

Westbourne Neighbourhood Plan Regulation 16 Consultation Responses

Summary of representations received by Chichester District Council (CDC) as part of Regulation 16 publication and submitted to the independent examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act

Parish Name: Westbourne Parish Council

Consultation Date: 12 June 2017 to 24 July 2017

All the original representation documents are included, in full, as part of the examination pack. The table below may be a summary of the representations received so may not always be a verbatim report.

Name and Reference	Date received	Method of submission	Summary of representation
Sport England (001)	14.06.17	Email	<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Planning Policy Statement: 'A Sporting Future for the Playing Fields of England'. http://www.sportengland.org/playingfieldspolicy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust</p>

		<p>and up to date evidence. In line with Par 74 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be</p>
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			<p>used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign</p> <p><i>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p>
SGN (002)	19.06.17	Email	<p>As per the strategic sites outlined in the Local Plan for the area: "SGN have assessed the impact of your proposed new ~30 dwellings by 2029 and based on the spread of development we can conclude that our gas infrastructure will be minimally affected by the levels of growth proposed."</p> <p>Having reviewed the proposed domestic dwelling developments only in the <i>Westbourne Neighbourhood Plan</i> and identified the relevant sites around Westbourne, we have acknowledged that these developments will have minimal impact on our gas infrastructure in this area and should not require reinforcement.</p> <p>While information obtained through the provision of Local Authority Development Plans on your Website is important to us, it only acts to identify potential development areas.</p> <p>Our principle statutory obligations relevant to the development of our gas network, arise from the Gas Act 1986 (as amended), an extract of which is given below:-</p>

			<p>Section 9 (1) and (2) which provides that:</p> <p>9. General powers and duties</p> <p>(1) It shall be the duty of a gas transporter as respects each authorised area of his:-</p> <p>(a) to develop and maintain an efficient and economical pipe-line system for the conveyance of gas; and</p> <p>(b) subject to paragraph (a) above, to comply, so far as it is economical to do so, with any reasonable request for him –</p> <p>(i.) to connect to that system, and convey gas by means of that system to, any premises; or</p> <p>(ii.) to connect to that system a pipe-line system operated by an authorised transporter.</p> <p>(1A) It shall also be the duty of a gas transporter to facilitate competition in the supply of gas.</p> <p>(2) It shall also be the duty of a gas transporter to avoid any undue preference or undue discrimination -</p> <p>(a) in the connection of premises or a pipe-line system operated by an authorised transporter to any pipe-line system operated by him; and in the terms of which he undertakes the conveyance of gas by means of such a system.</p> <p>We would not therefore develop firm extension or reinforcement proposals until we are in receipt of confirmed developer requests via our formal connections process.</p> <p>As SGN is the owner and operator of significant gas infrastructure within the Westbourne area and due to the nature of our license holder obligations;</p> <ul style="list-style-type: none"> - Should alterations to existing assets be required to allow development to proceed, then the alterations will require to be funded by a developer. - Should major alterations or diversions to such infrastructure be required to allow development to proceed this could have a significant time constraint on development and as such any diversion requirements should be established early in the detailed planning process. <p>We would therefore request that where the Council are in discussions with developers, via the Local Plan, these early notification requirements are highlighted.</p> <p>Additionally, SGN are aware of the advances being made in renewable technologies, especially those related to the production of bio-methane. Should any developer be proposing to include such technology within their development, then we would highlight the benefits of locating these facilities near existing gas infrastructure.</p>
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			Again where the Council are in discussions with developers, via the Local Plan, we would hope that these early notification requirements are highlighted.
Southern Water (003)	28.06.17	Email	Confirm that Southern Water has no comments in this instance.
West Sussex County Council (004)	07.07.17	Email	Given that the Submission Neighbourhood Plan for Westbourne includes the proposed allocation of small scale housing sites, it should be noted that this will be subject to the resolution of any highway safety and access issues at the planning application stage or as part of a consultation on a Community Right to Build Order. The County Council provided comments and general Development Management guidance in response to the previous Pre-Submission consultations.
Historic England (005)	17.07.17	Email	<p>Strongly welcome the references to the over 60 listed building entries in the parish (including the grade I Church of St John the Baptist and the grade II* Westbourne House), non-designated heritage assets, the Conservation Area, the West Sussex Historic Landscape Character Assessment, the Chichester District Historic Environment Record and its records for the parish in the sub-section "About Our Parish".</p> <p>This sub-section accords with the advice in the National Planning Practice Guidance "... where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions".</p> <p>We welcome the reference to historic identity and character in paragraph 3.1.1, Objectives 6, 7 and 9 for identifying potential development sites in paragraph 3.3.6, the reference to character in 3. of paragraph 3.3.7, clause 3 (v) of Policy OA1, the reference to the conservation areas and listed buildings in paragraph 4.7.6 and paragraph 4.7.7, especially clause 5 .</p> <p>We welcome and support Policy LD1 which we consider, together with the Village Design Statement and Conservation Area Character Appraisal and Management Plan, satisfies the requirement of paragraph 58 of the National Planning Policy Framework; "...neighbourhood</p>

			<p><i>plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics.”</i></p> <p>We particularly welcome and support section 4.10 and Policy LD3, although we would prefer “.....<i>special interest, character and appearance of the Conservation Area or the significance of other heritage assets</i>” – the “special interest” being the reason for its designation. However, for clarity, in our opinion, the policy still meets the basic conditions.</p> <p>We are pleased to note that impact on the conservation area and listed buildings and village character were two of the “key criteria” for identifying potential development sites.</p> <p>As regards the proposed housing sites, Land to the West of Monk’s Hill, is close to the grade II listed Monk’s Farmhouse, just to the north, However, if the site is developed for just six houses as proposed, with a buffer zone to the north, we do not consider that it would be likely to have a significant effect on the historic significance of the farmhouse. We welcome the reference in paragraph 4.14.1 to potential significant archaeological interest and the requirement in Policy SS1 for an archaeological evaluation prior to the submission of any planning application. We therefore have no objection to the allocation of this site.</p> <p>Land adjacent to Chantry Hall is not far from the Conservation Area but we note that the Conservation Area Character Appraisal does not identify the site as being important to the setting of the Area or in views to or from the Area. Our records show that the development of this site would not affect any other designated heritage assets. We welcome the reference in paragraph 4.14.5 to potential significant archaeological interest and the requirement in Policy SS3 for an archaeological evaluation prior to the submission of any planning application. We therefore have no objection to the allocation of this site either.</p> <p>As a general point, we still feel that the Plan could perhaps more clearly identify the issues affecting Westbourne that the Plan’s policies and proposals are intended to address. In our experience Neighbourhood Plans usually include a section on issues that have been identified through the community consultation process, which then inform and justify the Plan’s policies and proposals. We would expect to find this in Section 3 of the Plan but sub-sections 3.2 and 3.3 really only consider future development in the village.</p>
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Highways England (006)	18.07.17	Email	<p>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.</p> <p>Highways England will be concerned with plans or proposals that have the potential to impact on the safe and efficient operation of the SRN , in this case the A27 and associated junctions.</p> <p>Having assessed the updated document we have no comments on the Plan.</p>
Havant Borough Council (007)	18.07.17	Email	<p><u>Para 2.4.1 and 2.4.2:</u> The content of these paragraphs states that the Westbourne Doctors Surgery is managed by the Emsworth Practice. The council understands that the Emsworth Surgery is looking to relocate which may also affect the provision in Westbourne. One of the options being considered is a location on the Redlands Grange development (previously known as Hampshire Farm) in North Emsworth which is close to the border with Westbourne. We recommend that you contact the Emsworth Surgery and the South East Hampshire NHS Clinical Commissioning Group (CCG) for further information and their current position.</p> <p><u>Para 2.8.1 (Bullet Point 8):</u> Following HBC's comments on the previous edition of the Westbourne Neighbourhood Plan, we are pleased to see that you are aware of site UE76 (Land north of Long Copse Lane) which has been identified in the Local Plan Housing Statement (LPHS). The LPHS was adopted by Full Council on 7th December 2016 and is a clear position statement as to which sites Havant Borough Council considers could deliver sustainable development to meet the housing need up to 2036; providing the necessary infrastructure is provided alongside new housing.</p> <p>The site will be considered further in the Draft Local Plan 2036. The Draft Plan is due to go out to Public Consultation in January and February 2018. We hope to receive a representation by Westbourne Parish Council/WNPSG during this time.</p>

		<p><u>Policy LD4: Local Gaps</u> HBC have noted the locations of Inter Gaps 1 and 2. The woodland area in the north of Inter Gap 1 is in close proximity to the Hampshire border and Southleigh Forest. Previous Bat surveys have found that Bechstein's Bat inhabits the former Forest of Bere woodlands in this area. As such, the Council supports the inclusion of the woodland area in the north of Inter Gap 1. The protection of this woodland area from development will safeguard this important habitat for a rare and (both nationally and internationally) protected Bat species. If you require further information on Bechstein's Bat, then please contact HBC.</p> <p>The Council would suggest making reference to Bechstein's Bat in the woodland area of Inter Gap 1.</p> <p><u>Policy SS1: Land to the West of Monk's Hill</u> The Council has noted the allocation of the 6 dwellings at the land west of Monk's Hill (Policy SS1). The site is in close proximity to the Hampshire border and Southleigh Forest. Previous Bat surveys have found that Bechstein's Bat inhabits the former Forest of Bere woodlands in this area. The green infrastructure that will be provided with the development is supported by HBC for this reason. Even though this is a small proposed development, it is situated on the fringes of potentially suitable habitat for Bechstein's Bat and is potentially within 3km of known roosting sites. Therefore, relevant surveys will be required to determine the presence of Bechstein's Bat and their flight routes in this area. If you require further information on Bechstein's Bat, then please contact HBC.</p> <p>The Council suggests making reference to the sites proximity to Southleigh Forest and the presence of Bechstein's Bat within this woodland. The Council also recommends that a developer requirement is added to Policy SS1 which states that appropriate Bechstein's Bat surveys are carried out prior to development. If the presence of the species is found, either by roosting sites, flight paths or foraging sites, then appropriate mitigation will be required. Due to the rarity and limited information on the species, all Bechstein's Bat surveys should only be undertaken by suitably-qualified and licensed ecologists using the correct equipment.</p> <p><u>Appendix 7 – site 10 – Land rear of Parish Hall</u> Site 10 has not been included in the Westbourne Neighbourhood Plan as it would provide only 3 units (below the 5 unit threshold for allocation) and is identified in Flood Zone 3. This is supported by HBC as the site is in close proximity to the border with Emsworth and any</p>
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Environment Agency (008)	18.07.17	Email	<p>Appendix 7 – Site Assessments</p> <p><u>Flood Risk</u> Note that within this section some sites have been identified at being at risk of flooding, in accordance with the National Planning Policy Framework (NPPF) para 100-102, recommend the Sequential Test is undertaken to ensure development is directed to the areas of lowest flood risk. The Sequential Test should be informed by the Local Planning Authorities Strategic Flood Risk Assessment (SFRA).</p> <p>Have concerns if development is allocated in this flood zone without the Sequential Test being undertaken.</p> <p><u>Waste Water Treatment</u> Within this section and for most of the sites identified it is stated under the heading of flooding, drainage and water sources section, that if <i>there is no capacity in the sewage system that a private system could be used/be possible.</i></p> <p>Note concerns regarding the operation of the sewer system during high or prolonged periods of rainfall but <u>do not consider that the requirement for on-site sewage treatment is the best way to resolve these.</u> Discharges from wastewater treatment plants owned and operated by sewerage undertakers are significantly less likely to cause pollution than discharges from private plants treating domestic sewage or trade effluent. This is because discharges from public sewerage systems are much more likely to meet the standards set in their environmental permit as a result of effluent receiving more comprehensive and reliable treatment.</p>

			<p>Expect developments discharging domestic sewage to connect to the public foul sewer where it is reasonable to do so. The Environmental Permitting Regulations 2010 also specify that a small sewage discharge to water or groundwater is only exempt from the requirement for a permit if it “cannot reasonably, at the time it is first made, be made to the foul sewer”.</p> <p>At this time do not consider that it would be unreasonable for the proposed sites to connect to the public foul sewer and therefore indicate that the applicant would be very unlikely to obtain a permit for private on-site sewage treatment plant.</p> <p>The point at which the development connects to the sewer network is agreed with Southern Water, and is considered to be at the nearest point of capacity. Where there are concerns with the capacity of the sewerage network to accept additional foul flows then the connection could be required to be made directly to the Wastewater Treatment Works.</p> <p>Recommend that the requirement for on-site sewage treatment plants is removed from both policy 1 and 5; also recommend that there are discussions with Southern Water to understand their requirements in relation connection to the sewer.</p>
<p>Neame Sutton Limited on behalf of Southcott Homes (Fareham) Ltd (009)</p>	<p>24.07.17</p>	<p>Email</p>	<p>Introduction</p> <p>1.1 Neame Sutton Limited, Chartered Town Planners, are instructed by Southcott Homes (Fareham) Limited (“Southcott Homes”) to prepare representations in respect of the Regulation 16 Submission draft version of the Westbourne Neighbourhood Plan (“the Neighbourhood Plan”).</p> <p>1.2 The remainder of this document sets out Southcott Homes’ representations following the relevant paragraph and policy references within the Neighbourhood Plan identifies where the Basic Conditions have not been met.</p> <p>2. Representations</p> <p>Policy OA1: Sustainable Development – OBJECT – Not Reflecting National Policy on Sustainable Development</p> <p>2.1 Southcott Homes is supportive of the Neighbourhood Plan embracing the general presumption in favour of sustainable development that runs as the golden thread through the planning system; but wording of draft policy is overly restrictive and does not correctly reflect the</p>

		<p>presumption set out in the Framework.</p> <p>2.2 Amendments have been made but as drafted the policy states that sustainable development will only be permitted if it is located within the settlement boundary or an allocated site.</p> <p>2.3 Definition of sustainable development set out at Paragraph 7 of the Framework and the general presumption in favour contained at Paragraphs 14 and, in relation to housing development, Paragraph 49 of the Framework does not seek to distinguish between development that is inside or outside of a defined settlement. If a proposal meets with the definition of sustainable development and the three dimensions in particular then the Framework directs that it should be approved without delay.</p> <p>2.4 Appeal decision on land north of Long Copse Lane in Westbourne is a prime example of the correct application of the presumption in favour of sustainable development wherein the Inspector concluded the residential proposal for 16 no. dwellings comprised sustainable development even though it was situated outside of the defined settlement boundary and should as a consequence succeed.</p> <p>2.5 Criteria set out in the policy (Heading 3 (i) – (v)) are overly prescriptive and don't allow sufficient flexibility for individual proposals responding to the individual merits of any given site and goes well beyond the intention of National policy and the adopted Local Plan.</p> <p>2.6 It is therefore considered that the policy should be amended to more accurately reflect the presumption in favour of sustainable development set out in the Framework and that the criteria contained in the policy should either be reworded to allow for sufficient flexibility or removed and placed into the supporting text of the policy.</p> <p>Policy SS2: Land at Long Copse Lane – OBJECT</p> <p>2.7 Parish Council has acknowledged that full detailed planning consent was granted on appeal in December 2015 for 16 no. dwellings on this site; Figure 17 reflects the consented scheme.</p> <p>2.8 However policy sets out a series of criteria for the scheme to comply with, which given the fact that full detailed planning consent has already been granted and, at the time of preparing</p>
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		<p>this Representations, the development is nearing completion are considered entirely unnecessary. In effect this site comprises a commitment that the Parish Council can rely upon as part of meeting the minimum dwelling requirement of 25 dwellings in Westbourne over the plan period. The detailed criteria within the policy should therefore be deleted. In fact given the advanced stage of the development it would not seem necessary for the Council to include any reference to the 16 no. units as an allocation, save for the comments made below.</p> <p>2.9 In addition to the above point Southcott Homes remains of the view that the undeveloped land referred to as a 'paddock' on this site presents an ideal opportunity to allocate a further 9 no. dwellings thereby meeting the Parish Council's minimum dwelling requirement for the plan period in a single location. A scheme for a further 9 no. dwellings would dovetail with the current consented scheme and could utilise the existing consented point of access onto North Street.</p> <p>2.10 Allocation of the remaining 'paddock' area for 9 no. dwellings would not remove the need for the other allocations identified by the Parish Council in the Neighbourhood Plan at Monk's Hill and Chantry Hall but would instead introduce flexibility to ensure that the minimum level of housing for the settlement can be delivered in a timely manner.</p> <p>2.11 Increased provision would ensure that the Neighbourhood Plan remains up-to-date and resilient for a longer period following adoption given that the District Council is under an obligation, to fully review its Local Plan to increase its housing requirement within 5 years of adoption (from July 2015). District Council has formally commenced this process; Issues and Options consultation is currently underway until 03 August 2017. The fact that the evidence base for the adopted Local Plan in terms of housing need is out-of-date will have the inevitable consequence of increasing the dwelling requirements for District and in turn the settlements along the A259 corridor given the constraints imposed on the District as a whole, which would in turn necessitate a review of Neighbourhood Plans where they fail to meet the increased requirements.</p> <p>2.12 Given the conclusions set out by the Inspector who determined the appeal for 16 no. dwellings on the site it is apparent that the 'paddock' area comprises a sustainable location and a further 9 no. dwellings could be readily assimilated without harm to the character or setting of the settlement at this location.</p> <p>2.13 Plan detailing the proposed allocation site is attached for ease of reference.</p>
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<p>South Downs National Park Authority ((010))</p>	<p>24.07.17</p>	<p>Email</p>	<p><u>Para 1.2.2:</u> The SDNP Local Plan will be published for Pre Submission consultation in the Autumn 2017. The SDNPA request that the statement in paragraph 1.2.2 is updated to reflect the advance stage of the SDNP Local Plan. The paragraph refers to the adoption of the plan in July 2018, the SDNPA do not require any change to this proposed date for adoption.</p> <p><u>4.2.5, Policy OA1</u> Would welcome policy criteria including reference to the SDNP in bullet point 3 of policy to ensure applicants are aware of the National Park status which affects part of the Neighbourhood Plan designated area.</p> <p><u>4.2.5, Policy OA1-2</u> Point to of this policy requires 'compliance with all other policy requirements of the development plan, the SDNPA highlight this particular part of the policy as it may not be considered appropriate or proportionate for the Policy to require compliance with all other policies in the Development Plan, it may be more appropriate to require compliance with all relevant policies of the Development Plan.</p> <p><u>4.5.2, Policy OA3</u> Section 4.5.2 of this policy requires a marketing exercise to be completed for 12 months. This paragraph states that this is a policy requirement for Policy OA2 and OA3. SDNPA would recommend that this policy requirement is clearly stated in Policy OA2 if it is a requirement for that policy. It is not sufficient to reference the policy requirement in a separate policy.</p> <p><u>4.6.13 – 4.6.18</u> SDNPA would welcome reference to the SDNP Local Plan and relevant evidence base relating to Gypsies and Travellers and Travelling Showpeople in this section of the NDP. Text below could be used to provide a clearer picture of the need and SDNP approach relating to this matter:</p> <p>The Coastal West Sussex (Adur, Arun, Chichester & Worthing) Gypsy and Traveller Accommodation Needs Study identified a need for 6 pitches for Gypsies and Travellers and no plots for Travelling Showpeople within the SDNP part of the study area. Since the completion of the study 16 pitches have been supplied within the National Park. In addition it is expected that 2 pitches will become available through the movement of people to bricks and mortar</p>
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accommodation. This results in the provision of 12 pitches above the identified need of 6 in the period to 2027. Therefore there is currently no identified need for further sites within the Coastal West Sussex part of the National Park.

4.6.25, Policy OA4-2

SDNPA acknowledge the support for the approach adopted by the Authority and the proximity of Woodmancote and Westbourne to the National Park. However, the SDNPA policy is not within an adopted plan and still subject to public consultation and Examination. Currently the draft policy reads as follows:

Strategic Policy SD33: Gypsies and Travellers and Travelling Showpeople

1. Lawful permanent sites for Gypsies, Travellers and Travelling Showpeople will be safeguarded from alternative development, unless acceptable replacement accommodation can be provided or the site is no longer required to meet any identified need.
2. The SDNPA will seek to meet the need of Gypsies, Travellers and Travelling Showpeople up to 2027/28, by the allocation of permanent pitches and the granting of planning permission on currently unidentified sites for approximately:
 - a) 13 pitches in that part of the National Park located in Brighton & Hove;
 - b) 8 pitches in that part of the National Park located in Lewes District;
 - c) 11 pitches in that part of the National Park located in East Hampshire and Winchester Districts.
3. Development proposals to meet the needs of the Gypsy, Traveller and Travelling Showpeople community (as defined in *Planning Policy for Traveller Sites (2015)* or any subsequent policy) will be permitted where they:
 - a) Can demonstrate a local connection;
 - b) Can demonstrate that there is no alternative available pitch which could be used in the locality;
 - c) Do not result in sites being over-concentrated in any one location or disproportionate in size to nearby communities;
 - d) Are capable of being provided with infrastructure such as power, water supply, foul water drainage and recycling/waste management without harm to the special qualities of the National Park;

			<p>e) Provide sufficient amenity space for residents;</p> <p>f) Do not cause, and are not subject to, unacceptable harm to the amenities of neighbouring uses and occupiers;</p> <p>g) Have a safe vehicular and pedestrian access from the public highway and adequate provision for parking, turning and safe manoeuvring of vehicles within the site; and</p> <p>h) Restrict any permanent built structures in rural locations to essential facilities.</p> <p>4. Proposals for sites accommodating Travelling Showpeople should allow for a mixed use yard with areas for the storage and maintenance of equipment. If the criteria set out at part 3 of draft policy SD33 are supported by the Westbourne NDP group they should be included within the NDP policy and evidenced accordingly. Reference to a policy of another planning authority will not be given any weight in the determination of planning applications</p> <p>The SDNPA will be working with Chichester and the other Coastal West Sussex Authorities as and when GTAA's are updated and sites plans prepared. The SDNPA support the need for Chichester District Council to progress with the Gypsy & Traveller Site Allocations DPD. Experience shows that the lack of progress of such plans in other areas adjoining the National Park has led to sites being granted permission within the National Park at appeal due to a lack of supply.</p>
Taylor Wimpey Strategic Land (011)	24.07.17	Email	<p><u>Para 1.1.8:</u> Support the Neighbourhood Plan's recognition that annual monitoring of Plan is needed to ensure the Plan remains up to date and is able to meet identified local needs. CDC has begun review of Local Plan which will provide updated information on housing needs across the District and the amount required for each area. NPs should be in general conformity with most up to date evidence on needs and the development strategy for the District; monitoring and review of the NP will provide mechanism to achieve this.</p> <p><u>Figures 8 and 9; para 4.9.8 Policy LD2 Important Views:</u> Policy LD2 and figures 8 and 9 refer to important views which any development is required to maintain or enhance and not to cause unacceptable loss or diminution of these. View 9 is identified on figures 8 and 9 which show a view over a hedgerow from Foxbury Lane. However when viewed from this point on the ground the hedgerow is too high to see over and the site on the other side of the hedgerow is enclosed by trees and planting. The supporting text at paragraph 4.9.8 states that the Flint Chapel forms an important view from the village. Due to the</p>

		<p>height of the hedgerow the cemetery and chapel cannot easily be viewed from Foxbury Lane and therefore Taylor Wimpey considers the direction of the arrow (labelled 9) does not correctly point in the direction of an important view when taken from Foxbury Lane. The Chapel is much more visible from Cemetery Lane and an arrow from this direction would be more accurate.</p> <p>Paragraph 4.9.8 also states in relation to the cemetery that “the importance of this view was highlighted by a planning inspector during a recent planning appeal decision”. Taylor Wimpey does not consider a NP which should guide development over a number of years, should refer to specific planning application and appeal decisions and interpret Inspector’s comments given that these would have been determined at a point in time and relate to a specific proposal.</p> <p>Remove viewpoint 9 from policy LD2 and remove the final sentence at the end of paragraph 4.9.8 which refers to a planning appeal.</p> <p><u>Para 4.11.1 – 4.11.10 Policy LD4 Local Gaps:</u> Object to identification of Local Gaps, specifically the Infra Gap numbered 1 on Figure 11. Insufficient evidence or other information presented by NP to justify designation of local gap in this location. Designation of a local gap is considered to be a strategic policy issue outside remit of Neighbourhood Planning; as such is contrary to national policy. No evidence presented which demonstrates existing Countryside policies of Local Plan are insufficient to control development outside the identified settlement boundaries. Supported by the recent Examiners Report into the Odiham and North Warnborough Neighbourhood Plan which concluded that a local gap proposed in the NP that was not identified in the Local Plan was not justified and as a result was deleted. Inspector considered existing policies of the Local Plan were sufficient to control development without the need to identify a local gap designation and policy.</p> <p>Suggest delete the proposed local gaps and the local gaps policy.</p> <p><u>Para 4.13.1 – 4.13.3 Policy LGS1 Cemetery Green Space:</u> Object to identification of western part of proposed Local Green Space which covers the cemetery and its designation under policy LGS1. Western part of land is in private ownership, not publically accessible and does not form part of cemetery nor a local green space. It is separated by a mature tree boundary to the east and does not perform a function as open space. When viewed on the ground this area appears separate from the cemetery and is currently fenced off as grassland.</p>
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			<p>NPPF paragraph 77 sets out specific test that a proposed Local Green Space designation must meet stating that:</p> <p><i>“The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</i></p> <ul style="list-style-type: none"> - <i>Where the green space is in reasonably close proximity to the community it serves;</i> - <i>Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i> - <i>Where the green area concerned is local in character and is not an extensive tract of land.’</i> <p>In considering the extent to which a Local Green Space designation can cover, the Planning Practice Guidance States designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making. (Paragraph 007 ref 37-007- 20140306). It goes on to state that <i>“...blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.”</i> (Paragraph 015, Ref 37-015-20140306).</p> <p>No clear justification for inclusion of western land in Green Space designation given it is not publically assessable and is in private ownership. Historic England, in their response to the Pre-submission Neighbourhood Plan in April 2016, confirmed that: <i>“Land adjacent to Chantry Hall is not far from the Conservation Area but we note that the Conservation Area Character Appraisal does not identify the site as being important to the setting of the Area or in views to or from the Area. Our records show that the development of this site would not affect any other designated heritage assets”</i>.</p> <p>Suggest remove western area of the land identified for Local Green Space around the cemetery.</p> <p><u>Para 4.14.4, 4.14.8 Policy SS3 Land adjacent to Chantry Hall, Foxbury Lane</u> Support identification of land at Foxbury Lane as suitable for residential development but object</p>
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			<p>to limited number of dwellings allocated by policy SS3 and requirements for additional open space and car parking area. Draft policy allocates site for 6 dwellings, a car park and open space. Do not consider this makes best and most effective use of land; will not achieve sustainable development.</p> <p>Paragraph 4.14.4 states allocated sites which include Foxbury Lane have been selected in the most sustainable locations due to their walking proximity and their location adjacent to the existing settlement boundary. On this basis Plan should be seeking to make best use of land to deliver housing in a sustainable location. In addition paragraph 4.7.4 states the site has medium landscape capacity which is identified as having some capacity for development.</p> <p>Consider layout shown is detached development not in keeping with character of the area. NP states rationale is to create a rural farmyard idiom. This is not in keeping with the wider character of the area which consists of some older flint and brick properties with more modern development built closely together without any significant gaps or separation from the village. Proposed layout with open space separating the built development from the village creates a detached feel and does not take the opportunity to integrate the site with the village. In addition paragraph 60 of the NPPF states that "<i>Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles</i>".</p> <p>Site layout plan is too descriptive and constraining. It should be for planning application process to consider and determine suitable development proposal for the site. Layout plans and land use criteria for site should be removed from NP.</p> <p>Site can accommodate larger number of units and provide more suitable and sensitive layout than Plan is proposing. This would make best use of land, at appropriate density, and enable more comprehensive and in keeping development which fully adjoins the settlement boundary to be delivered as well as providing the ability to meet the housing needs of the area in a sustainable way.</p> <p>In order to make best use of a greenfield site, deliver housing to meet needs and to enable a well-designed and comprehensive scheme to be achieved, site should be allocated for greater number of dwellings, in accordance with surrounding densities to south and west. NP seeks to</p>
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		<p>meet its housing requirements of 25 dwellings, this must be seen as an ‘at least’ figure to ensure Plan can be sufficiently effective to deliver the required amount of housing. This is supported by adopted Core Strategy which identifies at policy 5 that the “indicative” housing number for Westbourne is 25 dwellings and states at paragraph 7.26 that “<i>Policy 5 presents indicative housing numbers to be planned for in each parish. These figures should be regarded as providing a broad indication of the potential scale of housing that the District Council and individual parishes will seek to identify through future planning documents.</i>”</p> <p>NP proposes 28 dwellings; to provide flexibility and react to any non-delivery of other sites, increasing number of dwellings on Foxbury Lane site would not significantly change the number of dwellings to be delivered in NP area overall but would ensure a sustainable development can be achieved. CDC is undertaking a Local Plan Review which it is expected will need to plan for additional housing in District. Making best use of land in proposed allocations, such as that at Foxbury Lane, and increasing the number of dwellings to be delivered in Westbourne will result in less need for further land to be identified for housing in the future.</p> <p>Planning Practice Guidance covers issue of viability and states (paragraph 005 ref 10-005-20140306) that NPs should be based on clear and deliverable vision of area, viability assessments should be considered as tool to assist with development of plans and policies. It goes on to state it should ensure policies are realistic and provide high level assurance that plan policies are viable. Foxbury Lane site proposed for 6 dwellings, open space and car parking. A development of such a small number of dwellings and a large amount of land with no development proposed places overly onerous obligation on developer to provide extra areas of open space and car parking that are not required to make the development proposal acceptable. Plan does not contain robust justification for such a small number of dwellings having to provide such a large area of land effectively in kind for open space and car parking that is not directly related to the development or required by it.</p> <p>NPPF para 204 states planning obligations, whether provided on site or through a financial contributions, should only be sought where meet all of the tests of being necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. Requirement for large area of open space and car parking does not meet tests; requirement should be removed from NP. Also noted that in addition to any on site requirements the development will be required to pay Community Infrastructure Levy which can further impact on viability.</p>
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			<p>Paragraph 4.14.8 refers to the Foxbury Lane appeal; suggests Inspector supported the Plan's view that site has limited capacity. This is not correct; appeal decision refers to specific development proposal; Inspector's comments were in relation to scheme proposed at time. Any development proposal coming forward would be considered on its merits and in accordance with planning policy; reference to appeal decision should be deleted.</p> <p>Suggest:</p> <ul style="list-style-type: none">- Remove the requirement to provide additional open space and car parking area as part of a development proposal.- Remove the layout plans for the site and any descriptions on this.- Increase the number of dwellings to be allocated on the site.- Remove the reference to the Inspector's appeal decision on Foxbury Lane.
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			<p>LEGEND Site Boundary</p> <p>PROJECT TITLE Foxbury Lane, Westbourne DRAWING TITLE Site Location Plan</p> <p>DATE 14 Apr 2015</p> <p>DRAWN BDC</p> <p>CHECKED DP</p> <p>AUTHORISED DP</p> <p>NUMBER 14.833/001</p> <p>REV. -</p> <p>SCALE 1:1250 @ A3</p> <p>Boyer</p> <p>cardiff colchester london hickmanham walsingham</p> <p>Approved from the Ordnance Survey map with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office, 5, Crown Court Road, London EC1A 3DF. © Crown Copyright 2014. Ordnance Survey Licence No. 100019074. Ordnance Survey, 2014. Ordnance Survey, 2014. Ordnance Survey, 2014.</p>
Natural England (012)	24.07.17	Email	<p>Previously provided comments that still apply as updated below.</p> <p>Generally Plan seems to deal responsibly with the Natural Environment and the sites allocated are unlikely to have any significant adverse effect on designated sites. Note that careful attention needs to be paid to foul water drainage system associated with development in this area, can impact on the Chichester & Langstone Harbours Ramsar site if they do not discharge into the mains sewer. This will be covered by the Chichester DC Surface Water & Drainage</p>

			<p>SPD (now adopted) so the Plan could reference that development needs to adhere to this in its points about water and drainage provision.</p> <p>It may be useful to expand on the term “biodiversity” in Policy 0A1, Sustainable Development to include assets specifically mentioned in the NPPF such as designated sites, priority habitats, protected species and ancient woodland.</p>
Gladman Developments (013)	24.07.17	Email	<p><u>Legal Requirements:</u> Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the NP must meet are as follows:</p> <ul style="list-style-type: none"> (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order. (d) The making of the order contributes to the achievement of sustainable development. (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). (f) The making of the order does not breach, and is otherwise compatible with, EU obligations. <p><u>National Planning Policy Framework and Planning Practice Guidance</u> NPPF sets out Government’s planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.</p> <p>At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.</p> <p>The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the latest and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development,</p>

		<p>a neighbourhood plan basic condition.</p> <p>The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.</p> <p>Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.</p> <p>Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.</p> <p><u>Planning Practice Guidance</u></p> <p>It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).</p> <p>On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.</p> <p>On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying</p>
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		<p>body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.</p> <p>Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded.</p> <p><u>Relationship to Local Plans</u> The adopted Development Plan relevant to the preparation of the WNP consists of the Chichester Local Plan Key Policies (CLPKP) and the saved policies contained in the Chichester Local Plan 1999. However it should be noted that the Inspector examining the CLPKP came to the conclusion that it was necessary for the Council to undertake a complete review of the Local Plan within five years to ensure that sufficient housing would be planned for to meet the needs of the area.</p> <p>Indeed, this is reflected in paragraph 2.9.2 of the Local Plan Review Issues and Options consultation document which states 'as the Local Plan Review moves forward, the current neighbourhood plans may each need to be reviewed to bring them in line with the strategic requirements of the emerging Plan Review. For most parishes, this is likely to include the identification of land for development....'</p> <p>As such, the WNP should allow for sufficient flexibility so that it able to respond positively to any changes which may be implemented through the Local Plan Review, as s38(5) of the Planning and Compulsory Purchase Act 2004 states that: 'If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be).'</p> <p><u>Westbourne Neighbourhood Plan</u> This section highlights the key issues that Gladman would like to raise with regards to the content of the WNP as currently proposed. Following a review of the WNP as submitted, it is considered that some policies do not reflect the requirements of national planning policy and guidance and we have therefore sought to recommend a series of alternative options to be considered prior to the plan being submitted for Independent Examination.</p>
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		<p><u>Neighbourhood Plan policies</u></p> <p><u>Policy OA1: Sustainable Development</u></p> <p>In principle, Gladman welcome the inclusion of Policy OA1 which broadly reflects the presumption in favour of sustainable development, which should be seen as the golden thread through both plan making and decision taking.</p> <p>However, it is considered that policy OA1 takes a more onerous approach to sustainable development than that contained in paragraph 14 of the Framework which makes clear that development proposals that are sustainable should go ahead without delay in accordance with the presumption in favour of sustainable development. Gladman submit that the Framework does not distinguish the difference between the sustainability of a development proposal on the grounds of whether it is located within or adjacent to a settlement boundary. Accordingly, it is recommend that the Neighbourhood Plan takes a more flexible and simplified approach to development adjacent to the existing settlement and the following wording is put forward for consideration:</p> <p>'When considering development proposals, the Westbourne Neighbourhood Plan will take a positive approach to new development that delivers sustainable development in accordance with the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Westbourne Neighbourhood Plan will be supported particularly where they:</p> <ul style="list-style-type: none">- Provide new homes including market and affordable housing; or- Opportunities for new business facilities through new or expanded premises; or- Infrastructure to ensure the continued vitality and viability of the neighbourhood area. <p>Development adjacent to the existing settlement will be permitted provided that any adverse impacts do not significant and demonstrably outweigh the benefits of development.'</p> <p>In addition, there is no need to include point 3 of the policy as these matters will be taken into account through the development management process when considering the relevant policies that may apply to a development proposal.</p>
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Policy LD1: Local Distinctiveness

Whilst recognising the importance of this policy we are concerned with the policy wording that **'requires' applicants to** follow the policies set out in the Plan and the guidance set out in the Village Design Statement (VDS). The VDS is a document which is intended to provide guidance only similar to that of an SPD. In addition, requiring development proposals to be in accordance with all policies in the Plan could result in having adverse effects on development viability. As such, **it is recommended that the word 'required' is instead replaced with 'encouraged'** in order to allow for a degree of flexibility so as to not stifle innovation or originality when development proposals are being considered through the development management process.

Policy LD2: Important Views

This policy requires any development must maintain or enhance the local character of the landscape and not cause unacceptable loss or diminution of significant views.

Gladman submit that new development can often be located in areas without eroding the views considered to be important to the local community and in these circumstances can be appropriately and sympathetically designed to take into consideration the wider landscape features of a surrounding area to provide new vistas and views.

Whilst it is noted that the Plan is supported by some brief commentary of the views identified, Gladman consider that this matter requires further evidence to support the proposed designations. Indeed, the PPG makes clear that **'proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan.'**

In addition, Gladman consider that to be valued, a view would need to have some form of physical attributes. This policy must allow a decision maker to come to a view as to whether particular locations contains physical attributes **that would 'take it out of the ordinary' rather than selecting views which may not have any landscape significance and are based solely on community support. An area's pleasant sense of openness to the open countryside cannot on their own amount to a landscape which should be protected.**

Policy LD3 Heritage

In principle, whilst we acknowledge the intention of this policy, the policy as currently written is

			<p>not in accordance with the requirements of national planning policy. Paragraphs 132 to 134 of the Framework relate specifically to designated heritage assets and highlight that the more important the asset the greater the weight should be attached to it. This policy will need to make a distinction and recognise that there are two separate balancing exercises which need to be undertaken for designated and non-designated heritage assets.</p> <p>Paragraph 135 of the Framework relates specially to non-designated heritage assets and the policy test that should be applied in these instances is that a balanced judgment should be reached having regard to the scale of any harm and the significance of the asset.</p> <p>These distinctions will need to be reflected within the policy so that it can be found in accordance with basic condition (a).</p> <p><u>Policy LD4 Local Gaps</u> Gladman submit that new development can often be located in Local Gaps, without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character. Whilst noting that a Strategic Gap was identified in the Local Plan 1999, we consider that the identification of a Local Gap policy is a strategic policy that should only be confirmed through the preparation of a Local Plan.</p> <p><u>Conclusions</u> Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. Whilst we support many of the policies aims and objectives in principle, we feel that the Plan would benefit from additional modifications to the Plan to ensure that it allows for flexibility going forward and ensures the Plan is capable of reacting positively to changes that may occur over the plan period.</p>
Chichester District Council (014)	21.07.17	Email	<p><u>Page 3:</u> para 1.1.4 – for accuracy the text should set out the date that each authority approved the designation, i.e. Chichester District Council (CDC) 3 December 2013 and the South Downs National Park Authority (SDNPA) 27 November 2013.</p> <p><u>Page 10:</u> para 2.7.6 – this makes reference to the identification of two possible sites for a car park but does not state where these are. The plan does not contain any specific policy for car park provision, except by means of an area for car parking identified in Policy SS3 Land</p>

			<p>adjacent to Chantry Hall. If this is an aspiration for the Plan and parish this should be made clear, possibly in a separate section.</p> <p><u>Page 14: Policy OA1: Sustainable Development</u> Bullets 1 and 2 are comprehensive. The inclusion of bullet 3 adds repetition but is also selective in the policies it makes reference to. Specific studies will only be required where appropriate and are not required for all development proposals.</p> <p><u>Page 15: Policy OA2: Local Economy and Employment</u> Para 3 needs to set out what is meant by 'employment uses' in terms of the Use Classes Order.</p> <p><u>Page 16: Policy OA3: Community Facilities</u> The last sentence in para 4.5.1 relates to a specific policy for supporting car parking proposals for the parish/village along with the identification of a site or sites and, as above, this may be better addressed separately. The aim of Policy OA3, from the first sentence, relates to protecting the loss of community facilities, whereas parking provision relates to new provision/sites.</p> <p>Para 4.5.2: this wording should be added to Policy OA2 for accuracy of implementation.</p> <p><u>Page 18: <i>Policy OA4 Community Balance - General comments</i></u></p> <p>Para 4.6.25 –the Strategic Housing Market Assessment (SHMA) recommended mix (or any successive document) should form the initial basis of the mix requirement, whilst taking account of local need evidence. This should be reflected in the policy.</p> <p><u>Page 19: Policy OA4-1 Housing for Younger People</u> It is not clear what is meant by "<i>the Parish Council will give priority to provision of affordable housing in time for the next review of the NP</i>". If relevant then it should be removed to text rather than policy.</p> <p><u>Page 16-19: <i>Community Balance - Comments relating to Gypsy, traveller and travelling showpeople.</i></u></p> <p>CDC acknowledges there are deep and serious local Parish concerns around the issue of</p>
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		<p>Gypsy and traveller provision in Westbourne parish. As a result the increased presence of Gypsies and travellers has led to local community pressure to include a policy in the neighbourhood plan that seeks to balance the overall local parish community and deter over provision of Gypsy and traveller sites.</p> <p>CDC appreciates the Parish Council's position. However, as currently drafted the policy (Policy OA4-2 GTTPS PLOTS/PITCHES) is not positively worded and does not provide additional criteria over and above the adopted CLPKP Policy 36 (Planning for Gypsies, Travellers and Travelling Showpeople). In this respect the policy does not meet basic condition a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).</p> <p><u>Points of accuracy:</u></p> <p>Paragraph 4.6.5 – The statement that most sites have been allowed on appeal is misleading. A total of 7 pitches and 1 travelling showperson plot have been allowed on appeal in the parish of Westbourne since April 2014 whereas 14 pitches and 4 travelling showperson plots have been permitted by the Council.</p> <p>Paragraph 4.6.9 – this states there are 30 pitches on Cemetery Lane and within its immediate environs. In addition it sets out that most fall below the guidelines for the size of pitch. This is misleading as there are (when taken together) 19 pitches and 5 plots on Cemetery Lane that have been granted planning permission and implemented. There is only one site (known as the Old Army Camp on Cemetery Lane comprising 17 pitches) in the parish of Westbourne which has more than 15 pitches on one single site. This is a public site which is run by Homespace Sustainable Accommodation on behalf of West Sussex County Council. Notwithstanding the above it should be noted that the guidance Designing Gypsy and Traveller Sites – A Good Practice (2008) was withdrawn on 1 September 2015.</p> <p><u>Page 18: Policy OA4: Community Balance</u> <u>Submitted Policy:</u></p> <p>Para 4.6.18 – this paragraph appears to draw attention to the emerging policy within the SDNP area of the parish currently set out in South Downs Local Plan: Preferred Options (September 2015), Strategic Policy SD26: Gypsies and Travellers and Travelling Showpeople. This policy has yet to be submitted to the Secretary of State for examination and therefore at this stage</p>
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		<p>there is no certainty the policy will remain in its current form. However, a similar criteria based neighbourhood plan policy approach which adds to the current CLPKP policy may be acceptable, subject to there being sufficient local evidence and justification for this approach and the policy/criteria complying with the basic conditions.</p> <p><u>Page 19: Policy OA4-2 GTTPS Plots and Pitches</u></p> <p>The policy states “<i>Applications for additional Gypsies, Travellers and Travelling Showpeople pitches/plots within the Neighbourhood Plan area will be resisted, as the supply for the identified need for this type of accommodation has already been exceeded for the plan period within the District, which has been disproportionately met by provision within Westbourne Parish</i>”.</p> <p>This sentence is misleading. Whilst there is currently a five year supply of pitches and plots, although close to the required provision the number of pitches and plots needed over the plan period has not yet been exceeded. To date 57 pitches and 18 plots have been granted planning permission. CLPKP sets out that 59 pitches and 18 plots are required for the period 2012-2027.</p> <p>The policy states that “<i>Given the lack of identified need, any new consent would be wholly exceptional and in this regard if deemed to meet the exceptional circumstances the proposal would need to pass the strict physical tests applied within the National Park for this type of development</i>”</p> <p>Whilst there is currently a five year supply of pitches and plots, the need for the whole plan period has not yet been met as set out above.</p> <p><u>Evidence Base Documents</u></p> <p><u>Housing and Population Document 20: Westbourne GTTSP Evidence Report 2016 ‘Gypsy, Travellers and Travelling Snowpersons. (GTTS) REPORT for WNDP Policy OA4’ –</u></p> <p><u>Appendix C: The Statistics – GYPSY & TRAVELLER PITCHES AND TRAVELLING SHOWPERSONS PLOTS IN THE CDC DISTRICT PER PARISH/WARD (the table) Statement of fact and commentary</u></p> <p>This provides misleading information. The notes on the figures set out that CDC has a total of</p>
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		<p>60 Parish and Town Councils within its District which are covered by the CLPKP 2014-2029. However, the CLPKP covers a total of 31 parishes; 12 of which are partly or substantially located within the South Downs National Park Authority.</p> <p><u>Page 22</u>: Policy LD1: Local Distinctiveness Para 4.7.10 should make reference to 'New' rather than 'All' development.</p> <p>Bullet 4 - this requirement should not relate to householder extensions.</p> <p><u>Page 22</u>: Policy LD2: Important Views Para 4.8.3 should make reference to 'New' rather than 'Any' development.</p> <p><u>Page 28</u>: Policy LD3 – Heritage Bullet 1 for accuracy should read 'The historic environment of the parish and its heritage assets.....'</p> <p>Bullet 2 should read 'preserve or enhance' rather than 'conserve'. This would bring it in line with wording in the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>Bullet 4 - this should be amended for accuracy as set out below: Archaeological investigation of sites where new developments or improvements are planned proposed will be required in areas where there is high archaeological potential. Following a desk-based assessment, appropriate archaeological investigation must be carried out, where appropriate, prior to construction. of new developments. Any reports should be made available for public viewing and be submitted to the District Council for inclusion in the Historic Environment Record.</p> <p><u>Page 32</u>: Local Gaps Para 4.11.5 and 4.11.6: it is not clear how the areas identified by numbers on Figure 11 relate to the numbered points in the text of the paragraphs. The plan needs to clearly identify which area is which by name and/or description in the text.</p> <p><u>Page 34</u>: Policy LD4: Local Gaps Para 4.11.10 – line 1 should refer to '....any new development proposed...'</p>
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		<p>Bullet 1 – it would be more accurate to use the word ‘eroding’ rather than ‘reducing’.</p> <p>Bullet 5 – it is not clear what is meant by ‘positive community uses’. This needs to be clearly defined in order for the policy to be applied. Without this the intention of the policy may be undermined.</p> <p><u>Page 35</u>: Policy BD2: Natural Environment Policy Policy should make it clear that these green corridors are protected if this is the intention.</p> <p><u>Page 40</u>: Policy SS1: Land to the West of Monk’s Hill Para 4.15.1 – text should be amended to read ‘The site is allocated for 6 dwellings....’</p> <p>The text should refer to a minimum of 6 units to be in accordance with the Local Plan.</p> <p>Bullet 2 – the dwelling footprints shown on the schematic plan may not be adequate to provide bungalows; gaps between dwellings may therefore prove to be smaller.</p> <p>Bullet 7 - it is not necessary for an archaeological evaluation to be carried out for every site only where required.</p> <p><u>Page 41</u>: Policy SS2: Land at Long Copse Lane This site is currently being built out. However, for accuracy and consistency the policy should refer to a minimum of 16 dwellings in accordance with the Local Plan; the timeframe should be in line with the local plan period of 2029 rather than 2015-2020.</p> <p>Studies can only be required where appropriate and relevant.</p> <p><u>Page 42</u>: Policy SS3: Land adjacent to Chantry Hall, Foxbury Lane Concern that the proposed allocation at Chantry Hall is identified within the proposed local gap; this is inconsistent with the NP policies and, as drafted, will therefore need to deliver the requirements of the gap policy (Policy LD4). The boundary of the gap should therefore be amended to omit the site.</p> <p>The policy should refer to a minimum of 6 dwellings in accordance with the Local Plan</p>
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			<p>The timeframe should be in line with the local plan period of 2029 rather than 2017-2020.</p> <p>Figure 18 requires a key, it is not clear what areas are to be paddock, car park, open space, planted buffer etc.</p> <p>Bullet 1 – reference to Figure 18 does not clearly show which areas are to be developed and for what use. The figure needs to be clearly marked up and relevant areas clearly shown if reference is to be made to Figure 18 in this way. Currently it will not be possible to implement the policy as desired by the local community.</p> <p>Bullets 6, 7, 8, 9 and 10 are also not clear through reference to Figure18.</p> <p>Bullet 12 – should refer to ‘new residential development’</p> <p>Bullet 13 - should be clear that permitted development would only be removed IF planning permission is granted, not state that ‘planning permission will be granted’.</p> <p><u>Page 48: Housing and Population Documents</u> Need to include:</p> <ul style="list-style-type: none">• Chichester District Council’s Planning Obligations and Affordable Housing SPD, 2016• GL Hearn Costal West Sussex Strategic Housing Market Assessment Update: Chichester District Summary Report 2012
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