**Chichester District Local Plan Preferred Approach**

**Summary of responses - Part One**

**Introduction**

The Local Plan Review Preferred Approach was the subject of public consultation between 13 December 2018 and 7 February 2019.

Part One of the Preferred Approach Plan contained 32 Strategic Policies and 15 Strategic Allocations. Part Two set out 35 detailed Development Management Policies. In addition, a document set out proposed changes to the policies map and a Sustainability Appraisal and Habitats Regulations Assessment were also published.

Just over 3,200 representations were made by 729 respondents. These can be broken down as follows –

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|  | Representations | Support | Object | Comment |
| Part 1 | 2742 | 389 | 1444 | 909 |
| Part 2 | 401 | 92 | 136 | 173 |
| Appendices to document | 25 | 1 | 12 | 12 |
| Sustainability Appraisal | 17 | 0 | 2 | 15 |
| Policies Map | 20 | 4 | 6 | 10 |
| Habitats Regulations Assessment | 3 | 0 | 0 | 3 |

All the consultation responses are available in full via the consultation portal which can be accessed via the council’s website at <https://www.chichester.gov.uk/article/30923/Preferred-approach---consultation-December-2018> . In addition, summary reports of the representations have been prepared and are also available on the same web page.

This report sets out a further summary of the responses received to Part One of the Plan. It focuses on the issues raised, and for that reason individual respondents are not named. However, where organisations have submitted responses, to help legibility, the organisation is stated in **bold**. All respondents have been advised of their respondent and representation numbers but if further guidance is sought please contact the Planning Policy team at [planningpolicy@chichester.gov.uk](mailto:planningpolicy@chichester.gov.uk)

It has not been possible to provide a unique reply to each representation received during the consultation. However, the document does set out an initial response to the issues raised based on all representations received. Whilst this does not represent the Council’s final view, it indicates how further work to be undertaken for the new Local Plan is intended to proceed at this time, and how consultation comments influence the development of the Plan.

A separate document sets out the responses to Part 2 of the consultation.

We would like to thank everyone who took the time to respond to this consultation.

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| **Introduction** | | | | |
| Respondents | Representations | Support | Object | Comment |
| 7 | 13 | 1 | 4 | 8 |
| Representation numbers  1295, 2289 (Historic England), 2395 (South Downs National Park Authority), 2585, 2616,  2620, 2621, 2797, 2800, 2803, 3057, 3058, 3059. | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| South Downs National Park   * Unclear why National Park is given high level of prominence in the Local Plan Review, when unlike the AONB, it is not part of the Plan area. * Why is CDC not integrating planning process with area of SDNP within CDC area? * CDC need to understand where unmet need from SDNP is generated from. | | | | |
| Evidence Base   * Not known if effectiveness of current Local Plan has been evaluated, with findings used to inform Preferred Approach. * Evidence seen under FOI does not show appropriate and effective cooperation has occurred, particularly with Highways England for development of transport infrastructure. * Statements of Common Ground not available as part of consultation. These must be re-consulted on at the next stage. * Suggest amendments to specific wording - para 1.5 and 1.16. Historic Environment Strategy does not form adequate evidence base. Should consider if archaeological evidence and significance of city is understood and available. **(Historic England)** * Commercial Development Plan absent as part of the consultation. | | | | |
| Amendments to wording   * Reference to Section 62 of the Environment Act 1995 should be added to paragraph   1.31. **(SDNPA)** | | | | |
| Other   * Section 1.7 – Poor local community involvement under existing plan. * Section 1.10 - cannot be sustained. Developments under existing Plan have not respected character of Chichester. * Many errors, CDC accountable for supplying incorrect & out of date information. * Section 1.26 - Support specific mention of need for cross-boundary cooperation over dark skies policy. | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| Overall, it is considered the South Downs National Park is a critical part of the context for this Local Plan and the review document does not give it undue prominence. The National  Park Authority works closely with the District Council and arrangements are in place for the District Council to deliver planning services on applications within the national park area. With regards to housing need, further detail is set out in the Housing Background Paper which will need to be updated.  The effectiveness of the current Local Plan has been assessed in Authority Monitoring Reports published each year. Work is ongoing with Highways England and others on the necessary transport evidence to support the Local Plan, and progress on this and other matters will be documented in Statements of Common Ground which will inform the next stage of the Plan and be placed on the Council’s website. Finally, work is underway to consider the detailed submission by Historic England and any necessary further work will be | | | | |

reflected in the Plan as it develops. Ultimately, the final draft version of the Plan will be supported by all necessary evidence.

Reference to Section 62 of the Environment Act 1995 is not considered necessary – other legal requirements (for instance, relevant legislation for minerals and waste planning) are not detailed in this section.

Other comments are noted. The Plan will be subject to significant updating prior to the next public consultation.

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| **Characteristics of Plan Area** | | | | |
| Respondents | Representations | Support | Object | Comment |
| 11 | 21 | 1 | 5 | 15 |
| Representation numbers  2290 (Historic England), 2291 (Historic England), 2420 (South Downs National Park Authority), 2444 (South Downs National Park Authority), 2489 (Chidham & Hambrook Parish Council), 2586, 2622, 2804, 2806, 2809, 2813, 2838, 2887, 2974, 3060, 3061, 3062, 3063,  3064, 3108, 3146. | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Amendments to wording   * Para 2.13 - Insert Tourism as a significant employer. * Para 2.29 should reflect para 7.100 (balance of development needs within environmental and landscape limitations) as a key challenge. * Para 2.27 - reference to 61 in National Park is irrelevant and should be deleted. * Para 2.23 - Chichester Harbour is important for its landscape value, as well as biodiversity, land and water-based recreation, and tourism. Chichester Harbour AONB should get its own reference under Environment Characteristics. * Para 2.29 - List in order of importance. Start by protecting environmental and historic assets, then support economic and social development, then provision for new housing and business sites. * Para 2.29 - Suggest 7th bullet point is 'Protect and enhance the character of the area including the Chichester Harbour AONB and the setting of the SDNP'. **(SDNPA)** * Para 2.29 - Climate change missing from list. * No recognition of requirements of established businesses for expansion and to build in resilience. No discussion of automotive sector/advanced manufacturing. * Final bullet 2.4 not consistent with para 6.91. * Para 2.28 – Object to "whilst recognising the need to accommodate new development" - used by developers to shoe-horn in inappropriate developments. * Para 2.18 - Phrase "offers the best potential for attracting inward investment" not substantiated. New jobs could drive out some existing businesses. * Para 2.18 – Object to "However, there is also a need to support and diversify economic activity in the rural parts of the plan area" original wording too unfocussed allowing any form of diversification. Only diversification that complements the area should be contemplated. | | | | |
| Changes to Maps   * Local Plan Map does not show Chichester Harbour AONB. Would help CDC demonstrate protected landscape constraints when identifying land for development. * Map page 16 - request clarification whether LP area includes Stedlands Farm and the Stable/Little Stedlands, Haslemere. **(SDNPA)** | | | | |
| Transport   * Para 2.2, 2nd bullet: accessibility from Manhood peninsula worse than recorded. * Para 2.5: A27 operating at more than double original capacity. Improvements have not satisfactorily kept up with traffic increases. | | | | |
| East-West Corridor   * Term East-West Corridor is ill defined and use of this term implies the focus of policy is on transport and through movement, to detriment of a more balanced focus on | | | | |

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| local settlement, existing residential, local countryside and amenity issues. **(Chidham**  **& Hambrook Parish Council)**   * Lack of vision, clarity and coherence of policy to Bourne Villages, character and surrounding countryside between the South Downs and Chichester Harbour AONB. |
| Wildlife/Conservation   * Para 2.24 - references to SNCIs; update to reflect sites now Local Wildlife Sites. * Para 2.29 - recommend penultimate bullet point is revised to include geodiversity and locally designated sites. Paras 171 and 174 of NPPF are clear locally designated sites must be safeguarded in plans in order to protect and enhance biodiversity. * Rural setting and green access need better acknowledgement and protection.   Accesses are fragile, easily disrupted or downgraded by new developments. |
| Historic Environment   * Support reference to historic environment of Chichester district, and heritage assets, in paras 2.27 and 2.28 as part of positive strategy for the conservation and enjoyment of historic environment (para 185 of NPPF). **(Historic England)** * Support, in principle, identification of "Protect the area's valuable heritage and historic assets"" as one of the challenges faced. NPPF requires local plans to do more than just conserve historic environment i.e. to enhance it as well. Should be identified as a challenge. **(Historic England)** |
| Other   * Data should reflect local plan area only not the district, in particular social and economic characteristics. |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| The various suggested amendments to the description of the characteristics of the area will be considered for inclusion in the next iteration of the Plan, particularly with reference to consistency across the Plan document and ensuring the characteristics are accurately described.  With regards to the map in this section, the purpose is simply to clearly identify the Plan  area, not environmental constraints.  Comments on transport are noted but the existing characteristics are considered adequately described elsewhere in the Plan and the evidence base.  The comments regarding East West corridor are noted. The description will be reviewed but is broadly considered a reasonable short summary of the characteristics of the area.  The description and issues regarding wildlife and conservation are noted and any appropriate updating and amendments to the challenges will be reflected in the next iteration of the Plan.  Comments regarding the historic environment are noted and requirement to enhance the historic environment will be reflected in next version of the Plan.  The Plan does not cover the whole district. Data used in the Plan and supporting evidence  is sourced at the most appropriate scale considering the availability and suitability of data. |

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| **Spatial Vision and Objectives; Local Plan Strategic Objectives; Spatial Strategy** | | | | |
| Respondents | Representations | Support | Object | Comment |
| 57 | 83 | 12 | 27 | 44 |
| Representation numbers  113, 155 (West Wittering PC), 156 (West Wittering PC), 157 (West Wittering PC), 227,  (Sustrans), 235 (Sustrans), 260, 339, 378, 421, 422, 481, 488, 489, 490, 491, 492, 494, 496,  497, 509, 525,552, 577, 972, 1003, 1035, 1123, 1272 (Goodwood Estates), 1390, 1396,  1442 (Natural England), 1444 (Natural England), 1475 (Theatres Trust), 1477 (Theatres  Trust), 1581, 1595 (Harbour Villages Lib Dem Campaign), 1614, 1652, 1657, 1885, 1973,  1977, 1979, 2007, 2094 (WSCC), 2100 (WSCC), 2235, 2242 (Historic England) , 2243  (Historic England), 2347, 2540 (Chichester Harbour Trust),2458 (Southbourne PC), 2627, 2702, 2741, 2794, 2795, 2815, 2817, 2821, 2823, 2825, 2827, 2831, 2832, 2842 (Sussex  Wildlife Trust), 2843, 2853 (Sussex Wildlife Trust) , 2855 (Sussex Wildlife Trust), 2860  (Sussex Wildlife Trust), 2888, 2894 (Sussex Wildlife Trust), 2965, 2976, 2978, 2977, 2984,  3065 (Chichester Harbour Conservancy) 3066 (Chichester Harbour Conservancy), 3151  (Rolls Royce), 3476, 3478, 3517 (Goodwood Estates) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support:   * Vision supports culture and arts **(Theatres Trust)** * Recognition of the importance of biodiversity and unspoilt landscapes **(Natural England)** * Paras 3.4 and 3.14, objective relating to conserving and enhancing landscape and heritage **(Historic England)** * Inclusion of a group of environmental objectives **(Sussex Wildlife Trust)** * Health and wellbeing references * Integrated transport objective and strategic transport objectives. * General support | | | | |
| Additional objectives / elements of vision suggested:   * Mitigating and Adapting to Climate Change - including renewable energy. Natural England suggest objective should be more ambitious – to reduce greenhouse emissions rather than minimise increase – noting the district is at particular risk from climate change. * Vision should specify that more homes will be delivered in the places people want to live. * Objective relating to improving cycling and public transport should also refer to walking **(WSCC)** * Health and Wellbeing should refer to walking/cycling. * Recognise role of Rolls Royce and potential expansion needs **(Rolls Royce)** * Need greater recognition of infrastructure requirements. * Would like to see stronger commitment to net biodiversity gains and natural capital, ecosystem services and climate resilience **(Sussex Wildlife Trust).** * Need a long term solution to A27. * Build reservoirs in the downs to catch rain and reduce coastal groundwater. | | | | |
| Object to taking 41 homes from SDNP   * Need affordable homes in SDNP for local people. | | | | |
| Comments relating to plan/strategy overall:   * Plan does not reflect the aspiration set out in 3.7 to carefully manage relationship of SDNP and AONB by maintaining and enhancing countryside between settlements **(Chichester Harbour Conservancy)** * Object to 3.5 suggestion that new development will be well located – Tangmere has | | | | |

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| no rail station.   * Need to consider development opportunities to North of city. * East West Corridor doesn’t have good cycle links – improvements to NCN2 and feeder routes are needed **(Sustrans)** * Dispute that new homes will make East Wittering more self contained or provide jobs (West Wittering PC) * Objections to term East-West corridor – seen as pejorative as settlements are distinct. * Objections to AL6 |
| Support but sceptical about the implementation and delivery of the vision / whether the rest of the plan is consistent with them.   * Conflict between different parts of plan. |
| Various comments on specific paragraphs and other wording suggestions:   * 3.1 **Historic England** suggest changes * 3.2 needs to go further re climate change * 3.4. too economic focussed. * 3.19 road building is not the solution – walking, cycling, public transport. * 3.19 should include mitigated northern route * Add ref to Waste Local Plan policy **(WSCC)** * Section on Manhood should refer to the Chichester Harbour AONB * 4.3 refer to natural environment * 4.4 ecological networks and green infrastructure * 4.84 need to spend on local roads A286 * Expand references to health and wellbeing for older people to include children and people with disabilities. |
| Other general comments:   * Loss of buses in Southbourne **(Southbourne PC)** * Comments on individual developments, kind of shops wanted, jobs lost, shops and facilities closed etc * Requests to attend examination * Concerns about publicity * Housing should be affordable and for local people, limit 2nd homes * Comments relating to SUDs, grey water systems, ponds, cycle links, bus provision |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| The additional elements proposed to be added to the vision are noted. Further aims, and in particular capturing an appropriate articulation of the climate emergency declared by the  Council, will be proposed in the next iteration of the plan. This includes detailed suggestions  submitted by a number of parties.  Concerns over the distribution of development are acknowledged. The ongoing Sustainability Appraisal and other evidence will continue to test and refine the distribution with regards to environmental impacts and other considerations. |

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| **Policy S1 Presumption in Favour of Sustainable Development** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 7 | 7 | 0 | 4 | 3 |
| Policy: 10 | 11 | 2 | 7 | 2 |
| Representation numbers  106, 231 (Sustrans), 304, 343, 553, 643, 860, 1210, 1601, 2244 (Historic England), 2459  (Southbourne Parish Council), 2703, 2757 (Home Builders Federation), 2981, 3003, 3010,  3014, 3293 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support   * Support positive approach to planning; presumption in favour of sustainable development. | | | | |
| Policy Wording   * Repeats NPPF, is it necessary. **(Home Builders Federation)** * Include Strategic Objective 10 of Chichester Vision ‘to move around safely and conveniently with opportunities to choose alternatives to car travel.' **(Sustrans)** * Reliance on national principles insufficient; should aim higher. Reference principles in Wildlife Trust's 'Homes for People and Wildlife' policy guidance and WHO's 'Urban Green Spaces - A Brief For Action.' **(Southbourne Parish Council)** * Not enough detail. Need small scale developments which can be absorbed and not overwhelm infrastructure. Infrastructure to be delivered before large developments. | | | | |
| Amendments to text wording   * Reword to reflect paragraph 11 of NPPF. **(Historic England)** * Section 4.2 Insert "and natural" in last sentence “..of the built and natural environment" * Where Neighbourhood Plan in place, state policies it contains are of prime importance. | | | | |
| Environment   * Not sufficiently supportive of environment. * Consider it essential all new developments should be truly sustainable ie use renewable energy rather than fossil fuels; be fully insulated. * Does not take account of environmental damage some strategic areas will suffer. * Principle of NPPF for healthy and just society. Focussing more traffic on A27 corridor not healthy. Stockbridge already exceeds the recommended air quality levels. * In ecology terms no new housing development on greenfield or agricultural land is sustainable. | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| The inclusion of this policy has been questioned, but on balance it is considered a useful addition to the Plan to have a confirmation of the presumption in favour of sustainable development.  Detailed comments regarding the policy wording will be considered further, with the intention of reflecting the intentions of the NPPF in the Chichester context.  Comments on the environment will be considered further and reflected in an expanded  section which contains a little more detail and clarity on sustainable development principles, taking into account best practice. | | | | |

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| **Policy S2 Settlement Hierarchy** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 4 | 4 | 0 | 2 | 2 |
| Policy: 51 | 63 | 29 | 17 | 17 |
| Representation numbers  3270 (Loxwood PC), 3312 (Genesis Town Planning obo Landlinx Estates Ltd), 3415 (Genesis Town Planning obo Meadows Partnership), 3268 (Genesis Town Planning obo Landacre Developments Ltd), 3331(Genesis Town Planning obo Mr Landgmead), 3337 (Genesis Town Planning obo Mr and Mrs Ellis), 3364 (Genesis Town Planning obo Mr Ferguson), 3380 (Genesis Town Planning obo Mr and Mrs Tearall), 3384 (Genesis Town Planning obo Ms Newman), 1312 (Seaward Properties), 1273 (HMPC Ltd), 2704 (Gladman), 2742 (Gleeson Strategic Land), 2623 (Barton Wilmore obo Martin Grant Homes), 1186 (Nova Planning), 2796 (LRM Planning Ltd obo Hallam Land Management), 2771 (ICENI Projects obo Fishbourne Developments Ltd), 3015 (Neame Sutton Ltd obo Sunley Estates Ltd), 3298 (Lucken Beck MDP Ltd obo Barratt Homes), 3309 (Genesis Town Planning obo Domusea), 2885 (Savills UK obo Bloor Homes Southern), 3241 (WSCC), 3324 (Luken Beck MDP Ltd obo Seaward Properties), 3423 (Genesis Town Planning obo Seaward Properties), 3407 (Genesis Town Planning obo Seaward Properties), 3420 (Genesis Town Planning obo Seaward Properties), 3401(Luken Beck MDP Ltd obo Seaward Properties), 3394 (Luken Beck MDP Ltd obo Seaward Properties), 3389 (Luken Beck MDP Ltd obo Seaward Properties), 3398 (Luken Beck MDP Ltd obo Seaward Properties), 2628 (Barton Willmore), 2691 (DMH Stallard obo Welbeck Strategic Land (IV) LLP) , 2786 (ICENI Projects obo Antler Homes Ltd), 3004 (Neame Sutton Ltd obo Danescroft Land Ltd), 3221 (Genesis Town Planning obo Elberry Properties), 3288 (Genesis Town Planning obo Chichester Grain Ltd), 3352 (Nexus Planning Ltd obo CEG), 3360 (Genesis Town Planning obo Junnell Homes Ltd), 3370 (Luken Beck MDP Ltd obo Landlink Estates Ltd), 3235 (Henry Adams LLP obo Taylor Wimpey Strategic Land ), 2608 (CBRE obo Premier Marinas), 2148, 2975 (Plaistow & Ifold PC), 2490 (Chidham & Hambrook PC), 1990, 3408 (Genesis Town Planning obo Greenwood Group Ltd), 734, 3290 (Lucken Beck MDP Ltd obo Barratt Homes, 2182, 1583, 238 (Sustrans), 648, 2917 (Genesis Town Planning obo Mr Phillips), 704, 1098, 1273 (HMPC Ltd), 2245 (Historic England), 3380, 3420 (Genesis Town Planning obo Seaward Properties Ltd), 793, 3115 (Chichester Harbour Conservancy), 297, 299, 2742 (Gleeson  Strategic Land), 2490 (Plaistow & Ifold PC), 1661, 2704 (Gladman), 297, 648, 1661, 1990,  787, 788, 1312 (Seaward Properties) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Request for settlement boundary   * Plaistow should have a settlement boundary 3270 (**Loxwood PC**) | | | | |
| Support for hierarchy classification for following locations:   * Loxwood (**Landlinx Estates Ltd and Antler Homes**), West Wittering (**Meadows Partnership**), Fishbourne (**Landacre Developments, Fishbourne Developments, Seaward Properties**), Birdham (**Martin Grant Homes**), North Mundham/Runcton (**Domusea** and Junnell Homes Ltd), Chidham and Hambrook (**Sunley Estates Ltd, Seaward Properties Ltd**), Hunston, Earnley (**Seaward Properties**), Southbourne (**Nova Planning, Hallam Land Management, Domusea, Seaward Properties, Barton Wilmore, Chichester Grain Ltd**), East Wittering/Bracklesham (**Barratt Homes, Welbeck Strategic Land**), Tangmere (**Bloor Homes Southern, Seaward Properties Ltd**), Chichester as sub-regional centre (**WSCC, Elberry Properties**), Bosham (**Seaward Properties Ltd**) * Hermitage should be service village (**Seaward Properties**) | | | | |
| Suggested service villages: | | | | |

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| * Marina as part of Birdham service village (**Premier Marinas**) * Sidlesham (Greenwood Group) |
| Object to designation of service village:   * Plaistow and Ifold – no settlement boundary (**Plaistow and Ifold PC**) |
| Definition of settlement hub:   * Should include good access to main road network, the rail network, employment and secondary and higher education facilities (**Barratt Homes**) * Should have access by sustainable means of transport |
| Further reviews required:   * All sustainable villages to provide more scope for windfall sites |
| Methodology/calculation of OAN/housing numbers:   * No correlation between ONS population data and OAN * No account taken of what can practically be achieved. |
| Policy wording:   * Include reference to potential effects on Historic Environment in assessing whether settlement suitable location for additional housing growth (**Historic England**) * Ensure services provided before development, strengthen plan wording to achieve this. * Chidham and Hambrook should be referred to throughout plan, not Hambrook/Nutbourne * Make reference to employment in sustainability criteria. |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| For the purposes of the settlement hierarchy Plaistow & Ifold are considered to function together as a single settlement. In this case, the characteristics of Plaistow means a legible,  coherent settlement boundary is difficult to establish. Nonetheless the range of services and  level of population set out in the settlement hierarchy background paper mean that together they warrant identification as a Service Village.  The support for the identification of the hierarchy classification is noted. Suggestions for additional service villages, and objections to Plaistow and Ifold are noted but there does not seem sufficient justification for changing the hierarchy.  The suggested amendments to the definition of a service hub are noted. The availability of public transport and a range of facilities is already included in the methodology for identifying the hierarchy. No compelling evidence has been received to indicate changes are necessary.  The expectation is that sustainable villages may well provide windfall development, either through infill or windfall sites.  The assessment of housing need is set out elsewhere in the Plan.  Regarding policy wording, it is considered other policies in the Plan protect the historic environment and deal with the provision of services; Hambrook/Nutbourne are the two settlements identified for the purposes of this policy; although employment sites are not explicitly outlined in the criteria, the location of sites in the methodology means that its inclusion would not lead to a significantly different outcome. |

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| **Policy S3 Development Strategy** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 21 | 24 | 2 | 6 | 16 |
| Policy: 95 | 117 | 14 | 49 | 54 |
| Representation numbers  79, 207, 232, 295, 361, 423, 425, 498, 557, 569, 583, 616, 653, 658, 702 (Paul Newman  Property Consultants), 716, 1062, 1110 (Batcheller Monkhouse), 1167, 1174, 1175, 1244  (North Mundham PC), 1314 (Seaward Properties Ltd), 1327, 1350, 1377, 1502, 1505  (Wisborough Green PC), 1519 (Lewis & Co Planning), 1540, 1554, 1604 (Harbour Villages  Lib Dem Campaign Team), 1633, 1662, 1797 (Heaver Homes Ltd), 1798, 1846, 1886, 1888,  1894, 1972, 1993, 3353 (CEG), 2009, 2035, 2042, 2221, 2296 (Portsmouth Water), 2402  (SDNPA), 2473, 2492, 2529, 2541 (Chichester Harbour Trust), 2629 (Barton Willmore), 2744 (Gleeson Strategic Land), 3005 (Danescroft Land Ltd), 2651, 2652 (Church Commissioners), 2692 (Wellbeck Strategic Land LLP), 2705 (Gladman), 2735 (Sussex Wildlife Trust), 2783 (Fishbourne Developments Ltd), 2788 (Antler Homes Ltd), 2798 (Hallam Land Management Ltd), 2845, 2846, 2847, 2865 (Persimmon Homes), 2890, 2936 (CPRE Sussex), 2987, 3056  (Chichester Harbour Conservancy), 3124, 3148 (Rolls Royce Motor Cars Ltd), 3236 (Taylor Wimpey Strategic Land), 2883 (Casa Coevo), 3242 (WSCC Estates), 3271 (Loxwood PC),  3294 (Church Commissioners), 3391, 3395, 3399 (Seaward Properties), 3402 (Seaward  Properties), 3325 (Seaward Properties), 3355 (Landlink Estates Ltd), 3494, 3503, 3511,  3514 (HMPC Ltd), 3549 | | | | |
| Omission site representations:  3432 (Domusea), 3427 (Seaward Properties), 3428 (Seaward Properties), 3429 (Seaward Properties), 3434 (Landacre Development Ltd), 3433 (Chichester Grain Ltd), 3431 (Junnell Homes Ltd), 3377 (Jeff Ferguson), 3382 (Mr and Mrs Tearall), 3388 (Rebecca Newman), 3413 (Greenwood Group Ltd), 3121 (Brookhouse Group), 2624 (Martin Grant Homes), 3320 (Landlink Estates), 3025 (William Lacey Group), 2836 (Casa Coevo), 3144 (Rolls Royce Motor Cars Ltd), 3017 (Sunley Estates Ltd), 3234 (Taylor Wimpey Strategic Land), 1644 (Thomas Procter), 3228 (J Pitts), 2674 (Devonshire Developments Ltd), 2811 (Pam Clingan), 2603 (Welbecj Strategic Land IV LLP), 2697 (Artemis Land and Agriculture Ltd), 2785 (Antler Homes Ltd), 2820 (Asprey Homes Southern), 2919 (D G Philips), 3008 (Danescroft Ltd), 3012 (Castle Properties), 3019 (Charities Property Fund), 3020 (Thakeham Homes), 3038 (G Rudsedski), 3040 (Mr and Mrs Bell), 3042 (Mr and Mrs Seymour), 3043 (Mr and Mrs Sadler), 3044 (Mr and Mrs Pick), 3045 (Mr and Mrs Green), 3048 (Mr and Mrs Chitty), 3122 (D R Pick Grandchildren’s Settlement), 3142 (Obsidian Strategic SB Ltd), 3220 (Elberry Properties Ltd), 3231 (Trustees of C L Meigher Lovett Will Trust), 3540 (CEG), 3334 (Samuel Langmead), 3544 (Berkeley Strategic Land Ltd), 1506 (Berkeley Strategic Land Ltd), 1643 (Thomas Procter) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support policy: **(Barton Willmore, Gleeson Strategic Land, CEG, Danescroft Land Ltd,**  **Antler Homes Ltd, Hallam Land Management Ltd, Church Commissioners, Fishbourne Developments Ltd, Wellbeck Strategic Land LLP, Seaward Properties)** | | | | |
| Support local community facilities (as set out in 2b of policy) in smaller settlements to improve self-sufficiency | | | | |
| Housing numbers should be increased:   * To raise allocation numbers and meet wider unmet need **(Fishbourne Developments Ltd, Persimmon Homes)** * Need greater flexibility in plan **(Church Commissioners)** | | | | |

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| * Sites in Chichester could have higher numbers **(WSCC Estates)** |
| Housing numbers:   * Ensure plan meets OAN, employment needs and protects essential open spaces around the city with long term designation **(HMPC Ltd)** * Be clear what quantum of development is allocated at each tier **(Gladman)** * Unclear how proportions of dwelling numbers were arrived at; suggest minimum of 1,400 new homes on Manhood rather than 750 **(Landlink Estates Ltd)** * No vision for housing and employment land * Aggressive plan being introduced when old plan not expired. Strong opposition to large scale developments. * Housing levels should be as in adopted Local Plan ; reinforce Manhood Peninsula existing communities, tourism, agricultural enterprises |
| Settlement hierarchy:   * Long term growth requirements may lead to reconsideration of hierarchy (Heaver Homes Ltd) * Consideration to be given to Lavant for development * Selsey is not a hub * Fishbourne is not service village * Westbourne could deliver housing **(Paul Newman Property Consultants)** * Camelsdale, Birdham and Hermitage should be service villages **(Casa Coevo, Lewis**   **& Co Planning, Seaward Properties)** |
| Service villages:   * Development here driven by opportunities **(Wisborough Green PC)** * Service villages not sufficiently defined **(Harbour Villages Lib Dem Campaign Team)** * Insufficient evidence for selection of allocations in service villages **(Taylor Wimpey Strategic Land)** * No recognition of special characteristics of each * North Mundham/Runcton suitable for strategic development **(Batcheller Monkhouse)** |
| Infrastructure:   * Are locations on the Manhood peninsula suitable * Lack of facilities and services needs to be addressed * Need safe transport infrastructure * Allocations west of Chichester need consideration of water supply **(Portsmouth Water)** * A27 upgrade is key * Need good walking and cycling infrastructure * Conflict of link road and flooding area |
| Distribution:   * Lack of comprehensive guidance and evidence for east/west corridor * Develop in north away from coastal flooding areas * Sites in north outside Loxwood available to take development **(Loxwood PC)** * Manhood cannot sustain levels of proposed development * Need new settlement * Will result in conurbation from Southbourne to Bognor to Tangmere * Inadequate balance between east/west corridor and Boxgrove, Halnaker, Goodwood etc. * Inconsistent approach to Hunston * Better distribution across District **(Seaward Properties Ltd)** * Majority of development should be around Chichester * Housing and employment to be around Lavant to absorb housing from SDNPA |

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| * No evidence of need of 500 homes at Chidham and Hambrook * Harm to environment if east/west corridor developed * Need to be able to integrate development proportionate to settlement size * SDNPA should take share of development * Need to balance requirements of new housing and need to protect sensitive attractive areas (**North Mundham PC**). * Need to address west of Chichester as a whole rather than individual settlements along a transport route. (**Southbourne PC**) |
| Environment:   * Concern CDC has not discharged landscape duties under Countryside and Rights of Way Act (2000). Development located directly outside AONB boundary. Insufficient evidence cumulative effects of development have been considered. **(Chichester Harbour Conservancy)** * Concern re level of greenfield development and ability of natural capital to absorb level and location of development **(Sussex Wildlife Trust)** * Setting of SDNPA and AONB **(SDNPA)** * Air quality and traffic congestion issues at Stockbridge * Damage to environment and landscape **(Chichester Harbour Trust)** * No indication approach of brownfield sites first before greenfield has been used for strategy **(CPRE Sussex)** * Building on floodplain up to Chichester Harbour boundary would be destructive, no justification |
| Economy:   * Government recognise High Streets not just retail; Selsey needs to increase footfall with other uses. * Underplay Chichester’s role as tourist destination * No consideration of need for strategic employment site **(Rolls Royce Motor Cars Ltd)** * Noise buffer at Goodwood should be developed as strategic employment site; include strategic housing south of Lavant and west of Chichester as exception site for meeting SDNPA unmet housing need. * Chichester Marina reword reference to promotion of ‘small scale’ **(Premier Marinas)** |
| Promoted sites:   * Pigeon House Farm, North Mundham, Wayside, Main Road, Nutbourne, Inlands Road, Southbourne, Land south of Gordon Road, Southbourne **(Domusea)** * 98 Fishbourne Road **(Seaward Properties Ltd)** * Former Burnes Shipyard, Bosham **(Seaward Properties Ltd)** * Cox's Barn Farm, Chidham and Hambrook **(Seaward Properties Ltd)** * Land south of Clay Lane **(Landacre Developments Ltd)** * Chichester Grain, Priors Leaze Road **(Chichester Grain Ltd)** * Land east of The Spinney, Runcton **(Junnell Homes Ltd)** * Bramber Nursery, West Wittering **(Jeff Ferguson)** * South of Yeoman's Field for housing **(Mr and Mrs Tearall)** * Site at Farmfield Hunston for housing **(Ms Rebecca Newman)** * Greenwood Nursery Highleigh Road Sidlesham **(Greenwood Group Ltd)** * Land at Barnfield Drive - continue to allocate through the LPR as part of the site does not yet have planning permission **(Brookhouse Group)** * Land to the west of Bell Lane, Birdham **(Martin Grant Homes)** * Site at Loxwood House Guildford Road **(Landlink Estates Ltd)** |

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| * Land at Blackboy Lane and Clay Lane, Fishbourne **(William Lacey Group)** * Land to the rear of Sturt Avenue, Lynchmere **(Casa Coevo)** * Land east of Rolls Royce for RR expansion **(Rolls-Royce Motor Cars Limited)** * Land east of Broad Road, Hambrook **(Sunley Estates Ltd)** * Land at Chantry Hall Farm, Westbourne **(Taylor Wimpey Strategic Land)** * Land at Bosham **(Mr Thomas Procter)** * Land north of Maudlin Farm, Westhampnett **(J Pitts)** * Land south of B2166, North Mundham (Lowlands) **(Devonshire Developments Limited)** * Land south of Madgwick Lane, Westhampnett **(Pam Clingan)** * Land south of Townfield, Kirdford for housing **(Welbeck Strategic Land IV LLP)** * Site at Crouchlands Farm **(Artemis Land and Agriculture Ltd)** * Black Hall, Loxwood, Land at Loxwood House, Loxwood **(Antler Homes Ltd)** * Lansdowne Nursery and Sherwood Nursery, Oving **(Asprey Homes Southern)** * Land north of Brandy Hole Lane and Land west of Plainwood Close **(Mr D G Phillips)** * Site at Portfield Quarry **(Danescroft Land Ltd)** * Loxwood Farm Place **(Castle Properties)** * 12 - 18 West Street and 51-55 Tower Street **(Charities Property Fund)** * Land West of Guildford Road, Loxwood **(Thakeham Homes)** * Land at Herons Farm, Kirdford **(Mr G Rudsedski)** * Land at Stoney Meadow Farm **(Mr & Mrs Bell)** * Land at Orchard House, Loxwood **(Mr and Mrs Seymour)** * Land south of Salthill Park **(Mr and Mrs Sadler)** * Land to the west of Chaffinch, Burlow and Florence Close **(Mr & Mrs Pick)** * Land west of Delling Lane, Bosham **(Mr and Mrs Green)** * Land east of Hermitage Close **(Mr and Mrs Chitty)** * Land at Whitestone Farm, Birdham **(D R Pick Grandchildren's Settlement)** * Land south of Main Road, Hermitage **(Obsidian Strategic SB Limited)** * Land at Sherwood Nursery Lansdowne Nursery **(Elberry Properties Ltd)** * Land at Salthill Park, Chichester **(Trustees of CL Meighar Lovett Will Trust)** * Land within the existing SDL boundary, to the east of the River Lavant **(CEG)** * Church Road Birdham **(Mr Samuel Langmead)** * Land at Raughmere Farm, Chichester **(Berkeley Strategic Land Ltd)** * Land at Lawrence Farm **(Berkeley Strategic Land Ltd)** * Land north of railways line at Highgrove Farm **(Mr Thomas Procter)** |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| Comments in support are noted.  The comments regarding housing numbers are noted. The rationale for the overall amount of housing in the Preferred Approach is set out in the Housing Background Paper. The rationale for distribution is set out in the Plan, Sustainability Appraisal and supporting evidence.  Representations received on the settlement hierarchy, individual service villages and proposed new service villages are noted. Overall, it is considered the settlement hierarchy is |

a reasonable basis for developing the Local Plan Review.

Where appropriate comments regarding infrastructure requirements will be addressed through an updated Infrastructure Delivery Plan and associated documents such as additional transport evidence.

Concerns over the distribution of development are acknowledged. The ongoing Sustainability Appraisal and other evidence will continue to test and refine the distribution with regards to environmental impacts and other considerations.

The environmental impacts have been considered through the evidence base prepared to date, including the Strategic Wildlife Corridors work, Strategic Flood Risk Assessment, Landscape Capacity Study and Gap Assessment, Habitats Regulations Assessment and Sustainability Appraisal. Further iterations of this work will consider further those impacts.

Specific comments regarding economic factors will be considered further as the Plan progresses.

Promoted sites will be considered where appropriate through a refresh of the Housing and Economic Land Availability Assessment, and if necessary through further Sustainability Appraisal work.

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| **Policy S4 Meeting Housing Need** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 24 | 27 | 1 | 20 | 6 |
| Policy: 115 | 127 | 6 | 76 | 45 |
| Representation numbers  2445 (**Adur and Worthing DC**), 3296 (**Church Commissioners for England**), 2449 (**Horsham District Council**), 2870 (**Rodway Planning Consultancy Ltd obo Mr and Miss Butterfield and Waldron**), 3139 (**PRP Architects Ltd obo Obsidian Strategic SB Ltd**), 2834 (**Verve Planning obo Casa Coevo**), 2801 (**LRM Planning Ltd obo Hallam Land Management**), 2625 (**Barton Wilmore obo Martin Grant Homes**), 2438 (**SDNP**), 2937 (**CPRE Sussex**), 3238 (**Henry Adams LLP obo Taylor Wimpey Strategic Land**), 3243 (**Henry Adams LLP obo WSCC Estates**), 2779 (**ICENI projects obo Fishbourne Developments Ltd**), 2789 (**ICENI Projects obo Antler Homes**), 3354 (**Nexus Planning Ltd obo CEG**), 3551(**WYG obo Berkeley Strategic Land Ltd**), 3326 (**Luken Beck MDP Ltd obo Seaward Properties Ltd**), 3396 (**Luken Beck MDP Ltd obo Seaward Properties Ltd**), 3392 (**Luken Beck MDP Ltd obo Seaward Properties Ltd**), 2631(**Barton Wilmore**), 3009 (**Neame Sutton obo Castle Properties**), 3002 (**Neame Sutton Ltd obo Danescroft Land Ltd**), 3013 (**Neame Sutton Ltd obo Sunley Estates**), 3036 (**Sigma Planning Services obo Rydon Homes Ltd**), 3317 (**Genesis Town Planning obo Landlinx Estates**), 3222 (**Genesis Town Planning obo Elberry Properties Ltd**)  3289 (**Genesis Town Planning obo Chichester Grain Ltd**), 3410 (**Genesis Town Planning obo Greenwood Group Ltd**), 3332 (**Genesis Town Planning obo Mr Langmead**), 3385 (**Genesis Town Planning obo Miss Newman**), 3301 (**Luken Beck MDP Ltd obo Barratt Homes**), 1542, 961(**Birdham PC**), 145, 1446, 1353, 2232, 530, 708, 1423,  426, 2109, 2755 (**Home Builders Federation**), 3021(**Thakeham Homes**), 2604 (**Boyer Planning obo Welbeck Strategic Land IV LLP**), 2707 (**Gladman**), 2745 (**Gleeson Strategic Land**), 2918 (**Genesis Town Planning obo Mr Philips**), 2779 (**Historic England**), 3338 (**Genesis Town Planning obo Mr and Mrs Ellis**), 3313 (**Genesis Town Planning obo Domusea**), 3361(**Genesis Town Planning obo Junnell Homes Ltd**), 3272 (**Genesis Town Planning obo Landacre Developments Ltd**), 3409 (**Genesis Town Planning obo Seward Properties ltd**), 2587 (**Turley obo Countryside Properties**), 3371 (**Genesis Town Planning obo Mr Ferguson**), 1158, 632, 1140 (**British Horse Society**), 1382, 3538, 457, 777, 660, 1875, 2571(**Earnley PC**), 2131, 1494, 1889, 2883 (**Savills Uk**  **obo Bloor Homes**), 344, 982, 784, 3026 (**Strutt and Parker LLP obo William Lacey Group**), 3050 (**Arun DC**), 2053 (**East Hampshire District Council**), 1151 (**Waverley Borough Council**), 3416 (**Genesis Town Planning obo Meadows Partnership**), 3383 (**Genesis Town Planning obo Mr and Mrs Tearall**), 1188 (**Savills UK obo Mr Pitchford**), 2866 (**Persimmon Homes**), 1462, 732, 25 (**Earnley Parish Council**), 916, 911, 2026, 1158,  2192 (**Environment Agency**), 80, 2675 (**DLP Planning Ltd obo Devonshire**  **Developments Limited**), 2693 (**DMH Stallard obo Welbeck Strategic Land IV LLP**), 835, 2532, 3532 (**Chidham Sustainability Network**), 1440 (**Donnington PC**), 1316 (**Ms Humble**  **obo Seaward Properties Ltd**), 3534, 65, 1319, 1058, 1637, 1667, 1915, 2542 (**Chichester**  **Harbour Trust**), 1446, 411, 744, 1974, 802, 714 (**West Itchenor PC**), 3357 (**Landlink**  **Estates Ltd**), 2572 (**Earnley PC**), 1005, 301, 2979 (**Plaistow and Ifold PC**), 2699 (**Dominic Lawson Bespoke Planning obo Artemis Land and Agriculture Ltd**), 982, 3403 (**Luken Beck MDP Ltd obo Seaward Properties Ltd**), 1939, 1467, 2518 (**Sidlesham PC**), 1558,  978, 145, 1875, 1964, 350, 777, 200, 1641, 3424 (**Genesis Town Planning obo Seaward**  **Properties Ltd**), 3515 (**HMPC Ltd**), 1418,1848, 362, 2989, 2989, 480, 327, 2949 (**CPRE**  **Sussex**), 2246 (**Historic England**), 1821 (**King & Co obo Heaver Homes Ltd**) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Housing Numbers:   * Support - Policy meets identified need. 3296 (**Church Commissioners**), 2801 (**LRM Planning Ltd obo Hallam Land Management**), 2625 (**Barton Wilmore obo Martin** | | | | |

**Grant Homes**), 2438 (**SDNP**), 2449 (**Horsham District Council**), 3139 (**PRP Architects Ltd obo Obsidian Strategic SB Ltd**)

* Object – to use of HEDNA as opposed to standard methodology. Not clearly demonstrated that exceptional circumstances exist for using OAN contained within HEDNA for calculating housing need. 3238 (**Henry Adams LLP obo Taylor Wimpey Strategic Land**), 3243 (**Henry Adams LLP obo WSCC Estates**)
* Mixes sites previously allocated and with planning permission with new allocations – unclear how housing numbers being addressed. 3354 (**Nexus Planning Ltd obo CEG**),
* Increase – housing figure should be minimum. 2779 (**ICENI projects obo Fishbourne Developments Ltd**), 2789 (**ICENI Projects obo Antler Homes** ). 2675 (**DLP Planning Ltd obo Devonshire Developments Limited**) 2918 (**Genesis Town Planning obo Mr Philips**). No flexibility with low % of allocations. 3238 (**Henry Adams LLP obo Taylor Wimpey Strategic Land**), 3243 (**Henry Adams LLP obo WSCC Estates**) Lacks clarity in regard to known commitments on strategic sites. 3354 (**Nexus Planning Ltd obo CEG**)
* Baseline and affordability factors out of date. 3551(**WYG obo Berkeley Strategic Land Ltd**)
* No account for unmet need from neighbouring authorities, not just SDNP. 3551(**WYG obo Berkeley Strategic Land Ltd**), 3317 (**Genesis Town Planning obo Landlinx Estates**), 3332 (**Genesis Town Planning obo Mr Langmead**), 3238 (**Henry Adams LLP obo Taylor Wimpey Strategic Land**), 3021(**Thakeham Homes**), 3410 (**Genesis Town Planning obo Greenwood Group Ltd**), 3243 (**Henry Adams LLP obo WSCC Estates**), 3289 (**Genesis Town Planning obo Chichester Grain Ltd**), 2631(**Barton Wilmore**), 2445 (**Adur and Worthing DC**), 3050 (**Arun DC**), 2707 (**Gladman**), 2755 (**Home Builders Federation),** 2449 (**Horsham District Council**), 1151 (**Waverley Borough Council**), 3313 (**Genesis Town Planning obo Domusea**), 3361 (**Genesis Town Planning obo Junnell Homes Ltd**), 3272 (**Genesis Town Planning obo Landacre Developments Ltd**), 3416 (**Genesis Town Planning obo Meadows Partnership**), 3338 (**Genesis Town Planning obo Mr and Mrs Ellis**), 3371 (**Genesis Town Planning obo Mr Ferguson**), 2779 (**ICENI projects obo Fishbourne Developments Ltd**), 1188 (**Savills UK obo Mr Pitchford**),
* Method used for calculating unmet need from SDNP is not standard one. 3009 (**Neame Sutton obo Castle Properties**), 3002 (**Neame Sutton Ltd obo Danescroft Land Ltd**), 2918 (**Genesis Town Planning obo Mr Philips**),
* Affordability – Significant affordability issues in District. NPPG advises the more significant, the larger the improvement to affordability is required. 25% uplift to demographic OAN is justified. 2870 (**Rodway Planning Consultancy Ltd obo Mr and Miss Butterfield and Waldron**)
* Capping of increase – CDC should meet capped requirement based on baseline position. 3002 (**Neame Sutton Ltd obo Danescroft Land Ltd**), 3013 (**Neame Sutton Ltd obo Sunley Estates**), 3009 (**Neame Sutton obo Castle Properties).**
* Object to capping of increase - 3036 (**Sigma Planning Services obo Rydon Homes Ltd**)
* Standard method in PPG suggests need assessment flawed as adopted plan already fails to meet need. 3317 (**Genesis Town Planning obo Landlinx Estates**), 3222 (**Genesis Town Planning obo Elberry Properties Ltd**), 3036 (**Sigma Planning Services obo Rydon Homes Ltd**), 3289 (**Genesis Town Planning obo Chichester Grain Ltd**), 3410 (**Genesis Town Planning obo Greenwood Group Ltd**), 3332 (**Genesis Town Planning obo Mr Langmead**), 3385 (**Genesis Town Planning obo Miss Newman**), 3301 (**Luken Beck MDP Ltd obo Barratt Homes**),
* Decrease – Need further justification for increase in housing requirement. Housing figure should be reduced to reflect 2016 ONS projections. No attempt to apply

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| sensitivity analysis to single end figure. 961(**Birdham PC**)   * Infrastructure cannot cope with level of proposed development and figure should be decreased to allow for this. Unlikely that level of housing predicted are going to be needed. * Object to use of word minimum – makes it difficult for communities to resist further development. 25 (**Earnley Parish Council).** * In order to deliver, less emphasis should be placed on sites coming forward through Neighbourhood Plan process. More allocations to ensure housing delivered evenly. Some issues will be difficult for Neighbourhood Plans to tackle (Infrastructure).3317 (**Genesis Town Planning obo Landlinx Estates**), 3354 (**Nexus Planning Ltd obo CEG**), 2693 (**DMH Stallard obo Welbeck Strategic Land IV LLP**), 1316 (**Ms Humble obo Seaward Properties Ltd**) |
| Buffer on HLS   * 1% buffer insufficient. 20% buffer on land supply needed to ensure delivery. 2755 (**Home Builders Federation**), 3021(**Thakeham Homes**), 2604 (**Boyer Planning obo Welbeck Strategic Land IV LLP**), 2707 (**Gladman**), 3296 (**Church Commissioners for England**), 2745 (**Gleeson Strategic Land**) |
| Trajectory   * Should be included in line with NPPF para. 73. 2755 (**Home Builders Federation**), 2918 (**Genesis Town Planning obo Mr Philips**), 3021(**Thakeham Homes**), 3354 (**Nexus Planning Ltd obo CEG**), 2779 (**ICENI projects obo Fishbourne Developments Ltd**), 2587 (**Turley obo Countryside Properties**), * Plan should allocate range of sites to ensure provision is even across plan period.   Should not have a stepped trajectory. 2755 (**Home Builders Federation**), 3301 (**Luken Beck MDP Ltd obo Barratt Homes**),   * Need trajectory for large sites. 3410 (**Genesis Town Planning obo Greenwood Group Ltd**), 3338 (**Genesis Town Planning obo Mr and Mrs Ellis**), 3371 (**Genesis Town Planning obo Mr Ferguson**), 3332 (**Genesis Town Planning obo Mr Langmead**), 3222 (**Genesis Town Planning obo Elberry Properties Ltd**), 3289 (**Genesis Town Planning obo Chichester Grain Ltd**), 3313 (**Genesis Town Planning obo Domusea**), 3361(**Genesis Town Planning obo Junnell Homes Ltd**), 3272 (**Genesis Town Planning obo Landacre Developments Ltd**), 3409 (**Genesis Town Planning obo Seward Properties ltd**), |
| Windfall/Small sites   * Clarify definition of windfall sites in Local Plan glossary to meet the ‘consistent with national policy’ test of soundness. 3371 (**Genesis Town Planning obo Mr Ferguson**) * Support allowance. 3371 (**Genesis Town Planning obo Mr Ferguson**), 3317 (**Genesis Town Planning obo Landlinx Estates**), 3332 (**Genesis Town Planning obo Mr Langmead**), 3410 (**Genesis Town Planning obo Greenwood Group Ltd**), 3385 (**Genesis Town Planning obo Miss Newman**), |
| SDNP   * Object – SDNP should meet own requirement – would assist in alleviating congestion on A259 corridor, will enhance vitality of rural communities. 1140 (**British Horse Society**)**,** 2571(**Earnley PC**) * Object – overall housing figure should increase as does not meet unmet need in SDNP. 2883 (**Savills Uk obo Bloor Homes**) * Support – SDNP welcome uplift to housing target to address unmet need arising from SDNP. 2438 (**SDNP**), 3026 (**Strutt and Parker LLP obo William Lacey Group**) |
| Evidence   * Clarify supporting evidence on capacity to deliver housing numbers. 3050 (**Arun DC**), 2449 (**Horsham District Council**), 3026 (**Strutt and Parker LLP obo William** |

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| **Lacey Group**),   * Making supporting evidence clearer on links between housing and employment. 2707 (**Gladman**), * SoCGs are required. 3050 (**Arun DC**), 2866 (**Persimmon Homes**), * SA flawed as Rydon only assessed impact 800dpa. 3036 (**Sigma Planning Services obo Rydon Homes Ltd**) * Study of existing housing stock required to assess vacancy prior to building new homes. |
| Local need:   * Housing should reflect local demand including affordable and sheltered housing * Occupation and purchase should be restricted to local residents and prevented from being second homes. |
| Infrastructure:   * Additional infrastructure required to cope with proposed development, including improvements to A27 |
| Housing distribution (East-West Corridor):   * Infrastructure cannot cope (A259/A27/Fishbourne roundabout). Impact on AONB/sensitive locations south of A259 and tourism. 2542 (**Chichester Harbour Trust**) * The difference between Option 1 and 1A is said to be that option 1A reduces the scale of development on Manhood and redistributes it to Southbourne, Hunston and Tangmere. However for some reason Chidham and Hambrook allocation reduces from 600 in Option 1 to 500 in Option 1A and there is no explanation or justification for this reduction. The 600 unit allocation for Hambrook in Option 1 should have been carried forward in Option 1A as it has a railway station and the 700 bus route. Then reduce 200 unit allocation for Hunston to 100 as it less sustainable location. * Consider housing allocation North of Chichester and south of SDNP |
| Housing distribution (Manhood Peninsula):   * Scale of development would negatively impact on tourist industry and economy. * Poor infrastructure (employment, transport, facilities) on Peninsula, scale of development will exacerbate existing situation. 1440 (**Donnington PC**), 714 (**West Itchenor PC**), 2572 (**Earnley PC**), |
| Housing distribution (North of plan area):   * Increase allocation to alleviate impact on east-west corridor. 2699 (**Dominic Lawson Bespoke Planning obo Artemis Land and Agriculture Ltd**), * Allocation exceeds the amount needed – limited employment, services, infrastructure. 2979 (**Plaistow and Ifold PC**), |
| Housing distribution (general):   * Allocate range of sites to ensure provision comes forward evenly. 3021(**Thakeham Homes**), |
| Policy wording:   * Policy should have criteria based approach to development on edge of settlement 2707 (**Gladman**), * Suggested criteria for Local Plan to assess sites is the same as suggested for Neighbourhood Plans. 2192 (**Environment Agency**) * The proposed policy wording is not positively prepared, consistent with national policy nor will it be effective in delivering the District's full local housing need in sustainable locations, such as the Settlement Hubs and Service Villages. 3403 (**Luken Beck MDP Ltd obo Seaward Properties Ltd**) |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| A refresh of the Housing and Economic Development Needs Assessment has been commissioned to provide an up-to-date assessment of the housing needs of the plan area, taking into account national planning policy and guidance. This will also address they types |

and tenure of housing required.

A housing trajectory will accompany the next stage of the plan to demonstrate the delivery of sites.

Statements of Common Ground will be sought with neighbouring authorities to document the extent to which agreement is reached on strategic planning matters, including meeting housing need. In its signed Statement of Common Ground with the South Downs National Park Authority, the District Council undertakes that, subject to the completion of the ongoing evidence-based work and the assessment of sites to meet the identified housing needs associated with the Local Plan Review, the Council will assess its ability to meet some or all of the unmet housing need arising from the part of the national park within Chichester District. It was also agreed that CDC will not commit to accommodating unmet housing need from elsewhere in the national park other than through the work of the West Sussex and Greater Brighton Strategic Planning Board.

The Council is updating the Housing and Economic Land Availability Assessment and associated evidence base to consider further the capacity of the plan area to meet the development targets identified.

Concerns over the distribution of development are acknowledged. The ongoing Sustainability Appraisal and other evidence will continue to test and refine the distribution with regards to environmental impacts and other considerations.

This policy will need consequential updating to reflect the increase in Plan period to 2036, planning permissions and completions since the preferred approach was published.

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| **Policy S5: Parish Housing Needs** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 11 | 11 | 2 | 4 | 5 |
| Policy: 196 | 203 | 11 | 153 | 39 |
| Representation numbers | | | | |
| 3006 (Neame Sutton obo Danescroft Land Ltd), 661, 153, 2446 (Horsham District Council), | | | | |
| 2439 (SDNP), 1274 (HMPC Ltd), 2625 (Barton Willmore obo Martin Grant Homes), 3356 | | | | |
| (Nexus Planning Ltd obo CEG), 1807 (King and Co obo Heaver Homes Ltd), 3141(PRP | | | | |
| Architects obo Obsidian Strategic SB Limited), 1607 (Harbour Villages Lib Dems Campaign | | | | |
| Team), 571, 2708, 1511 (Wisborough Green Parish Council), 3027 (Strutt and Parker LLP | | | | |
| obo William Lacey Group), 2746 (Gleeson Strategic Land), 3304 (Church Commissioners for | | | | |
| England), 1118 (Batcheller Monkhouse obo Alan Hutchings), 2780 (ICENI Projects obo | | | | |
| Fishbourne Developments Ltd), 2686 (DMH Stallard LLp obo Spiby Partners Ltd), 2682 | | | | |
| (DMH Stallard LLP obo Reside Developments), 1627, 2694 (DMH Stallard obo Wellbeck | | | | |
| Strategic Land (IV) LLP), 3125 (Savills obo D R Pick Grandchildren’s settlement), | | | | |
| 3304(Church Commissioners for England), 3237, 1084, 523, 571, 2980 (Plaistow and Ifold | | | | |
| Parish Council), 963 (Birdham Parish Council), 3457, 1511 (Wisborough Green Parish | | | | |
| Council), 995 (Birdham Parish Council), 427, 476, 2543 (Chichester Harbour Trust), 849, | | | | |
| 715 (West Itchenor Parish Council), 1499, 302, 1451, 1332, 3358 (Landlink Estates), 2626 | | | | |
| (Barton Willmore obo Martin Grant Homes), 1524 (Lewis and Co Planning), 1760, 3297 | | | | |
| (Church Commissioners for England), 3333 (Genesis Town Planning obo Samuel | | | | |
| Langmead), 3046 (Henry Adams Planning Ltd obo Mr and Mrs Green), 3425 (Genesis Town | | | | |
| Planning obo Seaward Properties Ltd), 1073, 1348, 2689, 3314 (Savills obo WSCC), 3233 | | | | |
| (Henry Adams Ltd obo Trustees of CL Meighar Lovett Will Trust), 3381(Genesis Town | | | | |
| Planning obo Mr and Mrs Tearall), 1901, 1317 (Seaward Properties), 293, 3411 (Genesis | | | | |
| Town Planning obo Seaward Properties), 3273 (Genesis Town Planning obo Landacre | | | | |
| Developments Ltd), 2604 (Boyer Planning obo Welbeck Strategic), 3039 (Henry Adams | | | | |
| Planning Ltd obo Mr Rudsedski), 1585, 3552 (WYG obo Berkeley Strategic Land Ltd), 31, | | | | |
| 39, 40, 41, 42, 43, 136, 138, 139, 140, 141,142, 143, 174, 183, 185, 186, 212, 214, 223, | | | | |
| 228, 282, 283, 305, 310, 375 (Loxwood Society), 533, 535, 537, 567, 614, 642, 731, 748, | | | | |
| 767, 979, 983, 1013 (Councillor Wilding), 1053, 1054, 1055, 1056, 1063, 1064, 1070, 1071, | | | | |
| 1073 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1088, 1094, 1100, 1103, | | | | |
| 1107, 1184, 1233, 1280, 1285, 1288, 1293, 1383, 1424, 1427, 1430, 1431, 1432, 1433, | | | | |
| 1470, 1486, 1568, 1857, 1902, 1903, 1905, 1908, 1909, 1910, 1911, 1912, 1913, 1967, | | | | |
| 1969, 1982, 2023, 2048, 2052, 2058, 2063, 2155, 2234, 2328, 2352, 2573 (Earnley Parish | | | | |
| Council), 2690, 2696, 2701, 2716, 2753, 2762, 2765, 2774, 2775, 2792, 2849, 2850, 2916, | | | | |
| 3052, 3157, 3269 (Loxwood Parish Council), 3319 (Genesis Town Planning obo Landlinx | | | | |
| Estates Ltd), 2790 (ICENI Projects obo Antler Homes Ltd), 3023 (Thakeham Homes), 3011 | | | | |
| (Neame Sutton Ltd obo castle Properties), 2835 (Verve Planning obo Casa Coevo), 3339 | | | | |
| (Genesis Town Planning obo Mr and Mrs Ellis), 933 (Pagham Parish Council), 3386 | | | | |
| (Genesis Town Planning obo Ms Newman), 2677 (DLP Planning Ltd obo Devonshire | | | | |
| Developments Ltd), 3318 (Genesis Town Planning obo Domusea), 3047(Henry Adams | | | | |
| Planning Ltd obo Mr and Mrs Chitty), 3041(Henry Adams Planning Ltd obo Mr and Mrs Bell), | | | | |
| 3363 (Genesis Town Planning obo Junnell Homes Ltd), 3412 (PRP Architects obo Obsidian | | | | |
| Strategic SB Ltd), 3264 (Henry Adams LLP obo WSCC), 1189 (Savills UK obo Mr Pitchford), | | | | |
| 3250 (Henry Adams LLP obo WSCC), 3239 (Henry Adams LLP obo Taylor Wimpey | | | | |
| Strategic), 703, (Paul Newman Property Consultants Ltd) 3227 (Henry Adams Ltd obo J | | | | |
| Pitts), 3376 (Genesis Town Planning obo Mr Ferguson), 3418 (Genesis Town Planning obo | | | | |
| Meadows Partnership), 3265 (Henry Adams LLP obo WSCC) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Strategy (support):   * Support – identification of parish specific housing requirements to provide certainty to local communities (**SDNP**) | | | | |

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| * Supportive of concept of creating new settlement rather than continuous growth of existing villages (**Wisborough Green PC**) |
| Strategy (object):   * Parish estimates are conservative and should not be viewed as target. Greater flexibility in production of Neighbourhood Plans encouraged (**HMPC Ltd**) * Any allocation over 100 dwellings should be considered strategic and allocated through LPR (**British Horse Society**) * Object - Policy misleading as to extent of allocations being passed to NPs. No justification for difference in housing figures attributed to parishes. Title misleading as implies parishes with strategic allocations have a 0 number to meet.(**CEG**) * Policy S5 is drafted to identify residual Parish requirements having regard for strategic allocations. If a strategic allocation were to fail to be delivered or would realise a lower yield, this mechanism would provide no opportunity to deliver those latent requirements in other sustainable locations within the Parish boundary. The policy should be restructured to identify the Parish requirement (i.e. 1300 for Tangmere) and then say that this amount is proposed to be delivered on an allocation site. In the event that the allocation under-delivers, then consideration should be given to alternate locations (**Heaver Homes Ltd**) * No evidence why certain parishes do not have allocations * Over reliance on strategic sites * SDNP need to accept own allocation of development |
| Neighbourhood Plans (Support)   * Welcome commitment to allocate sites through DPD if NP do not progress (**Church Commissioners for England**) * Approach to identifying small sites * Approach of intervening in NP if not reach sufficient stage but concern NP take time and this could prevent sustainable development coming forward. |
| Neighbourhood Plans (Object)   * Insufficient time allocated to take NP to examination (**Wisborough Green PC**) * Too much emphasis on sites coming forward through NPs. Should be more strategic sites |
| Policy wording:   * Strategic allocations should be shown in table (**William Lacey Group)** * Amend to allow for consideration of sites in suitable locations where NP not been submitted for examination within 6 months of LP adoption. * Confirm housing numbers are a minimum to ensure deliver required number |
| HEELA:   * Proposed site ref: HOV0016 (**Church Commissioners for England**) |
| Second Home Policy:   * Introduce second home policy to prevent over domimance new homes being sold as second homes |
| Parish numbers (Birdham) object:   * Birdham accepting unreasonable proportion housing development which is not supported by additional infrastructure – suggest 50 dwellings (**Birdham PC**) * Impact of allocation on AONB * Land west of Bell Lane should be included (**Martin Grant Homes**) |
| Parish numbers (Birdham) support:   * Village has potential to accommodate higher numbers as demonstrated by HEELA (**Lewis and Co Planning**) * Support allocation of 125 dwellings. 25 dwellings at Church Road Birdham (**Samuel Langmead represented by Genesis Town Planning**) |
| Parish numbers (Bosham) object: |

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| * Housing figure should be increased. * Strategic allocation for entire housing requirement overlooks potential capacity for smaller sites to come forward within and adjoining built up area (**Seaward Properties**) * Object to in principle ruling out of sites within AONB (**Seaward Properties**) |
| Parish numbers (Boxgrove) object:   * Parish numbers unjustified * Additional development will have negative impact on infrastructure |
| Parish numbers (Chichester) Object:   * Parish numbers should increase – additional land at the Tannery Site (**WSCC**), Land at Salthill Park (**Henry Adams obo Trustees of CL Meighar Lovett Will Trust**) |
| Parish numbers (Chidham and Hambrook) object:   * Object to nil allocation in Policy S5 – implies all development within strategic allocation. Overlooks capacity for unidentified sites to come forward. Propose land at Broad Road. Amend settlement boundary at Broad Road (**Genesis Town Planning obo Mr and Mrs Tearall and 1 other**) |
| Parish numbers (Earnley) object:   * Lack of development plan. Propose land south of Clappers Lane (**Seaward Properties**) |
| Parish numbers (Kirdford) object   * Land south of Townfield should be allocated site (**Welbeck Strategic Land IV LLP represented by Boyer Planning**) |
| Parish numbers (Fishbourne) object:   * Building on Bethwines Farm would erode separate identity of village * Object to nil allocation in Policy S5 and full allocation in strategic allocation.   Development should be spread throughout village as part of dispersed strategy (**Genesis Town Planning obo Seaward Properties**) (**Genesis Town Planning obo Landacre Developments Ltd)**. |
| Parish numbers (Lavant) Object:   * Lavant underproviding and should have parish number of around 206 – Raughmere Farm (**WYG obo Berkeley Strategic Land Ltd**) |
| Development at Loxwood (object):   * Insufficient overall infrastructure - sewage capacity, no surface water drainage, lack of employment, lack of educational provision, no local facilities (shop), no mains gas, lack of public transport, insufficient capacity on local roads * Unsustainable location * Flood risk * Environmental impact * Loss of character of village * No demand for additional housing * Increase the requirement - 1.9ha of land available at Loxwood House, Guildford Road adjacent to Loxwood Nursery Neighbourhood Plan allocation (**Genesis Town Planning obo Landlinx Estates Ltd**) |
| Development at Loxwood (Support)   * Support development and increase in allocation (**ICENI Projects obo Antler Homes**) (**Thakeham Homes**) (**Neame Sutton Ltd obo Castle Properties**) |
| Development at Lynchmere (object)   * Lynchmere should have housing figure – land to rear of Sturt Avenue (**Verve Planning obo Casa Coevo**) |
| Development at North Mundham (object):   * Proposed settlement boundary extension discordant and remote from settlement and extends excessively north * Insufficient capacity on road network |

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| * Distribution of development does not reflect facilities found in village * Housing figure should be increased and the LPR should allocate sites – land south of B2166 (**DLP Planning Ltd obo Devonshire Developments**), Pigeon House Farm (**Genesis Town Planning obo Domusea**), land at Stoney Meadow Farm (**Henry Adams Ltd obo Mr and Mrs Bell**), land east of The Spinney (**Genesis Town Planning obo Junnell Homes Ltd**) |
| Development at Sidlesham (object):   * Sidlesham should have housing figure – promote land at Greenwood Nursery, Highleigh Road (**Genesis Town Planning obo Greenwood Group**) |
| Development at Tangmere (object):   * Increase housing numbers – allocate land at Tangmere Apron (**Henry Adams obo WSCC**) |
| Development at Wisborough Green (object):   * Housing numbers too low (**Savills UK obo Mr Pitchford**) |
| Development at Westbourne (object):   * Housing should be allocated to Westbourne (**Henry Adams obo Taylor Wimpey Strategic**) (**Paul Newman Property Consultants Ltd**) |
| Development at Westhampnett (object):   * Sufficient land to accommodate development (**Henry Adams obo J Pitts**) |
| Development at West Wittering (object):   * West Wittering should take greater share of development (Bramber Nursery) (**Genesis Town Planning obo Mr Ferguson**) (**Genesis Town Planning obo The Meadows Partnership**) (Ellanore Lane)(**Henry Adams LLP obo WSCC**) |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| Comments regarding the overall strategy are noted. On balance it is considered the overall approach of setting out a mixture of strategic allocations and parish figures is appropriate. However, further iterations of the Plan should set out in a clearer manner the overall distribution of development.  Comments regarding the approach to neighbourhood plans are noted. The approach strikes a balance between providing opportunity for communities to guide development in  neighbourhood plans and provide sufficient certainty that development will be delivered.  The Council is bringing forward a housing strategy to consider housing matters alongside the new Local Plan.  Nearly all parish figures are objected to, with concerns over infrastructure, lack of capacity countered by parties seeking to promote additional or alternative sites. Promoted sites will be considered where appropriate through a refresh of the Housing and Economic Land Availability Assessment, and if necessary through further Sustainability Appraisal work. Concerns over the distribution of development are acknowledged. The ongoing Sustainability Appraisal and other evidence will continue to test and refine the distribution with regards to environmental impacts and other considerations. |

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| **Policy S6 Affordable Housing** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 8 | 8 | 0 | 4 | 4 |
| Policy: 35 | 37 | 7 | 13 | 17 |
| Representation numbers  2519 (Sidlesham PC), 2578 (Earnley PC), 989, 1330, 1248 (North Mundham PC), 2758,  3029, 1921, 2588, 2886, 2224, 1512, 956, 2982 (Plaistow & Ifold PC), 3299, 2871, 428,  1609, 1713, 81, 2632, 2655, 1646, 879, 1400, 663, 913, 1947, 3218, 3486, 108, 2496  (Chidham & Hambrook PC), 1642, 3278 (Westbourne PC), 1609, 2454 (Southbourne PC),  2378, 3548, 1355, 1247 (North Mundham PC), 2440 (SDNPA), 1108, 1347, 2991, 1176,  1608 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support for policy: **(Plaistow & Ifold PC, Westbourne PC, SDNPA )** | | | | |
| Viability:   * Viability evidence should be published by housebuilders to justify the % of affordable housing within developments to ensure transparency * Important that whole plan viability testing reflects PPG * There is too much flexibility in allowing developers to not fulfil their required quota   **(Southbourne PC)**. | | | | |
| Percentage of affordable housing:   * Consideration of the 30% figure in relation to further viability evidence **(Harbour Villages Lib Dems Campaign Team)**. * Suggest increasing the percentage of affordable housing in proportion to location of services transport infrastructure i.e. higher in Chichester city centre where rail and A27 links are good compared to more rural communities. | | | | |
| Other sources of affordable housing:   * Bring empty homes into use as a solution for affordable housing * Suggest including reference to Community Land Trusts (CLT) within policy to demonstrate fully the intention from para 4.45 **(Westbourne PC)**. * Include Social Housing, Build to Rent, Self-Build, Starter Homes, Discounted Market Homes, as additional options for affordable housing that are in accordance with NPPF definitions of affordable housing. * Include specialist housing for disabled and the elderly, including care and nursing homes. | | | | |
| Housing tenures mix:   * Ensure suitable mix within developments to account for changing demographics of the area, in particular the ageing population. * Many elderly people want to downsize and young people want small starter homes.   More small homes should be built to accommodate all this. | | | | |
| Wording of policy allows for too much flexibility; affordable housing should relate closely to local income levels **(Southbourne PC)** | | | | |
| Clarify most up to date definition of affordable housing to comply with NPPF **(Harbour**  **Villages Lib Dems Campaign Team)** | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| Comments on viability evidence are noted. The policy makes it clear an “open book” approach would be required if viability concerns are raised on development proposals. | | | | |

Further work is currently being undertaken on testing the percentage of affordable housing can and should be sought on larger market housing developments.

Comments on other sources of affordable housing, and housing tenures mix refer to elements which are outlined in detail in policy DM2 of the Preferred Approach Plan. Other comments refer to other specialist housing which is set out in policy DM1. The next iteration of the plan should make the linkages between these policies clearer.

Concerns that the policy is too flexible will be considered further in light of comments made in response to policy DM2.

Finally, the current definition of affordable housing *for planning purposes* should be included in the supporting text to make it clearer what the policy is seeking to secure.

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| **Policy S7 – Meeting Gypsies, Travellers and Travelling Showpeoples’ Needs** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 1 | 1 | 0 | 1 | 0 |
| Policy: 11 | 11 | 4 | 4 | 3 |
| Representation numbers  30, 82, 364, 429, 430, 482, 852, 2345, 2441 (South Downs National Park Authority), 2447 (Horsham District Council), 2522 (Sidlesham Parish Council), 3287 (Westbourne Parish Council) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support for Policy with some clarification of wording **(Horsham District Council), (South**  **Downs National Park Authority)** | | | | |
| Suggested updates to wording   * Open to misinterpretation: amend final sentence to: Existing PERMITTED traveller sites will be safeguarded. | | | | |
| Object to approach   * Need cannot be met. Restricting site selection unrealistic; sites need to be found including outside settlement boundaries. Criteria based policy required; must be flexible. * Policy should avoid overconcentration of GTTS dwellings in one location.   **(Westbourne Parish Council) (Sidlesham Parish Council)**   * Concern that Westbourne NP will not carry so much weight if policy is made.   **(Westbourne Parish Council)** | | | | |
| Object to evidence   * Inadequate/flawed evidence base. Challenge GTAA to avoid over provision.   **(Westbourne Parish Council)**   * No national evidence number of plots should be more than that defined in adopted Local Plan. Numbers derived from the G&T Community, which could be biased. | | | | |
| Definition   * Many gypsies/travellers qualify under definition but do not fit definition. Issues of resentment especially in communities with social housing need/pressure on school places. Criteria for assessment must be reviewed together with the transition to settled status. **(Sidlesham Parish Council)** * Ensure people claiming to be of traveller and gypsy heritage are genuine in a direct line of descent. | | | | |
| Pitch size   * Each pitch should have a maximum size to bring it in line with the settled community (can be around 40 homes per hectare). A similar constraint should be applied to the Travelling Community. | | | | |
| Site details   * Sites for more than 6 units should be within easy reach of the A27; all allocated sites should be proportionate in size and scale to the existing settlement. | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| Comments regarding the evidence base are noted. Detailed comments have been provided by the consultants which are set out in a supplement to this report.  It is considered that the plan would benefit from a section providing greater detail on how the  provision of Gypsies, Travellers and Travelling Showpeoples’ sites. This will provide greater clarity and certainty for all parties on how the identified need is likely to be met.  It is accepted that the policy wording may need further refining for clarity, and any changes | | | | |

will be considered in the next iteration of the plan.

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| **Policy S8 Employment Needs** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 11 | 11 | 3 | 4 | 4 |
| Policy: 19 | 20 | 3 | 13 | 4 |
| Representation numbers:  431, 458, 602, 666, 725, 776, 814, 926, 1203, 1275 (HMPC obo Goodwood Estates), 1513,  1586, 1636, 1639, 1666, 1717 (Harbour Villages Lib Dem Campaign), 1670, 2448 (Horsham  District Council, 2494 (Chidham and Hambrook PC), 2633, 2700, 2709, 2852, 2966, 2892,  2993, 3150 (Rolls Royce), 3244 (WSCC Estates), 3316 (Savills obo WSCC), 3477,3553  Other reps related to this policy: 98, 285, 318, ,338, 385, 513, 608, 636, 700, 769, 781, 850,  874, 1008, 1190, 1344, 1351,1398, 1421, 1447 (Donnington PC),1448, 1484,1742, 1794,  1805, 1852, 1891, 2374 (Birdham PC) , 2570 (Birdham PC), 2635, 3051 (Arun DC), 3460,  3526 (West Wittering PC), 3545 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support   * General support **(Horsham DC)** * Support flexible approach to leisure and community use | | | | |
| Need a clearer vision | | | | |
| Consider jobs homes balance   * Clarify commuting implications and related transport mitigation **(Arun DC)** * Consider if a housing uplift is needed to match jobs | | | | |
| Number too high   * No need for large allocation at AL6 * Forecasts too ambitious – economic uncertainty **(WSCC Estates)** * Need is for smaller businesses on brownfield sites / smaller better connected sites * Need an up to date Employment Land Review | | | | |
| Alternative general or specific locations proposed   * Area around Goodwood including the land proposed to be removed from AL4 (Westhampnett/NE Chichester)/ within the noise buffer. **(Donnington PC, Birdham PC, Harbour Villages Lib Dem Campaign)** * 2 sites at Westhampnett and Rolls Royce Car Park **(Goodwood Estates)** * Land for future expansion of Rolls Royce **(Rolls Royce)** * General area around Lavant and West Broyle (not site specific) * Land at Crouchlands Farm (as part of mixed use development) * Use brownfield sites/focus on regenerating the city centre * Suggestion that providing employment space to north of Chichester would better serve residents of the national park. | | | | |
| Policy wording   * Should be more flexible – could prevent development **(WSCC)** * Don’t limit to B1-B8 **(WSCC Estates)** * Reflect CIL viability evidence which suggested viability constraints on B1-B8 | | | | |
| Other   * Many objections to AL6 Land SW of Chichester (these are covered in more detail against that policy) **(Donnington PC, Birdham PC, West Wittering PC, Harbour Villages Campaign Team)** * Object to loss of green fields, impact on wildlife, landscape, traffic | | | | |

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| * Need to safeguard food production * Support flexible working space close to homes to reduce need to travel * Note that jobs have been lost on the Manhood * Note that there are limited opportunities in Chidham and Hambrook and little demand for existing premises there **(Chidham and Hambrook PC)** * Supports improvements to telecommunications * Need well paid high quality jobs rather than warehousing **(Harbour Villages Lib Dem Campaign Team)** |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| The overall need for additional employment floorspace is being considered in an update to the Housing and Economic Development Needs Assessment. This will consider more recent evidence on economic trends, and also include consider further the balance between homes and jobs and they types of employment land needed.  An Employment Land Review is underway which will also provide additional detailed evidence on existing employment sites to inform the final Plan approach.  Further evidence on draft allocations, and proposed additional sites will be considered where  appropriate through a refresh of the Housing and Economic Land Availability Assessment, and if necessary through further Sustainability Appraisal work.  Consideration will be given to the need to safeguardland for future expansion of Rolls Royce.  Viability evidence has been commissioned and the results will inform the next iteration of the Plan, including the approach to employment land.  The significant number of objections to policy AL6 are noted. These are considered further in that summary, but the concerns over the need for and deliverability of that site are understood and need to be addressed before the site could be confirmed in the final version of the Plan. |

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| **Policy S9 Retail Hierarchy and Sequential Approach** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 8 | 9 | 4 | 5 | 0 |
| Policy: 17 | 18 | 2 | 9 | 7 |
| Representation numbers  1416, 1417, 1441, 1445, 668, 1720, 2994, 2967, 880, 988, 2856, 969, 2589 (Turley obo  Countryside Properties), 2590 (Turley obo Countryside Properties), 1172 (Genesis Town Planning obo Rawleigh Property Management), 1669 (Chichester BID), 2634 (Barton Willmore), 1276 (HMPC Ltd obo Goodwood Estate), 969 (Chichester Conservation Area Advisory Committee), 3281 (Westbourne PC), 444, 431, 1856, 1153, 455, 510, 1640, 1673, | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Retail centre issues:   * Night time economy causes problems * Health of city centre not resilient | | | | |
| Retail hierarchy:   * Support hierarchy **(Westbourne Parish Council)** * Suggest changes to retail hierarchy **(Genesis Town Planning obo Rawleigh Property Management) (Turley obo Countryside Properties)** * Need to identify local retail parades which are distinct from local centres * Need to clarify terminology **(Genesis Town Planning obo Rawleigh Property Management)** | | | | |
| Retail frontages:   * Reducing primary shopping frontage shrinks range of retail offering * Online shopping destroying secondary/tertiary frontages | | | | |
| Retail offering:   * Offering should be more flexible * Offering should be expanded * Concerns about vacancy – reduce business rates or use for housing * Support promotion of retail offering **(Chichester Conservation Area Advisory Committee)** * Shops should be more affordable to support local citizens * More to be done to support small businesses * Overstock of bricks and mortar shopping **(Chichester BID)** * Should extend further than traditional High Street interpretation **(HMPC Ltd obo Goodwood Estate)** * Too many restaurants, not enough shops | | | | |
| Local centre:   * Remove Southern Gateway from Chichester local centre area until A27 is sorted * Support development of local centre at Tangmere **(Turley obo Countryside Properties)** * Widening area of Chichester city centre would make centre less easily accessible | | | | |
| Retail parks   * Retail parks damage city centre * Development should be restricted in out of centre locations | | | | |
| Other:   * Need policy for trade parks * Parking should be expanded and made cheaper * East Wittering has experienced decline in retail facilities despite growth in housing | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| This policy addresses the retail hierarchy and sequential approach. Further detail on retail | | | | |

policy is set out in proposed Development Management policies DM11 and DM12.

Many of the comments raised in response to this policy concern national trends or current concerns in retail. The plan proposed a short term strategy given the changing nature of the high street.

Overall it is considered that the hierarchy is an appropriate response to national planning policy, but further thought will be given to proposed amendments.

Further consideration will be given to the findings of the Retail Needs study, and in particular the identification of 9,500 sq m of additional comparison retail floorspace to 2026.

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| **Policy S10 Local Centres, Local and Village Parades** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Policy: 9 | 9 | 2 | 4 | 3 |
| Representation numbers  2995, 2591 (Turley obo Countryside Properties), 2636 (Barton Willmore), 538, 1173 (Genesis Town Planning obo Rawleigh Property Management), 1460, 2858, 3262 (Westbourne Parish Council), 670 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support in principle **(Westbourne Parish Council)** | | | | |
| Object:   * Nowhere to accommodate retail provision other than green fields | | | | |
| Wording:   * Suggest changes to policy wording **(Turley obo Countryside Properties)** * Interchangeable use of terminology is confusing **(Genesis Town Planning obo Rawleigh Property Management)** * Policy wording is not clear about role of local parades | | | | |
| Strategic development:   * Should be provision for strategic development where greater retail provision can be supported without impacting upon main centre **(Barton Willmore)** | | | | |
| Retail offering:   * Variety of services/shops should be encouraged and incentivised | | | | |
| Other:   * Use notices, signs and posters to communicate community activities * Policy does not enhance East Wittering centre * Policies S9 and S10 do not correlate **(Barton Willmore)** | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| Some comments received in response to this policy concern national trends or non-planning considerations. However, a number of comments have highlight detailed points where the policy could be improved for clarity. The points raised will be considered further and the policy amended as appropriate. | | | | |

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| **Policy S11 Addressing Horticultural Needs** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 4 | 4 | 0 | 1 | 3 |
| Policy: 13 | 13 | 4 | 3 | 6 |
| Representation numbers  85, 321, 349, 351, 600, 671, 1249 and 1250 (North Mundham PC), 1723 (Harbour Villages Lib Dems Campaign Team), 2524 (Sidlesham PC), 2724 (Sussex Wildlife Trust), 2861, 2894, 2938 (CPRE Sussex), 2996, 3378 (Landlink Estates Ltd), 3523 (Portsmouth Water) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Will need to review in the light of BREXIT **(CPRE Sussex )** | | | | |
| Horticulture wider than glasshouses:   * Community projects can use grass verges/redundant land (community orchards, vegetable growing etc.) * Combine green/environment/food related activities with small scale food growing for future * Amend policy to “Addressing Food Cluster Needs”; make reference to “other related facilities” **(Landlink Estates Ltd)** | | | | |
| Investment and development in industry:   * Scope for innovative horticulture to be encouraged in Sidlesham and Almodington   **(Harbour Villages Lib Dems Campaign Team)**   * Refer to “food cluster” industry and including related facilities **(Landlink Estates Ltd)** | | | | |
| Impact on landscape:   * Loss of valuable high-grade land in Runcton HDA as a result of permissions other than for glasshouses/polytunnels **(North Mundham PC)** | | | | |
| Reduction in areas north of HDA:   * Need explanation of reasoning; reductions should be replaced. **(North Mundham PC), (Landlink Estates Ltd)** | | | | |
| Runcton HDA expansion:   * Runcton is in prime position and surrounding areas are inferred in the Landscape Capacity Study as ideal for development **(Landlink Estates Ltd)** * current reported horticulture committed supply does not include ancillary horticultural developments - these would bring the committed supply above max requirement reported by G L Hearn – figures are out of date as there are many permissions since G L Hearn which evidence accelerated growth - even more HDA land is therefore required **(Landlink Estates Ltd)** | | | | |
| Tangmere HDA potential:   * Not possible to build glasshouses within HDA with new housing due to light pollution * Map of Tangmere HDA should be provided with latest glasshouse proposal shown in south west * Questions whether access road to new glasshouse site at south west part of HDA has been set back to south of the ‘apron’? | | | | |
| Tangmere HDA boundary:   * Concern whether Business Park and ‘apron’ site are excluded | | | | |
| Light pollution: | | | | |

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| * Require investigation of potential impact from horticultural development **(CPRE Sussex)** |
| Scale of industry outside HDAs   * Concern over scale of industry outside HDAs and other land uses within small HDAs   **(Sidlesham PC)**   * Suggest refusing to allow conversion of HDA land within smaller HDAs and include Fletchers Estate, Jakes Nursery and Street End Lane as HDAs **(Sidlesham PC)** |
| Impacts on water:   * Horticultural businesses may now need abstraction licences if have relied on rainwater harvesting and storage **(Portsmouth Water)** * Clarify how horticultural industry will support commitments to water efficiency   **(Sussex Wildlife Trust)** |
| Conflicts with tourism and quiet recreation:   * Horticultural development should respect Dark Skies policy of adjoining SDNP |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| Some comments have questioned the level of overall need for horticultural floorspace. The Housing and Economic Development Needs Assessment is being reviewed to consider the matter further. This will inform further consideration of comments made regarding the size and boundaries of Horticultural Development Areas and any delivery issues experienced. Further consideration will be given as to whether additional guidance should be included concerning the appropriate uses within the proposed areas.  Comments received on water requirements are noted, experience of recent horticultural development proposals has not highlighted a water supply issue with the deliverability of additional horticultural development.  Comments regarding light pollution are noted and will be considered alongside the comments received on draft policy DM23 to assess if any further amendments are  necessary. |

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| **Policy S12: Infrastructure Provision** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 15 | 17 | 2 | 7 | 8 |
| Policy: 57 | 57 | 15 | 24 | 18 |
| Representation numbers  2895; 2592 (Turley on behalf of Countryside Properties); 1976; 1724 (Harbour Villages Lib  Dem Campaign Team); 1671 (Chichester BID); 1649; 1589; 1588; 1399; 408; 1386; 1251  (North Mundham PC); 1122; 942; 952; 114; 679; 3414 (Seaward Properties Ltd); 3184  3321 (Domusea); 3292; 3274 (Landacre Developments Ltd); 3245 (WSCC Estates) 3240 (Taylor Wimpey Strategic Land); 3054 Henry Adams obo The Green Family site promoters); 2997 (Portsmouth Water); 2939 (CPRE); 2889 (Bloor Homes); 2867; 2738  (Boxgrove PC); 2725 (Sussex Wildlife Trust); 2654; 2637 (Barton Willmore); 2593 (Countryside Properties); 2544 (Chichester Harbour Trust); 2539; 2521 (Sidlesham PC) 2379; 2997 (Portsmouth Water); 2194 (Environment Agency); 2105 (WSCC); 2013; 1965;  1962; 1944; 1881; 1679; 1648; 1635; 1480; 1454 (Donnington PC); 1450; 1341; 1308; 1277  (HMPC Ltd); 1252 (North Mundham PC); 1160 (Thames Water Utilities); 1156; 1010; 993  (Birdham PC); 981; 955; 938; 683; 635; 584; 483; 433; 365; 322; 287; 239 (Sustrans); 198;  115; 109; 88. | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support Policy: **(WSCC Estates; Taylor Wimpey Strategic Land; Sussex Wildlife Trust; Barton Willmore; Sidlesham PC; Environment Agency; WSCC; Bosham Football Club; HMPC Ltd; Thames Water Utilities Ltd; Birdham PC; Countryside Properties; Chichester BID)** | | | | |
| Impact on the A27:   * Highways England should provide the funding * Proposed mitigation will not improve A27 * Proposed mitigation will penalise the Manhood Peninsula by restricting access to the main road and to and from the City. * There should be no further new housing until the A27 is improved * The plan should support a northern bypass * Local people should not be forced to take longer routes because of the proposed mitigation. | | | | |
| Impact on education:   * Object that no new schools are planned on Manhood Peninsula – it is unsustainable for places to be provided outside the area **(Donnington PC)** * Schools need to be built with new developments – no provision for education has been met on previous large sites * Existing schools are short on funding * Most schools are already at capacity | | | | |
| Impact on Waste water:   * A new Regional sewerage solution is needed to replace the unsustainable use of Aldingbourne Rife for sewage disposal. With large housing allocations to the north of Chichester Harbour it will not be possible to discharge effluent from Thornham WWTW and Bosham WWTW in future. Tighter standards for Nitrates and Phosphates will make these works redundant and the only sustainable solution is to treat all the flows at Apuldram and discharge at Bracklesham. A regional solution will allow future effluent re-use if this becomes desirable. * No reference to sewerage networks – leaving this to the planning application stage does not work **(Environment Agency)** * Untreated sewerage is ending up in the sea because the existing sewers cannot cope posing a risk to public health/health of SSSI. Increase capacity at all water treatment works **(Chichester Harbour Trust)** | | | | |

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| Impact on Flood Risk:   * No reference to flood risk infrastructure |
| Impact on emergency services:   * Insufficient policing, fire and ambulance services |
| Impact on Infrastructure   * The timing of the provision of infrastructure is too late, it needs to go in earlier/first.   **(CPRE)(Boxgrove PC)**   * No new development until the infrastructure is in place. * Undertakers and Local Planning Authorities must be engaged as early as possible and requirements for the funding of infrastructure must be much tougher and more stringent **(Portsmouth Water)** * Need more housing in order to ensure delivery of infrastructure **(Taylor Wimpey)** * Infrastructure must be part funded by Council, where it is of wider benefit than just to make a development acceptable **(Barton Willmore)** * Make better use of existing infrastructure first including opportunities for co-location and multi-functional use of facilities * Supports policy but doubts that S106, CIL and other funding will be sufficient to pay for all infrastructure needs **(Sidlesham PC)** * Supports policy but concerned about levels of new development because current infrastructure is inadequate. * Developer contributions need to be tested for viability **(Turley)(Bloor Homes)** * Infrastructure costs must be subject to viability **(WSCC Estates)** * Current proportions of housing/employment figures could restrict delivery of infrastructure **(WSCC Estates)** * Balance between market housing and affordable housing and necessary infrastructure is difficult to justify particularly in Service Villages **(North Mundham PC)** * IDP needs to be much more detailed particularly for the first five years **(Seaward Properties)(Landacre Developments Ltd)** |
| Modal switch:   * The policy should refer to sustainable forms of transport such as cycling * Trains only stop at small stations once an hour * Insufficient bus service out of peak hours and too expensive * This policy and policy S13 should aim to encourage cycling and walking access to be the natural and preferred modes of access. |
| Impact on health facilities:   * Manhood has issues with getting appointments at the medical centre * Specific provision should be made for additional doctors and other medical services on the Manhood Peninsula. |
| Broadband:   * Support the reference to development funding full fibre communications infrastructure   **(WSCC)**   * Object to reference to development funding full fibre communications infrastructure   **(Bloor Homes)**   * High Speed Broadband should be a priority for all areas of Chichester. |
| Electric vehicle Infrastructure   * Consider adding EV charging facilities as a key infrastructure requirement for developments. |
| Impact on Local Economy   * Marine Industry must be retained and encouraged **(Harbour Villages Lib Dem Campaign Team)** |

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| * City Centre should be planned to accommodate a mix of uses to maintain its vitality   **(Chichester BID)** |
| Impact on climate change   * Infrastructure should distinguish high carbon/low carbon, and which infrastructure has and does not have an impact on landscape and or historic environment, particularly car infrastructure. Must insist on low car developments, so that costly road infrastructure won’t need to be funded. * Green infrastructure must include blue infrastructure **(Sussex Wildlife Trust)** |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| The purpose of the policy is to set out how the council will address the provision of infrastructure to support the development proposed in the plan. A number of responses to  the policy request amendments to highlight factors such as the timing of infrastructure, the  role of developer contributions and viability testing. These will be considered further as the Plan progresses to see if improvements can be made to improve clarity and outcomes.  The majority of comments concerned issues with a range of infrastructure. The current understanding of infrastructure requirements is set out in the Infrastructure Delivery Plan (IDP) published in support of the Local Plan. The IDP will be revised as a result of new and emerging evidence, and further engagement with infrastructure providers. However, some initial comments on the points raised in the representations follow -  Impact on the A27: Further transport work is being undertaken and the Local Plan/IDP will be updated if required according to its findings. The original Peter Brett Study simply tested whether the level/location of development could be capable of mitigation. However, it is acknowledged that this won’t address all of the underlying A27 issues.  Impact on education: WSCC is responsible for School Place planning and has advised the Local Plan Review as to its requirements, which are set out in the IDP. These requirements will be kept under constant review as the plan progresses and the child product of each development is known. WSCC provides updates to CDC bi-annually.  Impact on Waste water: The policy will be amended to include reference to Waste Water Treatment Works in the list in the first paragraph. Liaison with Southern Water and Thames water was undertaken in the production of the LPR, and their findings as to what is needed is within the IDP, their needs are reviewed bi-annually. We are continuing to work with Southern Water to establish needs and are also working with Natural England and other partners on a nutrient neutral policy and management plan.  Impact on Flood Risk: The first paragraph of the policy will be amended to include the words ‘flood prevention’ after ‘environmental’. In addition, this issue is also covered by policies S20, point 13; S25; and S27.  Impact on emergency services: Liaison with the Police, Fire and Ambulance services was undertaken in the production of the local plan, and their findings as to what is needed is within the IDP, and this is reviewed bi-annually.  Impact on Infrastructure: The IDP provides as much detail as is known at this stage - the detail is refined through either the IBP or through the S106 once more information is known at the planning application stage.  The Viability Assessment will inform the decision to be taken about the balance to be taken between the level of affordable housing and infrastructure. A decision will then be taken by the Council as to whether to make policy changes in response to this evidence. |

Only enabling infrastructure has to be provided in advance of development, the remainder is phased in accordance with the build out of the development for viability reasons and the triggers for this are set out in S106 agreements.

Modal switch: Cycling as a sustainable transport form is covered in Policy S23

Impact on health facilities: Liaison with the NHS was undertaken in the production of the local plan, and their findings as to what is needed is within the IDP, and this reviewed bi- annually.

Broadband: This policy supports high speed broadband by ensuring that this is provided or funded as part of development proposals.

Role of West Sussex County Council: Paragraph 4.81 should be amended to better reflect the role of the County council in planning and securing essential infrastructure in strategic development

Electric vehicle Infrastructure: Provision for electric vehicle charging points is included in Policy 23. The bullet point will add the word ‘vehicle’ between ‘electric’ and ‘charging’.

Impact on Local Economy: These points are addressed elsewhere within the plan and the comments seem to be more related to employment and retail rather than infrastructure.

Impact on climate change: Policy S23 addresses most of the issues raised.

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| **East/West Corridor** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 5 | 5 | 0 | 3 | 2 |
| Representation numbers  2467 (Southbourne PC), 2777, 3480, 3539, 3546 (Harbour Villages Lib Dems Campaign Team) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Decision to develop east west corridor is short sighted: (**Harbour Villages Lib Dems**  **Campaign Team)**   * damaging to area * will not enhance villages * adverse impact on wildlife * increased use of shoreline footpaths. * Infrastructure not present. * Will develop land too close to AONB and create housing corridor * Green links from Chichester Harbour to South Downs**.** | | | | |
| Chichester Vision unsuitable to be incorporated in Plan. | | | | |
| New retail and offices should be "new" only in the sense of replacing vacating retailers and offices | | | | |
| Consider as whole instead of settlements along transport route. Would benefit from collective attention e.g. wastewater, traffic, landscape, wildlife, coalescence. Pressures of development exacerbated by AONB/NP and new development in adjacent county  **(Southbourne PC)** | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| The points raised in these representations are noted. The cumulative sustainability impact of the east/west corridor strategy is set out in the Sustainability Appraisal. Other options to  the east/west corridor strategy are being explored by further sustainability appraisal work  which will inform the next stage of the plan. | | | | |

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| **Policy S13 Chichester City Development Principles** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 1 | 1 | 0 | 1 | 0 |
| Policy: 25 | 27 | 15 | 3 | 9 |
| Representation numbers  3246 (Henry Adams LLP obo WSCC Estates), 3140, 2998, 2940 (CPRE Sussex), 2872,  2726 (Sussex Wildlife Trust), 2380, 2292 (Historic England), 2106 (WSCC), 2031, 1840,  1730 (Harbour Villages Lib Dems Campaign Team), 1674, 1575, 1498, 1481 (The Theatres Trust), 1405, 1278 (HMPC Ltd), 1271(HMPC Ltd), 972 (Chichester Conservation Area Advisory Committee), 726 (St Pancras Church), 717 (West Itchenor Parish Council), 605, 216 (Chichester City Council), 125 (Chichester Society), 90 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support: 216 (**Chichester City Council**), 125 (**Chichester Society**)   * Support approach. Policy site SA6 can deliver objectives (**Henry Adams LLP obo WSCC Estates**). * Policy S13 should also apply to the need for affordable housing within city’s urban area * Support requirement to protect views of Cathedral. 2940 (**CPRE Sussex**) * Support provision of enhanced green infrastructure network and approach that will ensure opportunities to deliver natural capital and measureable net gains in biodiversity are planned for at an early stage. 2726 (**Sussex Wildlife Trust**) * Support paragraph 4.91. Reference should be made to heritage impact assessments to underpin planning of new development. 2292 (**Historic England**) * Support aims to encourage walking and cycling. 2106 (**WSCC**) * Paragraph 4.88 needs to make more explicit that setting of the city and relationship with SDNP to be protected and not all land is available/suitable for development within corridor. 1278, 1271 (**HMPC Ltd**) * Increase housing numbers in city and increase social housing. | | | | |
| Object:   * Issues need to be more fully teased apart to better protect local character which in turn enhances economic development. * Additional recognition required for those accessing the East-West corridor by foot and bikes. * Need requirement for public art * Reference to be made to city centre being Conservation Area and details appended to policy. 972 (**Chichester Conservation Area Advisory Committee**) | | | | |
| City Centre redevelopment   * Area (Southern Gateway) must be fully redeveloped with hotel, multiuse centre, community facilities, university, housing for young people. 1730 (**Harbour Villages Lib Dems Campaign Team)** | | | | |
| Policy wording:   * Third bullet point is repeat of second. Delete third bullet point. | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| The broad support for this policy indicates there is some consensus on the development principles for Chichester City. The policy could benefit from some rewording to be more  explicit on key elements, remove repetition and improve clarity. This will be updated in the next iteration of the Plan. | | | | |

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| **East of Chichester** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting text: 1 | 1 | 0 | 1 | 0 |
| Representation numbers  3330 (Nexus Planning Ltd) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Presentation of LPR document is unclear as para 4.103 refers to strategic allocations already allocated in adopted LP **(Nexus Planning Ltd)** | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| Comments are noted. The text is to provide context for the position of development in that area to date. | | | | |

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| **Policy S14 Chichester City Transport Strategy** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Policy: 44 | 49 | 10 | 25 | 14 |
| Representation numbers  121, 126 (Chichester Society), 217 ( Chichester City Council) , 240 (Sustrans), 263, 434,  468, 469, 471, 514, 585, 586, 718 ( West Itchenor PC) , 755, 855, 896, 875, 898, 900, 904,  1085, 1111, 1220, 1355, 1564, 1582, 1618, 1676 (Chichester BID), 1682, 1731 ( Harbour  Villages Lib Dem Campaign) 1827, 1841, 2033, 2199, 2381,  2443 (SDNPA), 2727 (Sussex Wildlife Trust), 2874, 2896,2941 (CPRE), 2999, 3479  Representations recorded here but relating to the A27 or to the Transport Study: 92, 1124, 1408, 1548, 1561, 1656, 1675 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support   * General support **(Chichester BID)** * More specific support for elements of the policy – including bus lanes, priority measures * Cycling measures **(Sustrans)** | | | | |
| Prioritise sustainable modes of travel – various measures suggested to strengthen the approach including ( many of these are already in the policy)   * Reduce the need to travel * Reallocate road space * Develop local cycling and walking infrastructure programme * Provide park and ride **( West Itchenor PC, Chichester Society)** * Encourage use of peripheral car parks * Review car parking provision, charges and payment method * Parking restrictions to improve traffic flow – to help buses * Ensure that existing routes such as Centurion Way are protected and improved   **(CPRE)**   * Use s106 and CIL to deliver integrated transport strategy * Links to South Downs National Park should be mentioned in penultimate bullet re cycle connections **(SDNPA)** * Safeguard land to expand rail station **( W Itchenor PC, Chichester Society)** * Importance of pedestrian and cycle links between settlements (e.g. Donnington village to Stockbridge) and linking city centre to existing cycle routes. * Extend pedestrian area into Little London and Baffins Lane Car Parks | | | | |
| Other:   * This policy needs to be based on evidence – Chichester Vision Transport Feasibility Study is yet to be published – need to reconsult on proposals after that. * Use of peripheral car parks unsuitable for shoppers * Bus lane at Bognor roundabout will cause queues. * Need to resolve level crossing issue - underpass suggested **( West Itchenor PC, Chichester Society).** * Links to air quality. * Concerned about any reduction in town centre parking provision **(Chichester City Council).** | | | | |
| Comments relating to broader transport issues   * Need a proper solution to the A27 – not tinkering with junctions * Need a proper bypass * Welcome at grade improvements for A27 | | | | |

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| * Do not accept costings in Transport Study **( Harbour Villages Lib Dem Campaign Team)** * Create peripheral relief roads b/w A27 and A286 to East and West. |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| Many of the comments here relate to the ongoing transport assessment work being prepared in support of the Local Plan, and in particular the strategic issue with the A27. The finding  from that work will be incorporated in the next iteration of this policy.  The emphasis on sustainable travel is noted and it is considered the actions in the policy demonstrate that sustainable travel is a priority – though perhaps an introductory statement could make this clearer.  Much of the details sought in representations is likely to come forward in two complimentary studies. *Chichester Vision – Transport Feasibility Study* and *Sustainable Transport Package Feasibility for Chichester Study* are being progressed with guidance from West Sussex County Council as Highway Authority, and the findings from that work will be reflected in this policy in the next iteration of the Plan. |

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| **Policy S15 Goodwood Motor Circuit and Airfield** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Policy: 21 | 22 | 5 | 13 | 4 |
| Representation numbers  91, 276, 366, 409, 484, 526, 688, 712, 1028, 1039, 1221, 1253 (North Mundham PC), 1281  (Goodwood Estates), 1338, 1572, 1733 (Harbour Villages Lib Dem Campaign), 2248  (Historic England), 2382, 2875,3000, 3461, 3522 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support   * Support requirements in relation to heritage **(Historic England)** * General support **(Goodwood Estates)** | | | | |
| Support but   * Goodwood Estates will be preparing a “Whole Estate Plan” straddling area of this plan and SDNP (as required in SDNP Plan) – this should be acknowledged and need to ensure policies are consistent. * Object to noise buffer – areas along A27 don’t have one | | | | |
| Buffer zone should be used for industrial/commercial development (note more reps suggesting this made under S8 Meeting Employment Land Needs)   * Including some/all of that proposed for AL6 **(Harbour Villages Lib Dem Campaign)** * Noise shouldn’t be an issue for industry * Include a new link road for access to A27 East and West of city | | | | |
| Need A27 scheme to separate local and through traffic to avoid gridlock caused by Goodwood events. | | | | |
| Additional wording suggestions:   * Refer to noise and traffic chaos * Ensure greater spill off benefits to wider business community * Need to ensure any development doesn’t encroach on area of interest for future strategic road scheme. * Refer to light pollution visible from SDNP Dark Skies area | | | | |
| Other:   * Experience suggests policy requirement for additional traffic to be mitigated by opportunities for non car travel won’t work **(North Mundham PC)** * Policy should require additional development here to contribute to highway improvements * Consider protection of Goodwood has prevented a Northern bypass route coming forward * Dispute the economic and cultural benefits as folklore * Unclear why a separate policy is needed rather than generic policies applying | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| The forthcoming Whole Estate Plan for Goodwood is noted and if available could inform the next iteration of the Plan.  Comments regarding the future use of the buffer area for employment development are noted and will be considered further in light of the ongoing work on employment needs and  the deliverability of other sites.  Issues regarding the A27 are noted, but it is not considered appropriate for this policy to require new links unless justified by future work. | | | | |

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| **Policy S16 Development within vicinity of Goodwood Motor Circuit and Airfield** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Policy: 28 | 29 | 4 | 16 | 9 |
| Representation numbers:  93, 224, 315, 367, 485, 502, 690, 1027, 1038, 1168, 1254 (North Mundham PC), 1282  (Goodwood Estates), 1337, 1356, 1550, 1624, 1651, 1665, 1684, 1687, 1736 ( Harbour  Villages Lib Dem Team) 1995 (March C of E School) , 2030 (Summersdale Residents Assoc),2187, 2383, 2876, 2898, 3462, 3481 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support   * keeping the buffer (Summersdale Residents Assoc) and supporting the motor circuit. * With minor changes **(Goodwood Estates)** | | | | |
| Area should be used for employment ( similar comments also made against S15, S8 and AL6)   * Use buffer zone for employment, including from AL6 **(Harbour Villages Lib Dem Campaign)** * Use for commercial development that isn’t noise sensitive **(North Mundham PC)** * Industrial scheme would be compatible with a northern relief road through the buffer | | | | |
| Other uses:   * Primary schools should be removed from the definition of noise sensitive **(March C of E Primary School)** * This could form part of a larger housing allocation with most of the buffer kept as open space – incursion into buffer to be justified with technical work. (comment relates to HELAA site HWH0009) | | | | |
| Unclear why a buffer is needed here when noise is intermittent but not along A27 where it is constant.   * Presumption against development here should only relate to residential uses. | | | | |
| Recognise area as one of few quiet green routes from Chichester to the downs – any development should be sympathetic to rural character and enhance views from paths. | | | | |
| Development at Goodwood should be linked to providing land and funding for a northern bypass | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| Comments regarding the future use of the buffer area for employment development are noted and will be considered further in light of the ongoing work on employment needs and the deliverability of other sites.  The policy seeks to limit noise-sensitive uses within the buffer. Comments regarding specific uses are noted, but on balance the policy is considered to provide the right approach.  A buffer is still considered the appropriate approach, given the potential for nearby development to come into conflict with the activities at Goodwood. | | | | |

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| **West of Chichester** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 7 | 7 | 1 | 5 | 1 |
| Representation numbers  116, 410, 829 (Fishbourne PC), 1591, 2840 (Gleeson Strategic Land), 2877, 3482 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support growth towards east/west corridor. **(Gleeson Strategic Land)** | | | | |
| None of service villages are suitable for development due to poor accessibility; need new junction on A27 at Southbourne.  Development will damage character of rural settlements. | | | | |
| Weak plan. Need low car housing, home working, small scale shopping and school on site. | | | | |
| Para 4.112 - Add "while maintaining separation of the Service Villages." | | | | |
| Para 4.113 - cumulative impact on infrastructure of individual proposals is underplayed. Total of 2,300 homes; Fishbourne and roundabout will be affected not by traffic from 250 homes  but by that from 2,300 homes. **(Fishbourne PC)** | | | | |
| Para 4.115 – reasons for no development could be applied anywhere. Area (north of A27) should be considered for some development. | | | | |
| Implies northern part of city is excluded as near to SDNPA. Better to build here rather than floodplain, where economically and environmentally more viable. | | | | |
| Para 4.118 - When will the existing military use of Thorney Island next be reviewed? | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| Comments regarding the west of Chichester are noted. It is recognised that the Plan must consider the cumulative impacts of all development and clearly articulate aims, including the separation of settlements.  The availability of land elsewhere will be considered further following a review of the Housing and Economic Land Availability Assessment and ongoing Sustainability Appraisal work. | | | | |

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| **Policy S17: Thorney Island** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Policy: 10 | 10 | 2 | 3 | 4 |
| Representation numbers  3067 (Chichester Harbour Conservancy), 3001, 2879, 2545 (Chichester Harbour Trust),  2879, 2460 (Southbourne Parish Council), 2249 (Historic England), 2195 (Environment  Agency), 2005 (RSPB), 1592, 691 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support:   * Continued use of Thorney Island by MOD as good environmental custodians (2545   **Chichester Harbour Trust**),   * Support positive strategy for conservation and enjoyment of historic environment but would prefer ‘significant archaeological assets’ to remain in situ. 2249 (**Historic England**) | | | | |
| Object:   * Wording ‘have regard’ is open to interpretation and requires strengthening to protect AONB. 3067 (**Chichester Harbour Conservancy**) * Should Thorney Island cease to be required for military purposes, should receive at least equal protection to other areas within AONB, including presumption against new development and Chichester Harbour Conservancy’s Planning Principles policy. Infrastructure needs to be addressed should military leave. 2460 (**Southbourne Parish Council**) * No mention of the Core and Supporting Areas on Thorney Island which are within the SWBGS. 2005 (**RSPB**) | | | | |
| Policy wording:   * Support positive strategy for conservation and enjoyment of historic environment but would prefer ‘significant archaeological assets’ to be retained in situ. 2249 (**Historic England**) * Consider further wording to provide specific support for habitat creation. 2195 (**Environment Agency**) * Define ‘noisy sports’ | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| Comments regarding detailed wording are noted. It is noted the draft policy states particular regard should be given to environmental sensitivity of this area. The policy also makes it  clear that should this area cease to be required for military purposes, then those considerations still apply.  Further suggestions for detailed policy wording amendments will be considered further as the Plan progresses. | | | | |

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| **Manhood Peninsula** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 5 | 5 | 0 | 4 | 1 |
| Representation numbers  288, 360, 905, 2373, 2899 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Acknowledging poor accessibility and congestion caused by the A27 on the Manhood peninsula, no reference to chaos caused during the increasing number of events at  Goodwood, and peninsula being virtually cut off for several individual days.  More houses on peninsula will mean there is need to look at combined effect of multiple sites. | | | | |
| Housing should be carbon neutral | | | | |
| Green tourism is important and will be seriously affected. | | | | |
| Development is too near AONB, SPA, SSSI. Will be an impact on ecology and insufficient mitigation. | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| In general it is considered the supporting text offers a reasonable description of the relevant issues for the Manhood Peninsula. The proximity to sensitive environmental assets is  acknowledged. The cumulative impact of the development envisaged in the Plan is considered in the emerging evidence base, including the Transport Study and Infrastructure Delivery Plan. | | | | |

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| **Policy S18: Integrated Coastal Zone Management for the Manhood Peninsula** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Policy: 32 | 35 | 8 | 13 | 14 |
| Representation numbers  3459, 3130, 3068 (Chichester Harbour Conservancy), 2880, 2348 (West Sussex Local  Access Forum), 2196 (Environment Agency), 2103 (WSCC), 1593, 1587, 1580, 1456  (Donnington Parish Council), 1389, 1387, 1357, 1335, 1256 (North Mundham Parish  Council), 1255 (North Mundham Parish Council), 1223, 1219, 1130 (British Horse Society),  1127 (Chichester and District Cycle Forum), 991,792, 739, 693, 634, 559, 503, 475, 435,  368, 241, 191, 94, 84 (Marine Management Organisation) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support:   * Objective 5 – support and should apply to all Non-Motorised User (NMU) activity through provision of at least one multi user route and through developments linked to existing PROW and wider access networks. 2348 (**West Sussex Local Access Forum**) * Support specific references to key plans and intention that financial contributions sought to deliver both flood risk management infrastructure and improvements to quality of watercourse in area. 2196 (**Environment Agency**) * Support objective 5. Ensure at least one multi use route is provided through or around development which can also serve as green corridor. Routes can form basis of NMU network and link with PROW. 1130 (**British Horse Society**) * Support need to improve infrastructure to support sustainable modes of transport.1127 (**Chichester and District Cycle Forum**) | | | | |
| Impact on ecology:   * Plans as proposed would have unacceptable impact on ecology, AONB, SPAs, SSSI and Ramsar site. 1456 (**Donnington Parish Council**)   • | | | | |
| Object:   * Proposals would have negative impact on green tourism which is an important part of local economy. 1456 (**Donnington Parish Council**) * Infrastructure unable to cope with large scale development, including removal of foul drainage. 1256 (**North Mundham Parish Council**) * Policy should define and describe area covered by Manhood Peninsula acknowledging it commences immediately to south of and abutting A27 and includes whole parish of Appuldram, Donnington and Hunston. * AL6 proposed link road contrary to CDCs ICZM policy. * No specific mention of Chichester Harbour Conservancy | | | | |
| Policy wording:   * Strengthen policy wording to support plan area becoming carbon neutral by 2030 * Strengthen policy wording to ensure enhanced safe cycle routes, bus connections are provided and more than just ambitions. * Reword opening para of S18 to: "The Council will prepare plans, strategies, projects and other measures, in partnership with Chichester Harbour Conservancy and other organisations and local communities, to ensure that the Manhood Peninsula is planned for in a coordinated and integrated manner, whilst recognising the individual needs of the communities within the area." 3068 (**Chichester Harbour Conservancy**) * Include reference to canal footpath and National Coastal Footpath in bullet point 5. | | | | |

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| * Additional bullet to preserve the dark night skies of the Manhood and character of the peninsula as well as reducing power consumption. * Reference should be made to document ‘Towards Integrated Coastal Zone Management (ICZM) on the Manhood Peninsula’ as supporting document. * Reference should be made to South Marine Plan. 84 (**Marine Management Organisation**) |
| Climate Change/flood risk:   * Manhood Peninsula unsuitable for development as majority under 5m above sea level, subject to poor drainage |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| The comments regarding the policy wording, and suggestions for additions or amendments are noted. It is considered that the policy would benefit from amending to pick up a number  of the points raised and these will be reflected in the next iteration of the Plan.  A number of objections concern the development envisaged in the peninsula rather than the policy wording itself. The constraints set out in the supporting text have been considered when arriving at the draft distribution of development. Comments on individual sites are addressed in the relevant part of this document, and the distribution of sites will be considered further through the update to the Housing and Economic Land Availability Assessment and the ongoing Sustainability Appraisal work. |

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| **Policy S19 – North of the Plan Area** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 1 | 1 | 0 | 0 | 1 |
| Policy: 10 | 10 | 1 | 4 | 5 |
| Representation numbers  95, 111, 694, 786, 1331, 1890, 1877, 2837, 2250 (Historic England), 2251 (Historic  England), 3132 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Distribution of housing   * North of district more accessible than south. Need more affordable housing in SDNP, villages and communities on periphery. * Balance provision for city and limited development in national park for those working locally and requiring affordable housing. * North of Chichester should take a larger share of required housing, rather than along the A259 and Tangmere. * SDNP should share some of development or have northern route around Chichester. | | | | |
| Policy wording   * Too restrictive; does not allow flexibility for small scale housing not included in Policies S3 and S5. | | | | |
| Historic environment   * Paragraph 2.2 notes North of the Plan Area has "rich cultural and heritage assets".   Paragraph 4.128 should mention these assets. **(Historic England)**   * Support "Conserve and enhance the rural character of the area, the quality of its landscape and the natural and historic environment;" as part of positive strategy required by paragraph 185 of the NPPF. **(Historic England)** | | | | |
| Bus services   * Last bullet point not compatible with WSCC's decision to cut bus services. | | | | |
| Plaistow settlement boundary   * Plaistow village should have a defined settlement boundary. | | | | |
| Councillor Influence   * If the north is generally excluded from development, should councillors have undue influence when voting on issues that are not going to affect their area? | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| The north of plan area comprises those areas within the district which do not fall within the National Park. The description of the characteristics of this area is considered to be  reasonable, and the presence of significant settlements in nearby local authority areas is  noted in the text. It is worth noting the north of the plan area is considered a rural area under the Housing Act and therefore the rural exceptions policy applies.  The characteristics of Plaistow means a legible, coherent settlement boundary is difficult to establish.  Ultimately, the production and adoption of the Plan is a matter for the whole District Council as Local Planning Authority. In Chichester, engagement with Parish Councils and the focus on neighbourhood planning provides an additional local emphasis for decision taking. | | | | |

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| **Policy S20 Design** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 4 | 4 | 1 | 0 | 3 |
| Policy: 30 | 32 | 17 | 4 | 11 |
| Representation numbers  2252 (Historic England), 3248 (WSCC Estates), 3181, 127, 242, 719 (West Itchenor PC),  728, 678,1842, 2104 (WSCC), 2197 (Env Agency), 2253 (Historic England), 2638 (Barton  Willmore), 3248 (WSCC Estates), 2728 (Sussex Wildlife Trust), 2881, 2968, 3181, 1211,  377, 3512 (HMPC Ltd), 587, 973 (Chichester CAAC), 2422 (SDNPA), 6629, 2594 (Turley  obo Countryside Properties), 117, 380, 446, 486, 1131, 1321, 1615, 2349, 2384, 2281, 3069  (Chichester Harbour Conservancy), 695, 1257 (North Mundham PC) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support overall policy: **(Historic England, WSCC Estates, West Itchenor PC, WSCC, Env**  **Agency, Barton Willmore, Sussex Wildlife Trust)** | | | | |
| Need positive approach to secure high quality design:   * Recognise design, infrastructure, character of places * Take proactive approach **(SDNPA)** * Maintain communities’ distinctive character **(HMPC Ltd)** * Support modal shift to prevent climate change | | | | |
| Suggest minor wording amendments to strengthen policy including for AONB, Pagham, Medmerry, sense of place, climate neutral buildings, public rights of way, trees, parking etc.  **(Turley obo Countryside Properties, Chichester Harbour Conservancy)** | | | | |
| Communities’ views can contribute to process. | | | | |
| Scale of development will fail to respond to site and surroundings. **(North Mundham PC)** | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| Taking the comments as a whole, there seems to be broad agreement to the aims of this draft policy. A number of suggestions have been made for detailed amendments. These will  be considered further, alongside the newly published national design guidance, and any appropriate amendments will be reflected in the next iteration of the Plan. | | | | |

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| **Policy S21 Health and Wellbeing** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 5 | 5 | 2 | 0 | 3 |
| Policy: 11 | 11 | 4 | 2 | 5 |
| Representation numbers  3070 (Chichester Harbour Conservancy), 2942, 1622, 2017 (Sport England), 1622, 3249  (WSCC Estates), 2639, 493, 3217, 1000, 1258 (North Mundham PC), 1309, 950, 696, 1800,  3136, 2350 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support for policy: **(Sport England, WSCC Estates)** | | | | |
| Impact on infrastructure:   * Reference to expanding capacity of surgeries and hospital due to projected increasing population numbers over the plan period. * No mention of provision of care for ageing population, specifically for elderly/dementia sufferers. No specific planning policy protecting or necessitating dementia care facilities; this has caused issues in the past. | | | | |
| Reference to supporting documents:   * Additional wording to include reference to Sport England’s ‘Active Design’ guidance to strengthen the policy **(Sport England).** | | | | |
| Impact of development:   * Consideration upon health and wellbeing, from loss of natural environment, increased pollution, traffic congestion, strain on schools, health and social facilities **(North Mundham PC)**. * Much more needs to be included to encourage healthy living such as all facilities being within walking distance. * Safe green spaces should be considered as part of wellbeing planning. * This objective is supported but should encourage all NMU activity not limited to walking and cycling **(West Sussex Local Access Forum)**. | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| Comments regarding the capacity of health infrastructure are noted. The plan’s approach to this is set out in draft policy S12.  Comments regarding an ageing population are noted. The plan deals with specialist housing in draft policy DM1. Nonetheless, it is considered that this policy could be usefully expanded  to make expectations clearer and address the particular characteristics of Chichester, including a growing, relatively elderly population. | | | | |

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| **Policy S22 Historic Environment** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 1 | 1 | 0 | 0 | 1 |
| Policy: 14 | 15 | 7 | 2 | 6 |
| Representation numbers  6909, 1482 (Theatres’ Trust), 2256 (Historic England), 3250 (WSCC), 2254 (Historic  England), 3071 (Chichester Harbour Conservancy), 3506, (Historic England), 3513, 915, 974  (Chichester CAAC), 3138, 7057, 1628, 2658 (Church Commissioners), 2969, 2582 (Lavant PC) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support in principle: **(Historic England, Theatres’ Trust, WSCC)** | | | | |
| Heritage assets:   * Suggest inclusion of text to set out requirements of applicants for adequate description of significance of asset, proportionate to its significance and sufficient to understand impact of proposals **(Historic England)** * Improve explanation and text relating to heritage at risk **(Historic England)** * Definition of heritage too narrow; should older buildings be replaced with new carbon neutral, retrofit and preserve examples of 20th century architecture * Should include all historic routes * Take positive approach to improvement of assets at or vulnerable to risk; add text to support proposals for disused, redundant designated and non-designated assets into meaningful use (e.g. underused barns) (**Church Commissioners**) | | | | |
| Evidence base:   * Require up to date and adequate evidence base; historic environment strategy is not sufficient **(Historic England, Chichester Harbour Conservancy)** | | | | |
| Historic environment:   * CDC to need to recognise heritage assets and resource accordingly **(Chichester CAAC)** | | | | |
| Archaeology:   * Important to factor in preliminary evaluation in resource implications of development and avoid loss of irreplaceable data. | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| Whilst the comments are broadly supportive a number of detailed suggestions by Historic England and others will be considered further and any appropriate amendments to the detailed policy wording will be reflected in the next iteration of this plan.  Comments received from Historic England regarding the evidence base are being  considered with a view to clearly identifying the existing evidence base and identifying any necessary additional work. | | | | |

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| **Policy S23 Transport and Accessibility** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 37 | 40 | 3 | 22 | 15 |
| Policy: 164 | 194 | 14 | 117 | 63 |
| Representation numbers | | | | |
| 3555 (Highways England), 3541, 3542, 2000, 3537, 3528, 3525 (West Wittering PC), 3509, | | | | |
| 3508/2442 (SDNPA), 3505, 3496, 3490, 3485, 3452, 3251 (WSCC Estates), 3165, 3161, | | | | |
| 3152, 3051 (Arun DC), 2906, 2905/2904, 2851, 2841, 2805, 2729 (SWT), 2718, 2717, 2657 | | | | |
| (Church Commissioners for England), 2650, 2630, 2579 (Lavant PC), 2575 (Earnley PC), | | | | |
| 2567 (Friends of Pagham Harbour), 2538, 2525 (Sidlesham PC), 2516 (Bosham PC), 2495 | | | | |
| (Chidham & Hambrook PC), 2479/824 (Fishbourne PC), 2469/2470 (Southbourne PC), | | | | |
| 2385, 2353/2351 (WS Local Access Forum, 2324, 2213, 2198 (EA), 2108/2095 (WSCC), | | | | |
| 2046, 2034 (Summersdale RA), 2012, 2003, 2001, 1981, 1963, 1958, 1937, 1906, 1896, | | | | |
| 1887, 1882, 1867, 1863, 1858, 1855, 1853, 1843, 1828, 1814, 1786, 1780, 1695, 1688, | | | | |
| 1683, 1677, 1663, 1619, 1616, 1613, 1602, 1596, 1578, 1574, 1573, 1560, 1546, 1503, | | | | |
| 1493, 1489, 1474, 1465, 1458, 1455, 1449, 1443, (Donnington PC), 1429, 1414/867/866, | | | | |
| 1413, 1378, 1375, 1364, 1358, 1339, 1325, 1310, 1287, 1267, 1259 (North Mundham PC), | | | | |
| 1237, 1230, 1215, 1200, 1163, 1155, 1128, 1119, 1105, 1087, 1072, 1061, 1049, 1033, | | | | |
| 1032, 1031, 1015, 1014, 998/990 (Birdham PC), 997, 959, 945, 939/937/936 (Pagham PC), | | | | |
| 872, 856, 847, 806, 796, 794, 785, 778, 775, 768, 766, 754, 733, 720 (West Itchenor PC), | | | | |
| 672, 650, 644, 641, 627, 625 (Dell Quay Sailing Club), 618, 617, 595, 589, 588, 570, 555, | | | | |
| 554, 540, 519, 511, 500, 487, 477, 466, 455, 454, 448, 379, 369, 355, 341, 340, 329, 328, | | | | |
| 324, 312, 294, 286, 284, 266, 264, 262, 243, 187 (Friends of Brandy Hole Copse), 177, 128 | | | | |
| (Chichester Society), 118, 110, 69, 3219, 3143, 1829, 1749 (Harbour Villages Lib Dems | | | | |
| Campaign Team), 1689, 1680, 1594, 1193, 1187, 1132 (British Horse Society), 1125 | | | | |
| (Chichester and District Cycle Forum), 1109, 1067, 1059, 1041, 980, 967, 943, 941, 932, | | | | |
| 914, 910, 899, 894, 883, 698, 591, 564, 505, 342, 319, 278, 265, 193, 33 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support Generally (WSCC Estates, Church Commissioners for England, Summersdale RA, West Itchenor PC, Chichester Society)  * Car Sharing Clubs * Junction on A27 at Southbourne * Support Donnington bypass * Support given the loss of HE2b proposal **(Lavant PC)** * Support creation of integrated travel plan **(Bosham PC, Chidham and Hambrook PC, Southbourne PC)** including cycle **(C&H PC, Southbourne PC)** and pedestrian routes **(Southbourne PC)** * Support in principle, particularly for sustainable modes **(SDNPA)** * Inclusion of PROW welcomed **(WSLAF)** * Support proposals to mitigate impacts of development in A27 improvements * Support link road * Support EV charging provision * Support northern route option * Support para 5.27 as supports Southbourne’s desire for pedestrian bridge over railway **(Southbourne PC)** * Support para 5.15 – good to see bridleways included **(British Horse Society)** * Support commitment to improve highway infrastructure for cyclists and pedestrians   **(Chi and District Cycle Forum)** | | | | |
| Consultant’s report | | | | |

* + Obscure, contradictory, lacking coherence, unviable, transport model incorrect and outdated
  + Option 3a rejected
  + Fails to consider mitigating climate change, minimising pollution and protecting character of area from visual intrusion
  + Insufficient weight given to sustainable transport; no provision for walking/cycling from Chichester centre to AL6 area
  + Fails to consider impact of existing housing combined with future planned housing
  + No provision for impact of 2250 homes between Southbourne and Fishbourne

# (Chidham and Hambrook PC)

* + Restricted scope of study, fails to examine local network impacts **(Southbourne PC)**
  + It’s not clear what impact Scenario 1 will have on A286 **(SDNPA)**
  + Routes considered for mitigation not considered equally
  + Does not explore medium/long term transport infrastructure
  + Proposals detrimental to Parklands
  + Clarify diagrams and text regarding A27 junctions 14 and 15 (Stockbridge and Whyke)
  + Transport Study insufficiently robust for MP
  + Appendix F (Journey Times) to PBA Report does not include a comparison of journey impacted by “No Right Turn” restrictions
  + Para 1.2.3 as referred as para 3.4.2 in Transport Study has been removed – reinstate
  + No modelling for holidays/events; modelling does not recognise reality of summer traffic at tourist hotspots
  + Clearer explanation of table 5.3 required
  + Query air quality assessments informing study

Further work

* + Realistic estimate of costs for A27 mitigation works **(Highways England)**
  + Feasibility work necessary prior to submission **(WSCC)**
  + New viability testing to establish extent of contributions from development **(Highways England)**
  + Consider other viable options for A27 junctions in lieu of link road **(Highways England)**
  + CBA on A27 junction alterations
  + Update Planning Obligations & Affordable Housing SPD to reflect new housing development increasing traffic/contributions required from all sites **(Highways England)**
  + Redo analysis of traffic flows especially Bournes area
  + Need calculations of increased journey times based on restricted right turns on Stockbridge Road
  + Increases in summer traffic to beaches should be considered in travel plan (Fishbourne PC) and general tourist/holiday season as well as Goodwood events
  + Integrated transport plan for Area West of Chichester needed
  + Consider additional junction on to A27 in both directions between Southbourne and Fishbourne
  + Further assessment of new junction onto A27 at Southbourne
  + Junction between Norwich Road and St Paul’s Road needs to be resolved
  + Consider traffic light options for the two roundabouts
  + Assessments of air quality and accident numbers from increased traffic at Fishbourne roundabout (WW PC)
  + Provide clarification on mitigation for resolving commuting pressures **(Arun DC)**
  + Update understanding of effects of proposed alterations and mitigation to A27 on

local journeys

* + Provide advice to PC’s undertaking NP’s for strategic allocations to assess impacts of allocation on local network to aid site selection **(Chidham and Hambrook PC, Southbourne PC)**
  + Independent study of effects of traffic arising from planned new developments should identify impact on local communities as well as how air quality; noise and light pollution will impact upon AONB and health and well-being of Chichester residents
  + Impact of additional traffic on Clay Lane should be assessed (Fishbourne and other east/west corridor service villages use road to access Chichester and west of Chichester to avoid A27)
  + Need detailed transport study of A259 Emsworth to Fishbourne with mitigation identified for reducing pressure on A259 generally
  + Consider alternative entry point for MP traffic joining A27 near Fishbourne roundabout instead of directly onto roundabout – left/eastward merge onto A27
  + Real-time transport survey work to fully assess impact of proposed development, particularly on MP
  + Add specific, innovatory alternatives to policy; additional focus/weight given to cycling and other sustainable transport methods
  + Include measures to improve inner city junctions to allocate more space to pedestrians and cyclists eg; New Park Road junction near the University, Eastgate and the roundabout near Sainsburys
  + Explain why no assessment of impact to AQ/health from construction work and its impact on highway congestion
  + Commission report on how PBA measures achieve sustainable improvement in three AQMAs; reduction in noise, accident rates, light pollution and congestion need to be demonstrated in monetised outputs
  + Add measurable targets for uptake of public transport, reduction in CO2 and other pollutants
  + Analysis of costs and options for achieving a solution for through traffic

Funding

* + Exceeds likely developer contributions **(West Wittering PC)**
  + Lack of investment
  + CIL money should push forward measures addressing climate change obligations, health needs, sustainable travel
  + Monies should not be used to improve a HE road
  + Clarification of funding sources sought **(Lavant PC)**
  + Study estimate of £68m beyond level that could be funded by developer contributions

# (Earnley PC)

* + Development in Selsey should contribute to upgrade of B2145 as Selsey commuters cause pollution/noise and traffic **(Sidlesham PC)**
  + Pursue RIS2 Government funding
  + Query whether developer contributions will include significant new economic/ business development as well as significant “windfall” housing development not identified in LP or whether they will avoid contributing to A27 improvements
  + Since costs beyond S106/S278 possible funding, question whether Plan will fail viability tests
  + Traffic mitigation measures not deliverable as no defined funding plan
  + Use S106/S278 funds to provide dedicated cycle route from Chichester into the peninsula and east to west, segregated from road traffic
  + Cost of mitigation exceeds figure supported by value of developer contributions therefore strategy will depend on external funding, LPR should set out how it will deal with funding uncertainty **(WSCC)**

Link Road

* + General adverse impact **(Dell Quay Sailing Club)**
  + Remove/abandon **(Birdham PC)**
  + Unnecessary due to A27 works and changes in vehicle use **(Summersdale RA)**
  + Upgrade A27 sympathetically, avoid building link road
  + Wildlife/environment/recreation concerns
  + Increased capacity will induce demand
  + Will redirect local traffic along congested minor roads of MP, prevent easy access to A27 and A259 **(Southbourne PC)**
  + Support link road to reduce traffic through Donnington
  + Build before A27 improvements
  + Will double journey times
  + Increase danger **(Fishbourne PC)**
  + Proximity to harbour
  + Build link road into grassed/tree lined bank with noise barriers/reducing surfaces
  + Link road would push traffic south where roads not capable of coping with increased traffic
  + Must be mitigated by flyover east to west at Fishbourne A27 junction
  + Concern over level of road
  + Link road would need raising as this would destroy views of cathedral
  + Link road will be detrimental to West Wittering beach traffic in the summer
  + No evidence of consultation with HE
  + Increase in light pollution
  + Run-off from link road could enter water at River Lavant and also running into the Harbour

A27 improvements:

* + General objection to junction improvements
  + Need to ensure land outside highway boundary is available **(WSCC)**
  + Allow right turns from A27 to A286/B2145
  + Right turn ban would increase traffic flows to MP (WW PC) disadvantage Donnington and Hunston residents
  + Stockbridge roundabout previously found not suited to signalisation
  + Addition of traffic lights at Stockbridge will improve situation for those crossing it
  + Bognor roundabout will be at full capacity
  + Against no-right turns
  + Propose Systra’s long term plan for bypass
  + Support fly-overs at Fishbourne and Bognor junctions with underpasses at Whyke and Stockbridge junctions
  + Support fly-over at Stockbridge
  + Support northern A27 route - would halve traffic and lessen pollution; should be mentioned in policy – would obviate need for link road and could separate through and local traffic
  + Policy delays preparation for a northern relief road
  + Reject northern route; unaffordable
  + Should be fully assessed for potential adverse impacts on landscape (SDNPA)
  + No viable long-term A27 bypass solution; housing numbers not deliverable without acceptable solution
  + Mitigation measures not enough
  + General concern re; roundabout changes; remove junction changes to roundabouts
  + Oppose closure of link to Terminus Road
  + Plan should consider ways to reduce peak-time traffic volumes at roundabouts
  + Infrastructure in place before developments commence **(Birdham PC, Fishbourne PC)**
  + Donnington residents hugely disadvantaged by junction improvements **(Donnington PC)**
  + Object to 3 years of work for each junction amounting to 15 years of disruption

# (Birdham PC)

* + Significant deleterious effect on travel options for population south of A27 **(North Mundham PC)**
  + Hamburger junctions will cause major delays at peak times and additional miles in order to travel eastwards from south of A27
  + Suggest radical re-structure of Fishbourne roundabout with A27 unrestricted and north/south crossing via tunnel
  + Question whether junction improvements are included within policy requirements

# (Pagham PC)

* + Improvements contrary to Policy S28 Pollution **(Pagham PC)**
  + Concerted effort to get into RSI programme with HE and design sustainable low pollution improvement for the A27
  + Loss of traffic lights at Oving/Leave Oving crossing alone
  + A27 improvements must be carried out sympathetically towards local residents

Congestion

* + Concern re; increased traffic on main and back roads from existing and future development **(Donnington PC)**
  + Hinders access
  + Potential congestion on canal path
  + No proposals to manage additional traffic on A259 **(Dell Quay Sailing Club)**
  + Link Road will increase congestion on A286 and A27 Fishbourne roundabout
  + A27 – serious disruption occurs every summer weekend with people trying to access MP/West Wittering beaches/Goodwood motor and horse racing
  + A27 congested, dangerous and polluting
  + A286 already gridlocked especially during summer **(Birdham PC)**
  + No acceptable mitigation proposals re; increased congestion especially to improve traffic flows on A27 **(Birdham PC)**
  + Longer journeys
  + Concern re; fatalities caused by congestion **(Birdham PC)**
  + Reverse roads-first approach as transport priority
  + Plan favours through traffic **(Pagham PC)**
  + Housing on MP would require mitigation for traffic (Earnley PC)/worsening traffic congestion on MP needs to be dealt with
  + Chichester Selsey Road increased congestion will raise accident numbers unless better crossing facilities provided for pedestrian/cyclists (Friends of Pagham Harbour)
  + Moratorium on applications resulting in more traffic on road network until route agreed for bypass **(Fishbourne PC)**
  + Concern re; Southbourne railway crossing congestion
  + Plan not robust enough to cope with future traffic especially rush hour/bank holidays
  + Oving Road crossing will increase traffic in St James’ Road
  + Make improvements to A286 roundabout to improve flow of traffic
  + Separate through traffic from local traffic on A27
  + Establish an integrated and sustainable plan for future traffic flows **(Friends of Brandy Hole Copse)**
  + Congestion caused by railway crossings not addressed **(North Mundham PC)**
  + Sustainable transport – cycling, buses and trains are the only solution to encourage people to leave cars at home **(Chi and District Cycle Forum)**

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| * Need to improve local transport links on existing roads to south of City and ensure traffic can move easily north-south across A27 |
| Access:   * Residents will have no access to the East from Donnington & MP; reduces access to city * Donnington will be cut off from the city * Traffic increase will cause access issues for   + westbound traffic from A27 accessing town   + Eastbournd traffic accessing Donnington, Witterings, Hunston and Manhood * Rat runs likely to develop, unsuitable narrow residential roads will be used * Cars are only form of transport in some areas – policy should not be too restrictive   **(Church Commissioners for England)**   * Access to A27 at Fishbourne will be worsened by addition of no right turns at roundabouts; hamburger junction will be gridlocked in summer **(Chidham and Hambrook PC)** * Access will be reduced by link road **(Fishbourne PC)** especially accessibility to already congested Fishbourne roundabout with a loss of a right hand turn * Access limited by no right turns * Remove restricted access at junctions and Stockbridge Link Road * Concern over restriction of access on to MP * Access will be obstructed to local businesses by traffic tailbacks * Restricting access to A27 at Stockbridge and Wyke junctions will force traffic on to local streets * Access roads to MP stretched to capacity, A286 frequently blocked during summer months up to Stockbridge roundabout |
| Local issues:   * Homes devalued * Commuting for employment **(Sidlesham PC, Birdham PC)** will create financial burden due to added commuting costs * Local journeys will be longer * Improvements will lead to unacceptable detours for residents in Donnington * Ageing population disadvantaged by not having technology to access real-time travel information or car restrictive measures * Through traffic prioritised over local traffic **(Donnington PC)** * Air and Noise pollution * Long construction period impacting upon the economy not considered * MP cannot cope with more development without complete upgrade of A27 * Impact on Free School * Severe detrimental impact on Donnington and Apuldram residents * Congestion created at Fishbourne roundabout will be damaging to local communities, businesses and tourism **(Harbour Villages Lib Dems Campaign Team)** * Restrict car parking in new developments |
| Cyclists/Pedestrian/Equestrian   * Fails to demonstrate that cycling or walking routes will be enhanced * Prioritise cycling and walking * Join up existing PROW to enable access to SDNP **(SDNPA)** * Upgrading appropriate/suitable PROW to bridleways would contribute to WS Transport Plan aim of “improving safety for all road users” mentioned in para 5.18 |

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| **(British Horse Society)**   * Install better walking and cycling infrastructure connecting all 4 quadrants of city outskirts to the centre * identify important cycle network routes for development **(Lavant PC, Bosham PC)**   and pedestrian routes **(Bosham PC, Chi and District Cycle Forum)**   * Provide generous cycle routes not just lines on the road; segregated cycle routes on busy roads between settlements * Dedicated cycle routes that link in with existing routes on highways **(Harbour Villages Lib Dems Campaign Team)** * Concern re; increased accidents and increased pollution * Cycleways not viable on access roads to MP * Recognise potential of cycling to mitigate traffic increases/promote as sustainable form of transport * Recognise necessity of upkeep of established cycle routes ie; Centurion Way and Canal route in accordance with NICE guidelines **(Lavant PC)** * Strongly support policy to secure off-road connection for Salterns Way and Centurion Way **(SDNPA)** * Recommend maximising value of existing infrastructure to facilitate off-road user modes accessing either side of A27 **(WSCC)** * Ensure cyclist and pedestrian safety at A27 roundabouts and generally * Westhampnett Road near Sainsbury’s, New Park Road, Eastgate, Northgate, Westgate and Southgate roundabouts need redesigning to allocate more space to cyclists and pedestrians * A286 needs to be widened with dedicated cycle/horse routes or be cycle/horse free * Provide more space for cyclists by removing street parking on Bognor Road and St Paul’s Road to create cycle lanes * Link road will negatively impact Salterns Way * Provide new super cycle highway linking surrounding rural areas to Chichester * New Strategic cycling provision between Chi and Emsworth (NCN2) in a segregated form to ensure safe movement for all transport users **(Sustrans)** * More zebra crossings needed in Selsey especially Chichester Road * West of Chi could act as corridor for increasing volumes of non-motorised transport   **(WSCC)**   * Require developers to finance cycle infrastructure improvements to encourage ‘new residents’ to cycle/walk **(Chi and District Cycle Forum)** |
| Rail   * Pedestrian bridge over railway crossing at Southbourne should be included in policy   **(Southbourne PC)**   * Railway barrier timings to operate more efficiently * Poor rail links between Chidham & Hambrook, Bosham, Southbourne and Fishbourne * Invest in rail infrastructure; seek investment from Network Rail for signalling systems to improve on delays at Chichester level crossings * Invest in improved public transport links * Increase public transport and make more affordable * Suggest light railway link from MP * Promote/prioritise public transport * Reinstatement of peak hour frequency train service between villages on A259 corridor |
| Buses   * Provide for more bus lanes in policy * Promote/prioritise public transport |

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| * Need park and ride provision; especially for events, summer, commuting – suggest site allocated for employment to the SW * Potential delays caused by A27 proposals * Poor bus links between Chidham & Hambrook, Bosham, Southbourne and Fishbourne * Increase bus services * Invest in improved public transport links * Increase public transport and make more affordable * Provide more bus stops in Manor Road near Ellis Square |
| Sustainable cars   * Provide for hydrogen refuelling cars * Promote electric cars and ensure enough charging points |
| Air Quality   * No mitigation re; air quality decline in policy * Conflicts with DM24 * Increased air pollution **(Pagham PC)** * Integrated public transport system essential to avoid congestion and pollution * Prevailing winds will carry pollution across Chichester District * Concern over pollution for residents around Stockbridge Road, pollution already exceeds recommended levels; 3 schools along route * Standing traffic at traffic lights will worsen situation **(Donnington PC, Pagham PC)** * Worsening air quality; should be primary consideration in transport solutions * No risk analysis of death from pollutants **(Earnley PC)** effects on health * Suggest trees and green planting to mitigate against traffic fumes * Established AQMAs not taken into account * Elevation of link road across flood plain takes pollution to bedroom window level |
| Noise Impact:   * Conflicts with DM25 * Will cause additional noise * Disturbance to AONB * Concern over noise pollution to residents of Stockbridge Road * Mitigation measures should reduce effects of additional traffic noise on Bracklesham Lane ie; in form of speed limit reduction to 30 mph |
| Climate change   * Provide for Car Free Days in policy * Climate change commitments will be undermined by new link road * Lack of attention given to alternative sustainable transport options/public transport   **(Sidlesham PC, Chidham and Hambrook PC, Dell Quay Sailing Club)**   * Increase public transport and make more affordable * Discourage car use so that sustainable transport initiatives can be successful * Relief road is in conflict with IPCC * Transport measures need to take account of carbon emissions |
| Impact on Ecosystems/wildlife habitats   * Link road adjacent to sites needing protection – general concern re; loss of/effect on wildlife as a result of link road * Link road area is within SSSI Impact Risk Zone which affects the SAC, SPA and Ramsar designations **(SWT)** |

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| * Concern re; impact of link road on setting of Fishbourne wildlife corridor **(Fishbourne PC)** * Concern re; link road’s general impact on environment **(Chidham and Hambrook PC, Southbourne PC)** * Question survey data against biodiversity needs **(SWT)** * Environmental degradation of AONB * Major risk of obstruction to water vole and other wildlife corridors between Fishbourne meadow, Lavant, pond and ditches * Link Road would impact on important migratory bird species |
| Landscape   * Impact of link road on views **(Chidham and Hambrook PC, Southbourne PC)** * Improvements will destruct views of Cathedral and SDNP * Link road on floodplain **(C&H PC)/**flood risk **(Fishbourne PC),** within flood zones 2 and 3 and crossing a number of watercourses **(Environment Agency)** * Suggest explicit support for improving links into NP **(SDNPA)** * Loss of landscape, character, beauty and greenery * Concern re; loss of trees, hedges or bridge in works to Bognor Road roundabout * Link road near Chichester Harbour AONB, Pagham Harbour SPA and Medmerry designated SPA **(Birdham PC)** * Significant impact on Chi Harbour (SSSI and Ramsar Sites) * Acknowledge role of trees/vegetation as part of transport infrastructure; promote design to retain established trees/hedgerows/vegetation as well as plant more * Preserve unique views of cathedral from south |
| Changes to LPR Preferred Approach   * Change “road improvements” to “road workings” * 5.15 Inclusion of bridleways welcomed though there should be specific inclusion of PROW **(WSLAF)** * 5.16 Wording is misleading as provision of bridleways on Coastal Plain is very limited, restricting access for cyclists and equestrians. Upgrading suitable PROW to bridleways would improve access for all NMUs and contribute to the WS Transport Plan (2011-2016) to improve safety for all road users **(WSLAF)** * 5.16 lists specific roads but not cycle paths – include existing cycle paths such as Centurion Way (NCR88), Salterns Way, Chi to Bognor Regis and Chi to Emsworth (NCR 2) - South Coast cycle route * 5.16 Change to “There is an extensive public rights of way network across the plan area and a number of cycle paths, including the nationally important National Cycle Route Two. There are also several cycle routes that are currently incomplete but have great potential as drivers for tourism and to offer alternatives to the car on shorter journeys. These include Centurion Way (with a proposed extension to Midhurst), the Selsey Greenway (formerly the Selsey Cycle route) and the Chemroute (a proposed route between Chichester and Emsworth) * 5.16 – Insert “and a number of nationally important cycle paths including the Salterns Way and Centurion Way that need to be preserved and enhanced” * 5.16 – wording re; extensive public rights of way network is misleading since it implies the PROW network is available to all users whereas on coastal plain, PROW is entirely footpaths not for use by cyclists or equestrians **(British Horse Society)** * 5.16 delete “…strategic road link between Havant and Eastbourne and replace with “….The A27 is part of the Strategic Route Network connecting the south coast from Folkestone to Honiton, including the major ports of Portsmouth and Southampton. It is also a local road with five junctions within a four mile stretch where local and through traffic compete for space” |

* 5.18 misses reference to landscape protection
* 5.18 Insert “The strategy requires government input and earmarked funding to pre- plan the required integrated transport needed to enable the area’s residents to travel sustainably”
* 5.19 Amend to include “…. congestion in the city, on the Manhood Peninsula and the A27 junctions”
* 5.19 Insert “and on the Manhood Peninsula” after “Chichester City”. Remove “bypass” from “Chichester A27 bypass”
* 5.20 Insert “and coastal parts of the plan area” after “the more rural”
* 5.21 Change to “Without mitigation, and putting forward a fully financed integrated transport plan, this would lead…”
* 5.21 Add “from the through traffic on the A27,” after “Projected growth in road journeys” and add “and Manhood Penisula and East West Corridor” at end of paragraph
* 5.22 Last sentence to read “Furthermore, the A27 with the current junctions design, and many local roads are often significantly over capacity”
* Table following para 5.31 and policy text to refer to road bridge proposed over railway in Southbourne NP
* Consider additional wording to reflect impacts upon SDNP being mitigated and opportunities taken to improve GI networks **(SDNPA)**
* Number paragraphs and sub-paragraphs for ease of reference throughout local plan (Councillor Simon Oakley)
* Paras 5.23-5.25 should be updated in light of HE response to reflect that no viable scheme capable of central government is available
* Policy needs to address paras 5.21 to 5.24
* 5.23 and 5.24 Insert “Local communities firmly voted against a southern relief road and no right turns on the A27 during the HE consultation. The PBA report has reintroduced elements into the plan that were rejected by local communities.”
* Para 5.26 should refer to County and District Councils’ preference for a northern bypass
* 5.26 Change to “To address this position, the Council will work with Highways England, The County Council, the local community and Network Rail and major development….. A central element of the strategy is a package of proposed improvements to the rail network and sustainable travel network.”
* Last sentence of policy to provide that consultation on planned transport measures takes place separately from LPR
* Additional comment between 5.26 and 5.27 as follows: ‘meanwhile the likely alignments of a northern route as identified in existing 2016 HE studies will be safeguarded against other development’ – repeat in policy
* 5.27 unrealistic expectations in light of recent bus timetable cuts
* 5.27 add “effects of behavioural change will be limited”
* 5.28 Insert at end of last paragraph “…. need to be carefully monitored and funding coordinated to prevent rat running through local communities, put in more crossings and safe cycle routes to cross the road”.
* 5.29 Change last sentence to “In preparation for such a situation arising, potential park and ride sites will be identified at a nearly stage of the plan period, and if necessary secured. Also a review may be required to revise the transport strategy for the city.”
* 5.29 add “benefits of Park and Ride will be limited
* 5.30 Third sentence: change to “Implementation of the necessary measures”
* Change third bullet point in S23 ‘Planning to achieve’ should read ‘Requirement to achieve’
* 5.30 Delete second “be” and after “S278” insert “Agreements”

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| * 5.31 Remove A27 junction improvements – Fishbourne, Stockbridge and Whyke roundabouts and the raised new road * 5.31 Change to “Dutch-style roundabouts and allocation of more space to people who walk and cycle are needed to enable modal shift” * Delete “New road connecting Birdham Road to A27 Fishbourne roundabout” * Under “New Integrated Traffic Measures”, insert additional bullet point concerning cycling on Route NCN2 **(Sustrans)** * 5.3.1 Add to Wider Plan Area row “small-scale junction improvements on A259 between Emsworth and Chichester * 5.33 Change to “With Network Rail, train operators and local stakeholders to improve and extend services to facilitate….. The Council also works closely with bus operators to put in cleaner buses and extend their services” * Sustainable transport measures required to mitigate planned developments through more detailed assessment of sites including pre-app **(WSCC)** * Make it clear in the Plan text that discussions with Highways Agency to improve road network are ongoing |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| In light of the number and range of comments and objections received to this policy, a detailed document has been prepared by consultants PBA (now Stantec) to consider  detailed points. In addition, further sensitivity tests were carried out on the following four impacts –   1. Impact of additional flows at level crossings within the study area;   In summary, the results suggest that most of the level crossings on the A259 Main Road are predicted to maintain similar levels of delays generally seen in the base year, with the mitigation in place. However, the three level crossings in Chichester City are generally predicted to show delays greater than those in the base and in the Reference Case. The delays are generally shown to be relatively small and do not have any impact on route  choice within the model   1. Impact of the Arundel bypass;   In summary, the modelling suggests that the impacts of the A27 Arundel Bypass will have the greatest impact in the area local to Arundel and flow increases on the Chichester Bypass will be relatively modest at less than 5% in most cases in both the AM and PM peaks.   1. Impact of Peak Spreading (i.e. longer periods of congestion);   The results demonstrate that the Local Plan development can be delivered without increasing overall delays in the modelled area and therefore, with the mitigation in place the reduction in over capacity queues will have a positive impact on associated consequences, such as air quality.   1. Impact of Allowing right turns at A27 junctions and on local traffic;   The results indicate, that allowing the right turns at the A27, results in reduced performance of the junctions and the creation of rat run routes through Chichester City centre.  Full details are included in the document *Chichester District Local Plan*  *Transport Study: Responses to Representations Received through the Consultation Process*.  Further consideration of the representations received, additional transport work has been commissioned to develop further the findings of the study –  a. Review the assumptions on committed developments used in the Reference  Case |

* 1. Appraise the removal of Stockbridge Link Road as mitigation
  2. Model additional spatial development options
  3. Advise on implications for any need to phase development; and
  4. Consider further the extent to which a new road crossing over the railway line in Southbourne may be required in planning terms.

In addition, further work to consider the feasibility of the proposed mitigation is being commissioned, with the aim to provide all parties with greater comfort that the cost estimates for the proposed mitigation are robust, and that the strategic mitigation is ultimately deliverable.

The findings of this work will inform the ongoing development of the Plan. Further points raised in the consultation, including proposed amendments to the policy wording, will also be addressed in the next iteration of the Plan.

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| **Policy S24 Countryside** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 19 | 19 | 3 | 4 | 12 |
| Policy: 40 | 44 | 7 | 20 | 17 |
| Representation numbers  3519, 1133, 2487 (Fishbourne Parish Council), 2257 (Historic England), 1260 (North  Mundham Parish Council), 2400 (South Downs National Park Authority), 1340, 381, 190,  267, 1755, 3499, 825 (Fishbourne Parish Council) 3073 (Chichester Harbour Conservancy),  1692, 1784, 2528 (Sidlesham Parish Council), 2461 (Southbourne Parish Council), 2971,  3518, 3074 (Chichester Harbour Conservancy), 2710, 2107 (West Sussex County Council),  3030, 2891, 2609, 2386, 2212, 1597, 1950, 1951, 1948, 2740, 1234, 1527, 2547, 52, 3322,  2839, 3430, 1016, 1782, 1359, 370, 901, 1949, 1702, 3419, 3426, 2920, 3275, 3335, 3342,  3365, 3383, 3390, 2480 (Fishbourne Parish Council), 2730, 2864, 2527 (Sidlesham Parish  Council), 2659, 3283 (Westbourne Parish Council), 2943 (CPRE Sussex) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support for policy:**(Sidlesham PC, Southbourne PC, Westbourne PC, CPRE Sussex)** | | | | |
| Rural assets:   * Promote protection of existing traditional barns/agri buildings/ equine businesses through sensitive reuse **(WSCC, Church Commissioners for England)**. * Make reference to Chichester Harbour AONB, SSSI and SAC * Emphasis should be placed on protection of high grade agricultural land (grade 1 - 3a), biodiversity, structural tree planting (drainage,co2 reduction). Positive approach to recreational access supporting green tourism should form part of policies. **(Sidlesham PC)** * Recognise value of agricultural coastal plain. Consider introduction/preservation of bees and habitats. Greater support to establishment of community orchard and nut plantations. **(Southbourne PC)** | | | | |
| Gaps   * Suggest time frame of 25 years for gaps to be in place **(Harbour Villages Lib Dems Campaign Team).** * Delay decisions on allocations affected by gaps until policy added to Plan.   **(Fishbourne PC)**   * Strengthen policy to protect gaps; impact on landscape character, context and setting of AONB and NP; coalescence of settlements. **(Chichester Harbour Trust)** * Support policy for Countryside Gaps to prevent erosion of open countryside and prevent coalescence of settlements. | | | | |
| Settlement boundaries:   * If can’t meet OAN additional sites should be adjacent to, but outside of, the settlement boundary. * Why have settlement boundaries if they can be extended and built on. * Revise policy to ensure plan flexibility e.g. edge of settlement boundaries. * Object to boundary reviews; could increase supply of windfall sites and reduce requirement for new greenfield allocations in later DPD or NP; could also secure benefits from redevelopment of previously developed sites or sites abutting boundary and relate to built up area rather than countryside. **(Seaward Properties)** * If no settlement boundary reviews amend last sentence of S24**(Seaward** | | | | |

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| **Properties)**   * Unclear how S24 is applied in respect of AL site-based allocations.. Para 5.42 refers to study to inform analysis; this is needed prior to decisions on boundaries **(Heaver Homes Ltd)** * Marina should be considered within a settlement boundary in recognition of number of dwellings/employment/leisure opportunities it provides. Policy does not recognise contribution of other sites to jobs and homes. Suggest policy rewording **(Premier Marinas)** * Object to the way the settlement policy boundary reviews are proposed. Propose a settlement boundary amendment for Fishbourne to include land south of Clay Lane/west of Blackboy Lane.( **Landacre Developments Ltd)** * We propose a settlement boundary amendment for Fishbourne to include land to the rear of 98 Fishbourne Road. **(Seaward Properties)** * Land to the rear of Sturt Avenue should be within the settlement boundary for Lynchmere (2839) |
| Designations   * Consideration of development within parish of North Mundham should take account of diminished resource of countryside. **(North Mundham PC)** * Policy suggested to protect rural areas and enhance their character by tree planting, improvement to roadside environment, traffic management. **(Sidlesham PC)** |
| North of city   * Important District retains existing open land to the north and north east of the city. * Lavant not included - no mention of its settlement area and so the status of the area of Lavant outside of the SDNP is not defined. |
| Fishbourne/Bethwines Farm   * Support policy but building on Bethwines would be hypocritical and erode gap between settlements **(Fishbourne PC)** |
| Chichester Harbour AONB   * Pagham and Chichester Harbours should be kept separate; Chichester Harbour has list of 10 special qualities that constitute AONB designation that are not "characteristics" and they do not apply to Pagham Harbour. **(Chichester Harbour Conservancy)** |
| Biodiversity   * Overlooks biodiversity loss and needs which may allow developments to increase catastrophic losses of recent years. * Make reference to ecosystem character. Unacceptable harm should not be confined to appearance of countryside but include ecosystems and biodiversity. * No reference in policy to natural environment or biodiversity **(Sussex Wildlife Trust)** |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| Draft policy DM21 sets out the plan approach to alterations, change of use and/or re-use of existing buildings in the countryside, whilst draft policy DM22 sets out more detail on the  general approach to development in the countryside.  It is considered essential that subsequent development plan documents or neighbourhood plans are able to amend the defined settlement boundaries.  A study of the potential for introduction of gaps between various settlements across the plan area has been prepared indicates there is justification for the identification of gaps between settlements. It is intended that the next iteration of the plan identifies key areas for settlement gaps, with the exact boundaries to be set in subsequent development plan documents and neighbourhood plans, and makes it clear that additional settlement gaps can |

be identified where justified.

Suggestions for detailed amendments to the settlement boundaries will be considered further for potential inclusion in the next iteration of the plan. The inclusion of more precise policy wording, potentially in another part of the plan, will also be considered in relation to the definition of settlement policy boundaries.

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| **Policy S25 The Coast** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 1 | 1 | 0 | 1 | 0 |
| Policy: 13 | 13 | 3 | 3 | 7 |
| Representation numbers  3075 (Chichester Harbour Conservancy), 3076 (Chichester Harbour Conservancy), 83 (Marine Management Organisation), 1261 (North Mundham PC), 2530 (Sidlesham PC), 2424, 3162, 2907, 541, 713, 2462 (Southbourne PC), 2200 (Environment Agency), 2610 (Premier Marinas), 2548 (Chichester Harbour Trust) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support in principle: **(Environment Agency, Premier Marinas, Chichester Harbour Trust)** | | | | |
| Evidence base/guidance documents:   * Include reference to other relevant documents such as Pagham Harbour Management Plan, Chichester Harbour AONB Management Plan, South Marine Plan Area, Sustainable Shorelines **(Chichester Harbour Conservancy, Marine Management Organisation)** * Include reference to all statutory designations within the area, Special Protection Area (SPA) **(Chichester Harbour Conservancy)** | | | | |
| Impact of development on coast:   * Refer to issues around adapting to climate change, including potential for protecting and enhancing the coast and mitigation for coastal squeeze. **(Chichester Harbour Conservancy, North Mundham PC)** * Support for new opportunities to create saltmarsh and coastal grazing marsh in medium to long term. **(Environment Agency)** * Consider the importance of Chichester Harbour's drainage function **(Sidlesham PC)** * Over development appears obstructive for future tourist industry in terms of creating an unattractive environment. | | | | |
| Marine industry   * Support recognition of leisure, recreational use and water based activities and marine employment. Need policy approach to consider uses suitable to maintain sites as important recreational, economic and environmental resources. (**Premier Marinas)** | | | | |
| Wastewater   * The policy needs to address wastewater infrastructure capacity and discharging of untreated waste and include a strategy for mitigating pressure on harbour by providing alternative routes. **(Southbourne PC)** * Link with policies promoting wildlife corridors/gaps/green or blue space. Work with agricultural/horticultural business to reduce impact of chemical and nutrient run off into Harbour. **(Southbourne PC)** | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| It is considered that the plan should include more explicit reference to other relevant documents such as Pagham Harbour Management Plan, Chichester Harbour AONB  Management Plan, and the next iteration of the Plan will do so.  It is also considered that this policy should include more explicit reference to the coastal implications of climate change, including (but not limited to) the potential to mitigate coastal squeeze and the creation of new habitats.  The draft policy does recognise the leisure resource provided by the coast. | | | | |

The comments regarding links with wildlife corridors and green gaps are noted. The identification of wildlife corridors should be highlighted in the supporting text to this policy and will be incorporated in the next iteration of the local plan.

Comments regarding wastewater, drainage and by implication the sensitive environment of Chichester Harbour are noted. The capacity of wastewater infrastructure is being considered through the specific evidence and the Infrastructure delivery Plan. Should the results of that work indicate a phased approach to development, or a total limit on capacity, then that will be articulated in the plan in a headline delivery policy.

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| **Policy S26 Natural Environment** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 4 | 4 | 0 | 2 | 2 |
| Policy: 29 | 30 | 7 | 11 | 12 |
| Representation numbers  2201 (EA), 2731 (SWT), 1468 (Natural England), 2425 (South Downs National Park), 2719,  1017, 575, 2209, 2463 (Southbourne PC), 2731 (SWT), 2006 (RSPB), 2481 (Fishbourne  PC), 2397 (South Downs National Park), 1815, 3252 (WSCC Estates), 2549 (CHC), 2640,  1966, 1870, 2122, 2209, 194, 192, 2549 (Chichester Harbour Trust), 1966, 371, 2944  (CPRE Sussex), 2006, 2500, 1017, 2944, 1952, 1870, 2122, 1017, 1852, 192, 542, 2500,  1262 (North Mundham PC), 2209, 194, 902, 1201, 3171 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support in principle: (**Fishbourne PC, South Downs National Park, WSCC (Estates), RSPB)** | | | | |
| Impact on designations:   * Include reference to Chichester Harbour AONB and South Downs National Park and other specific designations within the policy and supporting text **(Natural England, South Downs National Park CPRE Sussex)** * Suggest re-instating the natural Environment Strategy that exists in the adopted Local Plan **(Southbourne PC)** | | | | |
| Impact on biodiversity:   * Ensure policy wording includes commitment to deliver net gains in biodiversity | | | | |
| Impact from development   * Impact on shoreline footpaths from increased public use should be considered * Ensure the principles in the AONB Management Plan are applied to new developments. **(Chidham & Hambrook PC)** * Consideration of brownfield sites as a priority | | | | |
| Future resilience:   * Consideration for the future impact on the natural environment of sea level rise and climate change. | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| Overall it is considered the representations received provide support for the aims of the policy but reflect concerns that it could be stronger. Other draft policies, including DM28  Natural Environment and DM29 Biodiversity are relevant and it is consider that the policy  and supporting text could better reflect national planning policy and guidance.  Other amendments to this policy will be considered to ensure it reflects the whole plan approach to the natural environment. | | | | |

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| **Policy S27 Flood Risk Management** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 1 | 1 | 0 | 0 | 1 |
| Policy: 22 | 22 | 5 | 5 | 12 |
| Representation numbers  86 (Marine Management Organisation), 797, 844, 1218, 1471 (Natural England), 1904, 2110  and 2111 (WSCC), 2204 (Environment Agency), 2298 (Portsmouth Water), 2471 (Southbourne PC), 2550 (Chichester Harbour Trust), 2533 (Sidlesham PC), 2550 (Chichester Harbour Trust), 2561, 2759, 3172 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Coastal erosion and protection   * Policy pre-text should include further reference to erosion with development being restricted in areas at risk of erosion as well as flooding **(WSCC)** * Strategic policy should also refer to coastal protection policy and guidance   **(Chichester Harbour Trust)** | | | | |
| Shoreline management plans:   * Policy pre-text should include reference to development taking account of SMPs   **(WSCC)**   * especially the CHC guidance on shoreline defences in Chi Harbour AONB   **(Chichester Harbour Trust)** | | | | |
| South Marine Plan:   * Plan area lies within SMP Area – for LP to be sound, needs to be clear inclusion of marine planning to comply with NPPF para 166 and Marine and Coastal Access Act 58(1) (3), also referred to in PAS soundness self-assessment checklist. Suggest reference made specifically to legal duty to co-operate with the Marine Management Organisation as well as reference to the South Marine Plan policies and fact that any works undertaken in development of flood risk management may require a marine licence **(Marine Management Organisation)** | | | | |
| Sequential approach:   * should be clearly stated that a sequential approach must take into consideration all forms of flooding **(WSCC)** * Development will only be approved when the sequential and exception tests referred to at 1b in the policy are satisfied in accordance with NPPF paras 157-8 **(Environment Agency)** | | | | |
| SuDs   * Should be designed into the landscape of all new development, included as part of a District wide approach to improve water quality and provide flood mitigation **(WSCC)** * State need for caution when using infiltration systems (especially deep bore systems) particularly when development site is in or close to a source protection zone * Responsibility of water generated by developers should not be limited to development site - incorporate into planning agreements with drainage infrastructure costs for taking water to sea or main river recognised at site evaluation stage **(Sidlesham PC)** * Pre-text should refer to WSCC Policy document for the Management of Surface Water before seeking further advice from the LLFA if necessary (para 5.58) - provide link also **(WSCC)** * Suggest using risk index method in CIRIA SuDS Manual to identify risk of pollutants and SuDS measures to mitigate risk – change paragraph 2 and add at end of last sentence “and the SuDS should be designed to minimise water quality impacts **(Natural England)** | | | | |

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| Groundwater protection:   * Need for caution when using infiltration systems when development site is in or close to a source protection zone **(Portsmouth Water)** * Insert in policy presumption against development where foundations/piling for development is likely to intercept natural underground drainage routes to sea |
| Management arrangements and funding for ongoing maintenance:   * Policy should require proposals for the lifetime of the development with planning conditions/ obligations used to secure arrangements **(WSCC)** |
| Climate change and impact of sea level rises:   * Insert reference in pre-text and policy to the Council prioritising the Plan area becoming carbon neutral by 2030 * Concern regarding lifespan of new infrastructure built in flood zones especially expense of trunk road improvements and large housing schemes given high probability of flooding due to sea level rises. Suggest new development proposals on or below 5 metre elevation contour line be assessed in terms of likelihood and effects of sea level rises * Concern predicted sea level rises would exacerbate flood impact of a 1 in 100 year event (as referred to at point 4 of policy) if coinciding with storm surges/ high winds |
| Brownfield run off rates matching those on greenfield sites:   * Impossible to achieve in many cases – where a development cannot deliver greenfield run off rates, suggest proposed development on brownfield sites should reduce run off rates, as far as practicable, below the existing run off rates for that site |
| Flood conditions:   * Storm discharge and capacity of WWTW to cope with excess run off in flood conditions should be referred to in policy pre-text **(Chichester Harbour Trust)** |
| Manhood Peninsula:   * Specific reference should be made to flood risk implications for Peninsula, its future constraints on development and effects on the economy and resilience of communities **(Sidlesham PC)** * Soakaway drainage ineffective in The Peninsula, integrated networks utilising existing ditch systems and augmenting these with attenuation areas with clear outlets to sea developed and maintained should be specifically suggested for the Peninsula **(Sidlesham PC)** * Seek inclusion of regional policy framework for flood risk and shoreline management (the Solent Shoreline Management Plan) and the aspiration to create new guidance for East Head to Emsworth |
| Blue/Green Infrastructure:   * Encourage use of green/blue infrastructure to mitigate flood risk ie; reed banks, areas designated for wildlife can form natural flood defences **(Southbourne PC)** |
| Need for strategic policy:   * Duplications/inconsistencies between strategic and DM policy **(Environment Agency)** * Point 3 of policy should be in DM policy instead **(Environment Agency)** * Point 4 of policy should be removed – suggests development with certain level of flood risk would be approved **(Environment Agency)** |
| Reducing flood risk for existing communities   * Require development to achieve a reduction in flood risk for existing communities on and off the development site **(Environment Agency)** |
| SFRA:   * Assessment limited to effects of climate change on rainfall and fluvial discharge.   Assessment of implications of sea level rise on coastal communities and developments along coastal inlets should be made |

Initial Council response to issues raised and way forward for the Local Plan Review

A number of points have been raised with regards to the context and purpose of this policy. It is considered that the supporting text and introduction needs to be reworked to give greater clarity and due recognition of a number of related elements, to include erosion and shoreline management plans; the south marine plan, and give greater prominence to the role of the sequential approach.

Further description of the role of West Sussex County Council as Lead Local Flood Authority would improve the legibility and understanding of this issue.

Further consideration will need to be given to the aims and interactions between this policy and draft policy DM18: Flood Risk and Water Management to ensure the roles and purposes of each are clear.

Some of the detailed points raised regarding issues of the operation of SuDS on the Manhood Peninsula require further consideration, and if appropriate should be reflected in

policy DM18 or supporting text.

An update to the Strategic Flood Risk Assessment and Stage 2 report is being commissioned to provide additional evidence to inform the next iteration of the plan.

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| **Policy S28 Pollution** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 2 | 2 | 0 | 2 | 0 |
| Policy: 29 | 30 | 5 | 14 | 11 |
| Representation numbers  234, 373, 467, 515, 574, 630, 710, 737, 773, 798, 857, 873, 1068, 1089, 1328, 1376, 1694,  1817, 1865, 1873, 1957, 2004, 2388, 2472 (Southbourne Parish Council), 2483 (Fishbourne  Parish Council), 2551, 2573 (Earnley Parish Council), 2642, 3078 (Chichester Harbour  Conservancy), 3173, 3254 (WSCC (Estates)), 3455. | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support for Policy **(WSCC Estates)** | | | | |
| Types of pollution   * Weak policy - need to recognise different forms of pollution and include more detail on how to address these. Include reference to Policies DM 23, 24 and 25. **(Southbourne Parish Council)** * Identify mitigation and acceptable level for each pollutant. * Policy should recognise 3 designated Dark Skies Discovery Zones within the District (in the AONB) and introduce measures to protect these. | | | | |
| Stockbridge   * How is congestion going to be improved, particularly in summer? * Ignores pollution already outside appropriate guidelines; Stockbridge AQMA has been above the maximum allowed NO2 measure for over 6 years. Serious health implications for residents. | | | | |
| Air pollution   * Not detailed enough. More monitoring and more measures included in this policy to ensure actions are taken. * Encourage measures to improve air quality and residents’ health; be more attractive to visitors and tourists. * Pollution assessment of any changes to the A27 with particular regard to pollution by particulate matter must be taken into consideration. * CDC needs to do more to limit pollution caused by vehicles. Suggestions include; Clean air zones, Cleaner/electric buses, Car free days, Work place parking levies, Anti-idling zones, Increased pedestrianised areas in villages and towns, Safe cycle routes/better network, More electric car charging points, Use of bus lanes, Car sharing schemes for commuters, Use of the car club, Park and Ride schemes | | | | |
| Traffic as cause of air pollution   * Fails to acknowledge traffic is major cause of pollution and new transport routes likely to add to problem. Impact on health. * B2145 already has very high traffic levels; proposed development will lead to significant increase in traffic and pollution. * Increase in air/noise/pollution associated with building of link road. * Already have 3 AQMA zones, more robust measures needed to counter private cars running on diesel and petrol. * EU Regulations already breached; air quality will worsen as result of traffic from developments feeding onto the A27. Section does not cover noise or light pollution. **(Fishbourne Parish Council)** | | | | |
| Impact of new development | | | | |

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| * Air and light pollution from developments need mitigation. Already high pollution levels to get worse with new development. * Protection from pollution needed; housing, roads, industry should follow that. No mention of climate change and possible detrimental effects. * Policy committing Council to "...require that the impacts are minimised and/or mitigated to an acceptable level" not good enough - be more specific. |
| Transport Study   * No significant deterioration of air quality recognised in transport study in relation to new commercial development. **(Earnley Parish Council)** |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| This draft strategic policy sets the general aims. However, the comments raised here highlight that insufficient clarity is given to subsequent policies in the plan DM23 Lighting, DM24: Air Quality; DM25: Noise, and DM26: Contaminated Land. The policy and supporting  text needs to be expanded to justify its inclusion in the plan. |

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| **Policy S29 Green Infrastructure** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 4 | 4 | 1 | 1 | 2 |
| Policy: 13 | 13 | 8 | 0 | 5 |
| Representation numbers  868, 2948, 2732 (Sussex Wildlife Trust), 2205 (Environment Agency), 3174, 2748 (Gleeson  Strategic Land), 244 (Sustrans), 1872, 2112 (West Sussex County Council), 740, 2389,  1819, 3255 (WSCC Estates), 2552 (Chichester Harbour Trust), 2643 (Barton Willmore), 2464 (Southbourne Parish Council), 3079 (Chichester Harbour Conservancy) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support in principle **(West Sussex County Council, Environment Agency, Barton**  **Willmore, WSCC Estates)** | | | | |
| Local Green Spaces:   * Add reference to Local Green Spaces | | | | |
| Blue infrastructure:   * Needs defining * Inconsistently represented through plan **(Sussex Wildlife Trust)** | | | | |
| New GI proposals:   * Concerned why new GI only proposed at selected strategic sites **(Sussex Wildlife Trust)** * Should be provided where there is accessibility for pedestrians, cyclists and horse riders **(Sustrans)** * Policies map shows no new GI which is an opportunity missed * Recommend measures are put in place to secure long term management of GI at strategic sites **(West Sussex County Council)** | | | | |
| Policy wording:   * Include reference to climate change * Include reference to greenways * Include reference to recreational disturbance **(Chichester Harbour Conservancy)** * Expand in relation to creation of GI links between AONB and South Downs National Park **(Chichester Harbour Trust)** * Agree with inclusion of private gardens and allotments as functional parts of GI   **(Gleeson Strategic Land)** | | | | |
| Renewable energy:   * New houses should be forced to instigate green policies such as renewable energy as standard | | | | |
| Wildlife:   * Need to recognise conflict of interest between GI for human use and that intended to protect habitats which may require restrictions on human use **(Southbourne Parish Council)** * Plan should insist on provision of suitable sized spaces on land suitable for wildlife | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| There is a need for this policy and supporting text to be developed to clearly articulate the Green Infrastructure strategy for this plan. The supporting text for draft policy DM32: Green Infrastructure contains a better articulation of the main issues.  Draft policy DM32: Green Infrastructure makes it clear that all development will be expected to contribute towards the provision of additional green infrastructure, and the protection and  enhancement of existing green infrastructure. | | | | |

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| **Policy S30 Strategic Wildlife Corridors** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 15 | 15 | 6 | 5 | 4 |
| Policy: 64 | 72 | 28 | 22 | 22 |
| Representation numbers  2435 (South Downs National Park Authority), 347, 2113, 2206 (Environment Agency), 2465  (Southbourne Parish Council), 2950, 579, 2041 (Sussex Ornithological Society), 799, 97,  566, 2475 (Fishbourne Neighbourhood Plan Group), 3080 (Chichester Harbour Conservancy), 2434 (South Downs National Park Authority), 750, 2115 (West Sussex County Council), 3507 (Chichester Harbour Conservancy), 2945 (CPRE Sussex), 1788 (Harbour Villages Lib Dem Campaign Team), 1361, 36, 992, 3175, 1422, 2484 (Fishbourne  Parish Council), 2581 (Lavant Parish Council), 3169, 524, 1571, 2526, 2261, 2498 (Chidham and Hambrook Parish Council), 3128, 2569 (Chichester Wildfowlers’ Association), 2553 (Chichester Harbour Trust), 1392, 2390, 1820, 3284 (Westbourne Parish Council), 2733  (Sussex Wildlife Trust), 572, 2565 (Friends of Pagham Harbour), 105, 1090, 1835, 1333  (Manhood Wildlife and Heritage Group), 442, 640, 1069, 1960, 534, 3224 (Henry Adams obo The Feltham Family), 3229 (Henry Adams obo The Smith Family), 3261 (Henry Adams obo WSCC Estates), 1199, 1992, 1263 (North Mundham Parish Council), 865, 188 (Friends of  Brandy Hole Copse), 2749 (Gleeson Strategic Land), 1497 (Natural England), 201, 2531  (Sidlesham Parish Council), 1823, 1822, 464, 1566, 1576, 1868, 2236, 782, 2114, 3502,  2576 (Earnley Parish Council), 1700, 1579, 204, 236, 3134, 1323, 449, 445, 3527 (West  Wittering Parish Council), 463, 53, 2189 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support in principle  **(Harbour Villages Lib Dem Campaign Team, Fishbourne Parish Council, Lavant Parish Council, Sussex Ornithological Society, CPRE Sussex, Chidham and Hambrook Parish Council, Chichester Wildfowlers’ Association, Chichester Harbour Trust, Westbourne Parish Council, Sussex Wildlife Trust, Environment Agency, South Downs National Park Authority, Friends of Pagham Harbour, Southbourne Parish Council, Manhood Wildlife and Heritage Group, West Sussex County Council, Earnley Parish Council, Chichester Harbour Conservancy, )** | | | | |
| Object  **(Henry Adams obo The Feltham Family, The Smith Family and WSCC Estates)** | | | | |
| Comments on policy wording, supporting text and background paper  **(Environment Agency, Southbourne Parish Council, West Sussex County Council)** | | | | |
| Suggested amendments to corridors  **(Friends of Brandy Hole Copse, Gleeson Strategic Land, Natural England, Sidlesham Parish Council, CPRE Sussex, Earnley Parish Council, Chidham and Hambrook Parish Council, Chichester Harbour Conservancy, Friends of Pagham Harbour, Southbourne Parish Council, Manhood Wildlife and Heritage Group, West Sussex County Council, Sussex Ornithological Society, Sussex Wildlife Trust)** | | | | |
| Corridors could be improved:   * Narrow in places – question effectiveness **(Sussex Ornithological Society, South Downs National Park Authority)** * No corresponding policies in neighbouring authorities plans **(South Downs National Park Authority)** * Corridors should link all SPAs including Pagham Harbour and Medmerry * Should be explored with conservation bodies to identify any other areas to be included **(West Sussex County Council)** | | | | |
| Fishbourne:   * Suggest corridor be moved to west of Fishbourne **(Harbour Villages Lib Dem Campaign Team, Fishbourne Parish Council, Fishbourne Neighbourhood Plan** | | | | |

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| **Group)**   * Current location of corridor limits ability of Fishbourne Parish Council to undertake appropriate assessment of sites **(Henry Adams obo The Feltham Family, The Smith Family and WSCC Estates)** |
| Development within corridors:   * Need to control what constitutes ‘minor development’ * Do not see how any development should be permitted in the corridors (except for satisfying criterion 3) **(Sussex Ornithological Society)** * Sensitively designed development could be brought forward within corridors   **(Gleeson Strategic Land)** |
| Conflict with northern bypass:   * Ensure policy does not preclude possibility of a northern bypass **(West Wittering Parish Council, Earnley Parish Council, West Sussex County Council)** |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| Whilst there is a level of support for this draft policy, a number of objections and suggestions for amending the policy have been received. Further evidence of species and areas of  habitat is being gathered which will inform the development of this policy going forward.  Comments received on the background evidence will be considered further to determine if any refinements to the methodology are appropriate.  The sequential approach set out in this policy seeks to provide a balance between the aims of the policy and not preventing other critical proposals coming forward. This includes for example, any future consideration of proposals for a northern bypass that may be forthcoming.  The implications of the proposed wildlife corridor to the east of Fishbourne are noted. At present, the evidence strongly indicates that the proposed corridor to the east of Fishbourne provides the best opportunity for improving wildlife links, as this location has the highest concentration of areas of habitat. The location of the proposed corridors will continue to be considered as additional evidence is received. |

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| **Policy S31 Wastewater Management and Water Quality** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 4 | 4 | 0 | 2 | 4 |
| Policy: 25 | 27 | 5 | 9 | 22 |
| Representation numbers  87 (Marine Management Organisation), 320, 330, 374, 907, 1002 ( Birdham PC), 1264 (N  Mundham PC), 1354, 1459, 1507 (Natural England), 1789 ( Harbour Villages Lib Dem Campaign Team ), 1965, 2117 (WSCC as LLFA), 2119 (WSCC as LLFA) , 2207  (Environment Agency), 2299 (Portsmouth Water) 2325 (Southern Water), 2391, 2451 (Southbourne PC), 2452 (Southbourne PC) 2485 (Fishbourne PC), 2512 (Bosham PC), 2534 (Sidlesham Parish Council), 2554 (Chichester Harbour Trust) , 2566, 2644, 2734  (Sussex Wildlife Trust), 2951, 3082 ( Chichester Harbour Conservancy) , 3256 (WSCC  Estates) ,3497 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support higher water efficiency measures to reduce flow, noting water company aspirations to reduce to 100lppd **(Portsmouth Water, Southern Water)** | | | | |
| Concern about the capacity of waste water treatment works **(Chichester Harbour Trust,**  **Sidlesham Parish Council, WSCC, Southbourne PC)**   * Need to set out a clear strategy for the pattern, scale and design of development in relation to arrangements for dealing with waste water **(West Sussex County Council as Lead Local Flood Authority)** * Detailed concerns about the Water Quality Study published alongside the Preferred Approach, particularly in relation to capacity at Thornham **(Southbourne Parish Council)** * Need to ensure required upgrades are in place ahead of development **(Bosham PC, Fishbourne PC, Southern Water)** * Southern Water should develop a regional waste water treatment solution and address groundwater infiltration (some detailed suggestions offered) * Concern about storm discharges and impact on water quality **(Chichester Harbour Trust)** * Concern about horticultural water use **(N Mundham PC)** | | | | |
| Need a nutrient neutral policy and management plan for Chichester Harbour **(Natural**  **England, Chichester Harbour Conservancy, Chichester Harbour Trust)** | | | | |
| Various wording changes suggested including   * Detailed wording suggestions provided to clarify scope and ensure no adverse effect on Chichester Harbour (Natural England) * Policy should be broadened to cover wider water quality and water resources within the plan area – examples of good policies elsewhere given **(Environment Agency)** * Need to address specific issues at Apuldram WWTW **(Environment Agency)** * Additional wording relating to capacity **(Southbourne PC)** * Need to refer to the South Marine Plan **(Marine Management Organisation)** * Policy needs to apply to industrial scale horticultural developments in Chichester and Pagham Harbour catchments | | | | |
| Other   * Surface Water and Foul Drainage SPD should be strengthened **(Southbourne PC)** * Need to set water consumption standards for horticulture **(Sussex Wildlife Trust)** | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| Comments and concerns relating to the Water Quality Assessment evidence study are | | | | |

noted. The Council is undertaking a review of the evidence, focusing on the key elements necessary to inform the approach in the Local Plan review, and the findings will be published in support of the emerging Plan. The plan will be informed by that assessment, and any implications in the timing and need for additional waste water infrastructure will be reflected in the final development strategy.

The detailed policy working suggestions are noted and the policy will be reviewed to incorporate appropriate amendments.

The concerns regarding the issue of nitrates in Chichester Harbour are noted. The Council is working with Natural England and others in developing an appropriate strategy to address the issue with will be reflected in the next iteration of the local plan.

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| **Policy S32 Design Strategies for Strategic and Major Development Sites** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 1 | 1 | 0 | 1 | 0 |
| Policy: 27 | 28 | 11 | 2 | 15 |
| Representation numbers  3543, 3257 (WSCC Estates), 3182, 3085 (Chichester Harbour Conservancy), 2952, 2946 (CPRE Sussex), 2893 (Bloor Homes Southern), 2736 (Sussex Wildlife Trust), 2645 (Barton Willmore), 2555 (Chichester Harbour Trust), 2412 (SDNPA), 2392, 2354 (West Sussex Local Access Forum), 2258 (Historic England), 2208 (Environment Agency), 2020 (Sport England), 1725 (Heaver Homes Ltd), 1520 (Natural England), 1305 (Bosham Football Club), 1265  (North Mundham PC), 1134 (British Horse Society), 800, 331, 651, 504, 548, 558 (Sustrans),  590, 592 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support policy: **(WSCC Estates, Chichester Harbour Conservancy, Bloor Homes Southern, Barton Willmore, Chichester Harbour Trust, West Sussex Local Access**  **Forum, Historic England, Environment Agency, British Horse Society, Sustrans** | | | | |
| Need high standard of sustainable development (e.g. at Southern Gateway) | | | | |
| Walking, cycling and bridleways:   * Encourage maximising existing and new movement connections, * Encourage walking and cycling * New routes linked to wider PRoW, bridleways and access networks **(West Sussex Local Access Forum, British Horse Society)** | | | | |
| Amendments to text:   * Reference to self-build and custom build should be included * Masterplans should include phasing strategy to demonstrate delivery * Need reference to biodiversity **(Sussex Wildlife Trust)** * Modern architectural sustainable design | | | | |
| Open space and playing fields:   * Loss of playing field or prejudice of playing field (eg housing next to playing field) would be resisted **(Sport England)** | | | | |
| Masterplans:   * Encourage early, proactive consultation with community **(CPRE Sussex)** * Encourage masterplans before applications **(SDNPA)** * Note they are not to be adopted therefore can reviewed; need to take pragmatic approach to responding to market **(Heaver Homes Ltd)** * Should be informed by Landscape and Visual Impact Assessment **(Natural England)** * Need to address detail of needs and data * Archaeological assessments required for all strategic sites | | | | |
| Identification of strategic sites should look back at ‘unconstrained list’ of sites considered in previous plans. | | | | |
| Settlements will lose their identity and turn into sizeable towns. **(North Mundham PC)** | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| It is considered that the criteria in the draft policy address most of the main points including many of the suggestions made in the representations. However, the expectations for community engagement and the role of Landscape Visual Impact Assessments could usefully be included in the policy and supporting text. | | | | |

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| **Policy AL1 Land West of Chichester** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 5 | 6 | 0 | 4 | 2 |
| Policy: 30 | 34 | 3 | 11 | 20 |
| Representation numbers  32, 120, 122, 147, 246 (Sustrans), 269, 332, 472, 593, 701, 803, 917, 918, 1135, 1362,  1518, 1521 (Natural England), 1704, 1707, 1710, 1711, 1830, 2029, 2120 (West Sussex  County Council), 2136 (West Sussex County Council), 2190, 2259 (Historic England), 2300  (Portsmouth Water Ltd), 2329 (Southern Water), 2355, 2394, 2414 (South Downs National  Park Authority), 2737, 2922, 2953, 2972, 3086, 3129, 3176, 3177. | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Scheduled Monument   * Support exclusion of scheduled monument. **(Historic England)** | | | | |
| Clarification of site areas   * Paragraph 6.10 – employment space = 6ha / 60,000 sq.m. Paragraph 4.112 – employment space = 6ha but in parentheses 36,000 sq.m. = 3.6 ha. | | | | |
| Settlement boundary   * Text should state that AONB is just 200m from settlement boundary. * Extend settlement boundary north to accommodate unmet housing need as affordable exemption site within 5 miles of the need as required in statute. | | | | |
| Land north of B2178   * Object to land north of B2178 being included in allocation. Potential car parking, visitor centre etc would damage rural setting and view of cathedral spire. * Text should reflect desire to limit impact of development on the lanes to north of B2178. Previous intention to partially close Brandy Hole Lane not mentioned. | | | | |
| Site Access   * Why was a road bridge not considered at Fishbourne Road with access to the SDL? * No proposals for access to the A27 with this development. * Access to the sports facilities from Clay Lane - not suitable for extra traffic. Access point changed from original plans. * Access from the south should be from Cathedral Way, not Westgate - no capacity. * No mention of detailed traffic infrastructure for southern end of development with 2nd phase. No spare capacity; all traffic will have to use St Pauls Rd/ Sherborne road. * Southern access route will cause disruption for greener modes of travel. | | | | |
| Sustainable transport links   * Paragraph 6.8 includes "offers good accessibility" whereas paragraph 12.29 of the adopted Local Plan refers to good "potential" accessibility, which is accurate. * Cycle and bus lanes included from outset to ensure sustainable travel choices. | | | | |
| Walking & Cycle routes   * Provide improved cycle routes between Fishbourne and North of City. * Safe crossing needed at junction of Sherborne Rd., St. Paul's Rd., and Norwich Rd. * Retain existing Centurion Way as a strategic cycle and walking route. **(Sustrans)** * Developer's provision inadequate and does not comply with current local plan. * Walking and cycling safely as important as car access. * Paragraph 10 - opportunity here to provide a multi-user PRoW for all NMUs. | | | | |
| Flooding | | | | |

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| * Para. 6.12 - dispute no major issue with flood risk; chalk stream runs north-south to east of site providing specialist river habitat. * Add to policy - Increase capacity to attenuate surface water on site, thereby reducing the discharge flows off the site below current rates and reducing the risk of flooding to residential areas downstream. **(WSCC)** |
| Green Infrastructure   * Point 4 - development provides opportunity to improve links to the wider countryside. * Refer to green infrastructure contribution of extension of Centurion Way to Midhurst. |
| WWTW   * Update regarding WWTW - Connection and pipeline being delivered by Southern Water. Outline permission allows for connection to Tangmere facility, also for onsite foul drainage facility. * Existing provision WWTW supported. Approach adjusted following OFWAT changes from April 2018. Need to work with site promoters to review whether delivery of new infrastructure aligns with occupation of the development. **(Southern Water)** |
| Water supply   * Assume that site has sewerage pumped to Tangmere and water supplied by us.   Portsmouth Water provided provisional designs for this system. On site mains are likely to be provided by a third party. **(Portsmouth Water)** |
| Education   * Potentially no school built until 2029. School must go in first. * Phase 1 to provide primary school - 2FE school and 1FE teaching accommodation.   Phase 2 to include expansion - 1FE of teaching accommodation. **(West Sussex County Council)** |
| Aldingbourne Rife   * Why is Aldingbourne Rife being allowed to deteriorate? |
| Biodiversity & SPA   * Para 6.14 – add 'mitigation' in relation to protecting nearby SPA. * Welcome protection of named sites; suggest possible enhancements (net gain). * Welcome recognition of the need for mitigation in relation to SPAs. * Support biodiversity and landscape clauses, however recommend wording change to clause 14. **(Natural England)** * Concern no recognition of net gains to biodiversity. |
| Centurion Way   * No reference to Centurion way for recreation disturbance. * Centurion Way protects and enhances biodiversity - Provides wildlife corridor between SDNP and Chichester Harbour. * Include use by equestrians when upgrading to a multi-user path. * Emphasise point 10, state development must not adversely affect, and preferably enhance usability of, Centurion Way connecting Chichester with the SDNP. **(SDNPA)** |
| Other   * Update to minimum 1600 homes to allow flexibility. Changes in density may allow up to 1750 dwellings. |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| The principle of development of the site is established in Policy 15 of the adopted Local Plan. The site is also the subject of a two-phase Framework Plan approved by Planning Committee in April 2016.  The specific and cumulative infrastructure impacts, including any implications for the timing |

of delivery of this development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.

The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified.

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| **Policy AL2 Land at Shopwyke** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 3 | 3 | 0 | 1 | 2 |
| Policy: 16 | 16 | 1 | 4 | 11 |
| Representation numbers  247 (Sustrans), 270, 333, 353, 805, 971, 1136, 1645, 2137 (West Sussex County Council),  2260 (Historic England), 2302 (Portsmouth Water Ltd), 2330 (Southern Water), 2356, 2396,  2739, 2908, 2954, 3049, 3178. | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Cycle track provision   * Para 6.19, add “Cycle provision will be expected to be fully compliant with all relevant aspects of current Local Transport Notes and, where doubt exists about compliance, developers may be asked to submit an independent cycle audit" * Para 6.20, change to “and a new bridge, built to shared foot and cycle bridge standards, across the A27 via Coach Road to Westhampnett village" * Proposals for cycle tracks/bridges at Portfield and Shopwyke at expense of existing e route from Tangmere to Chichester. If bridge provided at Portfield roundabout, clarification required of location of cycle route on western side. * Sustainable travel links to support WSCC Walking and Cycling Strategy 2016-2026 | | | | |
| Bridge provision   * Concern pedestrians/cyclists will be forced to wait until fixed number of houses built.   Change penultimate paragraph of policy to “Development of the site will be dependent on provision of bridges providing access out the site…….”   * Concern equestrian access not provided for – suggest reference to bridge at point 9 includes all NMUs ie; “foot/cycle/ equestrian access across bridge” **(WSCC)** * Bridge off-putting to a section of walkers, cyclists, and section of the disabled. * Support provision for foot/cycle bridge **(Sustrans)** | | | | |
| Allocation   * Development could be enhanced with approved Masterplan and Committee adopted Design Code/Regulatory Plan for site and incorporate further 100 dwellings on site. * Suggest 0.48ha employment land could be suitable for other forms of employment to complement neighbouring 3.52ha of employment. * Further allocation will alter character of Oving | | | | |
| Biodiversity and Green Infrastructure   * Policy too soft in relation to enhancing biodiversity and green infrastructure. * Amend Point 4 to read: “Open space and green infrastructure, with the enhancement of the existing lakes to deliver biodiversity net gains and safer access”. * Point 5 – insert “sustainable” before the word “access”. * Amend Point 6 - “Provide integrated green infrastructure…..”; * Point 12 – word “mitigate” change to “avoid”. * Penultimate paragraph, add “before any dwellings are occupied” at end of sentence * Lake provides opportunity for linking with habitats east of Chichester. In addition to the proposed wildlife corridor and focussed on the River Lavant Flood Alleviation Channel. | | | | |
| Transport access/infrastructure | | | | |

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| * Concern re; effect of new development on high traffic levels in area * Concern reference to transport infrastructure limited to acoustic screening of noise from A27 * Transport access at Bognor roundabout and Oving traffic lights * Make provision for regular bus services linking the site with Chichester City centre. |
| Wastewater Treatment/Supply   * Need to work with site promoters to review whether delivery of new infrastructure aligns with occupation of development. Amend final para of policy to read: “Occupation of development is phased to align with the delivery of infrastructure for adequate wastewater conveyance and treatment to meet strict environmental standards” **(Southern Water)** * Already under construction and has a conventional water supply system with all elements provided by us. **(Portsmouth Water Ltd)** |
| Historic buildings   * Amend Point 7 to reflect NPPF para 194 to include Grade II listed Shopwyke Grange: "Protect existing views of Chichester Cathedral spire and conserve and enhance the historic significance of the listed barn at Greenway Farm, the listed Shopwyke Grange and the cluster of buildings associated with the grade II\* listed Shopwhyke Hall which should be analysed at an early stage of the masterplan" **(Historic England)** |
| Community Facilities/Safety   * Community facilities/amenities should be planned to complement provision in allocation for East of Chichester (Oving Parish), to avoid duplication and/or competition * Concern proposed footbridge and crossing do not provide sufficiently safe routes to secondary and primary schools |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| The principle of development of the greater part of the site is established in Policy 16 of the adopted Local Plan and subsequent planning applications.  The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations  Assessment.  The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified. |

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| **Policy AL3: Land East of Chichester** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 4 | 4 | 0 | 2 | 2 |
| Policy: 21 | 23 | 5 | 3 | 15 |
| Representation numbers  3223 (Genesis Town Planning obo Elberry Properties Ltd), 2955, 2474 (Sussex Wildlife Trust), 2722 (Quod obo Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd), 2683 (Savills UK obo Suez – Sita UK), 2584 (Oving Parish Council), 2357 (West Sussex Local Access Forum), 2332 (Southern Water), 2303 (Portsmouth Water), 2262 (Historic England), 2218 (Environment Agency), 2138 (WSCC), 2121 (WSCC), 2083 (WSCC), 2036 (Sussex Ornithological Society), 1654, 1523 (Natural England), 1139 (British Horse Society), 929, 809, 622, 611, 334 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Land Promotion:   * Include site at Sherwood Nursery and Lansdowne Nursery within wider strategic allocation. 3223 (**Genesis Town Planning obo Elberry Properties Ltd**)   • | | | | |
| Object:   * Lack of certainty on housing numbers. Range from 600-1000. Unclear how such a difference in numbers can be planned for. Need true assessment of site capacity with consideration for natural capital assets (AONB, SPA). Need more ambitious requirement for green infrastructure. 2474 (**Sussex Wildlife Trust**) * Object if housing development is not supported by associated infrastructure and causes biodiversity/habitat fragmentation. 2584 (**Oving Parish Council**) * Remove strip of land along eastern boundary to provide enhanced environmental benefits. | | | | |
| Support:   * Site is brownfield, well located and can deliver housing requirement and community facilities sustainably. 2722 (**Quod obo Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd**), 2683 (**Savills UK obo Suez – Sita UK**) * Support opportunities for provision of green infrastructure links to wider countryside to comply with objectives of West Sussex Rights of Way Management Plan 2018- 2028. 2357 (**West Sussex Local Access Forum**) 1139 (**British Horse Society**) * Support wording relating to need to demonstrate capacity within sewer network and Waste Water Treatment Works. Need to work with developers to understand development programme. 2332 (**Southern Water**) * Integration of community facilities to complement those provided to land at Shopwyke. * Maximise opportunities on this site to reduce proposed numbers elsewhere on more sensitive locations. | | | | |
| Wildlife:   * 50m buffer zone should be established around shores of Drayton Pit in which no development can take place. 2036 (**Sussex Ornithological Society**) | | | | |
| Policy wording:   * Add additional criteria to ensure occupation of development phased to align with the delivery of sewerage infrastructure in consultation with service provider. 2332 (**Southern Water**) * Include reference to listed Shopwyke Grange. 2262 (**Historic England**) * Suggest amendment to wording to include ‘and capacity of the site to provide flood risk attenuation for the increased housing density’. 2138 (**WSCC**) * Additional wording to ensure site biodiversity protected and enhanced and that a | | | | |

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| buffer should be left around the pit in the south east of the site to minimise disturbance. Produce SUDS. 1523 (**Natural England**)   * Make clear in policy the need for integration with already permitted development. * Replace ‘promoting’ with ‘maximising’. Sub para 4. * Make specific reference to education as infrastructure. |
| Comment:   * No large diameter drains crossing site. Landfill may damage plastic pipes. On site mains maybe more expensive to protect to ensure water quality maintained. 2303 (**Portsmouth Water**) * Masterplan needs to consider area of site in Flood Zone 2 and lake. All development should be within flood zone 1. 2218 (**Environment Agency**) * Reference should be made to giving consideration to the Fuel Depot site allocation in the Waste Local Plan (Policy W10) and its safeguarding. * Consider the impact of sewage discharges on Aldingbourne Rife. |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment, and the  Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations  Assessment.  The technical work to date has not concluded there is an absolute constraint to the delivery of up to 1,000 homes on the sites, but further work is necessary before the capacity of the site can be confirmed.  The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified. |

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| **Policy AL4 Land at Westhampnett/North East of Chichester** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 5 | 5 | 1 | 2 | 2 |
| Policy: 23 | 28 | 6 | 8 | 14 |
| Representation numbers  314, 1279, 1140, 226, 248, 890, 2358, 2750 (SWT), 2333 (Southern Water), 2123 (WSCC),  335, 2139 (WSCC), 2084 (WSCC), 2415, 1718, 1714, 2264 (Historic England), 1342, 2304  (Portsmouth Water), 3521, 2415 (SDNP), 848, 1598, 1342, 2660, 1045, 1722, 1721, 2191,  3359 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support   * Welcome provision and reference to greenlinks to the SDNP and Chichester City (**WSCC**) (**SDNP**) | | | | |
| Environmental Considerations   * Consider riverine habitats (**SWT**) * Key views are from the higher ground to the north within the SDNP | | | | |
| Infrastructure   * Phase development to align with the delivery of key infrastructure (education, wastewater, services and roads) (**Southern Water, WSCC**) * Need to make reference to minerals safeguarding as within the sharp sand and gravel safeguarding area (**WSCC**) * Buffer zone should be considered for employment | | | | |
| Alternative uses   * Buffer zone should be considered for employment * Land proposed for removal should not be removed as strategic employment site and should be included within plan as development will not be affected by noise buffer or cause additional environmental pollution * Extend settlement to the north as exemption site for affordable housing * Consider additional land within existing SDL boundary to east of River Lavant for residential development. | | | | |
| General comments   * Will Lavant Valley greenspace still be secured | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| This principle of development in this broad area was established in Policy 17 of the adopted Local Plan. An outline application for phase one was permitted in June 2016, to deliver 300  dwellings, open space, a community facility and children's playspace. The initial phase of  built development focuses on the southern site, accessed off Stane Street and Madgwick Lane.  The constraints affecting the site are set out in paragraph 6.35 of the Preferred Approach Plan. However, the comments regarding the potential for part of the site to accommodate additional development (including employment development) are noted, and the potential for this area will be kept under review, particularly with regards to the need and deliverability of other potential allocations.  The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations | | | | |

Assessment.

The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified.

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| **Policy AL5 – Southern Gateway** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 1 | 1 | 0 | 0 | 1 |
| Policy: 38 | 41 | 3 | 19 | 19 |
| Representation numbers  129, 209, 249 (Sustrans), 271, 336, 473, 517, 522, 656 (Lavant Parish Council), 669, 721  (West Itchenor Parish Council), 816, 975, 1141, 1205, 1222, 1343, 1365, 1373, 1463, 1492,  1551, 1599, 1790, 1792, 1833, 1844, 1994, 2051 (Homes England), 2085 (WSCC), 2124  (WSCC), 2140 (WSCC), 2211 (Environment Agency), 2266 (Historic England), 2305  (Portsmouth Water Ltd), 2359, 2399, 2754 (Sussex Wildlife Trust), 3135, 3180, 3341, 3489. | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Transport:   * Need better plans for walking and cycling; dedicated cyclepaths to be shown.   National cycle routes NCN 2 [and 88] cross site; improve provision. **(Sustrans)**   * Consider alternative schemes (eg Freeflow, Gateway), improve interchange * £5million grant from Coast to Capital regeneration fund provides resources for mitigation of traffic congestion, noise, light, traffic pollution. | | | | |
| Transport – Road Use/Layout   * Take Systra BABA27 report into account to separate A27 through traffic from local traffic. No evidence provided that junction improvements adequate beyond 2035. * Use of narrow residential streets in city centre unwise. * No right turn from Terminus Road to Stockbridge Road is unhelpful. * Cars should not be attracted to use city centre as a n-s or e-w route. . * Detailed plans to be shown to residents for housing and construction traffic. All the proposed alterations at junctions are detrimental - pollution, noise. * Success of development depends on long term access to A27. * Traffic management and diverting all but buses along Basin Rd are dubious ideas * Detrimental to residents south of the A27 if vehicular access to City from south restricted prior to implementation of a HE scheme to relieve congestion on A27. * Flawed as it stands. Will disadvantage local residents, gridlock around Station, gentrification of canal. Scheme needs to be led by local Chichester residents. | | | | |
| Transport – Level Crossings   * Provision of bridge or underpass to allow the removal of level crossings on Stockbridge Road and Basin Road. Remove para 7 **(West Itchenor PC)** * Needs fully integrated bus/train interchange and the closing of both level crossings with maybe a tunnel for local buses and deliveries. * Delete reference to accommodating buses/coaches, restricting vehicular traffic using Stockbridge Rd level crossing and provision of appropriate car parking. * Insufficient to suggest “restrict vehicular traffic using the Stockbridge Road level crossing", lacks detail to give it any credence. **(Lavant Parish Council)** * Road layout with level crossings being maintained does nothing to improve safety, communication, environmental issues. Item 7 completely misses the requirement. | | | | |
| Transport – Public Transport:   * Extend to include railway and other buildings. Requires extension to the station with an additional platform and line for a Metro service. * Masterplan can include sustainable road layout for pedestrians, cars and buses. | | | | |

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| * Need proper public transport hub with toilets, tourist information, waiting area, RTPI screens. Current bus/stations unwelcoming, not in keeping with the rest of the city. * Replacing bus station with bus stops on road are less conducive to supporting the modal shift onto public transport. * Not clear what proposals will be to ensure no negative impact to users of bus station. * References to bus depot not clear whether that includes bus station; present bus station is close to the railway station which is important for integrated travel; |
| Green Infrastructure:   * Support opportunities for GI, links to countryside. New routes, links important on Coastal Plain; off-road multi-use path network beneficial to all NMUs. Would comply with aims of West Sussex Rights of Way Management Plan 2018-2028. * Include reference to incorporating blue/green infrastructure in and point 5 of policy.   Point 5 - also refer to S29 GI, make reference to fully exploiting opportunities for sustainable drainage. Point 8 should refer to a surface water management plan as well as a waste water management plan. **(WSCC)**   * Reference trees, links to Lavant course, trees/greenspace in vicinity of Walls, north- east and north-west of site, and near Kingsham Road/Canal - opportunity to introduce GI to enhance this location and the connectivity of other sites. * Green space should be preserved and an additional pocket park added to the area. * As only brownfield site allocated, CDC should be more progressive in delivering GI and biodiversity net gains. Fantastic opportunity to incorporate innovative design, particularly increased green infrastructure e.g. green walls. |
| Environment   * Comments made on adopted masterplan. Number of constraints to development, pleased to see specific criteria in the policy to ensure that these key constraints to the site within our remit are fully considered. **(Environment Agency)** * Object to term 'mitigation' in relation to protecting nearby SPA from adverse impacts.   If not resulting in avoidance of impacts then not effective and not legally compliant.   * Reservations with respect to deliverability due to proximity to SINC, Floodzones 2 and 3 on site and heritage assets. Insufficient information to conclude site is suitable. |
| Conservation Area/ Listed Buildings   * Site includes listed buildings/non designated heritage assets, buildings of interest, is within CA and near to listed buildings. **(Historic England)** * Criterion 3 and 9 are supported but should be strengthened. **(Historic England)** * Policy should more strongly promote opportunity to use heritage of the area to define its character and the desirability of new development. **(Historic England)** |
| Current Buildings/Design:   * Statements about buildings in area not making positive contribution are misleading   e.g. bus garage is an example of early use of thin-shell pre-stressed concrete/ might not be ""liked"" but examples of their time and should be preserved.   * Chichester Gate remains an eyesore * Listed and locally listed buildings of architectural or historic interest should be protected from demolition. |
| Minerals and Waste:   * Reference should be made to the mineral infrastructure safeguarding policy M10 as within 200m of the Chichester Railhead. **(WSCC)** |

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| * All waste water must be pumped to Tangmere. * Good water supply system. Reference to 'efficient use of water' confusing, many of strategic sites also drain to Apuldram. Sites need to be water efficient but not follow example of 'Code for Sustainable Homes'. Alternative provision possibly to reduce infiltration but not clear how funded, who would do work. **(Portsmouth Water Ltd)** |
| Education   * Sufficient space/expansion capacity to accommodate the child product from 350 dwellings. **(WSCC)** * Consideration to cumulative impact of housing in AL6 to allocate land within the area for a 1FE-2FE primary. Pro rata financial contributions towards the build costs would be sought from developers to mitigate their impact. **(WSCC)** * Expansion capacity to accommodate secondary aged pupils. Contributions would be required for expansion of secondary schools if feasible and required. **(WSCC)** * Expansion capacity to accommodate the child product from this proposed development for sixth form pupils. Contributions would be required for expansion of the provision if feasible and required. **(WSCC)** |
| Housing and Employment   * Need to include suitable housing for young people/ housing mix reflecting current population range. * Need employment sites for entrepreneurs. A link to the gigabyte project * Need multi use building for concerts, conferences, exhibitions and community activity. * Reliance on commercial and housing development in area misplaced. Success or otherwise will depend on a community led development scheme that incorporates significant public open space and high quality buildings. * Doesn't give clarity to Homes England that principle of residential development on the Police playing fields is acceptable. At pre-application and formal application stage decision makers may take the view that loss of open space on the Police playing pitches would be contrary to Council's local evidence base.**(Homes England)** |
| * Object to 6.41- Playing pitches are valuable assets, once built on cannot be put back. * The current CDC Masterplan does not meet the objectives set out in AL5 and wastes a huge opportunity to enhance the public realm in Chichester, in particular it does not currently include specific proposals for a high quality distinctive design response. |
| Other   * Idea is completely ludicrous and a waste of tax payers money! |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| A masterplan which provides detailed guidance on the expectations for development in this area was adopted by the Council in December 2017. The detailed comments received in the Preferred Approach consultation will be provided to the Southern Gateway project team for consideration any appropriate response.  The approach to transport will come forward in two complimentary studies. Chichester Vision – Transport Feasibility Study and Sustainable Transport Package Feasibility for  Chichester Study are being progressed with guidance from West Sussex County Council as Highway Authority, and the findings from that work will be reflected in this policy in the next iteration of the Plan.  The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this development, will be considered further through evidence studies,  including updates to the water quality assessment; the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.  The comments and issues raised in this consultation will be considered further in terms of |

whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified.

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| **Policy AL6 Land South West of Chichester** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 4 | 4 | 0 | 4 | 0 |
| Policy: 123 | 194 | 13 | 149 | 32 |
| Representation numbers: | | | | |
| 3545, 3536, 3526 (West Wittering PC), 3460, 3343 (Nexus Planning obo CEG), 3247 (Henry | | | | |
| Adams LLP obo WSCC Estates), 3183, 3168, 3160, 3145 (David Lock Associates obo Rolls- | | | | |
| Royce Motor Cars Ltd), 3131, 3087 (Chichester Harbour Conservancy), 2923 (CPRE | | | | |
| Sussex), 2909, 2776, 2770 (Sussex Wildlife Trust), 2635, 2574 (Earnley PC), 2570 | | | | |
| (Birdham PC), 2556 (Chichester Harbour Trust), 2478 (Fishbourne PC), 2416 (SDNPA), | | | | |
| 2377, 2376, 2375, 2374 (Birdham PC), 2360 (West Sussex Local Access Forum – WSLAF), | | | | |
| 2334 (Southern Water), 2331, 2321, 2306 (Portsmouth Water), 2293, 2288, 2268 (Historic | | | | |
| England), 2267, 2241, 2238, 2214 (Environment Agency), 2193, 2184, 2181, 2180, 2179, | | | | |
| 2178, 2177, 2174, 2173, 2172, 2170, 2169, 2168, 2166, 2165, 2163, 2161, 2154 (WSCC), | | | | |
| 2153 (WSCC), 2125 (WSCC), 2086 (WSCC), 2077, 22075, 2073, 2072, 2070, 2068, 2067, | | | | |
| 2066, 2044, 2038 (Sussex Ornithological Society), 2008 (RSPB), 1999, 1978, 1946, 1945, | | | | |
| 1943, 1942, 1938, 1907, 1900, 1899, 1898, 1897, 1891, 1883, 1880, 1869, 1866, 1860, | | | | |
| 1854, 1852, 1845, 1810, 1805, 1794 (Harbour Villages Lib Dems Campaign Team), 1793 | | | | |
| (Harbour Villages Lib Dems Campaign Team), 1787 (Harbour Villages Lib Dems Campaign | | | | |
| Team), 1773, 1745, 1742, 1737, 1659, 1621, 1526 (Natural England), 1500, 1495, 1491, | | | | |
| 1484, 1464, 1452 (WYG obo Berkeley Strategic Land Ltd), 1448, 1447 (Donnington PC), | | | | |
| 1421, 1410, 1398, 1366, 1351, 1346, 1344, 1322, 1283, 1238, 1227, 1224, 1216, 1195, | | | | |
| 1192, 1190, 1166, 1152, 1142 (British Horse Society), 1129, 1086, 1060, 1048, 1047, 1046, | | | | |
| 1037, 1026, 1008, 985, 965, 951, 946, 922, 921, 908, 892, 878, 876, 874, 854, 853, 850, | | | | |
| 818, 801, 781, 770, 769, 757, 756, 752, 743, 722 (West Itchenor Parish Council), 700, 685, | | | | |
| 636, 628, 624, 608, 556, 543, 518, 513, 478, 462, 385, 354, 338, 337, 318, 311, 308, 285, | | | | |
| 280, 279, 275, 250 (Sustrans), 146, 131, 130 (Chichester Society), 98, 96, 46, 34 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Insufficient evidence to demonstrate suitability/deliverability in light of known constraints (Flooding – SFRA2 is required, landscape (Landscape and Visual Character Assessment  required), transport, environmental impact) all need further testing. 2214 (**Environment**  **Agency**), 1526 (**Natural England**), | | | | |
| Support:  Additional housing could be accommodated on the site to ensure infrastructure is delivered (**WSCC Estates**) | | | | |
| Policy wording:   * Policy needs to refer to all constraints and protection of (including but not limited to) view of Chichester Cathedral framed by SDNP, impact on Salterns Way, Impact on Apuldram WWTW, air quality, respect SSSI and AONB, SPA, SAC, RAMSAR site, River Lavant Marsh LWS, Brent Geese and Wader Strategy * Ensure retention of separation between Apuldram, Donnington and Fishbourne 1447 (**Donnington PC**) * Support Clause 6 and 3 requiring mitigation and a Landscape and Visual Assessment (Natural England) * Strengthen wording on flood risk and ensure properly identified to limit housing to FZ1 and proper mitigation proposed. 2153 (**WSCC**), 2214 (**Environment Agency**) * Support requirement 5. 250 (**Sustrans)** * Support creation of green routes and links to comply with West Sussex rights of Way Management Plan. | | | | |
| Object on grounds of impact on environment:   * Views of Chichester Cathedral/Harbour/SDNP | | | | |

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| * Impact on Chichester Harbour AONB, SPA, SAC, SSSI, RAMSAR site, wildlife corridor, biodiversity, Brent Geese and close to sites in Solent Brent Goose and   Wader Strategy.   * Flood risk and climate change * Air quality * Noise * Light pollution/dark night skies * Soil pollution * Lavant Marsh LWS and chalk stream * Loss of green buffer between Chichester and Manhood Peninsula –a rea should be strategic gap between Apuldram and Donnington * Water quality 1526 (**Natural England**) |
| Object on grounds of impact on infrastructure:   * Link road – cause additional delays and lead to more congestion on roundabout, environmental impact, concern over need for elevation of link road * Require public transport/walking/cycling links to city centre and links to Salterns Way and A286. 2154 (**WSCC**), 1447 (**Donnington PC**) * To proposed Country Park as AONB already designated. 3087 (**CHC**) * Refer to infrastructure safeguarding policy M10 of Minerals Plan. 2086 (**WSCC**) * Loss of agricultural land and food production. * General services and infrastructure (GP surgeries) |
| Include additional land:   * Lawrence Farm (**Berkeley Strategic**) |
| Comment:   * School capacity – allocate land for a 1-2 FE primary school. Contributions needed for secondary and 6th form pupils. 2125 (**WSCC**) * Wastewater capacity. Currently limited capacity. New waste water infrastructure need to be put in place ahead of development. Odour assessment required. 2334   (**Southern Water**)   * Suggested alternative uses for the site – bus station relocation, Royal Mail depot, Park and Ride, clean energy (solar panels). * Portsmouth Water advised there is a water mains crossing the site that will need to be relocated (**Portsmouth Water**) * Wrong type of employment proposed. |
| Object on grounds of conflict with other policies within the plan |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| Significant objections received to this policy highlight a number of environmental and delivery issues with this proposal. Further evidence on the deliverability of this proposal would be required before it could be included in the next iteration of the Plan. Further transport work has been commissioned to consider further the implications if the proposed  Stockbridge Link Road is not delivered.  A review of the Housing and Economic Development Needs Assessment has been commissioned and the findings will inform the requirements for additional employment land within the district.  The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this proposed allocation development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.  The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified. |

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| **Policy AL7 Highgrove Farm, Bosham** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 11 | 11 | 1 | 9 | 1 |
| Policy: 79 | 83 | 3 | 65 | 15 |
| Representation numbers  239, 3291 (Luken Beck obo Barratt Homes), 1647 (King & Co obo Heaver Homes), 1269, 1658, 706, 272, 402, 3344 (Nexus Planning obo CEG), 3127, 2767, 1690, 728, 3362  (Landlink Estates), 29, 261, 984, 2859, 2509 (Bosham Parish Council), 2557 (Chichester  Harbour Trust), 421, 439, 87, 1425, 71, 1207, 3156, 213, 387, 891, 931, 1291, 3153, 1485,  3088 (Chichester Harbour Conservancy), 398, 399, 403, 532, 895, 1473, 1476, 1453, 1472,  1434, 2714, 601, 599, 404, 408, 1397, 3207, 405, 968, 414, 2087 (West Sussex County  Council), 77, 2405 (South Downs National Park Authority), 1528 (Natural England), 820, 1795 (Harbour Villages Lib Dems Campaign Team), 289, 1795 (Harbour Villages Lib Dems Campaign Team), 1336, 268, 2141 (West Sussex County Council), 1334, 833, 2269  (Historic England), 1315, 3185, 251 (Sustrans), 3053, 1329, 2661, 47, 822, 1750, 1297,  1439, 746, 2957, 780, 1052 (Bosham Football Club), 2361 (West Sussex Local Access Forum), 1143 (British Horse Society), 2772 (Sussex Wildlife Trust), 2335 (Southern Water), 2307 (Portsmouth Water), 424, 1436, 2706, 417, 37, 2924, | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support in principle  **(Luken Beck obo Barratt Homes, King & Co obo Heaver Homes, British Horse Society, West Sussex Local Access Forum)** | | | | |
| Object  **(Nexus Planning obo CEG, Landlink Estates, Bosham Parish Council, Chichester Harbour Trust, Chichester Harbour Conservancy)**   * Impact on infrastructure | | | | |
| Education:   * Support relocation of school **(Harbour Villages Lib Dems Campaign Team)** * Proposal to relocate school unacceptable, as would move it outside of village * No need for new school * Developer does not propose to deliver new school but to provide 2 hectares of land to accommodate new school **(Luken Beck obo Barratt Homes)** * Potential oversupply of school places within school planning area **(West Sussex County Council)** | | | | |
| Coalescence:   * Would contribute to coalescence along A259 corridor between Emsworth and Chichester * Need to maintain a gap between Fishbourne and Bosham **(Bosham Parish Council)** * Threatens identity of Bosham village | | | | |
| Wastewater and water quality:   * Limited existing capacity at closest provider – need to provide evidence that capacity exists **(Southern Water)** * Connection of new development at site prior to new infrastructure may increase flooding **(Southern Water)** * No large diameter mains within the area **(Portsmouth Water)** * No wastewater management plan * Concerned that the SA scores this allocation poorly for wastewater treatment | | | | |
| Open space and sports pitch provision:   * Football club would welcome relocation of club onto site **(Bosham Football Club)** * Object to inclusion of sports pitch, open space is to be multifunctional naturalistic | | | | |

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| green space **(Luken Beck obo Barratt Homes)**   * Policy does not identify provision to make up deficit in parks and recreation grounds or youth provision **(Bosham Football Club)** * Requirement for new cricket pitch **(Harbour Villages Lib Dems Campaign Team)** |
| Impact on AONB:   * Concerned about proximity to AONB **(Chichester Harbour Trust)** * Land available for housing within the AONB * Impact on intervisibility between AONB and National Park **(Chichester Harbour Trust, Chichester Harbour Conservancy)** |
| Landscape:   * Allocation should be informed by an LVIA **(Natural England)** * Landscape capacity study shows that 250 dwellings is maximum to be accommodated **(Bosham Parish Council)** * Wording could be more robust **(South Downs National Park)** |
| Transport:   * Traffic already at saturation * Should include safe, segregated pathways and cycleways **(Harbour Villages Lib Dem Campaign Team, Sustrans)** * Negative impact on A27 and A259 * Lack of existing public transport |
| Environment:   * Increase in air, noise and light pollutions * High grade agricultural land * Damage to habitats and biodiversity |
| Flood risk:   * Loss of floodplain * Potential for moderate risk of groundwater flooding **(West Sussex County Council)** |
| Heritage:   * Expect potential for non-designated archaeology to be assessed **(Historic England)** * Damage to views of Chichester Cathedral |
| Green infrastructure:   * Requirement for GI is not ambitious enough and does not align with paragraphs 20 and 174 of the NPPF **(Sussex Wildlife Trust)** * Welcome opportunities for provision of GI **(West Sussex Local Access Forum, British Horse Society)** |
| Amendments to policy and text wording:  **(West Sussex County Council, Bosham Parish Council, South Downs National Park Authority, Natural England)** |
| Additional site proposed:   * Land between Walton and Delling Lanes * French Gardens * Land adjacent to the new hospice * Broadbridge Farm **(CALA Group Ltd)** * North of Broadbridge **(King & Co obo Heaver Homes)** |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| Where appropriate comments regarding infrastructure requirements will be addressed through an updated Infrastructure Delivery Plan and associated documents such as additional transport evidence and update to the Water Quality Assessment.  In particular, confirmation is being sought on the overall need for school places and the  requirement for a new primary school in this location. The next iteration of the Plan will reflect any update received from the County Council as Education Authority. This will inform the identification of any potential for a sports pitch at this location. |

The environmental impacts have been considered through the evidence base prepared to date, including the Strategic Flood Risk Assessment and Landscape Capacity Study, Habitats Regulations Assessment and Sustainability Appraisal. Further iterations of this work will consider further those impacts.

Sites promoted as alternatives will be considered where appropriate through a refresh of the Housing and Economic Land Availability Assessment, and if necessary through further Sustainability Appraisal work.

The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified.

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| **Policy AL8 East Wittering Parish** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 2 | 2 | 0 | 1 | 1 |
| Policy: 39 | 41 | 3 | 30 | 8 |
| Representation numbers  935, 74, 2308 (Portsmouth Water), 2183, 2126 (WSCC), 1686, 1469, 1428, 964, 735, 544,  506 (EW & Bracklesham PC), 99, 67, 38, 1686, 1428, 964, 2958, 2925(CPRE), 2663, 2002,  1753, 1743, 1672, 1469, 1428, 1296, 1296, 912, 834, 823, 252, 2039, 1019, 958, 2773  (SWT), 1627, 3366, 3307, 2695, 2183, 1672, 1532, 912, 723 (West Itchenor PC),  834, 544, 2695, 2695, 2362, 2142 (WSCC), 1144, 2089, 2010 (RSPB), 3345 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support   * Suggest 2 separate sites rather than one and development could also be accommodated at Stubcroft Farm and Church Road * Opportunities for green infrastructure links to wider countryside (**WSCC, EW & Bracklesham PC**) | | | | |
| Infrastructure   * Expansion/improvement to existing facilities (health, WWTW) required to meet new demand and to support parts of development within West Wittering Parish * Capacity at existing schooling to accommodate new development (**WSCC**) * Allocation should be more appropriate to size of EW and should be allocated in accordance with evidence base rather than through Neighbourhood Plans | | | | |
| Employment   * Lack of employment opportunities, resist loss of employment/commercial uses. | | | | |
| Transport and Access   * Access road already congested and insufficient mitigation proposed to accommodate new development * Improve sustainability of site with cycle and footpath network linking Medmerry with EW and links to Salterns Way. * Need to improve public transport prior to development * A27 improvements needed before development can take place | | | | |
| Environmental Considerations   * Mitigation measures need to be clarified prior to development taking place to ensure no significant impact on Pagham Hbr SPA/Chichester Harbour AONB, SAC, SSI, Ramsar and Medmerry designations * Global warming and sea level rise should be taken into account and NPPF requires a ‘fall back’ area in event of coastal erosion * Concern increase in development will lead to increase in pollution levels * Concern lack of firm timescales could impact on ability to undertake HRA and ensure identified sites do not conflict with designated site interests (**RSPB**) * Loss of agricultural land | | | | |
| Type of development   * Development should include affordable housing and homes for the elderly * Restrict houses being purchased as second homes or holiday lets | | | | |
| Tourism   * Concern overdevelopment would have negative impact on tourist industry which is valuable economic benefit to local area | | | | |
| West Sussex Waste Local Plan   * Safeguarding policies with regards to minerals and waste should be referenced in Neighbourhood Plans and given due consideration in consultation with West Sussex County Council when allocating sites.(**WSCC**) | | | | |

Initial Council response to issues raised and way forward for the Local Plan Review Where appropriate comments regarding infrastructure requirements will be addressed through an updated Infrastructure Delivery Plan and associated documents such as additional transport evidence and update to the Water Quality Assessment.

The environmental impacts have been considered through the evidence base prepared to date, including the Strategic Flood Risk Assessment and Landscape Capacity Study, Habitats Regulations Assessment and Sustainability Appraisal. Further iterations of this work will consider further those impacts.

The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified.

It is understood that the parish council no longer intend to bring forward a neighbourhood plan to deliver this allocation. Therefore sites will be considered for allocation in the next iteration of the District Plan following an appraisal of options in the Housing and Economic Land Availability Assessment and Sustainability Appraisal, Habitats Regulations Assessment and other evidence studies.

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| **Policy AL9 Fishbourne Parish** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 17 | 20 | 1 | 13 | 6 |
| Policy: 87 | 93 | 9 | 61 | 23 |
| Representation numbers | | | | |
| 35,1104,1668, 274, 1799, 887, 1538, 528, 1380, 3346 (Nexus Planning obo CEG), 2128 | | | | |
| 292, 674, 144, 291, 2021, 3417 (Genesis Town Planning obo Seaward Properties), 70 | | | | |
| 2477 (Fishbourne Parish Council), 3091 (Chichester Harbour Conservancy), 1057, 758, | | | | |
| 1106, 545, 527, 309, 210, 1801 (Harbour Lib Dems Campaign), 1709, 2558 (Chichester | | | | |
| Harbour Trust), 743, 3055, 3164, 3163, 184, 536, 1525, 1065, 1197, 3081, 1406, 925, 1198, | | | | |
| 1391, 615, 1991, 1474 (Fishbourne Neighbourhood Plan Group), 2503, 3159, 3149 | | | | |
| 3158, 826, 132, 1851, 75, 3028 (Strutt and Parker obo William Lacey Group),2782 (ICENI | | | | |
| Projects obo Fishbourne Developments),3225 (Henry Adams obo The Feltham Family) | | | | |
| 3230 (Henry Adams obo The Smith Family),3259 (Henry Adams obo WSCC Estates) | | | | |
| 3276 (Genesis Town Planning obo Landacre Developments), 534, 887, 528, 1380, 144, | | | | |
| 927,1961, 2507, 2326, 1057, 545, 210,1801 (Harbour Lib Dems Campaign), 3055, 3164, | | | | |
| 1065, 925, 1391, 2503, 2900, 2878, 639, 309, 527, 68, 2822, 1104, 1538, 1380, 292, | | | | |
| 1441,1490, 2326, 1525, 925, 2503, 3149, 1851, 1538, 3028 (Strutt and Parker obo William | | | | |
| Lacey Group), 2216 (Environment Agency), 2778 (Sussex Wildlife Trust), 2090 (WSCC), | | | | |
| 2270 (Historic England),1530 (Natural England), 2336 (Southern Water), 2406 (South | | | | |
| Downs National Park Authority), 2477, 387,1525, 826, 3090 (Chichester Harbour | | | | |
| Conservancy), 3089 (Chichester Harbour Conservancy),386, 817 (Fishbourne Parish | | | | |
| Council), 819 (Fishbourne Parish Council), 35, 1538, 1530 (Natural England), 2476 | | | | |
| (Fishbourne Parish Council), 3259 (Henry Adams obo WSCC Estates),2873 (Rodway | | | | |
| Planning), 2011 (RSPB),3346 (Nexus Planning obo CEG), 1196, 927, 313, 181, 3091 | | | | |
| (Chichester Harbour Conservancy), 836, 2558 (Chichester Harbour Trust), 3123, 1197, | | | | |
| 1198, 639, 536, 1145 (British Horse Society), 2363 (West Sussex Local Access Forum), | | | | |
| 3510, 927, 1762, 1530 (Natural England), 2336 (Southern Water), 1196, 2309 (Portsmouth | | | | |
| Water), 2477 (Fishbourne Parish Council), 313, 3091 (Chichester Harbour Conservancy), | | | | |
| 1106, 2558 (Chichester Harbour Trust), 3123, 615, 1380, 927, 1961, 2507, 210, 3123, 3164, | | | | |
| 1406, 1198, 1391, 639, 536, 1851, 3187, 2486, 2502, 48, 528, 2143 (WSCC),2401, 2128, | | | | |
| 253, 294, 1744, 3510, 144, 281, 1196, 211, 291, 1818, 927, 2507, 2477 (Fishbourne Parish | | | | |
| Council), 313, 182, 2665, 1057, 1106, 210, 2743, 2848, 3055, 3164,3163, 3081, 1406, 925, | | | | |
| 615, 2474 (Fishbourne Neighbourhood Plan Group), 3149, 639, 536, 826, 132, 1851, 3187, | | | | |
| 2486, 35, 48, 528, 3510, 281, 211, 1490, 2848, 3164, 1538 | | | | |
| 1198, 3159, 3149, 536, 2476 (Fishbourne Parish Council), 2502, 1668, 1380, 2128, 211 | | | | |
| 1818, 927, 1490, 1961, 313, 758, 210, 3123, 3164, 3163, 1197, 3081, 1391, 1991, 536 | | | | |
| 527, 132, 1851, 2502, 1668, 528, 3510, 210, 2558 (Chichester Harbour Trust), 1197, 3149, | | | | |
| 639, 2127 (WSCC), 144, 927, 313, 210,2743, 2848, 3123, 3164, 3163, 3081, 1406, 615, | | | | |
| 3159, 639, 536, 132, 1668, 528,1380,281, 1196, 927, 1961, 2507, 181, 836, 3164, 3081, | | | | |
| 1406, 1391, 615, 639, 536, 132, 281, 927, 3163, 3081, 2782 (ICENI Projects obo | | | | |
| Fishbourne Developments), 3225 (Henry Adams obo The Feltham Family), 3230 (Henry | | | | |
| Adams obo The Smith Family), 3259 (Henry Adams obo WSCC Estates), 2751 (Gleeson | | | | |
| Strategic Land), 2873 (Rodway Planning), 3417 (Genesis Town Planning obo Seaward | | | | |
| Properties), 1961, 836, 1106, 1197 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Object to scale of development   * Impact on infrastructure (including local transport network which is already at capacity, both the A259 and A27) (**Fishbourne Neighbourhood Plan Group**) * Deliverability (**Nexus Planning obo CEG**) (**Fishbourne PC**) * No identified housing need, need more information on how this figure was arrived at (**Fishbourne Neighbourhood Plan Group**) | | | | |

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| * Unsustainable development (**Harbour Lib Dems Campaign**) * Spread allocation across more than one site to include Bethwines Farm, land east of Clay Lane, land south of Clay Lane, land east of Deeside Avenue, land east of Fishbourne, land at Fourways, land to rear of 98 Fishbourne Road, land north of A27 (**Genesis Town Planning obo Seaward Properties**)( **Henry Adams obo The Feltham Family**) (**Henry Adams obo The Smith Family**) (**Gleeson Strategic Land**) (**Rodway Planning**) (**Genesis Town Planning obo Seaward Properties**) * Inadequate mitigation on the Harbour (**Chichester Harbour Conservancy**) (**Chichester Harbour Trust**) * Loss of agricultural land (**Chichester Harbour Conservancy**) * Additional facilities required to support development, both existing and proposed (**Fishbourne PC**) |
| Support (**Genesis Town Planning obo Landacre Developments**) (**Strutt and Parker obo William Lacey Group**) (**ICENI Projects obo Fishbourne Developments**) (**Henry Adams obo WSCC Estates**)   * Sites can deliver above proposed growth (**ICENI Projects obo Fishbourne Developments**) * Allocation should be spread across multiple sites/dispersed allocation (**Genesis Town Planning obo Landacre Developments**) * Support requirement for provision of Green Infrastructure and for the provision of segregated and maintained paths between developments and other routes (**British Horse Society**) (**West Sussex Local Awareness Forum**) (**WSCC**) |
| Bethwines Farm   * Object (**Harbour Lib Dems Campaign**) to development here due to landscape impact, policies S24, 25 and 26 should be applied to development on this site (**Fishbourne Parish Council**) * Should be retained as a viable farm and/or wildlife corridor |
| Clay Lane   * Should not be a wildlife corridor (**Harbour Lib Dems Campaign**) |
| Policy wording   * Remove criterion 5 * Amend point 3 to include ‘A range of types, sizes and tenures of residential accommodation in line with the Fishbourne Neighbourhood Plan’ to include special provision….. * Amend policy wording to ‘Neighbourhood Plan review should consider meeting need through allocation of small and large sites’ (**Strutt and Parker obo William Lacey Group**) * Make specific reference to issues for consideration (including the South Protection Zone, protecting heritage assets and their setting, the SDNP and improving links to the SDNP and Chichester Harbour AONB, Air, noise and light pollution, Solent Wader and Brent Goose Strategy) in the Neighbourhood Plan when identifying sites (**Environment Agency**) (**Historic England**) (**SDNPA**) (**Natural England**) * Reference Joint Minerals and Waste Local Plan Safeguarding policies **(Sussex Wildlife Trust**) * Amend policy wording to   “6. Expansion and provision of green infrastructure into the wider countryside including between settlements and facilities;  7. Demonstration that development would not have an adverse impact on the nature conservation interest of identified sites and habitats and that measurable net gains to |

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| biodiversity will be delivered;  8. Provide mitigation to ensure the protection of the SPA, SAC and Ramsar site at Chichester Harbour as a result of water quality issues relating to runoff into a designated site, and avoiding loss of functionally linked supporting habitat...'” (**Sussex Wildlife Trust**)   * Add criteria to consider waste water (**Natural England**) (**Southern Water**) * Amend paragraph 6.62 to state that Chichester Harbour is not to the south of the village as the AONB boundary includes the part of Fishbourne up to the A259 (**Chichester Harbour Conservancy**) * Paragraph 6.65 point 2 should refer to the relationship with Bosham (**Fishbourne PC**) * Policy should refer to groundwater quality protection and the additional requirements when using infiltration systems where development is in a source protection zone (**Portsmouth Water**) |
| Neighbourhood Plan   * Land at Deeside Avenue currently allocated for community purposes in NP is landlocked therefore not deliverable (**Henry Adams obo WSCC Estates**) * Concern over deliverability if left to NP (**Nexus Planning obo CEG**), (**Rodway Planning**) * No indication of timescales for NP review and potential impact on ability to undertake HRA (**RSPB**) |
| Environmental Considerations   * Require more detail on location of sites given environmental sensitivity of area, potential increase in pollution (including impact on water quality) and an increase in recreational disturbance and potential conflict with environmental designations (**RSPB**) (**Chichester Harbour Conservancy**) (**Fishbourne Parish Council**) (**Chichester Harbour Trust**) * The SA identifies a problem with WWTW for this location, sewer and wastewater treatment capacity should be considered (**Natural England**) (**Southern Water**) (**Chichester Harbour Conservancy**) * Breach of current and emerging AONB Management Plan (**Chichester Harbour Conservancy**) |
| Settlement identity/coalescence   * Need to prevent the merger between Fishbourne and Chichester and Fishbourne and Bosham |
| Infrastructure   * Primary school at capacity although expansion maybe possible. Sufficient secondary school capacity. Contributions required (**WSCC**) |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.  The comments and issues raised in this consultation will be considered further in terms of  whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified. Comments regarding landscape and ecological designations are noted. In March 2019 the *Revised Landscape Capacity Study* was produced which confirmed the assessment in the November 2018 study regarding the capacity for landscape change. The Preferred Approach Plan notes the potential landscape sensitivities, including protecting views to the South Downs National Park and Chichester Harbour Area of Outstanding Natural Beauty and their settings.  The objections relating to the wildlife corridor are noted. Further work is required to determine the final location and extent of the wildlife corridor, and consider the impact that |

may have on the capacity of this area to deliver the levels of development envisaged in the policy.

Therefore further consideration will need to be given to the capacity of this service village area to accommodate development, particularly with regards to landscape capacity and the proposed wildlife corridor.

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| **Policy AL10 Chidham and Hambrook Parish** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 8 | 8 | 0 | 5 | 3 |
| Policy: 45 | 51 | 5 | 33 | 13 |
| Representation numbers  2255, 63, 2499 (Chidham and Hambrook PC), 1146 (British Horse Society), 3092 (Chichester Harbour Conservancy), 3093 (Chichester Harbour Conservancy), 2781 (Sussex Wildlife Trust), 2091 (WSCC), 2129 (WSCC), 2144 (WSCC), 2271 (Historic England), 1534 (Natural England), 2408 (SDNPA), 3367 (Landlink Estates), 3016 (Neame Sutton obo Sunley Estates), 1419, 2403, 1847, 529, 837, 2666, 49, 137, 3188, 2493 (Chidham and  Hambrook Parish Council), 827, 1732, 180, 254 (Sustrans), 1600, 2027, 1206, 1182, 1235,  1758, 1746, 1802 (Harbour Villages Lib Dems Campaign Team), 1803 (Harbour Villages Lib Dems Campaign Team), 3422 (Genesis Town Planning obo Seaward Properties), 1426, 1436, 1438, 1862, 2147, 1487, 1488, 2162, 1861, 2032, 3533 (Chidham Sustainability  Network), 1884 (Chidham Sustainability Network), 1914, 1917, 1918, 2310 (Portsmouth Water), 2364 (West Sussex Local Access Forum), 2559 (Chichester Harbour Trust), 3262, 3347 (Nexus Planning obo CEG) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support **(Neame Sutton obo Sunley Estates, British Horse Society, West Sussex Local Access Forum)** | | | | |
| Object: Size of allocation (Chidham Sustainability Network, Harbour Villages Lib Dems Campaign Team, Chidham and Hambrook PC, Sussex Wildlife Trust, Landlink Estates)  * Infrastructure to be provided before housing * Inadequate distribution of housing **(Chidham Sustainability Network)** * Impact on, and lack of, infrastructure * Impact on local character * Impact on landscape * Service Village designation * Specific sites – Orchard Farm, Drift Lane and Baileys Field. | | | | |
| Neighbourhood Plan:   * Question deliverability of allocation through neighbourhood plan process **(Nexus Planning obo CEG, Neame Sutton obo Sunley Estates)** * Conflict of interest between Chidham & Hambrook parish and Southbourne where land within Southbourne parish may be allocated but in reality forms part of Hambrook * Allocation of sites in NP should conform with paras 184 and 194 of NPPF **(Historic England)** | | | | |
| Impact on AONB:   * Allocation should not erode setting of AONB **(Chichester Harbour Trust)** * AONB should come before the National Park in sentences **(Chichester Harbour Conservancy)** * Major development on fringe of AONB **(Chichester Harbour Conservancy)** | | | | |
| National Park:   * Strengthen wording regarding conservation and enhancement of National Park   **(SDNPA)** | | | | |
| Coalescence:   * Contribute to coalescence along the A259 **(Chichester Harbour Trust)** | | | | |
| Green infrastructure:   * Welcome opportunities to provide GI links to countryside and coastal plain **(West** | | | | |

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| **Sussex Local Access Forum, British Horse Society)**   * Create multifunctional access route on path using A27 overbridge to maximise existing GI value **(WSCC)** * Include criterion requiring provision of GI **(SDNPA)** |
| Water and wastewater:   * Site should be considered in combination with Southbourne and Bosham allocations   **(Portsmouth Water)**   * No large diameter mains in area and mains reinforcements may be required   **(Portsmouth Water)**   * Impacts on water quality from sewage **(Natural England, Chichester Harbour Conservancy)** |
| Environment:   * Acknowledge presence of Local Wildlife Site in text **(Sussex Wildlife Trust)** * Make reference to recreational disturbances **(Sussex Wildlife Trust, Natural England)** * Refer to Solent Wader and Brent Goose Strategy **(Natural England)** * Loss of agricultural land **(Chichester Harbour Conservancy)** * Pollution **(Chichester Harbour Conservancy)** * Housing should be of certain environmental standards |
| Transport:   * Lack of public transport * Improvements to cycleways, including reference to NCN2 **(Sustrans)** * Impact on A259 * Impact on A27 – suggest new junction * Parking issues * No mention of road upgrading **(Chidham & Hambrook PC)** |
| Education:   * Lack of capacity for new allocation **(Chidham and Hambrook Parish Council)** * Land for 2FE primary school should be provided **(WSCC)** * May be oversupply of school places within school planning area **(WSCC)** * Support relocation of school to north of Hambrook **(Harbour Villages Lib Dems Campaign Team)** * Unclear where early years places will be accommodated **(Chidham and Hambrook PC)** |
| Flooding:   * Risk of flooding from sea level rises and surface water |
| Other:   * Refer to Joint Minerals Local Plan and Waste Local Plan **(WSCC)** * Definition of affordable * Provision of housing for younger people |
| Omission sites:   * Land at Cox’s Barn Farm, Hambrook **(Genesis Town Planning obo Seaward Properties)** |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this development, will be considered further through evidence studies,  including updates to the water quality assessment; the transport assessment, and the  Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.  The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified. Comments regarding landscape and ecological designations are noted. |

In March 2019 the *Revised Landscape Capacity Study* was produced which confirmed the assessment in the November 2018 study regarding the capacity for landscape change in the east-west corridor. The Preferred Approach Plan notes the potential landscape sensitivities, including protecting views to the South Downs National Park and Chichester Harbour Area of Outstanding Natural Beauty and their settings.

Therefore further consideration will need to be given to the capacity of this service village area to accommodate development, particularly with regards to landscape capacity and proximity to the sensitive environment of the AONB.

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| **Policy AL11 Hunston Parish** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 13 | 18 | 0 | 18 | 0 |
| Policy: 107 | 145 | 4 | 121 | 20 |
| Representation numbers | | | | |
| 3500, 3492, 3491, 3488, 3484, 3483, 3475, 3474, 3473, 3472, 3471, 3470, 3469, 3468, | | | | |
| 3467, 3466, 3465, 3464, 3463, 3453, 3451, 3450, 3449, 3448, 3447, 3446, 3445, 3444, | | | | |
| 3443, 3442, 3441, 3440, 3439, 3438, 3437, 3436, 3435, 3387, 3369 (Landlink Estates Ltd), | | | | |
| 3348 (CEG), 3300 (Church Commissioners of England), 3212, 3198, 3190, 3167, 3154, | | | | |
| 3126, 2910, 2784 (Sussex Wildlife Trust), 2684 (Spiby Partners Ltd), 2678 (Devonshire | | | | |
| Developments Ltd), 2667, 2508 (Hunston Parish Council), 2404, 2365 (West Sussex Local | | | | |
| Access Forum), 2342, 2341, 2340, 2311 (Portsmouth Water Ltd), 2272 (Historic England), | | | | |
| 2217 (Environment Agency), 2145/2133/2092 (West Sussex County Council), 1849, 1770, | | | | |
| 1767, 1761, 1759, 1748, 1747, 1741, 1739, 1734, 1726, 1719, 1708, 1698, 1696, 1612, | | | | |
| 1577, 1565, 1562, 1537, 1536 (Natural England), 1408, 1404, 1394, 1381, 1304, 1294, | | | | |
| 1292, 1290, 1289, 1286, 1284, 1266 (North Mundham Parish Council), 1217, 1147 (British | | | | |
| Horse Society), 1117, 1116, 1115, 1114, 1113, 1112, 1102, 1099, 1097, 1096, 1095, 1093, | | | | |
| 1036, 1034, 996, 970, 949, 944, 934 (Pagham Parish Council), 920, 909, 903, 886, 828, | | | | |
| 791, 783, 779, 759, 753, 736, 687, 673, 667, 664, 659, 612, 582, 581, 578, 563, 546, 501, | | | | |
| 420, 419, 406, 359, 345, 255 (Sustrans), 237, 233, 230, 229, 222, 221, 220, 189, 181, 179, | | | | |
| 176, 175, 152, 150, 149, 148 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support: General (Church Commissioners for England)  * Support reference to Hunston Copse in 6.72 **(Sussex Wildlife Tust)** * Support provision of green infrastructure links **(WSLAF, British Horse Society)** * Support 6.77 in relation to respecting setting of listed buildings/conservation area   **(Highways England)**   * Support point 8 –provide attention to the quality of water run off to local ponds and low lying areas | | | | |
| Traffic Congestion:   * General concern re; existing and increased traffic from future development * Impossible to leave Manhood Peninsula; cannot take further traffic * Accident levels * Free School congestion * Install traffic lights outside Hunston Village Hall * Detrimental impact on B2145, overused already * Concern re; B2166/A27 * Risk of danger from increased congestion * Roads have no capacity for future development * Prevents/slows access into and out of Hunston * Gridlock in the summer/peak times * Delays * Traffic mitigation proposals required * Congestion will be worsened from development in other parishes * Concern re; access for emergency services | | | | |
| Nature/wildlife/environment:   * General concern re; impact * Habitats will be destroyed particularly in Hunston Copse * Protect the Copse/Ancient Woodland | | | | |

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| * Benefits must outweigh any adverse impact on biodiversity * Impact on current wildlife corridors * Impact on SAC/SPA/Ramsar sites * Future development should incorporate wildlife enhancing features * Policy incompatible with DM22, DM28, DM29 and DM30 |
| Pollution:   * General concern * Health impacts from poor air quality * Stationary traffic increases pollution * Increasing noise |
| Funding:   * Lack of S106 spend from current developments |
| Allocation:   * No further development, already at full capacity * Not site specific **(Portsmouth Water Ltd)** * Lack of evidence to support 200 **(Devonshire Developments Ltd)** * Find alternative smaller sites * Limit scale of housing along B2145 corridor * Build on outskirts of village * Lower numbers; more even distribution throughout District * Reduce numbers to level that can be supported by current road infrastructure   **(Pagham PC)**   * Limit to 100 * Limit to 80 * 35 identified in Local Plan * Reduce to 50; allocate 150 to Runcton **(Landlink Estates Ltd)** * N.Mundham to take higher numbers * Concern re additional housing proposed by Arun DC * Question deliverability through NP process **(CEG, Spiby Partners Ltd)** * Build on brownfield * Move allocation to north of District |
| Specified alternative sites for development:   * No building at end of Southover Way; build in field at main roundabout on B2145/B2166 * Do not develop field between Southover Way and Hunston Copse * 2ha is available for 50 houses at Farmfield * Build on fields just before new school * Land at Reedbridge Farm **(Spiby Partners Ltd)** * Old Hunston Dairy * Chalder Farm * Land behind public car park next to Hunter’s Lodge riding school |
| Housing:   * Housing to integrate with village * Too many empty properties already * Lack of social/affordable housing * Need social housing for rural people working in the countryside * Unaffordable for young people; need starter homes/housing shared communal areas |

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| * Low-rise accommodation for the elderly * Smaller sized properties * Housing mix to reflect neighbourhood plan * Low-energy or PassivHaus design |
| Walking/Cycling   * Lack of infrastructure for non-motorised transport * Preserve PROW * Canal path unsuitable for travelling to school; requires improvement for pedestrians/ cyclists * Improve/provide more pedestrian pavements, provide lighting * Complete gaps in footpath and cycle path networks * Increase cycle paths to Chichester, Sidlesham and Selsey; * Ensure safe pedestrian/cycle access generally across village * Cycling and pedestrian paths from Hunston to Chichester along B2145 * Suggest bridleway link to S Mundham (with potential for future cycle links to Pagham and towards Bognor Regis) and to Sidlesham via golf course and Brimfast Lane would improve access to the countryside and services **(WSCC)** * Off-road multi-use path network on Coastal Plain would be of great benefit to all NMUs **(British Horse Society)** |
| Transport   * Traffic calming * Poor bus service; requires improvement * Improve A27 * A27 improvements before development * Implement northern A27 route * No proposals included in policy to improve local road network (Pagham PC) * No provision for impact of allocation on A259 and A27 * Deny access from proposed development down Church Lane * Provide light rail link to Chichester * Include park and ride facility off A27 * Lack of sustainable transport options * Adequate parking necessary for development * Discourage car use |
| Local Infrastructure/Services   * Generally insufficient * Concern re; schools capacity * Further school capacity required to accommodate development (WSCC) * Concern re medical facilities capacity (GPs/Hospital) * Impact on tourist industry * Need new village hall, green and recreation area funded by developers * Concern re capacity of local services/facilities * Lack of local employment |
| Flood risk/WWTW capacity   * General concern re; waste water treatment capacity * Increasing discharge consent headroom at Pagham not supported due to impacts on SPA/ Ramsar from allocation and Arun development (NE) * Access to potential sites is across flood risk level 3 zones * Low lying, concern re flooding with further development |

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| * Sewers inadequate * Surface water drainage and sewage overload already * Install more drains * Locate development solely in flood zone 1; allocation in 2 or 3 would need to be supported by L2 SFRA or equivalent **(Environment Agency)** |
| Character of Village:   * Will become an extension of Chichester * Lose identity as village * Concern re coalescence **(Hunston PC)** * Impact on residents * Change Hunston from “Service Village” to “Rest of Plan” area |
| Landscape:   * General concern re; impact * Preserve greenfields * Loss of views * Loss of agricultural land * Loss of green infrastructure/open space and play areas * Impact on ancient woodland **(Hunston PC)** * 15m margin to protect Hunston Copse is inadequate * Development should not be sited near the conservation area/listed buildings * Take into consideration Landscape Capacity Study of Nov 2018 |
| Non-planning related issues:   * Repair roads * Stop mineral extraction and lorry/tractor movements * Provide public toilet and cash machine * Increase bus services for school children; restrict private car use for pupil transport * Increase parking at Free School * Reduce bus fares |
| Changes to Plan policy text:   * 6.22 Chichester Canal LWS should also be mentioned **(Sussex Wildlife Trust)** * 6.77 Insert new bullet point “Particular regard should be taken of the Chichester Free School, located near Hunston” * Change point 2 of policy to “To meet specialised housing needs including accommodation for older and younger people” * Change “minimum of 200” to “about 200” or “maximum” **(Hunston PC)** * 6.77 should be incorporated into policy * Policy para 7 add: “and that measurable net gains to biodiversity will be delivered”   **(Sussex Wildlife Trust)**   * 6.77 mitigation impacts should include impacts on the B2166 to Pagham * Specify types of housing in policy * 6.77 include “enhancing biodiversity and habitat in Hunston” * 6.78 add “and surrounding area” at end of sentence |
| Changes to Plan policy:   * Para 1 Replace “well integrated” with “adequately integrated” * Para 6 delete “opportunities for the” * Para 7 add “including ancient woodland” at end of sentence * Para 8 change start to “Be planned with special regard to the need to avoid potential |

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| impacts of recreational disturbance on …” **(Sussex Wildlife Trust)**   * Para 9 should read “run-off into a designated site” and include waste water quality impacts **(Natural England)** * Para 10 insert “education” after “infrastructure” * Add to policy: “Demonstration that the development would not have an adverse impact on the significance of heritage assets including listed buildings or on the character or appearance of the Hunston Conservation Area” **(Historic England)** * Need to refer to the Joint Minerals Local Plan and Waste Local Plan particularly safeguarding policies M9, M10 and W2; development at, adjacent or proximal to existing waste/mineral sites/infrastructure should be subject to consultation with WSCC **(WSCC)** * Amend Policy to include protection of views to Chichester Cathedral Spire and Hunston Copse **(North Mundham PC)** * Funding for improving Cycle route NCN88 and links between Chichester and Selsey need to be explicitly mentioned in policy **(Sustrans)** |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this proposed allocation development, will be considered further through evidence studies, including updates to the water quality assessment; the transport  assessment; and the Infrastructure Delivery Plan; along with the Sustainability Appraisal and  Habitats Regulations Assessment.  The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified. |

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| **Policy AL12 Land North of Park Farm, Selsey** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 2 | 2 | 0 | 2 | 0 |
| Policy: 27 | 30 | 2 | 16 | 12 |
| Representation numbers  100, 2868 (Quod obo Thawscroft Ltd), 3372 (Landlink Estates Ltd), 1148 (British Horse  Society), 2366 (West Sussex Local Access Forum), 2273 (Historic England), 1716, 2040 (Sussex Ornithological Society), 2014 (RSPB), 2787 (Sussex Wildlife Trust), 1539 (Natural England), 1268 (North Mundham PC), 1306 (Flood Action Group), 840, 830, 2337 (Southern  Water), 738, 947, 3194, 2134 (WSCC), 2088 (WSCC), 2312 (Portsmouth Water), 2146  (WSCC), 1850, 1751, 1752, 2668, 1553, 1395, 2959, 2407, 2146 (WSCC), 1716, 547 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support:   * Landlink suggest increasing allocation to 480 dwellings minimum and reduce allocations at East Wittering and Birdham (**Landlink**) | | | | |
| Green Infrastructure:   * Support. Creating new routes and links on coastal plan with off road multi use path network. | | | | |
| SPA /Ornithological considerations   * Development of 250 homes would be detrimental to SPA and bird populations, especially Brent Geese. Further studies required to identify sites used by Brent Geese. * Is site deliverable in terms of the requirements of the Habitats Regulations. | | | | |
| Flood Risk:   * Land at lowest point in Selsey and suffers from flooding/surface water drainage issues. | | | | |
| Infrastructure:   * Education – further capacity required to accommodate development. Contributions and/or land sought from development. * Make reference to Minerals and Waste Safeguarding as site within Sharp sand and gravel safeguarding area * May need to reinforce water mains * Sidlesham WWTW experiences capacity issues currently, exacerbated by groundwater infiltration. * No consideration to employment. | | | | |
| Transport:   * No provision made for road infrastructure impact of additional 250 dwellings onto B2145, A27 and A259. * Need to refer to Selsey Greenway project. | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this proposed allocation development, will be considered further through  evidence studies, including updates to the water quality assessment; the strategic flood risk  assessment; the transport assessment; and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.  The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified | | | | |

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| **Policy AL13 Southbourne** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 8 | 8 | 0 | 3 | 5 |
| Policy: 61 | 73 | 8 | 41 | 24 |
| Representation numbers  28, 107, 119, 208, 256 (Sustrans), 323, 358, 382, 383, 413, 437, 447, 709, 771, 774, 831,  842, 877, 957, 1040, 1149, 1204, 1213, 1363, 1420, 1541 (Natural England), 1556, 1727,  1754, 1859, 1874, 2015 (RSPB), 2037, 2050, 2055, 2093 (West Sussex County Council),  2098, 2099, 2132 (West Sussex County Council), 2158, 2159, 2210 (Environment Agency),  2215, 2231, 2274 (Historic England), 2287, 2313 (Portsmouth Water Ltd), 2338 (Southern  Water), 2367, 2372, 2409 (South Downs National Park Authority), 2410, 2466 (Southbourne  Parish Council), 2535, 2537, 2560, 2646, 2669, 2791, 2807, 2960, 3035, 3094, 3095, 3155,  3189, 3260 (WSCC (Estates)), 3263, 3286 (Westbourne Parish Council), 3295, 3302, 3336,  3350, 3393, 3397, 3400, 3404, 3493, 3498, 3501, 3504. | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support in principle:   * Support overall policy or specific detail, support allocation, support GI. | | | | |
| Supporting text   * Strengthen supporting text eg may to should etc. | | | | |
| Infrastructure – General   * Inadequate provision of services and facilities **(Southbourne PC)** * Suggest change word “address” to “deliver” in first paragraph of Policy. * Concern re delivery, should be prior to construction **(Southbourne PC)** * Need community hall/centre **(Southbourne PC)** * Criteria 7, add "sports/youth facilities and retail units". * Concern over capacity of doctors’ surgery **(Southbourne PC)** | | | | |
| Highways and transport   * Inadequate highway network **(Southbourne Parish Council)** * Include reference for account of any future potential new access on to A27. * Point 3, after "access to site(s)" add ", particularly non-vehicular,". * Limited employment = increased travel for residents; impacts transport infrastructure. * Suggest road parallel to Stein Road off A259 running north with bridge over railway line joining A27. Reduced allocation built along this road with no access to Stein Road to preserve existing village and no increase of traffic along Stein Road. * General concern over pollution and congestion **(Southbourne PC)** * New road bridge required as mitigation measure over railway line to support housing proposals and relieve future/present congestion – **(Westbourne Parish Council)** * Improve level crossing at Stein Road. * Concern re. railway station handling increased numbers from new development. * Point 4 to read “Improvements to the situation relating to various existing and planned railway crossings will be required as part of phased development”. * Lack of public transport. | | | | |
| Infrastructure - Sewage/water network   * Inadequate sewage/drainage systems **(Southbourne PC).** * Point 16 to read: “Ensure sufficient capacity within the sewer network and relevant Wastewater Treatment Works before the delivery of development as required” **(EA)** * Criteria 16 change “as required” to “as it is required” | | | | |

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| * Confirm sufficient water resources in Portsmouth Water's area of supply, though local reinforcement of water mains may be required **(Portsmouth Water)** |
| Infrastructure - Schools/youth/early years   * Insufficient space within primary schools to serve proposed development. 2 FE expandable to 3 FE primary school required **(WSCC)** * No early years’ childcare or youth provision **(Southbourne PC)** * Criteria 6 change “consideration” to “investigation” |
| AONB/ designated sites   * Protect; don’t include in development options. * Concern over erosion of setting of AONB and SDNP **(SDNPA)** * AONB should be mentioned before the National Park; clarify meaning of “new views” * Suggest point 9 reads same as Fishbourne policy **(SDNPA)** * Amend point 12 to read: “Provide mitigation to ensure the avoidance of adverse effects on the SPA, SAC and Ramsar site …..” * Proposed development on fringe of AONB, breaches AONB Management Plan; within SSSI Impact Risk Zone; impacts AONB long-distance views; urbanisation of countryside; inadequate landscaping and screening mitigation * Protection of SPA, SAC and Ramsar site necessitates reinstatement of Ham Brook wildlife corridor **(Southbourne PC)** * Concern potential sites conflict with legislation protecting designated sites **(RSPB)** |
| Wildlife   * Detrimental impact; inadequate survey data to support proposal. * Biodiversity requirements are unambitious * Point 11 add “and that measurable net gains to biodiversity will be delivered” * Make reference in supporting text to Solent Wader and Brent Goose Strategy **(Natural England)**, and Solent Recreation Mitigation Partnership **(RSPB)** areas should be avoided when allocating sites in NP**.** |
| Pollution   * Unavoidable increases of light, air, noise and soil pollution |
| Flood Risk   * Development to be located solely within Flood Zone 1 **(EA)** * Southbourne is at or below 5m contour; at risk of flooding due to sea level rise – necessity for new development to be on higher ground |
| Transport Study   * Proposals not synchronised with transport study * No account of traffic movements/ air quality travelling east during construction of Fishbourne roundabout * 11 additional zones added to accommodate proposed housing allocation though results fail to illustrate local traffic impact * Propose new access point onto the A27 |
| Cycling and walking   * Need provision for safe cycling and walking * Include reference to South Coast National Cycle Network (NCN2). **(Sustrans)** * Para 6.90 - Point 6 and Policy item 10 amend to "as well as the inclusion of cycling and pedestrian routes (in particular an integrated, segregated cycle route running between Chichester and Emsworth - sometimes referred to as the Chemroute);" |
| Housing delivery |

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| * Enable multiple size-ranging sites dispersed across area to be considered * Houses concentrated in one area * Includes housing trajectory to ensure appropriate level of housing delivery in 0 - 5 year period and balanced delivery over remainder of plan period. * Concern re; delivery through NP and whether sites identification process will be completed by submission of plan **(RSPB)** * Concern over increase in allocation number * Propose SPG for development West of Chichester * Increase to 3000 dwellings - propose east side of village for development * Concern over north-side of allocation, particularly cramped development, lack of greenspace, remote location and gas mains * Consistency (eg around 1,250 in text; minimum in policy) * End of first paragraph of policy add: “Development should be dispersed around the settlement to allow the phasing of well-integrated high quality sustainable urban extensions providing good access to facilities and sustainable forms of transport.” and refer to “sites” rather than “site” * Criteria 2: add "disabled accommodation, first-time buyers, single-parent families" * Housing for younger people and shared communal areas. * Concern that housing will not be affordable for local people * All new housing should be carbon neutral; encourage renewable energy sources |
| Heritage Assets   * Add to Policy AL13: "Demonstration that the development would not have an adverse impact on the significance of heritage assets, including listed buildings, or on the character or appearance of the Prinsted Conservation Area." **(Historic England)** |
| Open Space/Green Belt/Green Infrastructure   * Green space proposed in NP as part of “Green Ring” **(Southbourne PC)**.   Incorporate into policy and secure funding from future development.   * Loss of green belt. * Detrimental impact on green space. * GI requirements unambitious. * Change point 10 to “Expansion and provision of green infrastructure into the wider countryside.” * Suggest point 10 reads: ‘Identify opportunities and secure the expansion and provision of multifunctional green infrastructure into the wider countryside and protected landscapes of the South Downs National Park, and Chichester Harbour AONB, including between settlements and facilities.’ **(SDNPA)** |
| Agricultural land   * Loss of open farmland |
| Settlement identity   * Loss of settlement identity. * Detrimental impact upon quality of life in existing settlements, value of property etc. |
| Coalescence   * Concern over coalescence with Hermitage/Emsworth and Chidham and Hambrook |
| Bourne Community College   * Concern new development would compromise open outlook and rurality of school. * Incorporate improvements to Bourne College facilities **(Southbourne PCl)** |

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| * Concern over capacity. |
| Lack of employment   * Employment opportunities limited. |
| Use classes   * Flexible space for employment to include small-scale leisure use **(Southbourne PC)** |
| Propose site allocations   * Land on Cooks Lane as identified in SHLAA and HELAA. * 3 sites at 139 Wayside, Main Road, Land adjacent to Newton, Inlands Road, and land at Gordon Road. * Promote land to north and west of Southbourne (69.3ha). * Propose land adjacent to Prinstead Lane **(WSCC (Estates))** * Suggest Land to the north of Gosden Green Southbourne /object to land in North. * Possible conflict as land proposed at Willowbrook Riding Centre (HSB0001) is located in Parish of Southbourne although forms part of Hambrook settlement. * Remove sites HSB0006 and adjacent plot HSB0007 from the plan. * Land west of Southbourne and south of railway line could be allocated as first phase so southern section of new link road is built to enable access to land to the north. |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this proposed allocation development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.  In particular, confirmation is being sought on the overall need for school places and the  requirement for a new primary school in this location. The next iteration of the Plan will reflect any update received from the County Council as Education Authority. This will inform the identification of any potential for a sports pitch at this location.  In response to broader concerns regarding the impact of level crossings, PBA consultants included the impacts of level crossings as one of the sensitivity tests which is summarised in the document *Chichester District Local Plan Transport Study: Responses to Representations Received through the Consultation Process*. However, this work does not address whether a requirement for a new road bridge is justifiable in transport terms. Further work is being undertaken to test further if a new bridge can be justified in planning terms, and separately technical work on the feasibility of delivering a bridge to inform a delivery strategy going forward.  The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified. |

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| **Policy AL14: Land West of Tangmere** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Supporting Text: 4 | 4 | 0 | 2 | 2 |
| Policy: 24 | 27 | 9 | 8 | 10 |
| Representation numbers  3323 (Luken Beck obo Seaward Properties) 3226 (Henry Adams obo Pitts) 257 (Sustrans) 2901 (Savills obo Bloor Homes) 3303 (Church Commissioners) 1735 1693 (King & Co obo Heaver Homes) 2599 (Turleys obo Countryside Properties) 348 603 2275 (Historic England)  2339 (Southern Water) 604 2926 (CPRE Sussex) 2961 1412 (Tangmere Parish Council)  3197 2418 (South Downs National Park Authority) 603 2600 (Turleys obo Countryside  Properties) 1411 (Tangmere Parish Council) 603 2135 (WSCC) 1638 832 2393 348 1638  3351 (Nexus Planning obo CEG) 337 2793 (Sussex Wildlife Trust) 326 2393 3550 2961 2368 (West Sussex Local Access Forum) 1150 (British Horse Society) 2339 (Southern Water) 2314 (Portsmouth Water) 2393 | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Support Policy (**Luken Beck obo Seaward Properties**) (**Henry Adams obo Pitts)** (**Savills obo Bloor Homes**) (**Church Commissioners**) (**King & Co obo Heaver Homes**)  Potential to increase housing numbers within/adjacent to the allocation (**Luken Beck obo Seaward Properties**) (**Turleys obo Countryside Properties**)   * 7.6ha could come forward prior to allocation with independent access (**Henry Adams obo Pitts**) * Strategic policies should support approach to phased delivery of sites (**Savills obo Bloor Homes**) * Support opportunities for provision of GI links and improvements would comply with objectives of West Sussex Rights of Way Management Plan (**West Sussex Local Access Forum**) (**British Horse Society**) | | | | |
| Object   * Object to criteria 2 and 8 (**Savills obo Bloor Homes**) * Will significantly alter the nature of the village * Question size and deliverability of the allocation | | | | |
| Infrastructure   * Education – insufficient capacity/space to accommodate development, further consideration required to additional space to allow for expansion (**WSCC**) * Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of new infrastructure aligns with the occupation of the development as existing system unsustainable(**Southern Water**) * HAD and Housing could impact on source protection zone, the groundwater needs protecting (**Portsmouth Water**) | | | | |
| Amendments to policy wording   * Strengthen criterion 8 and include criteria on Conservation Area (**Historic England**) (**Turleys obo Countryside Properties**) * Include criteria on waste water (**Southern Water**) * Include provision of housing for younger people with shared communal areas * Replace reference to ‘planned’ with ‘masterplanned’ to make clear whole site and allocation will be masterplanned as a whole and that the precise number of dwellings will be determined through the masterplan (**Turleys obo Countryside Properties**) * Add education to list of benefits * Welcome criteria 5. Policy should be expanded to address sensitivity of site in terms of views from locations within SDNP (**South Downs National Park Authority**) * Clarify paragraph 6.95 to ensure consistent with strategic policies relating to retail development (**Turleys obo Countryside Properties**) | | | | |

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| * Amend policy wording to refer to improvements to sustainable public transport services and links to Chichester City and the Five Villages and Barnham rail station (**Turleys obo Countryside Properties**) * Make specific reference to noise mitigation measures for properties on A27 (**Turleys obo Countryside Properties**) * Include extract from Tangmere Neighbourhood Plan in para 6.92 (**Tangmere PC**) * Ensure NP approach does not hinder development by determining phasing – amend para 6.94 (**King & Co obo Heaver Homes**)   • |
| Environmental considerations   * Lack of biodiversity requirements (**Sussex Wildlife Trust**) (**CPRE Sussex**) * Consideration to be given to chalk stream priority habitat within the site (**Sussex Wildlife Trust**) |
| Initial Council response to issues raised and way forward for the Local Plan Review |
| The principle of development of the site was established in Policy 18 of the adopted Local Plan which allocated the site for mixed development comprising 1,000 homes, Community facilities, Open space and green infrastructure. Since then work has developed and it is considered that the site could deliver around 1,300 dwellings during the Plan period,  together with supporting community facilities, open space and recreation, and infrastructure.  The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this development, will be considered further through evidence studies, including updates to the water quality assessment (Including any necessary phasing of development); the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.  It is thought that the policy should make more explicit the role of the masterplanning process to ensure the site is delivered in accordance with proposed policy S32.  The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified. |

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| **Policy AL15 Land at Chichester Business Park, Tangmere** | | | | |
| Respondents | Representations | Support | Object | Comment |
| Policy: 3 | 1 | 0 | 0 | 1 |
| Representation numbers  2315 (Portsmouth Water) | | | | |
| Summary of issues and key comments raised by residents and other respondents | | | | |
| Water supply:   * Allocation likely to be within a Source Protection Zone for Aldingbourne public water supply abstraction **(Portsmouth Water)** * Need for caution when using infiltration systems e.g. deep bore systems   **(Portsmouth Water)** | | | | |
| Initial Council response to issues raised and way forward for the Local Plan Review | | | | |
| Further detailed discussions need to be held with Portsmouth Water, and if appropriate reference should be made to groundwater quality protection and Portsmouth Water's  Groundwater Protection Guidance. | | | | |