigated on the local and 	No, I wish to communicate through written representations	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>40% of the site with the remaining 60% of the site area given over to ground level car parking and landscaping.</p> <ul style="list-style-type: none"> Provision of satisfactory means of access; Investigation of any contamination on the site to identify any necessary mitigation measures required. <p>As previously stated the Site area and the Plan included in the Site Allocation Proposed Submission DPD are incorrect (see correct plan attached). There is no evidence that the following site specific criteria set out in the text of Policy CC9 are justified or necessary and as written they would unnecessarily threaten the viability and delivery of the site and should be deleted as the wording we suggest addresses all site specific matters which are justified based on the available evidence.</p>	<p>strategic road network;</p> <p>Delete: There is no evidence that the site cannot be accessed satisfactorily as a matter of principle or that net traffic generation from this small site would have any significant negative traffic impact. Furthermore Framework paragraph 32 states that Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe and not on the basis that any significant traffic impact cannot be mitigated</p> <ul style="list-style-type: none"> be supported by a Road Safety Audit; <p>Delete: whether or not a proposal is supported or otherwise by a Road Safety Audit is a matter that should be addressed at application stage and is not relevant to a policy allocation</p> <ul style="list-style-type: none"> investigate the extent of any minerals in consultation with West Sussex County Council, as the Minerals Planning Authority, prior to the commencement of development. <p>Delete: Not necessary. The site is not identified, allocated or protected in the West Sussex Joint Minerals Local Plan Proposed Submission Draft (Regulation 19) January 2017 which is currently the subject of public consultation until March 2017.</p>		
Consultation ID Number SAPS57 (No attachments)													
Policy CC9				Mrs	West	West Sussex County Council	Yes	No	Effective	<p>The County Council requested further information in response to the 'Preferred Approach' consultation to assess the impacts of the proposed employment allocations on the transport network and ensure that there is sufficient evidence to allocate the sites. It is understood that the majority of these sites now either have planning permission or have been assessed to an appropriate level as part of the Development Management process. This is with the exception of Site CC9 Springfield Park. The County Council therefore requested further evidence to support its allocation in the DPD.</p> <p>Following an assessment of the available evidence, it appears that the proposed level of development for Springfield Park is within the levels tested in the transport evidence base to support the Chichester Local Plan. Impacts on the A27/A259 Bognor Road</p>	<p>Where reference is made to the presence of minerals, it is suggested that the wording is amended to the following:</p> <p>'Development shall <i>consider the presence of minerals and the impact of sterilisation, as required by National Policy, and set out in the relevant minerals safeguarding policy. The Minerals Planning Authority should be consulted on development proposals.</i>'</p>	No, I wish to communicate through written representations	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>roundabout, A259/B2166 Drayton Lane roundabout and at the junction accessing the A259 from the adjacent former fuel depot site should be investigated as part of a Transport Assessment to support a planning application for Springfield Park.</p> <p>Following the County Council's comments on the Preferred Approach DPD, the Draft West Sussex Joint Minerals Local Plan has progressed and the Proposed Submission Draft (January, 2017) has recently been published for a period of representation. The Proposed Submission Draft Plan includes policies on mineral safeguarding (Policies M9 and M10) and is accompanied by a separate Minerals Planning Guidance, which provides further information on how the policies should be implemented. It is recommended that some minor changes are made to the text to make the proposed housing and employment sites policies more 'effective' to ensure that minerals and waste issues are properly considered when development proposals come forward.</p>			
Consultation ID Number SAPS3 (No attachments)													
6				Mrs	Brown	West Wittering Parish Council	Yes	No	Justified	West Wittering Parish Council adjoins East Wittering and Bracklesham Parish Council. That the housing number identified for EW&B PC is excessive and that the current road infrastructure would not be able to support additional journey numbers. The proposal is therefore unsustainable.		No, I wish to communicate through written representations	
Consultation ID Number SAPS19 (No attachments)													
6					Parish Clerk	East Wittering And Bracklesham Parish Council	Yes	Yes		The Parish Council strongly supports the designation of its village centre and it would not like to see any of it lost to housing.		No, I wish to communicate through written representations	
Consultation ID Number SAPS13 (No attachments)													
Policy HN1				Mr	Williams	Natural England	Yes	Yes		Housing allocation would have to satisfy the interim Solent Recreation Mitigation Partnership strategy for the Solent as well as the neighbouring Pagham Strategy.		No, I wish to communicate through written representations	
Consultation ID Number SAPS14 (No attachments)													
Policy LY1				Mr	Williams	Natural England	Yes	Yes		No issue with nearby designated sites, no comment.		No, I wish to communicate through written representations	
Consultation ID Number SAPS16 (No attachments)													
Policy LY1				Mr	Parrott	Waverley Borough Council	Yes	Yes		Thank you for consulting Waverley Borough Council on this document. We made the following comment on the pre-submission version of this document in September 2016 on the site to the rear of Sturt Avenue Policy LY1: ' Thank you for consulting Waverley on the above document. Waverley borders Lynchmere, and I asked one of my Development Control colleagues to assess the potential effect of developing the site to the rear of Sturt Avenue Policy LY1, on Waverley. After the site inspection, we are of the view that provided the site requirements that you suggest can be complied with, Waverley would have no objection to the development of the site. There was concern about the amount of water running down the north eastern boundary road and the issue of accessing the		No, I wish to communicate through written representations	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>site, but clearly these are a matter for yourselves.'</p> <p>We note that the policy states that planning permission will need to be sought from Waverley as well as yourselves and also that the settlement boundary now excludes land within Waverley.</p> <p>As such, Waverley has no further comment to make on Policy LY1.</p>			
Consultation ID Number SAPS18 (No attachments)													
Policy LY1				Ms	Howard	South Downs National Park Authority	Yes	Yes		<p>Thank you for consulting the South Downs National Park Authority (SDNPA) on the Proposed Submission version of the Chichester Site Allocation Plan.</p> <p>The NPA does not have any further comments to make on the plan. However, I would like to draw your attention to the need to re-draw a small section of the settlement policy boundary around Camelsdale in order to exclude land within the National Park.</p>		No, I wish to communicate through written representations	
Consultation ID Number SAPS20 (No attachments)													
Policy LY1	Mr	Wilson	Savills UK	Ms	Bell	Thames Water Utilities Ltd		No	Consistent with National Policy	<p>The majority of Chichester's boundary and the proposed sites fall outside of Thames Water's area with the exception of the housing site proposed to be allocated under Policy LY1.</p> <p>A key sustainability objective for the preparation of Local Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: "Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater...."</p> <p>Paragraph 162 of the NPPF relates to infrastructure and states: "Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas."</p> <p>The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that "Adequate water and wastewater infrastructure is needed to support sustainable development" (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>Given the proposed Policy LY1 housing site is on the edge of Thames Water's water/sewerage area, we request that the developer be required to contact Thames Water at the earliest opportunity to agree how the necessary infrastructure will be delivered to service the site.</p>	<p>Proposed Change: Policy LY1 be amended to require the submission of a water supply/drainage study to demonstrate how necessary infrastructure can be provided and existing infrastructure protected.</p> <p>Proposed Change: It is essential that Thames Water are consulted in relation to the proposed access and this should be mentioned in the Policy LY1 supporting text.</p> <p>Proposed Change: It is essential that Thames Water are consulted in relation to the foundation design and protection of water Source Protection Zone1 SP1 and this should be mentioned in the Policy LY1 supporting text.</p>	Yes, I wish to speak to the Inspector at the hearing sessions	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>Access and Impact on Thames Water's Infrastructure: The proposed housing site is also located adjacent to Thames Water's Sturt Avenue Water Supply Pumping Station and the access to the housing site uses the Thames Water access road off Sturt Avenue. It has not yet been demonstrated that a satisfactory access can be provided to service the proposed housing site.</p> <p>It is understood that the Developer proposes to replace the bridge owned by Thames Water. This must be able to take the largest vehicle that Thames Water requires to access the water treatment works and enable pedestrian access. Thames Water have significant concerns regarding this. The Road is single track and chemical delivery lorries are required to wait at the site entrance until an Operator can attend to open the gate. This would block the proposed housing development access. It is not advisable to have chemical delivery lorries in contact with the public and once the delivery begins it cannot be moved.</p> <p>Water Supply: This Policy LY1 site falls within a water Source Protection Zone1 (SP1), which is in place to protect public water supply from contamination so there will be requirements placed on the construction and use of the development. Thames Water recommends that the applicant consults with Thames Water Development Control Department on the telephone number: 01923 898072.</p> <p>At present any flood water naturally flows across the green hatched area of the proposed development site. If the Developer carries out work to prevent flood water entering the Development site which will put the water into a SP1 (Source Protection Zone) creating a significant risk of contamination of drinking water supply and the potential for loss of Customer Supply. The current sewer is designed to take site waste flows.</p> <p>Thames Water would also need to assess the risk to water resources from the construction of the foundations associated with the development. We therefore support the inclusion of the fourth bullet in Policy LY1.</p> <p>More detailed information can be obtained from Thames Water's Groundwater Resources Team.</p>			
Consultation ID Number SAPS28 (No attachments)													
Policy LY1					Parish Clerk	Lynchmere Parish Council	Yes	No	Positively prepared Justified Effective Consistent with National Policy	<p>Lynchmere Parish Council (LPC) Response to CDC Further Site Allocation Consultation on land behind Sturt Avenue</p> <p>Lynchmere Parish Council is giving a further response to Chichester District Council regarding the soundness of the approval given by Cabinet to include this site in the DPD</p> <p>Inclusion of the site is not sound because it is not supported by 'proportionate evidence', most likely not deliverable and is against NPPF.</p> <p><u>Flood Zone concerns</u></p> <p>Historic flood warnings from the EA itself and photographic and</p>	Please see response above under Q.5	Yes, I wish to speak to the Inspector at the hearing sessions	Please see response above under Q.5

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>written evidence supplied by local residents clearly indicate that flooding on this site is caused more often by groundwater than the river bursting its banks. The EA admitted they have not replied to the evidence we sent them on groundwater issues on 14.12.16 within the 20-day timeframe. The EA also stated it was CDC's responsibility to do the fluvial flood assessment on this specific site to see if it was suitable for any housing development but to date CDC have not done that assessment. The EA have now informed us that WSCC are the lead Authority for flooding issues in our area and that they should be looking at the groundwater issues. The WSCC Flood Management Team have told us they have not been asked by CDC for an assessment on this particular site. The only report on flooding which can have been considered therefore is that submitted by the prospective developer of the site. As the EA have not completed their remapping of the flood zone and no assessment has been done by the EA or CDC the Parish Council considers that there is no proportionate evidence on which to base an objective decision on flood risk and so including the site cannot be justified. Furthermore, when proper flood assessments are done they may well indicate" flood risks make this site unsuitable for development. Therefore, development will not be deliverable, thus inclusion is not sound because it will be ineffective.</p> <p><u>Access concerns</u></p> <p>Access to this site is by way of an unadopted single track road owned by Thames Water (leading to their pumping station) and a pedestrian bridge over the river Wey. The owner of the site has access rights over the road and proposes to rebuild the bridge to take vehicular traffic. West Sussex County Council's response to the Consultation was that they had no objections on Highways grounds to this site being developed. They have since clarified to the Parish Council in an e-mail on 25th November 2016 that they had no objection to the principle of development being established because it would be for a planning application to demonstrate that safe access can be provided. However, the NPPF guidelines require a substantive response from statutory Consultees. This therefore fails the soundness test on grounds that it is contrary to national policy. It also fails on the 'proportionate evidence' test for the following reasons; WSCC say that the unadopted access road is the responsibility of Surrey County Council Highways as it is just on their side of the border. However, the Parish Council is advised that the centre of the river is normally regarded as the boundary between different Councils so the last few feet of the bridge over the river into the site is actually in West Sussex.</p> <p><i>contd..</i></p> <p>This means WSCC and CDC also have a responsibility to consider whether they feel the only access to the site is suitable but they have not done this assessment. Thames Water in their response have said that 'it has yet to be demonstrated that satisfactory access to the site has been provided for'. Since the initial consultation they have also expressed concerns about water pollution and" the need to keep their single track road clear due to the hazardous chemicals which they transport over it into their pumping station. The owner of the site merely asserts that access can be created without evidence or addressing the issues of the single track road and the safety of the bridge. This was simply not put to the test by CDC in their initial consideration. Therefore, LPC</p>			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>considers that the test of 'proportionate evidence' has not been met.</p> <p><u>Highways concerns</u></p> <p>Access from the single track road to the site towards the main road, Camelsdale Road, is only by way of Sturt Avenue and Moorfields. There is no other way. Both those roads are narrow residential roads and Moorfields in particular is often single file due to residents' parked cars. In past planning applications for housing on nearby sites using the same and only access to the main road, and also in general planning enquiries from the previous owner about this site WSCC objected on both highways and access grounds. Some of these applications went to Inspectors who backed the findings and commented that the narrow roads leading to Sturt Avenue are dangerous including to pedestrians and school children who walk down them to access the back entrance to the nearby Camelsdale Primary School. They also expressed concerns about the restricted visibility from the turning on the Moorfield junction on to Camelsdale Road which is the only access into the Sturt Road site since the alternative route from the main road to Haslemere was closed in the 1980's on safety grounds (Ref FH/02/01620/OUT). The roads have not been altered since then. No evidence showing how these concerns can be met has been submitted by anyone. This issue applies to the site regardless of the type, style or quality of a development. It is therefore time wasting to assert that these issues will be addressed if and when a planning application is made because safe access is a sine qua non to development. Again there has been no proportional evidence nor would the site actually be deliverable.</p> <p><u>Environmental concerns</u></p> <p>Evidence from local residents and their environmental consultants showed this site to be a haven of wildlife and natural buffer zone between residential areas of Haslemere and Camelsdale. Loss of this would be against policies of the NPPF. No evidence was produced to show that the balance between the need for housing numbers and habitat protection lay on the side of development. No evidence was produced to show that the settlement boundary should be changed to include the site other than to favour the developer.</p> <p><u>Officers Report to Cabinet</u></p> <p>In the CDC officers report to Cabinet members on this Consultation it was stated there was no objection from any of the statutory Consultees but we feel this does not fully reflect the comments made. The EA expressed some reservations and while Thames Water did not state they objected they did say they wanted more information on infrastructure and that it "had not yet been demonstrated that satisfactory access to the site had been provided for".</p> <p>The Cabinet were not given these details and therefore did not consider them when they approved that this site should be reallocated and should go to the next stage of the Consultation</p>			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4. Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>subject only to the EA's findings.</p> <p>There is also a contradiction in CDC's Site Allocation DPD Methodology and Assessment Report published in December 2016 where on page 28 it states that site CH0820 land at Sturt Avenue is not suitable for development and has been assessed and discounted because there is no available access and the site forms a natural buffer to the existing settlement. The site was given a -3 rating for development. However, in the very next section with the same reference number it states that the site is now up for reallocation following further information from the current landowner which resulted in the site being reassessed and rated +21. We feel evidence presented by LPC, local residents and others was not given enough material weight and consideration in both the Officer's report and the Cabinet debate. There was no proportional evidence therefore to support the decision to reallocate the site.</p> <p><u>Alternative sites</u></p> <p>LPC has not been asked to find alternative sites. On the contrary, we were asked in February 2016 whether we wanted the provisional allocation of 10 houses removed from the DPD because there were no potential sites in Lynchmere. We agreed to this allocation being taken out only to find in May 2016 that due to information submitted by the owner of the site to CDC in December 2015 this site would be resubmitted. We feel we could find alternative windfall sites for 10 houses and there is a possibility of other land becoming available in the next 5 years. The fact we were given a New Homes Bonus by CDC shows LPC has supported housing development where we can.</p> <p>LPC considers that the process at Sturt Avenue has been flawed from the start and LPC has no confidence that this is an appropriate site to be included in the DPD, nor that the evidence submitted and the process for examining it pass the test of soundness.</p> <p>Yours sincerely</p> <p>Kate Bain (Clerk to LPC)</p>			
Consultation ID Number SAPS39 (No attachments)													
Policy LY1				Councillor	Hardwick		No	No	Justified Effective Consistent with National Policy	<p>I am one of the Chichester District Council's members for Fernhurst and Lynchmere ward including the proposed Sturt Avenue site (Section 8: LY01). I am also a member of Chichester District Council's cabinet.</p> <p>I make this submission to ensure all up to date material and views are before the examiner. I am concerned that, insofar as the Site Allocation DPD/Proposed Submission ('Proposed Submission') continues to contain this site off Sturt Avenue (identified in Section 8 and reflected in the proposed Policy LY01), the Proposed Submission is unsound and does not fulfil its primary purpose of identifying suitable, deliverable sites for residential development consistent with Chichester's Local Plan and the NPPF.</p>	Removal of the Sturt Avenue site (LY01) from the Allocation DPD. See above for reasons.	Yes, I wish to speak to the Inspector at the hearing sessions	My colleague, Cllr Graves, and I consider that our views as ward members and as participants in the process may usefully contribute to the evidence available at the hearing.

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p><u>Policy: Is allocation consistent with local and national policy</u></p> <p>At each stage in this allocation process to date, my Chichester District Council Ward Colleague, Cllr Graves and I, have considered the site carefully, mindful of the Local Plan and the general need for housing in our district (particularly affordable housing). We have met with the promoter and their agent and residents and the Parish Council as well as spoken at length with CDC's relevant officers. We have considered voluminous evidence submitted at consultations. However we continue to share concerns, widely held and voiced locally including by the parish council that, this flood plain site is unsustainable and inappropriate for residential development.</p> <p>Those concerns are well supported by evidence submitted in the consultations at various stages, which evidence demonstrates (in summary) that this site presents (a) unacceptable flood risks (to its own future residents and surrounding properties) , (b) has inadequate /unsafe access and (c) may jeopardise the neighbouring Thames Water supply. These factors put its development in conflict amongst other policies, with NPPF para 100/101 and our policy LP.19.</p> <p>In particular:</p> <ul style="list-style-type: none"> - Developing the site in this way presents unreasonable flooding risks, from Groundwater, Surface water and Fluvial sources to neighbouring properties and upstream properties bordering the same river. - Its development will exacerbate already unacceptable levels of risk to Highways users including pedestrians (incl. accessing the village primary school) using the only vehicular access, Moorfields. - Development of this site will add unwarranted risks to the water supply and its infrastructure (as confirmed by Thames Water in their consultation submission January 2017). Thames Water make clear that this site falls within a water Source Protection Zone1 (SP1) to protect public water supply from contamination. They note that if the Developer prevents flood water entering the site this will put the water into a SP1 creating a significant risk of contamination of drinking water supply and the potential for loss of Customer Supply. I also share Thames Water's concerns about the risk to water resources from the construction of the foundations associated with the development. <p>I share the concerns of my colleague, the Parish Council and many residents that there is insufficient proportionate evidence to base the decision to allocate this site and such decision is not justifiable.</p> <p><u>The Process</u></p> <p>My colleague, Cllr Graves, and I further share concerns widely held locally about <u>the process</u> by which this site has progressed into the DPD submission for examination. We are particularly concerned with the advice councillors received as to the relative weight to be</p>			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>given to local consultees' submissions as against statutory consultees on occasions when Chichester District Council's ('CDC') members have been asked to approve its inclusion/progression as an allocation site. Most recently and critically, I refer to CDC's Full Council meeting on 22 November 2016 (audio transcript available on CDC website [link]) where potentially confusing or misleading information and advice was provided which may have influenced the voting outcome and the site's subsequent inclusion in the DPD.</p> <p>When Council members voted to include this site in the Allocation DPD draft for Submission, they were advised to put great weight on the fact that the relevant 'expert' statutory consultees had not objected to the allocation proposal, but that the 'anecdotal' evidence of residents and the Parish Council should not be relied upon against such 'expert' evidence. The audio recording of 22 November 2016's Council meeting will bear this out (from audio minute ref 43 – 83).</p> <p>In fact, the evidence from Lynchmere parish council and over 40 residents and their advisers (put in as part of the Summer 2016 allocation consultation) overwhelmingly showed that the site falls foul of sustainability policies both in the Local Plan and the NPPF, in particular in relation to flood risk and access constraints. By contrast the evidence from statutory consultees was extremely thin, yet undue weight was put on their apparent lack of substantive objection. When properly assessed the reality was that very little assessment or analysis had been provided by key statutory consultees at this stage.</p> <p><u>Process: Flooding evidence</u></p> <p>The Environment Agency put in no substantive fluvial flood map evidence, having acknowledged its existing fluvial flood mapping was incorrect and required a complete remodelling and re-mapping. That work is still awaited. CDC resolved at Council on 22 November 2016 (item 162 recommendation 4): " <i>That the retention of the site to the rear of Sturt Avenue Camelsdale be approved within the Site Allocation DPD: Proposed Submission for examination subject to confirmation from the Environment Agency that there is no objection once the flood zone remodelling has been completed.</i> " Unless that re-modelling has been delivered prior to submission without flood objections, that Council decision is clear: there is <u>no</u> authority from CDC for this site to be included in this DPD examination.</p> <p>As for groundwater and surface water, it has since emerged that the Lead Flood Authority, WSCC, was not asked to input to the consultation and made no contribution at that stage of the allocation process as to the suitability of the site from the Surface and Groundwater perspective (major issues on the site according to many neighbouring residents and the parish council). Unfortunately it appears WSCC flood team were not directly notified of this allocation process and did <u>not</u> participate in any consultations: confirmed by the flood management team of WSCC writing to the Parish Council on 23/1/17 Jan. They had in the past been asked to comment on the original Local Plan consultation in</p>			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>2013 and had done so but <u>not</u> since.</p> <p>Yet the advice given to CDC members on 22 November 2016 deciding whether to include the Site in the allocation DPD was that the statutory consultees <u>had</u> given substantive advice and raised no concerns. Councillors were advised that this <i>lack of objection</i> should outweigh contrary evidence supporting objections from residents and the parish council. It seems very clear now that such advice was simply wrong or at least very misleading and makes the subsequent decision by members of CDC (22 November 2016 Council) to progress the site to examination potentially unsafe/unsound and may have contributed to an inappropriate site progressing to examination.</p> <p><u>Process: Access/Highways</u></p> <p>Similarly members of CDC were advised that the statutory Highways Authorities had raised <u>no</u> concerns on access issues, which should outweigh the array of evidence from the parish council and residents that there were real concerns with the narrow access roads (Moorfield in particular) which had concerned Planning Inspectors in related appeals.</p> <p>Subsequently the Parish Council was advised by WSCC that it also had not in fact formally responded in the summer consultation in relation to Highways issues. They stated to the PC that WSCC do not generally input on the mere principle of development, only later at specific planning applications. What they did contribute (but only at an earlier stage in the process, in April 2016) was narrowly on the issue of trip generation: "with regards to trip generation, WSCC would raise no concerns to the trips related to 10 dwellings using Sturt Avenue/Moorfield". Yet CDC Councillors were led to believe that a substantive response had come in from Highways: members were advised in November 2016 both in the officer's report (para 6.6) and in the debate (audio recording of 22 November 2016 at 63:10) leaving the unfortunate impression that a substantive assessment and submission had been made. Members were advised [audio recording 65.22]: " <i>We should take on trust that the officers have fairly quoted what the statutory consultees have said , that they have no objection. All we have fromobjectors is some anecdotal evidence....</i> ". Again, in this context, the decision by members to leave the Site in was made giving excessive/undue weight to an apparent lack of objections from statutory consultees who had not in fact contributed any meaningful assessment.</p> <p>We urge the examiner to consider whether these procedural/evidential issues may themselves make the related resolution to approve the inclusion of the site unsafe/unsound, aside from the separate policy issues.</p> <p>To conclude:</p> <ul style="list-style-type: none"> Based on the evidence available to CDC (and in this examination) the site cannot be demonstrated as being appropriate, justified or consistent with national and local policy directed at the principles of sustainable development in the form of 10 residential properties. 			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<ul style="list-style-type: none"> Further the decision to include this site in the Proposed Submission DPD is unsafe given that that decision was taken after misleading advice to councillors to give little or no weight to the 45 or so responses from the Parish Council and local residents raising evidence in objection to the submission, in the face of statutory consultees who had apparently raised 'no objection', but in fact had made no meaningful or considered assessment in the process. <p>Overall, given all I have read and heard to date, I share concerns (as one of a number of dissenting voices in the CDC Council along with Cllr Graves) as to whether this is an appropriate site for allocation in terms of policies, and whether its inclusion in the DPD was resolved by CDC after due process. I therefore urge the Examiner to consider very carefully whether and to what extent its continued inclusion makes the overall Site Allocation DPD unsound.</p>			
Consultation ID Number SAPS40 (No attachments)													
Policy LY1				Mrs	Lax	Environment Agency	Yes	Yes		<p>Our current Flood Map for Planning shows that part of the site is within Flood Zones 2 (land assessed as having between a 1% and 0.1% annual probability of river flooding) and 3 (land assessed as having a greater than 1% annual probability of river flooding). The main River Wey also runs down the eastern edge of the site.</p> <p>It is important to note that flood zones indicate indicative risk from tidal or fluvial flooding, in this case it is obviously fluvial flooding from the river. It is important that all aspects of flooding are considered and we would suggest that consultation is undertaken with West Sussex County Council as the Lead Local Flood Authority in this area to enable Chichester District Council to understand any potential risks posed from other sources of flood risk such as ground water, surface water and overland flow.</p> <p>Given the flood zones associated with the site the sequential test should be applied. The National Planning Policy Framework (para 100-101) is clear that in plan making, Local Planning Authorities should apply a sequential approach to site selection so that development is, as far as reasonably possible, located where the risk of flooding (from all sources) is lowest. In an email dated 10th January 2017 Chichester DC have confirmed that the sequential test has been satisfied and that there are no sequentially preferable sites available to allocate.</p> <p>The current flood mapping in this area is not aligned with the main river. We are currently undertaking remodelling work to better inform our understanding of flood risk in this area, but the results of this are not yet available. The result of this re-modelling work may result in changes to the Flood Map in this area.</p> <p>We have however recently reviewed a flood model for the site undertaken by a consultant. Whilst the modelling provided by the consultant would not be appropriate to update the Flood Map, we are satisfied that the approach taken to assess flood risk on the proposed development site is sufficiently precautionary and provides a better representation of flood risk on the site than that which the current Flood Map shows. Therefore this information could be used by Chichester DC to give a better understanding of the flood risk on the site. It could also be used as the basis for the</p>		No, I wish to communicate through written representations	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>flood risk assessment that would need to be provided at the planning application stage. Based on the modelling undertaken by the consultant the development site within the redline boundary is located in Flood Zones 1, 2 and 3. The majority of the site is shown to be within Flood Zone 1.</p> <p>The sequential approach should be taken on site and all built development proposed through this allocation should be in flood zone 1. A buffer zone adjacent to the river will also be required. We would suggest that the requirement for the sequential approach on site is added as a development criteria within this policy.</p> <p>We have also noted that while the development may be able to be located entirely within flood zone 1, the access and egress from the development will be through flood zones. It is for the Local Planning Authority to make a judgment on the safety of access and egress from the site in discussion with the relevant emergency planners and if deemed necessary, the relevant emergency services.</p> <p>Please note that a flood risk activity permit for any new or enlarged crossing of the River will be required from the Environment Agency. This will need to demonstrate that any new vehicular crossing will not have a detrimental effect on flood risk and the habitat(s) and species present, or that mitigation measures can be put in place to adequately reduce these effects. Our preference is for clear span bridges.</p> <p>Part of this site is also located in a Source Protection Zone 1. This is designated in order to protect groundwater sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. In this case it is not an issue that impacts on the principle of development on the site and therefore the allocation of the site, but it is important that this is borne in mind for how construction activity is undertaken. It will be imperative that this is addressed when any planning application comes forward for this site.</p>			
Consultation ID Number SAPS44 (No attachments)													
Policy LY1				Cllr	Graves		No	No	Justified Effective Consistent with National Policy	<p>I am one of the two councillors representing Lynchmere at Chichester District Council and have very serious concerns about the soundness of the process which has been followed for the Site Allocation Consultation on the Land behind Sturt Avenue. This submission is made so that the Examiner has a clear picture of the process and situation in order to make his decision.</p> <p>It first went to a meeting of the Council's Cabinet and was passed subject to confirmation from the Environment Agency that there was no objection once the flood zone modelling had been completed. This to be carried out as part of the site has previously been categorized as Flood Zones 2 & 3 and had not been considered suitable for housing</p> <p>The Site Allocation Consultation was then taken to a meeting of Chichester District Council where the Parish Council Chairman spoke and expressed their concerns regarding the application. Great concerns were also expressed by a resident</p>	See above. All proper procedures should have been taken and all information should have been before council before making the decision. I consider this process was unsound. The Sturt Avenue site should not be included.	Yes, I wish to speak to the Inspector at the hearing sessions	I am a ward member and have relevant knowledge of the site and the process.

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>representing the 47 other residents who had written in answer to the consultation. These very real concerns, supported by photographs, showed strong evidence of groundwater flooding, drainage and other water problems. There are also serious traffic and access constraints along Moorfield, which is extremely narrow allowing one car at a time, no passing place and with parking on one side of the road as the houses have no garages. Moorfield leads to Sturt Avenue and Orchard Close thence to the narrow unmade track leading to the Thames Water Pumping Station. These roads were not built for the current level of traffic and the children attending Camelsdale School walk down Moorfield to access the school grounds. These concerns were listened to but the meeting was told that none of the Statutory Consultees had made any negative comments on the application. No Comments at all had been made. With this information the Council passed the Site Allocation Plan to go forward for consultation.</p> <p>We now understand that the Statutory Consultees do not visit sites at the Site Allocation stage but only when a Planning Application has been made, so that the fact that members of the Council were told that there were no concerns – “No Comments from the Consultees” renders the statements valueless, but gives the impression that the consultees have substantively assessed and have no problem with the application. This is a serious misrepresentation. In this case the “No Comment” totally outweighed the information contained in the letters written by 47 residents. On further investigation we now understand that where the proposed development is under 50 the statutory consultees do not make site visits so when the Council is told that the Statutory Consultees have no comment these statements are valueless, giving erroneous information.</p> <p>The Parish Council has only just found out from the Environment Agency that West Sussex County Council are the Lead Local Flood Authority who are responsible for reporting on Groundwater Flooding. They were contacted by the Parish Council and reported that they had not been notified of the consultation. As groundwater is a major problem in the area which abounds in “springs”, this question should have formed part of the Site Allocation Consultation from the beginning. The River Wey which flows alongside the site overflows in bad weather and exacerbates the situation. This information should have been available to the Councillors to assist in their decision process.</p> <p>The decision by the Council has unfortunately been made on the assumption that “No Comments” indicated that this decision had been reached following site visits. The fact they were not invalidates the decision – it is unsound.</p>			
Consultation ID Number SAPS46 (No attachments)													
Policy LY1					Surrey County Council	Surrey County Council	Yes	Yes		<p>Thank you for consulting Surrey County Council on the Chichester Site Allocation Proposed Submission 2014 - 2029 DPD and also for the subsequent email from Sue Payne, dated 18 January 2017.</p> <p>Ms Payne made reference to our previous informal comments relating to the proposed allocation of the site in Sturt</p>		No, I wish to communicate through written representations	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4. Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>Avenue, Camelsdale for 10 units with the point of access being located within the Surrey County boundary. We would reiterate that we have no objection to this proposal and that we consider, given the opportunities for pedestrian and cycle connectivity to the site, that it would be acceptable in terms of its location.</p> <p>I therefore confirm that we have no comments to make on this Submission DPD. Thank you for consulting us and also following up on infrastructure issues relating to Surrey as a neighbouring authority.</p>			
Consultation ID Number SAPS50 (Please refer to additional attachments – Electronic only)													
Policy LY1				Mr	Rait		No	No	Positively prepared Justified Effective Consistent with National Policy	<p>The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:</p> <ul style="list-style-type: none"> • Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; • Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; • Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and • Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. <p>Notes for submission.</p> <p><u>Positively Prepared</u> – This proposal is not consistent with achieving sustainable development. Of the 5 identified sites reviewed in the plan, the Sturt Avenue site was scored as the second lowest out of the 5 options that were put forward in the CDC sustainability report with a score of -2. This is not reasonable.</p> <p>From the CDC Sustainability appraisal Nov 2016:</p> <p>2.2.5 Lynchmere Housing Options Option 1 (land at Sturt Avenue) [submitted option] and Option 5 (land at Sturt Meadow Cottages) These options would involve clearing woodland and also have a negative impact on the River Wey adjacent. The sites also have poor access, although they are close to the facilities of Camelsdale. The submitted policy contains some mitigation proposals for the biodiversity</p>	<p>Removal of this site from the plan.</p> <p>Land at Camelsdale As well as looking at the individual site characteristics - you also need to look at the policy context for the Sturt Avenue site. The approved Core Strategy [Adopted Chichester Local Plan] [See: http://www.chichester.gov.uk/newlocalplan]. sets the strategy and targets that need to be delivered in the District. The current consultation document – 'Sites and Allocation Plan' is only intended to interpret and implement the above targets. It is not a stand-alone document. So in addressing the Sturt Avenue allocation in the current consultation document – you also need to go 'upstream' and test the proposal/allocation against the adopted Local Plan requirements This is what I am summarising below: Step Policy no. in adopted Local Plan Policy content Comment 1 Policy 25 Development in the North of the Plan area Provision will be made for small scale development in the North of the Plan area through Neighbourhood Plans and/or the Site Allocation DPD, in accordance with Policies 2 and 5. The Council will encourage and support development proposals and other initiatives that: • Conserve and enhance the rural character of the area, the quality of its landscape and the natural and historic environment; • Safeguard existing local facilities and expand the range of local facilities; and • Improve</p>	Yes, I wish to speak to the Inspector at the hearing sessions	We as the residents appear to be the only ones who have thoroughly researched and fully understood the multiple reasons why this woodland is inappropriate for development

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>impacts, but some negative impacts remain.</p> <p>An independent ecology report's findings (attached) have not been considered. A review of this report would show that appropriate due diligence has not been performed to determine the biodiversity impacts.</p> <p><u>Justified</u> – The inclusion of this land is not justified based on the lack of local community engagement or support for this proposal. In addition to this there are other alternatives noted in the CDC sustainability report that were relatively more attractive. Lynchmere was originally allowed to remove the allocated housing number of 10 as no suitable sites were available. No reasonable explanation has been given on why this decision has been reversed. In addition to this, the decision to submit a site that was one of the worst options in terms of sustainability is inconsistent with the stated aims of the local plan.</p> <p>The guidance notes state that the DPD should be based on a robust and credible evidence base involving: evidence of participation of the local community. During the submission phase, a large amount of evidence was supplied by local residents & objections were raised by both the Parish & District council. This evidence was not properly considered when putting forward the Sturt Avenue Site.</p> <p>This land is also in flood zones 3 and 2 based on the current mapping by the environment agency. It should be noted that the environment agency is due to re-map this site but has not yet done so. In addition to this, local authorities are responsible for responsible for undertaking preliminary flood risk assessments including groundwater, for assessing where these risks are significant, for mapping the associated risk where relevant and for developing local flood risk management plans. It has been confirmed that West Sussex County council are the lead local flood authority and they have not been consulted on the plan. This raises serious concerns over the due diligence performed and whether it is suitable and evidence gathered suitable and sufficient. Inclusion of this land that has been identified as in a flood zone without consulting West Sussex County Council is inappropriate.</p> <p><u>Effective</u> – The development proposal for the land behind Sturt Avenue is not deliverable. There are intractable access issues that have not been addressed. Thames Water have raised concerns over this land. There are also technical issues of building on a floodplain, the cost of foundations and piling.</p> <p><u>Consistent with National policy</u> – As noted in the above points, inclusion of this site in the plan does not follow the NPPF's principle in favour of sustainable development. We would also like to raise the following issues:</p> <p>Settlement boundary change</p> <p>As stated in the Methodology and assessment document:</p>	<p>accessibility to facilities in nearby centres outside the North of the Plan area.</p> <p>As we discussed, The proposal may meet criteria 3 in being close to Haslemere, but it does not meet the first criterion and neither is the scheme required to keep local services going [2nd criterion].</p> <p>2 Policy 2 Development Strategy and Settlement Hierarchy ...Service Villages: .. Camelsdale/Hammer..... Outside of Chichester city and the Settlement Hubs, the Service Villages will</p> <p>This scheme falls within the first category of developments – ie housing.</p> <p>The main issue in this policy though is the need to change the settlement boundary to be the focus for new development and facilities. Provision will be made for the following: • Small scale housing developments consistent with the indicative housing numbers set out in Policy 5; • Local community facilities, including village shops, that meet identified needs within the village, neighbouring villages and surrounding smaller communities, and will help make the settlement more self-sufficient; and • Small scale employment, tourism or leisure proposals.</p> <p>Settlement Boundaries There is a presumption in favour of sustainable development within the Settlement Boundaries which will be reviewed through the preparation of Development Plan Documents and/or Neighbourhood Plans, reflecting the following general approach: 1. Respecting the setting, form and character of the settlement; 2. Avoiding actual or perceived coalescence of settlements; and 3. Ensuring good accessibility to local services and facilities.</p> <p>accommodate the proposal. Such a change to the boundary does not really respect the character of the area. The proposal is in a 'contrived' location with poor access. It also fails the second criterion because it will</p>		

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>2.9 The concept of settlement boundaries is to draw a policy line which separates built-up areas (within which development is, in principle, acceptable), from the countryside (within which, with limited exceptions, it is not).</p> <p>This site clearly marks the natural settlement boundary; it separates the built-up area from the surrounding countryside. The Methodology and assessment criteria states any settlement boundary review will follow this general approach:</p> <p>1. Respecting the setting, form and character of the settlement; 2. Avoiding actual or perceived coalescence of settlements; and 3. Ensuring good accessibility to local services and facilities.</p> <p>The proposed change fails on all 3 points. The key point, and the one which is of greatest concern to a large portion of the local community, is point 2. Development of this land would mean the coalescence of Camelsdale and Haslemere as it would remove the small natural barrier between Sturt Avenue in West Sussex and the houses of Sturt Road in Surrey. This would create coalescence of Waverley and Chichester with this part of Camelsdale becoming part of Haslemere in Surrey.</p> <p>Sustainable development</p> <p>Nearly all journeys made by local residents from Sturt Avenue are made by car. The location is quite remote and due to inadequate lighting on Kings Road it is not practical to walk to the train station in the dark. In addition to this, the single lane unadopted road that is the only route of access to this site is not of sufficient legal width to include a footpath, nor is there room to add one. As noted by Thames Water this is their access route to their pumping station and is owned by them. Given that there can be no pedestrian access to the site any development on this site would contradict the methodology on sustainable development and raises further questions on why this site was chosen above other identified sites that were more appropriate in terms of sustainability.</p> <p>The golden thread of the National Planning Policy Framework's (NPPF) is a presumption in favour of sustainable development, with the eleventh core planning principle stating that plan-making should "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable".</p> <p>Access</p> <p>The methodology and assessment document states that 'the site has been reassessed and concerns regarding access have been overcome'. This assessment is flawed as it did not include further information that has been provided. The local residents, the Parish and District councils & Thames Water have identified further issues that were not included in this assessment.</p> <p>Thames Water have significant concerns regarding the 24-hr</p>	<p>remove a green gap between the village and Haslemere.</p> <p>3 Policy 5 Parish Housing Sites 2012- 2029 Small scale housing sites will be identified to address the specific needs of local communities in accordance with the indicative parish housing numbers set out below. Suitable sites will be identified in neighbourhood plans or in a Site Allocation DPD which the Council will prepare following adoption of the Local Plan. The proposal may provide 'x' new houses – but that is not the same as meeting the 'specific needs' of the locality. The proposal includes large expensive 'villas' but does nothing for providing small units or affordable housing. Secondly, 'indicative' housing needs, clearly means that there is not an essential 'top down' driver for the proposal. The housing figure is only required if it meets the other policies of the Local Plan. Which this analysis indicates that it does not</p>		

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>access that their vehicles require to the pumping station that owns the proposed single track access lane which is the only vehicular and pedestrian access point. It is noted in their submission that these vehicles often carry hazardous chemicals. It is of particular concern to local residents that these vehicles may be held up on a small residential street, and it is clearly inappropriate to develop on this land if the chances of this happening increase due to access issues.</p> <p>The access lane is an unadopted single track road. It is entirely unsuitable for the additional traffic, and for any access required by emergency and service vehicles. It is narrow and visibility is bad. There would be no space for pedestrian access along this narrow track. As people in this area drive to all amenities, and shop online due to the remoteness, ten houses will create a large traffic increase along roads that can't cope. There is a bottleneck of the single track between Sturt Avenue, over the bridge to Surrey and then the existing footbridge back into West Sussex. This is a dirt track owned by Thames Water, and is not wide enough to allow pedestrians let alone passing traffic. They have raised their concerns separately that they won't be able access their own water plant if this is allowed.</p> <p>The proposed access to the site then goes along Moorfields. Due to resident parking this is in effect a single track road, with a very difficult junction for visibility at its entrance. This road is used as a drop off point for the local school, with many young children using this to access Camelsdale School where there is a school gate at the bottom of the road. Due to the narrow footpath, mothers are forced to walk directly in the road. Any further increase in traffic along this road will be dangerous. This access route was deemed unacceptable by Chichester Council when they were assessing the access to the development of Wey Gardens at the other side of Sturt Avenue in 2002, which led to the development not being agreed unless access was rerouted away from Sturt Avenue & Moorfields and the development went ahead with access via Camelsdale Road instead..</p> <p>There are often problems with parked cars blocking access, which we have experienced with an ambulance in the past. This is fairly regular with normal traffic, see email below as an example. It is interesting to note that this occurred on the exact day of the council meeting when it was claimed that concerns over access had been overcome.</p> <p>From: Waste and Recycling wasteandrecycling@chichester.gov.uk Date: 23 November 2016 at 11:03:34 GMT To: "benedictesross@hotmail.co.uk" benedictesross@hotmail.co.uk Subject: RE: Report a missed bin collection</p> <p>Dear Benedicte Ross</p> <p>Thank you for your email</p> <p>The collection crew had reported blocked access to Moorfield due to a parked vehicle. All green bins in Sturt Avenue and Orchard Close were subsequently missed. A recollection has been</p>			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p><i>arranged for these missed bins granted we are now able to gain access. If you can please leave your bin out at its collection point until emptied.</i></p> <p><i>If I can be of further assistance, please do not hesitate to contact me</i></p> <p><i>Yours sincerely</i></p> <p><i>James Harris</i> <i>Administrative Assistant</i> <i>CCS Contract Management</i> <i>Chichester District Council</i></p> <p>Flooding</p> <p>Attached are photographs showing the flooding in this area from recent years. Groundwater flooding issues in relation to the plan have not yet been reviewed or accessed by the lead local flood authority as they were not notified of this consultation.</p> <p>The developers are intending to build an access bridge over the River Wey in addition to the existing culvert. This is likely to increase any flooding issues.</p> <p>The proposed access road crosses an area of the site which is often flooded, and is currently flood zone 2. As noted by Thames Water, development here will transfer floodwater into a SP1 zone, risking contamination of drinking water supply.</p> <p><u>This document is submitted on behalf of the following people who previously objected at the last stage and felt that their views were not taken into account:</u></p> <p>Kevin Rait Lorna Rait Haider Fekaiki Rudi Fekaiki Marci Bourne Chris Phillips Louisa McClean Helen Morton Chris Barrett Sarah Middler Jason Middler Sarah Finbow Carl Hewitt Lyndsay Irvine Michael Irvine Benedicte Ross Daniel Butterworth Margaret Adlam Michael Adlam Stefan Beck Simon Fisher Leigh Fisher Mark Ritchie Amy Beck</p>			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										Zoe Otter Bernadette Hewitt Chris Eaves Bill Eames Lisa Twidell Paul Twidell Rachel Philips Janice Hopwood Billy Hatifani			
Consultation ID Number SAPS51 (Please refer to additional attachments – Electronic only)													
Policy LY1					Rait		No	No	Positively prepared Justified Effective Consistent with National Policy	<p>The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:</p> <ul style="list-style-type: none"> • Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; • Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; • Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and • Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. <p>Notes for submission.</p> <p><u>Positively Prepared</u> – This proposal is not consistent with achieving sustainable development. Of the 5 identified sites reviewed in the plan, the Sturt Avenue site was scored as the second lowest out of the 5 options that were put forward in the CDC sustainability report with a score of -2. This is not reasonable.</p> <p>From the CDC Sustainability appraisal Nov 2016:</p> <p>2.2.5 Lynchmere Housing Options Option 1 (land at Sturt Avenue) [submitted option] and Option 5 (land at Sturt Meadow Cottages) These options would involve clearing woodland and also have a negative impact on the River Wey adjacent. The sites also have poor access, although they are close to the facilities of Camelsdale. The submitted policy contains some mitigation proposals for the biodiversity impacts, but some negative impacts remain.</p> <p>An independent ecology report’s findings (attached) have not been</p>	removal of this site from this plan.	No, I wish to communicate through written representations	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>considered. A review of this report would show that appropriate due diligence has not been performed to determine the biodiversity impacts.</p> <p><u>Justified</u> – The inclusion of this land is not justified based on the lack of local community engagement or support for this proposal. In addition to this there are other alternatives noted in the CDC sustainability report that were relatively more attractive. Lynchmere was originally allowed to remove the allocated housing number of 10 as no suitable sites were available. No reasonable explanation has been given on why this decision has been reversed. In addition to this, the decision to submit a site that was one of the worst options in terms of sustainability is inconsistent with the stated aims of the local plan.</p> <p>The guidance notes state that the DPD should be based on a robust and credible evidence base involving: evidence of participation of the local community. During the submission phase, a large amount of evidence was supplied by local residents & objections were raised by both the Parish & District council. This evidence was not properly considered when putting forward the Sturt Avenue Site.</p> <p>This land is also in flood zones 3 and 2 based on the current mapping by the environment agency. It should be noted that the environment agency is due to re-map this site but has not yet done so. In addition to this, local authorities are responsible for undertaking preliminary flood risk assessments including groundwater, for assessing where these risks are significant, for mapping the associated risk where relevant and for developing local flood risk management plans. It has been confirmed that West Sussex County council are the lead local flood authority and they have not been consulted on the plan. This raises serious concerns over the due diligence performed and whether it is suitable and evidence gathered suitable and sufficient. Inclusion of this land that has been identified as in a flood zone without consulting West Sussex County Council is inappropriate.</p> <p><u>Effective</u> – The development proposal for the land behind Sturt Avenue is not deliverable. There are intractable access issues that have not been addressed. Thames Water have raised concerns over this land. There are also technical issues of building on a floodplain, the cost of foundations and piling.</p> <p><u>Consistent with National policy</u> – As noted in the above points, inclusion of this site in the plan does not follow the NPPF's principle in favour of sustainable development. We would also like to raise the following issues:</p> <p>Settlement boundary change</p> <p>As stated in the Methodology and assessment document:</p> <p>2.9 The concept of settlement boundaries is to draw a policy line which separates built-up areas (within which development is, in principle, acceptable), from the countryside (within</p>			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>which, with limited exceptions, it is not).</p> <p>This site clearly marks the natural settlement boundary; it separates the built-up area from the surrounding countryside. The Methodology and assessment criteria states any settlement boundary review will follow this general approach:</p> <p>1. Respecting the setting, form and character of the settlement; 2. Avoiding actual or perceived coalescence of settlements; and 3. Ensuring good accessibility to local services and facilities.</p> <p>The proposed change fails on all 3 points. The key point, and the one which is of greatest concern to a large portion of the local community, is point 2. Development of this land would mean the coalescence of Camelsdale and Haslemere as it would remove the small natural barrier between Sturt Avenue in West Sussex and the houses of Sturt Road in Surrey. This would create coalescence of Waverley and Chichester with this part of Camelsdale becoming part of Haslemere in Surrey.</p> <p>Sustainable development</p> <p>Nearly all journeys made by local residents from Sturt Avenue are made by car. The location is quite remote and due to inadequate lighting on Kings Road it is not practical to walk to the train station in the dark. In addition to this, the single lane unadopted road that is the only route of access to this site is not of sufficient legal width to include a footpath, nor is there room to add one. As noted by Thames Water this is their access route to their pumping station and is owned by them. Given that there can be no pedestrian access to the site any development on this site would contradict the methodology on sustainable development and raises further questions on why this site was chosen above other identified sites that were more appropriate in terms of sustainability.</p> <p>The golden thread of the National Planning Policy Framework's (NPPF) is a presumption in favour of sustainable development, with the eleventh core planning principle stating that plan-making should "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable".</p> <p>Access</p> <p>The methodology and assessment document states that 'the site has been reassessed and concerns regarding access have been overcome'. This assessment is flawed as it did not include further information that has been provided. The local residents, the Parish and District councils & Thames Water have identified further issues that were not included in this assessment.</p> <p>Thames Water have significant concerns regarding the 24-hr access that their vehicles require to the pumping station that owns the proposed single track access lane which is the only vehicular and pedestrian access point. It is noted in their submission that</p>			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p>these vehicles often carry hazardous chemicals. It is of particular concern to local residents that these vehicles may be held up on a small residential street, and it is clearly inappropriate to develop on this land if the chances of this happening increase due to access issues.</p> <p>The access lane is an unadopted single track road. It is entirely unsuitable for the additional traffic, and for any access required by emergency and service vehicles. It is narrow and visibility is bad. There would be no space for pedestrian access along this narrow track. As people in this area drive to all amenities, and shop online due to the remoteness, ten houses will create a large traffic increase along roads that can't cope. There is a bottleneck of the single track between Sturt avenue, over the bridge to Surrey and then the existing footbridge back into West Sussex. This is a dirt track owned by Thames Water, and is not wide enough to allow pedestrians let alone passing traffic. They have raised their concerns separately that they won't be able access their own water plant if this is allowed.</p> <p>The proposed access to the site then goes along Moorfields. Due to resident parking this is in effect a single track road, with a very difficult junction for visibility at its entrance. This road is used as a drop off point for the local school, with many young children using this to access Camelsdale School where there is a school gate at the bottom of the road. Due to the narrow footpath, mothers are forced to walk directly in the road. Any further increase in traffic along this road will be dangerous. This access route was deemed unacceptable by Chichester Council when they were assessing the access to the development of Wey Gardens at the other side of Sturt Avenue in 2002, which led to the development not being agreed unless access was rerouted away from Sturt Avenue & Moorfields and the development went ahead with access via Camelsdale Road instead..</p> <p>There are often problems with parked cars blocking access, which we have experienced with an ambulance in the past. This is fairly regular with normal traffic, see email below as an example. It is interesting to note that this occurred on the exact day of the council meeting when it was claimed that concerns over access had been overcome.</p> <p>From: Waste and Recycling wasteandrecycling@chichester.gov.uk Date: 23 November 2016 at 11:03:34 GMT To: "benedictesross@hotmail.co.uk" benedictesross@hotmail.co.uk Subject: RE: Report a missed bin collection</p> <p>Dear Benedicte Ross</p> <p>Thank you for your email</p> <p>The collection crew had reported blocked access to Moorfield due to a parked vehicle. All green bins in Sturt Avenue and Orchard Close were subsequently missed. A recollection has been arranged for these missed bins granted we are now able to gain access. If you can please leave your bin out at its collection point until emptied.</p>			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<p><i>If I can be of further assistance, please do not hesitate to contact me</i></p> <p><i>Yours sincerely</i></p> <p><i>James Harris</i> <i>Administrative Assistant</i> <i>CCS Contract Management</i> <i>Chichester District Council</i></p> <p>Flooding</p> <p>Attached are photographs showing the flooding in this area from recent years. Groundwater flooding issues in relation to the plan have not yet been reviewed or accessed by the lead local flood authority as they were not notified of this consultation.</p> <p>The developers are intending to build an access bridge over the River Wey in addition to the existing culvert. This is likely to increase any flooding issues.</p> <p>The proposed access road crosses an area of the site which is often flooded, and is currently flood zone 2. As noted by Thames Water, development here will transfer floodwater into a SP1 zone, risking contamination of drinking water supply.</p> <p><u>This document is submitted on behalf of the following people who previously objected at the last stage and felt that their views were not taken into account:</u></p> <p>Kevin Rait Lorna Rait Haider Fekaiki Rudi Fekaiki Marci Bourne Chris Phillips Louisa McClean Helen Morton Chris Barrett Sarah Middler Jason Middler Sarah Finbow Carl Hewitt Lyndsay Irvine Michael Irvine Benedicte Ross Daniel Butterworth Margaret Adlam Michael Adlam Stefan Beck Simon Fisher Leigh Fisher Mark Ritchie Amy Beck Zoe Otter Bernadette Hewitt Chris Eaves</p>			

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4. Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										Bill Eames Lisa Twidell Paul Twidell Rachel Philips Janice Hopwood Billy Hatifani			
Consultation ID Number SAPS52 (Please refer to additional attachments – Electronic only)													
Policy LY1				Mr	Soobadoo		Yes	Yes		<p>We submit representations in response to the Site Allocation Proposed Submission Development Plan Document (DPD) Consultation. Our comments relate specifically to the site in our ownership proposed for allocation under Policy LY1.</p> <p>We are pleased that the Council has taken our previous representations to the Site Allocation Preferred Approach Consultations (submitted 17 February 2016 and 22 September 2016) into account and considers the site suitable and deliverable for inclusion within the Site Allocation DPD for 10 houses.</p> <p>Propose additions to policy should they be required.</p>	<ul style="list-style-type: none"> provide a water supply/drainage study to demonstrate how necessary infrastructure can be provided and existing infrastructure protected; be in accordance with details to be agreed by the EA. 	Yes, I wish to speak to the Inspector at the hearing sessions	
Consultation ID Number SAPS56 (No attachments)													
Policy LY1				Mrs	West	West Sussex County Council	Yes	No	Effective	<p>The County Council has no comments on the proposed housing allocation in its capacity as Local Highway Authority.</p> <p>The County Council, in its role as Lead Local Flood Authority, notes that the proposed allocation LY1 Land to the rear of Sturt Avenue in Lynchmere Parish is in an area identified as being at high risk of groundwater flooding. Specifically, the interpretation of this designation is that there will be a significant possibility that incidence of groundwater flooding could lead to damage to property or harm to other sensitive receptors at, or near, this location. Where flooding occurs it is likely to be in the form of shallow pools or streams; there may be basement flooding. Road or rail closures should not be needed and flooding should pose no significant risk to life. Surface water flooding may be exacerbated when groundwater levels are high.</p> <p>It is understood that CDC is undertaking an update to its Sequential Test to ensure that all sites are included, and if required should undertake an exception test if no alternative sites are available. This approach would ensure that the allocation is consistent with national policy and guidance. All technical evidence relating to flood risk on proposed site allocations within the DPD should be considered and published when it is submitted for examination.</p>		No, I wish to communicate through written representations	
Consultation ID Number SAPS15 (No attachments)													
Policy PL1				Mr	Williams	Natural England	Yes	Yes		No comment.		No, I wish to communicate through written representations	
Consultation ID Number SAPS34 (Please refer to additional attachments – Electronic only)													
Policy PL1	Mr	White	Genesis Town Planning			Genesis Town Planning	Yes	No	Positively prepared	As it stands the SADPD fails the 'positively prepared, justified and	Deleting the greenfield site north of Little Springfield Farm in policy PL1	Yes, I wish to speak to the	The SADPD as drafted does not

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
									Justified Consistent with National Policy	<p>consistent with national planning policy tests of soundness.</p> <p>To be positively prepared the plan should be based on a strategy which seeks to meet objectively assessed development requirements. The 10 dwellings allocated to Plaistow and Ifold in policy PL1 is derived from the housing requirements in Key Policies Local Plan 2015. This Plan doesn't meet objectively assessed need (OAN) and was only found sound by the Inspector in 2015 on the basis the Council agreed to complete a review within 5 years to ensure OAN is met. Additional housing at Plaistow and Ifold above the 10 dwelling indicative figure would provide a useful 'stop gap' arrangement before the review is completed in 2020. The threshold for 30% on site affordable housing provision is set at 11 dwellings in the Key Policies Local Plan policy 34. Limiting housing to only 10 dwellings at Plaistow and Ifold even if provided on a single site would therefore deny the settlement any on site affordable housing provision. An increased allocation would allow some on site provision and contribute more effectively towards meeting housing need.</p> <p>To be Justified the Plan should be the most appropriate strategy when considered against the reasonable alternatives based on proportionate evidence. We believe the wrong site has been included for development at Ifold in policy PL1. It is not justified as it is a greenfield site and another brownfield site is available nearby. The Sustainability Appraisal prepared as part of the evidence base for the SADPD has a flawed scoring methodology as there is no performance indicator that allows a brownfield site to be scored any differently to a greenfield site. Without a brownfield/greenfield performance indicator the SA will simply continue to identify the wrong site. We would ask the Council to bring this comment on the SA to the attention of the SADPD Inspector along with our main SADPD representations.</p> <p>The selection of the site in Policy PL1 is not consistent with national planning policy. As the NPPF confirms, sustainability is not just about accessibility to services but is also about encouraging the effective use of previously developed land, which can even be acceptable even in highly protective designations such as green belt (Core planning principle 8, paragraph 111 and paragraph 89 6th bullet). According to paragraphs 56-58 good design is another key aspect of sustainable development and should contribute to making places better for people. The selected site in PL1 is greenfield and denies any opportunity to reuse the alternative brownfield site at Little Springfield Farm nearby. The design and layout of new building at Little Springfield Farm would displace the unsightly B2 buildings already there and bring self-evident visual benefits. On any view, redevelopment of the Little Springfield Farm site would secure sustainable development.</p>	and allocating the brownfield site for residential development at Little Springfield Farm instead would improve the performance of the SADPD in connection with the positively prepared, justified and consistent with national planning policy tests of soundness. The site is large enough to cater for at least 11 dwellings if the Inspector felt the benefits this would bring in terms of on-site affordable housing provision justified the increase. In the event the Inspector agrees that the site could accommodate complimentary business and shop uses these could be included in the site specific criteria in policy PL1. We reserve the right to elaborate on these comments further at the SADPD Examination if invited to attend.	Inspector at the hearing sessions	<p>meet the tests of soundness and we would welcome the opportunity to participate in the Examination debate to explain this to the Inspector.</p> <p>There are also fundamental shortcomings in the evidence base for the SADPD in that the SA has flaws in its scoring methodology. We would like to draw these flaws to the attention of the inspector as well.</p>
Consultation ID Number SAPS54 (Please refer to additional attachments – Electronic only)													
Policy PL1				Mrs	Weddell	Plaistow And Ifold Parish Council	No	No	Positively prepared Justified Effective Consistent with National Policy	<p>The representations set out above clearly demonstrate that the allocation of the site Land to the North of Little Springfield Farm in policy PL1 makes the draft SA DPD fail the tests of soundness. The draft Plan;</p> <ul style="list-style-type: none"> Is not legally compliant as there has been a failure in the duty to co-operate; 	As a result, it is submitted that policy PL1 should be deleted and a site for "about 10 units" should be identified and allocated by the Parish Council through the neighbourhood planning process.	Yes, I wish to speak to the Inspector at the hearing sessions	

Policy Number	Title	Family Name	Company / Organisation	Title	Family Name	Company / Organisation	3.1 Legally compliant?	3.2 Sound?	4.Unsound because it is not:	5. Reasons for not being legally compliant/sound	6. Change(s) needed to make the Site Allocation DPD legally compliant and sound.	7. Attend and give evidence at the hearing part of the examination?	8. Reasons for appearing at examination
										<ul style="list-style-type: none"> • Is not legally compliant as there has not been sufficient regard to national policy, particularly paragraphs 7 and 8 of the NPPF; • Is not positively prepared as it is not based on the adopted strategy set out in the adopted Local Plan; • Is not justified as it is not based on recent, robust and credible evidence base, including the recent appeal decision for the Little Springfield Farm brownfield site; • Is not justified as it is not the most appropriate strategy when considered against reasonable alternatives; • Is not justified as policy PL1 does not help to ensure that the social, environmental and economic impacts are balanced and sustainability objectives will be achieved; • Is not effective as there has been a lack of working with other public bodies (namely the Parish Council) who have identified more sustainable, alternative sites • Is not consistent with national policies, particularly in the form of paragraphs 7 and 8 of the NPPF. • Furthermore, the draft SA DPD is not positively prepared as the adopted Local Plan strategy is for "the identification of sites and phasing of delivery will be determined primarily by local communities through a neighbourhood planning process". This process is currently underway in Plaistow and Ifold Parish, and should be allowed to continue. It is clear that the Neighbourhood Plan Steering Group have engaged with the local community and explored a number of alternative potential sites. At the time of drafting these representations, work is being carried out to finalise the preferred site. 			