

John Slater Planning Ltd

# Selsey Neighbourhood Plan 2014 - 2029

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## **Submission Version**

A Report to Chichester District Council on the Examination of the Selsey  
Neighbourhood Plan

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## Executive Summary

My examination has concluded that the Selsey Neighbourhood Development Plan should proceed to referendum, subject to the Plan being amended in line with my recommended modifications which are required to ensure the plan meets the basic conditions. The more noteworthy include –

- Clarify which parts of the document will form part of the development plan and explicitly state that the contents of Annexes A and B should not be used in the determination of planning applications.
- Rewording of the policy dealing with the historic environment.
- Removing the requirement that any use of Selsey Hall must be a use beneficial to the local community.
- Removing the policy relating to cross peninsula transport links.
- The policy regarding the provision of a cycle link to Chichester be deleted.

The referendum area does not need to be extended beyond the plan area.

## Introduction

Neighbourhood planning is a process, introduced by the Localism Act 2011, which allows local communities to create the policies which will shape the places where they live and work. The neighbourhood plan provides the community with the opportunity to allocate land for particular purposes and to prepare the policies which will be used in the determination of planning applications in their area. Once a neighbourhood plan is made, it will form part of the statutory development plan alongside the Chichester Local Plan. Decision makers are required to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

The neighbourhood plan making process has been led by Selsey Town Council which is a “qualifying body” under the neighbourhood planning legislation.

This report is the outcome of my examination of the Submission Version of the Selsey Neighbourhood Plan. My report will make recommendations based on my findings on whether the Plan should go forward to a referendum. If the Plan then receives the support of over 50% of those voting at the referendum, the Plan will be “made” by Chichester District Council, the Local Planning Authority (LPA) for the Selsey Town Neighbourhood Plan area.

## The Examiner’s Role

I was formally appointed by Chichester District Council in September 2017, with the agreement of Selsey Town Council, to conduct this examination. My role is known as an Independent Examiner. My selection has been facilitated by the Neighbourhood Planning Independent Examiner Referral Service which is administered by the Royal Institute of Chartered Surveyors (RICS).

In order for me to be appointed to this role, I am required to be appropriately experienced and qualified. I have over 40 years’ experience as a planning practitioner, primarily working in local government, which included 8 years as a Head of Planning at a large unitary authority on the south coast, but latterly as an independent planning consultant. I am a Chartered Town Planner and a member of the Royal Town Planning Institute. I am independent of both Chichester District Council, and Selsey Town Council and I can confirm that I have no interest in any land that is affected by the Selsey Neighbourhood Plan.

Under the terms of the neighbourhood planning legislation I am required to make one of three possible recommendations:

- That the Plan should proceed to referendum on the basis that it meets all the legal requirements.
- That the Plan should proceed to referendum if modified.
- That the Plan should not proceed to referendum on the basis that it does not meet all the legal requirements.

Furthermore, if I am to conclude that the Plan should proceed to referendum I need to consider whether the area covered by the referendum should extend beyond the boundaries of the area covered by the Selsey Neighbourhood Plan area.

In examining the Plan, the Independent Examiner is expected to address the following questions:

- a. Do the policies relate to the development and use of land for a Designated Neighbourhood Plan area in accordance with Section 38A of the Planning and Compulsory Purchase Act 2004?
- b. Does the Neighbourhood Plan meet the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 namely that it specifies the period to which it is to have effect? It must not relate to matters which are referred to as “excluded development” and also that it must not cover more than one Neighbourhood Plan area.
- c. Has the Neighbourhood Plan been prepared for an area designated under Section 61G of the Localism Act and has been developed and submitted by a qualifying body.

I am able to confirm that the Plan does relate to the development and use of land, covering the area designated by Chichester District Council, for the Selsey Town Neighbourhood Plan on 4<sup>th</sup> December 2012.

I can also confirm that it does specify the period over which the plan has effect namely the period from 2014 up to 2029.

I can confirm that the Plan does not cover any “excluded development”.

There are no other neighbourhood plans covering the area covered by the Plan designation.

Selsey Town Council as a Town or Parish Council is a “qualifying body” (QB) under the terms of the legislation.

## **The Examination Process**

This is the second version of the neighbourhood plan that has been submitted for examination. In 2016 I was appointed to carry out the examination of an earlier version of the Plan. In November 2015, I held a public hearing and it became apparent that I would not be in a position to recommend that the plan, in its then format, should go to public referendum. I set out my concerns in an Interim Conclusions Report, dated 7<sup>th</sup> December 2015, which was then considered by the Town Council who resolved to withdraw the Plan as submitted. I therefore concluded the examination and issued a final report dated 22<sup>nd</sup> February 2016.

As I am familiar with the Plan area, having conducted a number of visits to the town during the first examination, I have concluded that it is not necessary for me to conduct a further visit to the town, as part of this new examination.

The presumption is that the neighbourhood plan will proceed by way of an examination of written evidence only. However, the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or to give a person a fair chance to put a case. I am satisfied that I am, on this occasion, in a position to properly examine the Plan without the need for a hearing.

I am required to give reasons for each of my recommendations and also provide a summary of my main conclusions.

## **The Consultation Process**

I am very aware that the previous version of the neighbourhood plan which was withdrawn, had gone through extensive public consultation including both a Regulation 14 and Regulation 16 consultation. This latest version is essentially a remodelling of the earlier version of the document. The regulations require that as this is a new plan, it will be a new version of the plan and will have to go through its own consultation.

A public consultation open day was held on 18<sup>th</sup> March 2017 as part of the Regulation 14 Pre-Submission Consultation which ran from 20<sup>th</sup> February until 3<sup>rd</sup> April 2017. This event was attended by 191 individuals. There was also an Open Day for community groups and businesses held on 20<sup>th</sup> March 2017. In total, 49 representations were received and these are recorded, along with a note as to how the plan has been changed as a result of the representations, in Appendix 1 of the

Consultation Statement.

I am satisfied that appropriate and proper in public engagement has taken place on the latest version of this neighbourhood plan.

## **Regulation 16 Consultation**

I have had regard, in carrying out this examination, to all the comments made during the period of final consultation, which took place over a 6-week period between 9<sup>th</sup> February 2018 and 23<sup>rd</sup> March 2018. This consultation was organised by Chichester District Council, prior to it being passed to me for its examination. That stage is known as the Regulation 16 Consultation.

In total 9 individual responses were received from Historic England, Natural England, Chichester District Council, Highways England, West Sussex County Council, Southern Water, Sports England, Mr Paul Henry and Quod on behalf of Thawscroft Ltd.

I have carefully read all the correspondence and I will refer to the representations where it is relevant to my considerations and conclusions in respect of specific policies or the Plan as a whole.

## **The Basic Conditions**

The Neighbourhood Planning Examination process is different to a Local Plan Examination, in that the test is not one of “soundness”. The Neighbourhood Plan is tested against what is known as the Basic Conditions which are set down in legislation. It will be against these criteria that my examination must focus.

The six questions which constitute the basic conditions test seek to establish that the Neighbourhood Plan: -

- Has had regard to the national policies and advice contained in the guidance issued by the Secretary of State and it is appropriate to make the Plan?
- Will the making of the Plan contribute to the achievement of sustainable development?
- Will the making of the Plan be in general conformity with the strategic policies set out in the Development Plan for the area?

- The making of the Plan does not breach or is otherwise incompatible with EU obligations or human rights legislation?
- Whether prescribed conditions are met and prescribed matters have been complied with?
- Whether the making of the Plan will have a significant effect upon a European site or a European offshore marine site, either alone or in combination with other plans and projects?

During the course of this examination the Government issued a revised National Planning Policy Framework. However, in accordance with the stipulation of Paragraph 214 of the 2018 NPPF, this examination has been carried out applying the policies in the 2012 version of the Framework.

### **Compliance with the Development Plan**

To meet the basic conditions test, the Selsey Neighbourhood Plan is required to be in general conformity with the strategic policies of the adopted Development Plan, which in this case is the Chichester Local Plan: Key Policies 2014-2029. In addition to the Local Plan, the Development Plan also includes the Joint Minerals Local Plan and the Waste Local Plan which have been both adopted by West Sussex County Council and the South Downs National Park Authority. These two documents are not relevant to the preparation of the Plan.

Selsey is identified as a Settlement Hub within the settlement hierarchy as set out in Policy 2. Policy 23 deals specifically with Selsey and allocates a housing figure of 150 new homes with consequential changes to the settlement boundary. Policy 4 sets an overall housing figure of 7,388 for the plan period and Table 4 sets an approximate figure of 150 new homes to Selsey.

When the Local Plan was going through its examination the Inspector required that the District Council should be reviewing the housing policies within the next 5 years. That review is now underway and the Council has conducted an Issues and Options Consultation in 2017 and the Preferred Approach document is expected to be published in November 2018. The plan period will be extended to 2035.

### **Compliance with European and Human Rights Legislation**

Chichester District Council carried out a Screening Opinion on the Pre-Submission Version of the Plan and produced a screening report dated 13<sup>th</sup> February 2017. The report concluded that it was unlikely that there will be any significant effects arising

from the Plan and a full Strategic Environmental Assessment (SEA) as required by EU Directive 2001/42/EC which is enshrined into UK law by the “Environmental Assessment of Plans and Programmes Regulations 2004”, would not be required.

The Basic Conditions Statement that was submitted with the Plan did not make any reference to the plan being screened under the Habitat Regulations. I was particularly conscious of the location of the Pagham Harbour SPA being in close proximity to the Plan area. I raised this issue with the LPA and they agreed that a Screening Opinion needed to be carried out before the plan could proceed with the examination as compliance with European Obligations is one of the Basic Conditions. That has delayed the preparation of this report but was a necessary legislative requirement. That screening has now been carried out and has concluded that as Chichester DC has already in place mitigation measures to manage potential recreational disturbance, the plan itself would have no adverse effect on the integrity of the Pagham SPA and an Appropriate Assessment would not be required. Natural England has confirmed that they agree with that conclusion.

The plan area adjoins the Potential Solent and Dorset Coast Marine Special Protection Area, pSPA. However Natural England has concluded that as the Plan does not increase waterborne recreation or fishing, there is no pathway impact on the pSPA.

I am satisfied that the basic conditions regarding compliance with European legislation are met. I am also content that the Plan has no conflict with the Human Rights legislation.

## **The Neighbourhood Plan: An Overview**

This neighbourhood plan has been prepared within the planning context set by the adopted Chichester Local Plan– Key Policies 2014 - 2029. This plan was adopted in July 2015. In terms of residential development, the plan required the provision of **around** 150 homes in Selsey. These have already been provided in fact an additional 98 homes have been granted permission in excess of the 150 units. It is therefore not necessary for this neighbourhood plan to be allocating additional land for housing or proposing extending the settlement boundary so as to accommodate additional residential development. I am aware that the Chichester District Council is committed to producing a new local plan. This plan is at an early-stage in its life and I do not consider that it is necessary for the neighbourhood plan to have regard to it.

However, if it transpires that the new plan, once it has progressed if it requires an increase in housing numbers to be allocated to the town of Selsey, then either Chichester District Council can allocate additional sites itself or alternatively the Town Council may wish to consider reviewing this neighbourhood plan to reflect the

changed strategic planning policies that relate to the town. My original proposal was to explicitly recommend that the Town Council should review this neighbourhood plan in the light of the need to have to allocate more homes in Selsey. I have been now advised that the Town Council has told the LPA that it does not wish to address the allocation of extra housing and will leave the matter to the District Council. It is, of course, entitled to come to that decision, but it does mean that the local community will not be allowed to exercise its choice, through referendum regarding where any additional housing should go. That task is likely now to fall to the Local Plan Review itself. It may or may not include the need to allocate the Thawscroft site to which I have received representations from Quod, on behalf of the owners of that site to allocate it now. I am not persuaded that the case has been made that the current plan needs to allocate further sites at this stage, as the strategic policy in the Local Plan only requires around 150 units to contribute to the overall housing position. It is to Policy 4 and Table 7.2 of the Local Plan that this neighbourhood plan has had to have regard in order to meet one of the basic conditions.

In carrying out this new examination, I have reviewed carefully the comments I made in respect of the early examination in the document Interim Conclusions of the Independent Examiner dated 7 September 2015. A number of my criticisms related to the structure and layout of the original document. Whilst there is no set format for the layout of a neighbourhood plan, the structure of the document now submitted is absolutely clear as to the development plan policies that will apply and these are clearly indicated in the section entitled Policies. The plan now has two annexes. Annex A – History, Design and Guidance– Background Evidence and Annex B – Audit -Background Evidence. I wish to make it explicitly clear that my examination has only looked at the Policies section as that contains the development plan policies which will be used to determine planning applications. For the avoidance of doubt, I will recommend that the front pages of the two annexes should include a statement– “The contents of this annex do not form part of the development plan and its contents should not be used for the determination of planning applications”, so as to clarify their status. The District Council has made some suggestions at Regulation 16 for changes to the supporting text of the policies section and also various paragraphs of the two annexes. I do not propose to make any recommendations on these as they do not fall within my legal responsibility, which is to address the issue of basic conditions and the legal tests. However, I would urge the Town Council and the District Council planners to meet together to discuss the comments and suggestions which can only improve the final document. I will be making recommendations, in terms of the wording of a number of the policies and it will be necessary for the supporting text in some cases to be amended, so that the document reads as a coherent plan. Again, that is beyond my role as an examiner.

I have had to recommend that a small number of policies be deleted. The

neighbourhood plan is a document that is to be used for determining planning applications and will only be used where development takes place within the plan area. Examples such as the plan offering support for a cycle link to Chichester is a matter that can be included within the neighbourhood plan but as a Town Council aspiration rather than a planning policy. As much of the route falls outside the plan area, it is a link that would be more appropriately included within the local plan.

### *Recommendation*

**Insert on the front cover of Annex A and Annex B the following text “The contents of this annex do not form part of the development plan and its contents should not be used for the determination of planning applications”**

## **The Neighbourhood Plan Policies**

### **Policy 001**

This policy deals with design matters. I do not consider that the policy content deals with ‘heritage’ which is more appropriately dealt with under the following policy “Historic Environment”. There are some minor issues with the policy wording. The NPPF 2012 requires plans to seek “high quality and inclusive design for all development” not just new dwellings as sought by the first bullet point. This is a point made by Chichester DC.

In terms of the use of materials I consider the criteria should not be the use of “natural local resources and colours” but rather materials that would complement and be in keeping with those used in the immediate area.

I find the term “roof elevation” somewhat problematic, as the roof can be part of a building’s elevation. I believe that the District Council’s suggested drafting provides a more usable policy for when decisions are taken at a development management level.

Not all development requires landscaping e.g. installation of the new shopfront, changes of use or domestic extension. I therefore propose to include “where appropriate” as a caveat.

There is an additional element to this policy arising from my conclusions in respect of Policy 002 in that the support for innovative and contemporary design should be included within the design policy. This will be consistent with paragraph 60 of the NPPF.

### *Recommendations*

***Retitle the heading “Design”***

***In the first bullet point replace “dwellings” with “buildings”.***

***Insert a new bullet point “Contemporary and innovative materials and design will be supported.***

***At the end of the second bullet point, delete all the text after “vernacular” and insert “by being in keeping with the materials used in the immediate area”.***

***In the third bullet point replace “careful account of height and roof elevations” and replace with “account of the height and scale of building elevations”***

***In the fourth bullet point insert “where appropriate” after “landscaping”***

## **Policy 002**

The title of the policy is “Historic Environment”, but the policy as submitted appears to relate to development in the parts of the town, that could not be described by any stretch of the imagination as “historic”. It would be difficult for an applicant or a decision maker to know how to respond to the “historic context” when addressing sites which are away from conservation areas or areas identified in the third bullet point i.e. in the setting of listed buildings and non-designated heritage assets. The NPPF explicitly urges that “the concept of conservation is not devalued through the designation of areas that lack special interest”. Planning policy can only protect areas that are specifically identified as being of historical or architectural interest – that is the role of conservation area designation and other heritage protection. It appears that the Neighbourhood Plan is seeking to extend heritage protection across the town without defining the areas it wants to cover or having to justify other historically important area.

I consider that the first bullet point is covered by the first bullet of Policy 001 which deals with the character of the area and the issue of contemporary design would also be more appropriately located within the policies dealing with design.

The final bullet point properly addresses the needs a particular regard to the areas of architectural or historical interest when dealing with buildings or areas of particular value but the policy needs to more specifically relate to the effect of that development on the significance of those assets. The District Council has pointed out that there is more than one Conservation area and to no longer to refer to the Selsey Conservation Area Character Appraisal (Review) is no longer accurate.

The policy cannot provide the same level of protection to statutory protected buildings or area as non-designated assets which would include locally listed buildings. That would be contrary to national advice and would fail one of the basic conditions. I have therefore recommended, in my proposed modification a form of wording that would bring the balance of matters to be considered, into line with what is required by para 135 of the NPPF.

*Recommendation*

**Reword the policy as follows**

***“Any new development that will affect either directly or the setting of any listed buildings or a conservation area will be expected to recognise, respect, conserve or enhance and seek to better reveal the significance of that building or area. The effect of development on the significance of locally listed buildings and other non-designated historical assets will be judged having regard to the scale or harm of any loss and the significance of the heritage asset”***

**Policy 003**

Sustainable development is not just specific to development within the settlement boundary. Sustainable development, as defined in the NPPF, is equally achievable development within the countryside. I would therefore recommend modifications to the policy so as to give greater clarity to decision-makers.

*Recommendation*

***In the first bullet point replace “sustainable” with “residential, employment, leisure and community”***

**Policy 004**

This policy allows the placing of temporary units of accommodation for agricultural workers. Whilst I acknowledge that the plan has not identified any site selection criteria, I am not aware that there are other appropriate farm sites within the plan area that even need or have the ability to accommodate accommodation for temporary workers on this scale. I have received no evidence that other sites are better located. Accordingly, I am satisfied that there is an agricultural need for seasonal workers to be accommodated and that this allocation is well located, being essentially screened and will not impinge into open countryside. Accordingly, I conclude that this is a locally distinctive policy which meets the basic conditions.

I will propose a minor amendment to the policy phrasing, placing a requirement “to minimise the impact of recreational disturbance” rather than “look to minimise” which is not specific enough to protect a European protected site.

*Recommendation*

***In the first bullet point delete “look to”***

### Policy 005

I have no comments to make on this policy in respect of basic conditions.

### Policy 006

I accept that the desire of the plan is to see the Selsey Hall used for purposes such as a theatre, cinema or performance space and the viability and practicality of that should be fully explored before alternative uses are considered. Once it is demonstrated that these specific uses are not viable or deliverable, it is important that the building has a new beneficial use, rather than stand empty and deteriorating until a use which provides a “beneficial facility to the local community” is found. It may be that some commercial uses may also be of value to the local community. Whilst that may be achieved, that criterion should not be a determinant of what uses can or cannot occupy the building.

#### *Recommendation*

**Delete the final bullet point.**

### Policy 007

I have no concerns regarding this policy. The paragraph relating to meeting the needs of essential infrastructure providers should be included in the wording of policy rather than left in the supporting text. I have not treated this policy as a designation as local green space for the purpose of paragraphs 76/77 of the NPPF.

#### *Recommendation*

**Insert the paragraph currently below the policy box “Proposals for essential infrastructure...” after the last paragraph of the policy.**

### Policy 008

One of the legal requirements of the neighbourhood plan policy is that it must be a policy “for the development and use of land”. It must be borne in mind that the referendum question would be “Should the policies in the Selsey Neighbourhood Plan be used to determine planning applications”. Another statutory requirement is that it can only impose planning policy on land within the neighbourhood area”

This policy merely offers support for “proposals for cross peninsula links. There is no route identified nor is the nature of the route, whether it be a road, cycleway or public transport link. As a neighbourhood plan policy, it does not meet the basic conditions as it could not be used to determine a planning application and I will be

recommending that the policy be deleted. However, it is entirely appropriate for the town's desire for a new transport link to be included within its neighbourhood plan, but it should be included as a community aspiration, which does not form part of the development plan.

***Recommendation***

***That the policy be deleted and be replaced as a Community Aspiration.***

**Policy 009**

This policy relates primarily used to land outside the plan area. No route is identified within the plan area, that can be protected by way of a safeguarding line when taking development management decisions. Based on this policy a landowner would not know whether their site was affected by the proposal. Again, does not meet basic conditions that can be retained in the plan as a community aspiration.

***Recommendation***

***That the policy be deleted and be replaced as a Community Aspiration.***

**Policy 010**

The clarity of this policy can be improved by referring to the allocation sites shown on the Policies Map in Appendix 2. The first part of the policy reads as the justification for the policy and should be moved to the supporting text.

A decision maker would not know what land uses and therefore their respective Use Classes are referred to by the designation "commercial usage classification", but I would assume that these uses all within Use Classes A1 to A5 and B1 and B2 and also Class C1 Hotels. The protection should extend both for change of use or through redevelopment for alternative uses, although there are permitted development rights, which could allow changes of use in certain circumstances, to residential use. I do not consider that there is value in maintaining vacant buildings if there is no possibility of a new occupier being found. The policy as written does not include any reference to market demand. I have therefore proposed to modify the policy to allow for evidence of marketing of the building to be submitted before new uses are approved. Equally it would be not appropriate for the redevelopment of buildings to be prevented if the buildings were to be retained in their existing usage.

***Recommendations***

***Replace the first sentence with "The employment site shown on the map in Appendix 2 is allocated for employment uses."***

***In the second paragraph of the policy replace “with a commercial usage classification” with “within Use Classes A1- A5, B1, B2 and C1” and replace all text after “retained” with “or redeveloped for that use or similar commercial uses, unless it can be shown that there is no demand for the continued use and the site has been marketed continually and effectively for a period of 12 months”***

### **Policy 011**

A planning policy only covers matters that require planning permission. This is not normally required for the refurbishment or upgrading of buildings or indeed the organisation but planning permission can be required for alterations so I will refer instead to that within the policy.

#### ***Recommendation***

***Replace “refurbishment, upgrading or modernisation” with “extension or alteration”.***

### **Policy 012**

The policy needs to make reference to the Policy Map set out in Appendix 2. I have struggled with how a decision maker would know to what extent “the loss of the unit results in a mix of varied commercial floor spaces (varied in terms of class and gross internal area) in the residual units”. I have had difficulty in understanding what this particular criterion is trying to achieve in policy terms. I tested it in my mind with a theoretical proposal to see whether it would seek to prevent the change of use of a vacant shop unit to office use in a retail arcade. I assume that it would meet the criteria of creating the variety of commercial floor space sought but it may well be the same floor area of other units on the block. Would that mean that it was unacceptable? I do not consider that the policy passes the test for a neighbourhood plan policy in that it should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. I consider that the second criterion is the appropriate test which reflects the policy for Selsey’s retail areas which already exists in Policy 29 Chichester Local Plan.

In addition, the policy as written in the second paragraph is contradictory as it states that all following criteria must be met yet each criterion ends with “or” rather than “and”.

#### ***Recommendations***

***In the first sentence after “centres” insert “as shown on the Policies Map shown in Appendix 2”.***

**Delete all of the text in the first sentence of the second paragraph after “supported where” and also delete the first and third bullet points.**

### **Policy 013**

As the District Council has pointed out the plan does not identify the role or status of the Infrastructure Priorities List. It is therefore not clear how an applicant would know what community facilities the facility should enhance. As such I will be adopting the suggested wording put forward by the District Council.

#### **Recommendations**

**At the end of the first paragraph replace “where” with “provided it is demonstrated that it complies with all the relevant policies contained in the Neighbourhood Plan, Policies 26 and 29 of the Chichester Local Plan and where”.**

**In the first bullet point replace “provision” with “development” and insert at the end “and/ or”.**

**Replace all of the second and third criteria with**

- **“The development enhances the tourist offering and/ or**
- **The development delivers enhanced community facilities”**

### **The Referendum Area**

If I am to recommend that the Plan progresses to its referendum stage, I am required to confirm whether the referendum should cover a larger area than the area covered by the Selsey Town Neighbourhood Plan. In this instance, I can confirm that the area of the Selsey Town Neighbourhood Plan as designated by Chichester District Council on 4<sup>th</sup> December 2012, is the appropriate area for the referendum to be held and the area for the referendum does not need to be extended.

### **Summary**

I am pleased that the Town Council has persevered with its Neighbourhood Plan following the issues that were identified by its first version. It is clear that the town may still face the need for the allocation of further land for housing but that will be a matter that will be part of the Local Plan Review. This plan has been prepared in the context of the existing adopted Local Plan.

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I have recommended changes to a number of the policies to address issues which are necessary to ensure the Plan meets the Basic Conditions.

However, the proposed deletion of a number of policies does not mean that the proposals are not important – it is that a neighbourhood plan cannot promote routes and linkages that fall outside the plan area. I hope that the Town Council will continue to advocate them in the context of the Local Plan Review.

To conclude, I can confirm that my overall conclusions are that the Plan, if amended in line with my recommendations, meets all the statutory requirements including the basic conditions test and that it is appropriate, if successful at referendum, that the Plan, as amended, be made.

**I am therefore delighted to recommend to the Chichester District Council that the Selsey Neighbourhood Plan, as modified by my recommendations, should now proceed to referendum.**

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2<sup>nd</sup> October 2018