

# Chichester Local Plan 2021 - 2039

## Council Responses to Regulation 19 Representations (in Plan order)



## Chapter 1: Introduction, 1.1

### Support

#### Summary of representations:

Support preparation of Local Plan and welcome opportunity to comment on the plan at this early stage of its preparation. Promoting site (HELAA ref: HFB0027) which was part of area previously allocated as site AL6.

#### Summary of representation changes to plan:

Support preparation of Local Plan and welcome opportunity to comment on the plan at this early stage of its preparation. Promoting site (HELAA ref: HFB0027) which was part of area previously allocated as site AL6.

#### Response:

Noted.

#### Action:

No change in response to this representation.

4089

Support

**Document Element:** Chapter 1: Introduction, 1.1

**Respondent:** Berkeley Strategic Group

### Object

#### Summary of representations:

Do not believe Local Plan provides a suitable level of development around Chichester City. Have evidence to demonstrate greater number of suitable sites than being proposed.

#### Summary of representation changes to plan:

Do not believe Local Plan provides a suitable level of development around Chichester City. Have evidence to demonstrate greater number of suitable sites than being proposed.

#### Response:

Reflecting the spatial strategy the majority of the growth proposed in the Local Plan is located within or around Chichester city and reflects the availability and suitability of sites as assessed through the HELAA.

#### Action:

No change in response to this representation.

4098

Object

**Document Element:** Chapter 1: Introduction, 1.1

**Respondent:** Berkeley Strategic Group

## Support

### Summary of representations:

Support Spatial Strategy and focussing majority of growth at Chichester City.

Promoting site (HELAA ref: HLV0007).

### Summary of representation changes to plan:

Support Spatial Strategy and focussing majority of growth at Chichester City.

Promoting site (HELAA ref: HLV0007).

### Response:

Noted.

### Action:

No change in response to this representation.

4229

Support

**Document Element:** Chapter 1: Introduction, 1.1

**Respondent:** Mr David Lock and Ms Melanie Jenkins

**Agent:** Mr Jonathan Lambert

## Support

### Summary of representations:

CDC should provide a local plan that balances the needs of the local residents and the preservation of the environment and does not create or exacerbate any possible environmental damage caused by pollution and energy use.

### Summary of representation changes to plan:

CDC should provide a local plan that balances the needs of the local residents and the preservation of the environment and does not create or exacerbate any possible environmental damage caused by pollution and energy use.

### Response:

Noted.

### Action:

No change in response to this representation.

4338

Support

**Document Element:** Chapter 1: Introduction, 1.1

**Respondent:** Mr Simon Davenport

## Object

### Summary of representations:

Plan strategy changed in such a way that public should have an opportunity to comment on those changes before a Reg 19 consultation. As can only comment on tests of soundness not an opportunity for appropriate public engagement. No opportunity to comment on new allocations, the suitability of the sites, content of the policy, change in strategy.

### Summary of representation changes to plan:

The Plan should be paused and time given for public engagement at a meaningful level.

### Response:

There is considerable flexibility open to LPAs in how the initial stages of local plan production are carried out and there is no requirement to have a further Regulation 18 consultation.

The Regulation 19 consultation still provides an opportunity to comment on all aspects of the Plan.

### Action:

No change in response to this representation.

**4568****Object**

**Document Element:** Chapter 1: Introduction, 1.1

**Respondent:** Mr Matthew Taylor

## Object

### Summary of representations:

Government has tasked Growers to grow more home grown produce, increase productivity, reduce food miles and UK's reliance on imported food. Can achieve these aims but horticultural and food industries need planning policies in place enabling sustainable development.

### Summary of representation changes to plan:

More flexibility is needed in the Local Plan to meet needs of horticultural sector.

### Response:

Comments noted. See council's response to representations made by respondent to Local Plan sections on Addressing Horticultural Needs and Horticultural Development.

### Action:

No changes in response to this representation

**4728****Object**

**Document Element:** Chapter 1: Introduction, 1.1

**Respondent:** West Sussex Growers' Association

## Object

### Summary of representations:

CDC should be meeting their identified housing need and disagree with justification that there is insufficient capacity (due to constraints) within parts of the district.

Plan does not adequately meet current housing need, particularly need for affordable housing.

### Summary of representation changes to plan:

N/A

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need (July 2024) and Transport (July 2024) Background Papers.

### Action:

No changes in response to this representation

4758

Object

**Document Element:** Chapter 1: Introduction, 1.1

**Respondent:** Rydon Homes Limited

**Agent:** DMH Stallard LLP

## Object

### Summary of representations:

Plan as drafted, in particular housing delivery risks being found 'unsound' on the grounds of failing to be positively prepared and lacking a fully considered highways evidence base.

### Summary of representation changes to plan:

Following policies should be reworded to ensure plan's overall soundness:

Policy H1 – must reflect Objectively Assessed Need, evidence base on which the justification for a reduction in housing delivery is flawed and not credible.

Policy H2 – quantum of development at Southbourne (A13) should be 1,250

Policy A13 – increase dwelling number to 1,250 and allocate specific site.

### Response:

See the response to the respondent's representations to the policies referenced:

Policy H1 – 4775/6074

Policy H2 – 6072/6075

Policy A13 – 4782/6076

### Action:

No changes in response to this representation

4787

Object

**Document Element:** Chapter 1: Introduction, 1.1**Respondent:** Wates Developments and Seaward Properties**Agent:** Barton Willmore now Stantec

Support

**Summary of representations:**

Welcome opportunity to comment on Regulation 19 Plan. RSPB has many important interests and priorities within the district, including the Eastern Solent and Arun Valley and the internationally important designations within.

**Summary of representation changes to plan:**

Welcome opportunity to comment on Regulation 19 Plan. RSPB has many important interests and priorities within the district, including the Eastern Solent and Arun Valley and the internationally important designations within.

**Response:**

Noted.

**Action:**

No change in responses to this representation.

4925

Support

**Document Element:** Chapter 1: Introduction, 1.1**Respondent:** Royal Society for the Protection of Birds (RSPB)

Object

**Summary of representations:**

The Legal status of the Plan is proven but because of the protracted course of the plan's preparation some stages are now dated and raise the question that they should be refreshed. This is the particular case in respect of public participation. There have also been significant changes in legislation that guides the plan's formulation that would have benefited from revised statement of legislative/legal context.

**Summary of representation changes to plan:**

The Legal status of the Plan is proven but because of the protracted course of the plan's preparation some stages are now dated and raise the question that they should be refreshed. This is the particular case in respect of public participation. There have also been significant changes in legislation that guides the plan's formulation that would have benefited from revised statement of legislative/legal context.

**Response:**

There is considerable flexibility open to LPAs in how the initial stages of local plan production are carried out and there is no requirement to have a further Regulation 18 consultation.

**Action:**

No change in responses to this representation.

5342

Object

**Document Element:** Chapter 1: Introduction, 1.1**Respondent:** Mr Paul Bedford

Support

**Summary of representations:**

Support in principle.

**Summary of representation changes to plan:**

Support in principle.

**Response:**

Noted.

**Action:**

No change in responses to this representation.

6267

Support

**Document Element:** Chapter 1: Introduction, 1.1**Respondent:** The Goodwood Estates Company Limited**Agent:** HMPC Ltd

## Chapter 1: Introduction, 1.2

Object

**Summary of representations:**

Government has tasked Growers to grow more home grown produce, increase productivity, reduce food miles and UK's reliance on imported food. Can achieve these aims but horticultural and food industries need planning policies in place enabling sustainable development.

**Summary of representation changes to plan:**

More flexibility is needed in the Local Plan to meet needs of horticultural sector.

**Response:**

Comments noted. See council's response to representations made by respondent to Local Plan sections on Addressing Horticultural Needs and Horticultural Development.

**Action:**

No changes in response to this representation

4743

Object

**Document Element:** Chapter 1: Introduction, 1.2**Respondent:** West Sussex Growers' Association

## Object

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### Summary of representations:

This plan appears to contradict the DPD. It should be noted that where a new DPD is adopted it will take precedence over this document. Comment is generated in response to Bosham site allocation which is not sound.

### Summary of representation changes to plan:

As above. New DPD should come before this document is approved. The site allocations are not sound and possibly not compliant.

### Response:

The Local Plan currently being prepared is a DPD. It will replace the adopted Local Plan Key Policies and set the strategic framework for the preparation of future Neighbourhood Plans and any subsequent DPD. As set out in Local Plan Appendix H, the policies in the currently adopted Site Allocation DPD have been 'saved' for continued use.

See also the respondent's representations to Policy H2 – Rep 4882.

### Action:

No changes in response to this representation

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4817

Object

**Document Element:** Chapter 1: Introduction, 1.2

**Respondent:** Willowfield Farm



## Object

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### Summary of representations:

There has not been sufficient, recent public consultation. The last stage was in January 2019 on the Preferred Option as confirmed by the latest Statement of Community Involvement published in November 2018. Neither has there been published a Statement of Common Ground. It is recommended that this be published at same time as Regulation 19. Much has changed in four years, including government commitments to tackle Climate Change and Sustainable Transport.

Water, sewerage, sea level rise, pollution have all worsened all of which must be taken into account

### Summary of representation changes to plan:

There has not been sufficient, recent public consultation. The last stage was in January 2019 on the Preferred Option as confirmed by the latest Statement of Community Involvement published in November 2018. Neither has there been published a Statement of Common Ground. It is recommended that this be published at same time as Regulation 19. Much has changed in four years, including government commitments to tackle Climate Change and Sustainable Transport.

Water, sewerage, sea level rise, pollution have all worsened all of which must be taken into account

### Response:

There is considerable flexibility open to LPAs in how the initial stages of local plan production are carried out and there is no requirement to have a further Regulation 18 consultation.

A Statement of Compliance (January 2023) with the Duty to Cooperate was published alongside the Regulation 19 Local Plan.

### Action:

No change in responses to this representation.

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**4878****Object**

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**Document Element:** Chapter 1: Introduction, 1.2

**Respondent:** Manhood Peninsular Action Group

## Chapter 1: Introduction, 1.3

Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation

4746

Support

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**Document Element:** Chapter 1: Introduction, 1.3

**Respondent:** West Sussex Growers' Association

## Purpose of the Plan, 1.4

Support

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**Summary of representations:**

Support for whole plan policy

**Summary of representation changes to plan:**

Support for whole plan policy

**Response:**

Noted.

**Action:**

No change in responses to this representation

4507

Support

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**Document Element:** Purpose of the Plan, 1.4

**Respondent:** Birdham Parish Council

## Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

Support

**Response:**

Noted.

**Action:**

No change in responses to this representation.

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4750

Support

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**Document Element:** Purpose of the Plan, 1.4

**Respondent:** West Sussex Growers' Association

## Support

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**Summary of representations:**

Parish Council wishes to register its support for the current Local Plan.

**Summary of representation changes to plan:**

Parish Council wishes to register its support for the current Local Plan.

**Response:**

Noted.

**Action:**

No change in responses to this representation.

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5232

Support

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**Document Element:** Purpose of the Plan, 1.4

**Respondent:** West Itchenor Parish Council

**Agent:** West Itchenor Parish Council

## Object

### Summary of representations:

The NPPF states (paragraph 22) strategic policies should look ahead over a minimum 15 year period from adoption. The plan period is 18 years but as unlikely Local Plan will be adopted before 2024-25 it may not cover the required plan period of 15 years.

### Summary of representation changes to plan:

The Council should extend the plan period to at least 2040 to ensure this requirement is met

### Response:

Comments noted.

### Action:

No change in responses to this representation.

5233

Object

**Document Element:** Purpose of the Plan, 1.4

**Respondent:** Hallam Land Management Limited

**Agent:** LRM Planning

## Object

### Summary of representations:

Parish Council supports the plan overall and that the plan is legally compliant and sound but feel the Local Plan consultation period has not allowed sufficient time for proper local consultation and includes proposals that have never previously been consulted upon in Boxgrove.

### Summary of representation changes to plan:

N/A

### Response:

There is considerable flexibility open to LPAs in how the initial stages of local plan production are carried out and there is no requirement to have a further Regulation 18 consultation.

The Chichester Local Plan; Proposed Submission proposes a parish housing figure for Boxgrove of 50 dwellings (Policy H2). This is unchanged from the Preferred Approach Local Plan, which was the subject of consultation during December 2018 – February 2019.

### Action:

No change in responses to this representation.

5688

Object

**Document Element:** Purpose of the Plan, 1.4

**Respondent:** Boxgrove Parish Council

## Object

**Summary of representations:**

We believe the plan should be withdrawn and significantly revised.

**Summary of representation changes to plan:**

We believe the plan should be withdrawn and significantly revised.

**Response:**

Comments noted.

**Action:**

No change in responses to this representation.

**5972****Object**

**Document Element:** Purpose of the Plan, 1.4

**Respondent:** Chichester Harbour Trust

**Purpose of the Plan, 1.5**

## Object

**Summary of representations:**

While the Plan recognises climate change there is no forecast scenario of what climate the Plan is designed to cater for either in 2039 or any intervening years.

**Summary of representation changes to plan:**

The Plan should be revised to forecast how climate change may alter land use planning requirements over the period of the plan and demonstrate how the Plan is sufficiently flexible to the changes which will occur albeit the timing of these changes are uncertain. As an example it is clear that some existing areas of housing in the Manhood Peninsular are very vulnerable to flooding due to storm surges. Climate change will bring an increasing risk of such events and some housing areas should be identified in the Plan for such displacement to take place.

**Response:**

The Local Plan already recognises that climate change is an issue to be addressed and sets out a strategic approach to development on the Manhood Peninsula, including the relocation of settled areas (Policy NE14 Integrated Coastal Zone Management for the Manhood Peninsula) and requirements for new development around the coast (Policies NE12 Development Around the Coast and NE15 Flood Risk and Water Management).

As set out in the Planning Practice Guidance, the primary source of evidence for defining coastal change management areas is the shoreline management plan. However, the relevant SMPs for the Plan Area do not currently require the identification of such areas.

**Action:**

No change in responses to this representation.

**4624****Object**

**Document Element:** Purpose of the Plan, 1.5

**Respondent:** Mr Colin Mckenna

## Support

### Summary of representations:

Support.

### Summary of representation changes to plan:

Support.

### Response:

Noted.

### Action:

No change in responses to this representation.

4760

Support

**Document Element:** Purpose of the Plan, 1.5

**Respondent:** West Sussex Growers' Association

## Object

### Summary of representations:

Local Plan does not fully take into account need of horticultural industry to develop functionally linked development in proximity to existing horticultural operations.

### Summary of representation changes to plan:

Should allow for siting of functionally linked developments within the Runcton HDA, which is currently prohibited by the wording of Policy E4 in only allowing ancillary developments rather than the suite of development uses required to support a world class food cluster.

### Response:

Noted.

Noted. See response to representations made by respondent to Policy E4.

### Action:

No changes in response to this representation

4950

Object

**Document Element:** Purpose of the Plan, 1.5

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Purpose of the Plan, 1.6

## Object

### Summary of representations:

There will be environmental constraints which overrule any local plan, including this one, as projected rising sea levels as well as abnormal weather events threaten human habitation of the coastal plain.

The primacy of working within the short term climate forecasts and the need to avoid further environmental damage in the area will mean that the existing local plan will have reduced relevance to ongoing development.

### Summary of representation changes to plan:

There will be environmental constraints which overrule any local plan, including this one, as projected rising sea levels as well as abnormal weather events threaten human habitation of the coastal plain.

The primacy of working within the short term climate forecasts and the need to avoid further environmental damage in the area will mean that the existing local plan will have reduced relevance to ongoing development.

### Response:

The Local Plan already recognises that climate change is an issue to be addressed and sets out a strategic approach to development on the Manhood Peninsula, including the relocation of settled areas (Policy NE14 Integrated Coastal Zone Management for the Manhood Peninsula) and requirements for new development around the coast (Policies NE12 Development Around the Coast and NE15 Flood Risk and Water Management).

As set out in the Planning Practice Guidance, the primary source of evidence for defining coastal change management areas is the shoreline management plan. However, the relevant SMPs for the Plan Area do not currently require the identification of such areas.

### Action:

No change in responses to this representation.

4579

Object

Document Element: Purpose of the Plan, 1.6

Respondent: Mr Simon Davenport

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

Support

### Response:

Noted.

### Action:

No change in responses to this representation.

4761

Support

**Document Element:** Purpose of the Plan, 1.6

**Respondent:** West Sussex Growers' Association

## Purpose of the Plan, 1.7

Support

### Summary of representations:

█ Welcome the idea of neighbourhood plans, which consider very democratic.

### Summary of representation changes to plan:

█ Welcome the idea of neighbourhood plans, which consider very democratic.

### Response:

█ Noted.

### Action:

█ No change in responses to this representation.

5159

Support

**Document Element:** Purpose of the Plan, 1.7

**Respondent:** John Newman



## How to Use the Plan, 1.10

## Object

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### Summary of representations:

Proposed housing number for Loxwood increases provision already made and ignores the Neighbourhood Plan prepared by the Parish Council and residents.

No account of inadequate infrastructure, lack of regular public transport or long term job opportunities.

The scale of the proposals will change the nature of

### Summary of representation changes to plan:

Review the overall plan for Northern area to ensure a more equitable distribution of housing.

National Planning Guidelines not followed and Neighbourhood Plan should not be rode roughshod over.

### Response:

It must be recognised that the Local Plan is the primary development plan document for the Plan Area and will establish the strategic policies for the Plan Area for the next 15 years. Its preparation may render some policies within made neighbourhood plans out of date.

### Action:

No change in responses to this representation.

4347

Object

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**Document Element:** How to Use the Plan, 1.10

**Respondent:** Juliet Robertson

## How to Use the Plan, 1.11

### Object

#### Summary of representations:

Government has tasked Growers to grow more home grown produce, increase productivity, reduce food miles and UK's reliance on imported food. Can achieve these aims but horticultural and food industries need planning policies in place enabling sustainable development.

#### Summary of representation changes to plan:

More flexibility is needed in the Local Plan to meet needs of horticultural sector.

#### Response:

Comments noted. See council's response to representations made by respondent to Local Plan sections on Addressing Horticultural Needs and Horticultural Development.

#### Action:

No changes in response to this representation

4768

Object

**Document Element:** How to Use the Plan, 1.11

**Respondent:** West Sussex Growers' Association

## Policy Context, 1.13

### Object

#### Summary of representations:

Government has tasked Growers to grow more home grown produce, increase productivity, reduce food miles and UK's reliance on imported food. Can achieve these aims but horticultural and food industries need planning policies in place enabling sustainable development.

#### Summary of representation changes to plan:

More flexibility is needed in the Local Plan to meet needs of horticultural sector.

#### Response:

Comments noted. See council's response to representations made by respondent to Local Plan sections on Addressing Horticultural Needs and Horticultural Development.

#### Action:

No changes in response to this representation

4773

Object

**Document Element:** Policy Context, 1.13

**Respondent:** West Sussex Growers' Association

## National Planning Policy, 1.14

### Object

#### Summary of representations:

The NPPF is currently under review and may result in a shift in Government Policy on development - particularly on housing targets. We feel that the publication of the Chichester Local Plan pre-empts the outcome of the consultation and potential change in national planning policy.

#### Summary of representation changes to plan:

The timescale of the plan submission should be amended to allow for the confirmation of national planning policy. In the meantime, to guard against speculative development, there should be a moratorium on building in the district.

#### Response:

A revised NPPF was published in December 2023. The NPPF contains transitional arrangements whereby Local Plans that have reached Regulation 19 stage before 19 March 2024 will be examined under the relevant previous version of the NPPF. These transitional arrangements, therefore, apply to the Chichester Local Plan as it reached Regulation 19 stage in January 2023.

#### Action:

No changes in response to this representation

**4091****Object**

**Document Element:** National Planning Policy, 1.14

**Respondent:** Chichester Harbour Trust

## Relationship between Neighbourhood Plans and the Local Plan, 1.17

### Object

#### Summary of representations:

Not sound because not effective to make decision based on incomplete or out of date plans without making additional enquiries of local residents and land users who have a better understanding of the local area.

#### Summary of representation changes to plan:

Paragraph should be amended to make clear that existing neighbourhood plans should not be overridden with increased housing numbers unless local support demonstrated through a positive local referendum.

#### Response:

It must be recognised that the Local Plan is the primary development plan document for the Plan Area and will establish the strategic policies for the Plan Area for the next 15 years. Its preparation may render some policies within made neighbourhood plans out of date.

#### Action:

No changes in response to this representation

**4073****Object**

**Document Element:** Relationship between Neighbourhood Plans and the Local Plan, 1.17

**Respondent:** Mr Matthew Rees

## Object

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**Summary of representations:**

■ The plan is out of date and incomplete with reference to the revisions made in the plan.

**Summary of representation changes to plan:**

■ Update the plan and re submit.

**Response:**

■ It is unclear what revisions the respondent is referring to.

**Action:**

■ No changes in response to this representation

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4376

Object

**Document Element:** Relationship between Neighbourhood Plans and the Local Plan, 1.17

**Respondent:** Mr John Wolfenden

## Support

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**Summary of representations:**

■ Support – with qualification

**Summary of representation changes to plan:**

■ Support – with qualification

**Response:**

■ Noted.

**Action:**

■ No change in responses to this representation.

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4391

Support

**Document Element:** Relationship between Neighbourhood Plans and the Local Plan, 1.17

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

Paragraphs 1.17 - 1.22 focus almost exclusively on timing of Neighbourhood Plans and housing delivery. No mention of how can energise communities on issues linked to built and ambient local environment, create well-supported visions for areas of change, design standards and shape and influence inward investment to unlock land and deliver new development.

### Summary of representation changes to plan:

Paragraphs 1.17 - 1.22 focus almost exclusively on timing of Neighbourhood Plans and housing delivery. No mention of how can energise communities on issues linked to built and ambient local environment, create well-supported visions for areas of change, design standards and shape and influence inward investment to unlock land and deliver new development.

### Response:

Whilst the role of Neighbourhood Plans is acknowledged, it is considered unnecessary for the Local Plan to go into the level of detail suggested by the respondent.

### Action:

No change in responses to this representation.

5742

Object

**Document Element:** Relationship between Neighbourhood Plans and the Local Plan, 1.17

**Respondent:** Chichester City Council Neighbourhood Plan Steering Group

## Object

### Summary of representations:

Concern regarding consultation process in relation to Parish Council, neighbourhood planning and local community support.

### Summary of representation changes to plan:

Concern regarding consultation process in relation to Parish Council, neighbourhood planning and local community support.

### Response:

There is considerable flexibility open to LPAs in how the initial stages of local plan production are carried out and there is no requirement to have a further Regulation 18 consultation.

It must be recognised that the Local Plan is the primary development plan document for the Plan Area and will establish the strategic policies for the Plan Area for the next 15 years. Its preparation may render some policies within made neighbourhood plans out of date.

The consultation undertaken accorded with the Council's adopted Statement of Community Involvement and with the statutory requirements for Local Plans at this stage of their preparation. Whilst the on-line consultation portal was the preferred means of submitting a response, representations could also be made via email and letter.

### Action:

No change in responses to this representation.

**6020****Object****Document Element:** Relationship between Neighbourhood Plans and the Local Plan, 1.17**Respondent:** Chidham and Hambrook Parish Council**Object****Summary of representations:**

Parish Council agree that Chichester District requires an effective adopted Local Plan to protect the district, and especially villages, from speculative development. However, concerns about the methodology for the housing allocation.

Wisborough Green cannot take further (significant in percentage terms) housing allocation without a detrimental impact on its rural and historic character - contrary to Local Plan objectives.

**Summary of representation changes to plan:**

N/A

**Response:**

The increase in the north compared to the Preferred Approach is due to the need to explore all possible means of meeting the 638dpa figure, which included looking again at the potential for development in the north east of the plan area. For further detail on the justification for the housing figure in the north east of the plan area, please see the Housing Distribution Background Paper (July 2024).

The Housing Distribution Background Paper (July 2024) explains the development of the proposed distribution of housing and the SA report (January 2023, Section 7), sets out the Council's reasoning for the preferred growth strategy having considered reasonable alternatives.

**Action:**

No change in responses to this representation.

**6194****Object****Document Element:** Relationship between Neighbourhood Plans and the Local Plan, 1.17**Respondent:** Wisborough Green Parish Council

## Relationship between Neighbourhood Plans and the Local Plan, 1.18

### Support

#### Summary of representations:

Support – with qualification

#### Summary of representation changes to plan:

Support – with qualification

#### Response:

Noted.

#### Action:

No change in responses to this representation.

### 4392

### Support

**Document Element:** Relationship between Neighbourhood Plans and the Local Plan, 1.18

**Respondent:** Wisborough Green Parish Council

### Object

#### Summary of representations:

Have reviewed Neighbourhood Plan to tight timetable in order to meet CDC advice that the Regulation 14 consultation must be started by January 2020 if the village was to allocate sites. CDC have subsequently increased allocation and subsequent delay but has provided little information or support.

#### Summary of representation changes to plan:

Have reviewed Neighbourhood Plan to tight timetable in order to meet CDC advice that the Regulation 14 consultation must be started by January 2020 if the village was to allocate sites. CDC have subsequently increased allocation and subsequent delay but has provided little information or support.

#### Response:

The Council acknowledge that progress on the Local Plan has not taken place in line with the timetable originally envisaged. However, the need to address infrastructure issues, in particular the A27 and water neutrality, has impacted on the Council's ability to move forward with the Local Plan.

This has also necessitated the Council testing various development scenarios and the Council has shared information with Parish Council's in advance of the Regulation 19 consultation when it has been in a position to do so.

#### Action:

No change in responses to this representation.

### 6195

### Object

**Document Element:** Relationship between Neighbourhood Plans and the Local Plan, 1.18

**Respondent:** Wisborough Green Parish Council

## Relationship between Neighbourhood Plans and the Local Plan, 1.19

### Support

#### Summary of representations:

Support – with qualification

#### Summary of representation changes to plan:

Support – with qualification

#### Response:

Noted.

#### Action:

No change in responses to this representation.

### 4393

### Support

**Document Element:** Relationship between Neighbourhood Plans and the Local Plan, 1.19

**Respondent:** Wisborough Green Parish Council

### Object

#### Summary of representations:

The support and sharing of evidence and information is essential, though has been sadly lacking on CDC's part during the past 3 years, in stark comparison to the good level when the Neighbourhood Plan was first prepared.

#### Summary of representation changes to plan:

The support and sharing of evidence and information is essential, though has been sadly lacking on CDC's part during the past 3 years, in stark comparison to the good level when the Neighbourhood Plan was first prepared.

#### Response:

The need to address infrastructure issues, in particular the A27 and water neutrality, has necessitated the Council testing various development scenarios and the Council has shared information with Parish Council's when it has been in a position to do so.

#### Action:

No change in responses to this representation.

### 6196

### Object

**Document Element:** Relationship between Neighbourhood Plans and the Local Plan, 1.19

**Respondent:** Wisborough Green Parish Council



## Relationship between Neighbourhood Plans and the Local Plan, 1.20

### Object

#### Summary of representations:

Local Parishes can assist the supply of land for development needs with managed change through Neighbourhood Plans (NPs), providing opportunities for limited, appropriate growth, in smaller settlements.

Specific policies should protect land within Parishes adjoining the National Park from inappropriate development.

Questioned whether figures proposed for Parishes represent the true potential of the area or the needs of the community.

#### Summary of representation changes to plan:

Plan must encourage neighbourhood plans to actively pursue long-term growth.

Plan must examine strategic infrastructure needs and ensure enhancement opportunities are identified and protected through appropriate policy designations to ensure new developments do not compromise the ability to deliver. Further development of housing sites immediately adjacent to the A27 should be resisted unless provision is made within the application for appropriate upgrading of that route (this is most important in locations close to existing or potential junctions.)

#### Response:

The Local Plan identifies those parishes where it is expected allocations will be made via Neighbourhood Plans (Policies H2 and H3). In addition development that supports local community services or economic growth will be supported where this is consistent with the development strategy (Policy S1).

The proposed modifications to Policy T1 Transport Infrastructure set out the council's approach to securing transport mitigation to support the planned growth.

#### Action:

No change in responses to this representation

4283

Object

**Document Element:** Relationship between Neighbourhood Plans and the Local Plan, 1.20

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Relationship between Neighbourhood Plans and the Local Plan, 1.21

Support

### Summary of representations:

WGPC's Reg 14 consultation was completed in May 2021, the process was then paused by CDC; it was not until January 2023 that CDC advised that WG's housing allocation had increased to 75.

The NP process will be resumed when the Local Plan has been through examination.

### Summary of representation changes to plan:

WGPC's Reg 14 consultation was completed in May 2021, the process was then paused by CDC; it was not until January 2023 that CDC advised that WG's housing allocation had increased to 75.

The NP process will be resumed when the Local Plan has been through examination.

### Response:

Noted.

### Action:

No change in responses to this representation.

4394

Support

**Document Element:** Relationship between Neighbourhood Plans and the Local Plan, 1.21

**Respondent:** Wisborough Green Parish Council

## Duty to Co-operate, 1.23

### Object

#### Summary of representations:

Needs to be clearer what has been agreed in respect of Statements of Common Ground and whether neighbouring authorities will be able to meet any unmet demands. Council should optimise housing delivery especially where these areas are geographically close to the SDNP.

#### Summary of representation changes to plan:

It needs to be clearer what has been agreed in respect of the Statement of Common Ground. It also needs to be clearer whether neighbouring authorities will be able to meet any unmet demands. The council should optimise housing delivery especially where these areas are geographically close to the SDNP.

#### Response:

As set out in the Statement of Compliance (April 2024) no neighbouring authority has confirmed that it is in a position to accommodate any of the Plan Area's unmet need. Statements of Common Ground have been agreed with East Hampshire District, Horsham District and Havant Borough Councils and are being drafted with the Plan Area's other neighbouring planning authorities, which set out the position on unmet housing needs.

In respect of the SDNP, the Authority are updating their housing needs evidence and are not able, at this stage, to identify if there is any unmet need arising within the Plan Area.

#### Action:

No change in response to this representation

## 4362

### Object

**Document Element:** Duty to Co-operate, 1.23

**Respondent:** Welbeck Strategic Land IV LLP (Welbeck Land)

**Agent:** Miss Jess Bain

### Support

#### Summary of representations:

Support – with qualification

#### Summary of representation changes to plan:

Support – with qualification

#### Response:

Comments noted. See also response to representation 6233 from Wisborough Green Parish Council.

#### Action:

No change in response to this representation

## 4628

### Support

**Document Element:** Duty to Co-operate, 1.23

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

Concern Local Plan not seeking to address unmet need agreed by WSGBSPB and cannot meet own need. Also that no progress since LSS2.

### Summary of representation changes to plan:

N/A

### Response:

The Council have sought to address unmet needs during the preparation of this Local Plan and have engaged with both neighbouring authorities and those in the wider region but, as set out in the updated Statement of Compliance (April 2024), no authority has confirmed that it is in a position to accommodate any of the Plan Area's unmet need.

It is acknowledged that preparation of LSS3 has not advanced as quickly as the Council and others would have wished. However, in the absence of progress on the LSS3 update the Council is, as referenced above, preparing statements of common ground with individual authorities.

### Action:

No change in response to this representation.

4780

Object

**Document Element:** Duty to Co-operate, 1.23

**Respondent:** Reside Developments Ltd

**Agent:** Tetra Tech

## Object

### Summary of representations:

Concerns Plan strategy, specifically the 'constrained' housing requirement figure has led to discussions with Neighbouring Authorities focused on meeting Chichester's unmet need rather than the ability of Chichester to meet the unmet need of neighbouring authorities.

Council should revisit discussions with neighbouring authorities, particularly the South Downs National Park, to understand any unmet need that can be accommodated within Chichester District, and there is no justified rationale for a suppressed housing requirement figure.

### Summary of representation changes to plan:

The Council should re-visit its discussions with neighbouring authorities.

### Response:

The Council have sought to address unmet needs during the preparation of this Local Plan and have engaged with both neighbouring authorities and those in the wider region.

In respect of the SDNP, the Authority are updating their housing needs evidence and are not able, at this stage, to identify if there is any unmet need arising within the Plan Area.

### Action:

No change in response to this representation

**4935****Object****Document Element:** Duty to Co-operate, 1.23**Respondent:** Gleeson Strategic Land**Object****Summary of representations:**

Under provision against OAN has not been justified anywhere in discussions with neighbouring authorities before Plan was submitted. No Statements of Common Ground have been produced or agreed. The failure to meet the duty to cooperate cannot be remedied because it has already ended with the Submission Plan. The plan therefore fails the positively prepared and justified tests. It also fails to comply with national policy in the NPPF paragraph 24-27 which advises on the duty to cooperate approach.

**Summary of representation changes to plan:**

N/A

**Response:**

The Statement of Compliance published at the time of the Regulation 19 consultation set out that no neighbouring authority had confirmed that it was in a position to accommodate any of the Plan Area's unmet need. The latest position is set out in the updated Statement of Compliance (April 2024) and Statements of Common Ground have been agreed with East Hampshire District, Horsham District and Havant Borough Councils and are being drafted with the Plan Area's other neighbouring planning authorities, which set out the position on unmet housing needs.

**Action:**

No change in response to this representation

**5018****Object****Document Element:** Duty to Co-operate, 1.23**Respondent:** Domusea**Agent:** Smith Simmons Partners

## Object

**Summary of representations:**

Undertaking to review within 5 years not met; failure to meet duty to cooperate; under provision against need not justified anywhere in discussions with neighbouring authorities.

**Summary of representation changes to plan:**

N/A.

**Response:**

The Statement of Compliance published at the time of the Regulation 19 consultation set out that no neighbouring authority had confirmed that it was in a position to accommodate any of the Plan Area's unmet need. The latest position is set out in the updated Statement of Compliance (April 2024) and Statements of Common Ground have been agreed with East Hampshire District, Horsham District and Havant Borough Councils and are being drafted with the Plan Area's other neighbouring planning authorities, which set out the position on unmet housing needs.

**Action:**

No change in response to this representation

**5026****Object**

**Document Element:** Duty to Co-operate, 1.23

**Respondent:** Hanbury Properties

**Agent:** Smith Simmons Partners

## Object

**Summary of representations:**

Plan not legally compliant as it has not been reviewed within 5 years of the last Plan adopted in July 2015.

Under provision against OAN has not been justified anywhere in discussions with neighbouring authorities before Plan was submitted. No Statements of Common Ground have been produced or agreed. The failure to meet the duty to cooperate cannot be remedied because it has already ended with the Submission Plan. The plan therefore fails the positively prepared and justified tests. It also fails to comply with national policy in the NPPF paragraph 24-27 which advises on the duty to cooperate approach.

**Summary of representation changes to plan:**

N/A

**Response:**

The Statement of Compliance published at the time of the Regulation 19 consultation set out that no neighbouring authority had confirmed that it was in a position to accommodate any of the Plan Area's unmet need. The latest position is set out in the updated Statement of Compliance (April 2024) and Statements of Common Ground have been agreed with East Hampshire District, Horsham District and Havant Borough Councils and are being drafted with the Plan Area's other neighbouring planning authorities, which set out the position on unmet housing needs.

**Action:**

No change in response to this representation

5104

Object

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**Document Element:** Duty to Co-operate, 1.23

**Respondent:** Seaward Properties Ltd

**Agent:** Smith Simmons Partners

## Duty to Co-operate, 1.23

## Object

### Summary of representations:

Concerning Statements of Common Ground not available for the consultation to provide clarity as to key issues and co-operation that has taken place to address issues.

Whilst West Sussex authorities have established mechanism for joint working through the WSGBSPB, no progress made in addressing the unmet needs of area. Recognise area is constrained by national park and coastal location but seemingly nothing has been achieved in seeking to move forward. Would question whether mechanisms established have maximised effectiveness of Local Plan preparation in addressing unmet housing needs. Expectation that cross boundary issues are not pushed forward to future plans or plan reviews, yet this is clearly what is being done in West Sussex and Greater Brighton area.

### Summary of representation changes to plan:

N/A

### Response:

The Council have sought to address unmet needs during the preparation of this Local Plan and have engaged with both neighbouring authorities and those in the wider region but, as set out in the updated Statement of Compliance (April 2024), no authority has confirmed that it is in a position to accommodate any of the Plan Area's unmet need.

It is acknowledged that preparation of LSS3 has not advanced as quickly as the Council and others would have wished. However, in the absence of progress on the LSS3 update the Council is, as referenced above, preparing statements of common ground with individual authorities.

### Action:

No change in response to this representation.

## 5145

## Object

**Document Element:** Duty to Co-operate, 1.23

**Respondent:** Home Builders Federation



## Object

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**Summary of representations:**

Query whether Plan addresses issues arising from WSGBSPB review of LSS. Transfer of unmet housing demand to adjoining authorities is characteristic feature of past policy. SA categorically states would be no realistic potential to meet unmet housing need above the now established LHN figure. Should WSGBSPB's report signal need for district to absorb housing from other areas may be problems as Plan does not appear to offer any contingency or process on how such pressure might be mitigated.

**Summary of representation changes to plan:**

N/A

**Response:**

As the LSS3 is in the early stages it is premature to say what options will be explored to address unmet needs across the sub-region but CDC will continue to engage with relevant stakeholders on this issue.

It should be noted that a housing requirement figure significantly above the LHN has previously been considered (as set out in the SA report published at the time of the Preferred Approach Local Plan).

The justification for not meeting the housing needs in full is set out in the Housing Need (July 2024) and Transport (July 2024) Background Papers.

**Action:**

No change in response to this representation.

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**5350****Object**

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**Document Element:** Duty to Co-operate, 1.23

**Respondent:** Mr Paul Bedford

## Support

### Summary of representations:

Council may well have fulfilled Duty to Co-operate, however LSS3 not yet been agreed and Statements of Common Ground not available at this point. Reserve position but believe LPA has followed the letter and spirit of the Duty to Cooperate in arriving at the pre-submission plan.

### Summary of representation changes to plan:

Council may well have fulfilled Duty to Co-operate, however LSS3 not yet been agreed and Statements of Common Ground not available at this point. Reserve position but believe LPA has followed the letter and spirit of the Duty to Cooperate in arriving at the pre-submission plan.

### Response:

The Statement of Compliance published at the time of the Regulation 19 consultation set out the key cross boundary strategic issues and engagement undertaken by the Council with neighbouring authorities and other relevant bodies on these issues.

It is acknowledged that preparation of LSS3 has not advanced as quickly as the Council and others would have wished. However, in the absence of progress on the LSS3 update the Council is, as referenced above, preparing statements of common ground with individual authorities.

### Action:

No change in response to this representation.

5364

Support

**Document Element:** Duty to Co-operate, 1.23

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

Developments in Horsham District and Waverley Borough areas will place pressure on infrastructure in Wisborough Green and this should be assessed alongside proposed growth in Wisborough Green. Do not believe spatial planning issues across local authority boundaries are being correctly considered. Approach seems to only be considered a macro level, ignoring cumulative effect of development outside of plan area.

### Summary of representation changes to plan:

Developments in Horsham District and Waverley Borough areas will place pressure on infrastructure in Wisborough Green and this should be assessed alongside proposed growth in Wisborough Green. Do not believe spatial planning issues across local authority boundaries are being correctly considered. Approach seems to only be considered a macro level, ignoring cumulative effect of development outside of plan area.

### Response:

It is accepted that new development may affect existing infrastructure and local services and may require new or enhanced provision to meet needs. Therefore, all relevant service providers are consulted to identify if the services they provide have existing capacity or if additional capacity is needed to accommodate the proposed development. This is outlined in the Infrastructure Delivery Plan (IDP) that supports the Local Plan. It is the responsibility of service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver infrastructure by requiring developers to make financial contributions through the developer obligation process (as set out in policy I1) or by the phasing of development in line with the expected delivery of required infrastructure. CDC will continue to work with service providers to understand the Plan Area's infrastructure needs and to regularly update the IDP (through the IBP).

### Action:

No change in response to this representation.

6233

Object

**Document Element:** Duty to Co-operate, 1.23

**Respondent:** Wisborough Green Parish Council

## Duty to Co-operate, 1.24

## Object

### Summary of representations:

Plan should explain in greater detail findings of co-operative working with neighbouring authorities to achieve a more sustainable spatial strategy, that provides a “joined up” spatial vision.

### Summary of representation changes to plan:

N/A

### Response:

The Duty to Cooperate Statement of Compliance (April 2024) provides details of the engagement and joint working with neighbouring authorities. It is considered unnecessary to repeat elements of the evidence base in the Plan’s reasoned justification.

### Action:

No change in response to this representation.

## 4286

## Object

**Document Element:** Duty to Co-operate, 1.24

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

### Summary of representations:

Government has tasked Growers to grow more home grown produce, increase productivity, reduce food miles and UK’s reliance on imported food. Can achieve these aims but horticultural and food industries need planning policies in place enabling sustainable development. More flexibility is needed in the Local Plan to meet needs of horticultural sector.

### Summary of representation changes to plan:

Government has tasked Growers to grow more home grown produce, increase productivity, reduce food miles and UK’s reliance on imported food. Can achieve these aims but horticultural and food industries need planning policies in place enabling sustainable development. More flexibility is needed in the Local Plan to meet needs of horticultural sector.

### Response:

Comments noted. This is not a DtC matter. Responses to the issues raised are dealt with under the representations made by the respondent to the horticultural section of the Plan.

### Action:

No changes as result of this representation

## 4779

## Object

**Document Element:** Duty to Co-operate, 1.24

**Respondent:** West Sussex Growers' Association

## Duty to Co-operate, 1.25

## Object

### Summary of representations:

No Statement of Common Ground has been agreed with neighbouring authorities and key statutory undertakers as required. e.g. National Highways. Not sufficient to say this will be done in the future as many of large housing proposals require key infrastructure to be agreed in advance of development.

### Summary of representation changes to plan:

N/A

### Response:

The Statement of Compliance published at the time of the Regulation 19 consultation set out the key cross boundary transport issues, the engagement undertaken by the Council with relevant bodies on these issues and the outcomes of that at that stage. The latest position is set out in the updated Statement of Compliance (April 2024) and Statements of Common Ground.

The IDP, which supports the Local Plan, also sets out the infrastructure requirements for individual site allocations.

### Action:

No changes as result of this representation

**3994****Object**

**Document Element:** Duty to Co-operate, 1.25

**Respondent:** Chichester and District Cycle Forum

## Object

### Summary of representations:

Council has not engaged constructively with Conservancy. Has been no dialogue to address key strategic matters of housing provision, biodiversity, landscape and setting of AONB. Not yet been asked to agree a Statement of Common Ground. Disappointing since the Conservancy is the Statutory Joint Advisory Committee for the AONB, yet not part of the plan-making process.

### Summary of representation changes to plan:

Council has not engaged constructively with Conservancy. Has been no dialogue to address key strategic matters of housing provision, biodiversity, landscape and setting of AONB. Not yet been asked to agree a Statement of Common Ground. Disappointing since the Conservancy is the Statutory Joint Advisory Committee for the AONB, yet not part of the plan-making process.

### Response:

For clarification, the Chichester Harbour Conservancy are not one of the prescribed duty to cooperate bodies. They have been consulted at all stages of plan making.

### Action:

No changes as result of this representation

4076

Object

**Document Element:** Duty to Co-operate, 1.25**Respondent:** Chichester Harbour Conservancy

Object

**Summary of representations:**

The council has engaged constructively, actively and on an ongoing basis with other local authorities and organisations to address key strategic matters but needs to reset the relationship with the residents of Saxon Meadow in order to comply with the principles set out in its principles of community involvement

**Summary of representation changes to plan:**

Paragraph should be amended to refer to working with residents of Saxon Meadows in accordance with SCI.  
Amend paragraph to read: 'The council has engaged constructively, actively and on an ongoing basis with other local authorities and organisations to address key strategic matters but needs to reset the relationship with the residents of Saxon Meadow in order to comply with the principles set out in its principles of community involvement. Statements ...'

**Response:**

As this section of the Plan deals specifically with working with prescribed bodies under the Duty to Cooperate, the proposed amendment would not be appropriate.

**Action:**

No changes as result of this representation

4100

Object

**Document Element:** Duty to Co-operate, 1.25**Respondent:** Mr Matthew Rees

Support

**Summary of representations:**

Support – with qualification

**Summary of representation changes to plan:**

Support – with qualification

**Response:**

Comments noted. See also response to representation 6197 from Wisborough Green Parish Council.

**Action:**

No changes as result of this representation

4397

Support

**Document Element:** Duty to Co-operate, 1.25**Respondent:** Wisborough Green Parish Council

## Object

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**Summary of representations:**

Despite requirements in NPPF and contrary to statement in paragraph 1.25, Stagecoach has not been approached or involved in a meaningful, collaborative or ongoing way in the preparation of the Plan.

**Summary of representation changes to plan:**

Despite requirements in NPPF and contrary to statement in paragraph 1.25, Stagecoach has not been approached or involved in a meaningful, collaborative or ongoing way in the preparation of the Plan.

**Response:**

Stagecoach are not one of the prescribed duty to cooperate bodies. However, they have been engaged during the preparation of the IDP in terms of the infrastructure (bus provision) required to support the proposed level and distribution of growth.

**Action:**

No changes as result of this representation

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**5513****Object**

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**Document Element:** Duty to Co-operate, 1.25

**Respondent:** Stagecoach South

## Object

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**Summary of representations:**

CDC must complete the Statements of Common Ground before the Plan progresses any further.

**Summary of representation changes to plan:**

CDC must complete the Statements of Common Ground before the Plan progresses any further.

**Response:**

Finalised SoCG are published on the Council's website.

**Action:**

No changes as result of this representation

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**5554****Object**

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**Document Element:** Duty to Co-operate, 1.25

**Respondent:** Millwood Designer Homes

**Agent:** Savills

## Object

### Summary of representations:

Procedure set out in NPPF and PPG has not been followed; overwhelming unmet need for housing not addressed in evidence for plan; no statement of common ground demonstrating how A27 cross-boundary issues has or will be resolved.

### Summary of representation changes to plan:

N/A

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need (July 2024) and Transport (July 2024) Background Papers.

The Statement of Compliance published at the time of the Regulation 19 consultation set out the key cross boundary transport issues, the engagement undertaken by the Council with relevant bodies on these issues and the outcomes of that at that stage. The latest position is set out in the updated Statement of Compliance (April 2024) and Statements of Common Ground.

### Action:

No changes as result of this representation

5773

Object

**Document Element:** Duty to Co-operate, 1.25

**Respondent:** Beechcroft Developments Limited

**Agent:** Genesis Town Planning Ltd

## Object

### Summary of representations:

CDC cannot demonstrate Local Plan policies have been developed through effective, ongoing and constructive engagement with Prescribed Bodies; there are no up to date, published and agreed SOCGs with any Prescribed Bodies; Parish Council issued multiple FOIs to CDC to determine the state of the SOCGs regarding Water Neutrality yet were rejected each time by CDC.

### Summary of representation changes to plan:

N/A

### Response:

The Statement of Compliance published at the time of the Regulation 19 consultation set out the key cross boundary strategic issues and the engagement undertaken by the Council with relevant bodies on these issues and the outcomes of that at that stage.

The latest position is set out in the updated Statement of Compliance (April 2024) and Statements of Common Ground.

Freedom of Information requests received will have been responded to in accordance with the council's published FOI procedures.

### Action:

No changes as result of this representation



5785

Object

**Document Element:** Duty to Co-operate, 1.25**Respondent:** Kirdford Parish Council**Agent:** Troy Planning + Design

Object

**Summary of representations:**

Object. Statements of Common Ground should have been agreed prior to publication. Statements within evidence base pertaining to infrastructure and future delivery that do not reflect concerns at the current local situation, and the stresses that are already apparent. WGPC and the other northern parishes concerns are not being taken seriously by CDC.

**Summary of representation changes to plan:**

Object. Statements of Common Ground should have been agreed prior to publication. Statements within evidence base pertaining to infrastructure and future delivery that do not reflect concerns at the current local situation, and the stresses that are already apparent. WGPC and the other northern parishes concerns are not being taken seriously by CDC.

**Response:**

The Statement of Compliance published at the time of the Regulation 19 consultation set out the key cross boundary strategic issues and engagement undertaken by the Council with neighbouring authorities and other relevant bodies on these issues.

It is accepted that new development may affect existing infrastructure and local services and may require new or enhanced provision to meet needs. Therefore, all relevant service providers are consulted to identify if the services they provide have existing capacity or if additional capacity is needed to accommodate the proposed development. This is outlined in the Infrastructure Delivery Plan (IDP) that supports the Local Plan. It is the responsibility of service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver infrastructure by requiring developers to make financial contributions through the developer obligation process (as set out in policy I1) or by the phasing of development in line with the expected delivery of required infrastructure. CDC will continue to work with service providers to understand the Plan Area's infrastructure needs and to regularly update the IDP.

**Action:**

No changes as result of this representation

6197

Object

**Document Element:** Duty to Co-operate, 1.25**Respondent:** Wisborough Green Parish Council

## Duty to Co-operate, 1.27

## Object

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### Summary of representations:

Object. The plan has not been positively prepared and will not meet the needs of the horticultural industry and accordingly fails to take the opportunities available to deliver economic growth and create local jobs.

The national significance of the horticultural industry is acknowledged in LSS2. Accordingly, the Chichester Local Plan will need to ensure that the competitiveness of the industry is maintained.

### Summary of representation changes to plan:

Object. The plan has not been positively prepared and will not meet the needs of the horticultural industry and accordingly fails to take the opportunities available to deliver economic growth and create local jobs.

The national significance of the horticultural industry is acknowledged in LSS2. Accordingly, the Chichester Local Plan will need to ensure that the competitiveness of the industry is maintained.

### Response:

Disagree with comments. The specific horticulture related policies (policies E3 and E4) provide an appropriate approach to meet the anticipated future needs of the industry.

### Action:

No changes as result of this representation

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**4951****Object**

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**Document Element:** Duty to Co-operate, 1.27

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Duty to Co-operate, 1.28

### Object

#### Summary of representations:

Not sufficiently explained how key strategic and cross-boundary issues are being addressed through and across the plan area. In list of effective outcomes no mention of economic impact, and its role in protecting and enhancing the physical and environmental objectives of the plan (and wider) area. Authorities should jointly promote a vibrant and sustainable economy, which recognises and enhances the assets which contribute to and comprise that economic activity.

#### Summary of representation changes to plan:

N/A

#### Response:

The list of outcomes is not exhaustive and the Employment and Economy Chapter introductory text references the links to the County economic priorities. The Duty to Cooperate Statement of Compliance (April 2024) also provides details of the engagement and joint working with neighbouring authorities.

#### Action:

No changes as result of this representation

**4139****Object**

**Document Element:** Duty to Co-operate, 1.28

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## How the Plan has developed, 1.33

### Object

#### Summary of representations:

Vision document now over 5 years old, prepared before Covid 19 pandemic. Update to assumptions behind it is required given response to Covid 19 affected working patterns, residential and business requirements and retail habits. Chichester Neighbourhood plan team will be able to address gaps and outdated aspects of Vision document.

#### Summary of representation changes to plan:

Vision document now over 5 years old, prepared before Covid 19 pandemic. Update to assumptions behind it is required given response to Covid 19 affected working patterns, residential and business requirements and retail habits. Chichester Neighbourhood plan team will be able to address gaps and outdated aspects of Vision document.

#### Response:

The Local Plan economic and retail evidence base have been updated and reflects the implications of the Covid 19 pandemic.

#### Action:

No changes as result of this representation

**5748****Object**

**Document Element:** How the Plan has developed, 1.33

**Respondent:** Chichester City Council Neighbourhood Plan Steering Group

## How the Plan has developed, 1.34

### Object

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#### Summary of representations:

The last public consultation stage concluded in February 2019. Many matters have changed since then, especially Government policy.

#### Summary of representation changes to plan:

The Plan should take greater account of Climate Change commitments made at Cop 26 for instance. This could have been done and been subject to public consultation.

#### Response:

The Local Plan already recognises that climate change is an issue to be addressed and sets out a strategic approach to development on the Manhood Peninsula, including the relocation of settled areas (Policy NE14 Integrated Coastal Zone Management for the Manhood Peninsula) and requirements for new development around the coast (Policies NE12 Development Around the Coast and NE15 Flood Risk and Water Management).

#### Action:

No changes as result of this representation

3996

Object

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**Document Element:** How the Plan has developed, 1.34

**Respondent:** Chichester and District Cycle Forum

## How the Plan has developed, 1.37

## Object

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**Summary of representations:**

This is a comment only

There has been no further public consultation on the preferred approach since 2018/19, four years have passed since this time. The issues that were raised during that consultation are still relevant today and have not been addressed within the new proposed Plan.

**Summary of representation changes to plan:**

This is a comment only

There has been no further public consultation on the preferred approach since 2018/19, four years have passed since this time. The issues that were raised during that consultation are still relevant today and have not been addressed within the new proposed Plan.

**Response:**

There is considerable flexibility open to LPAs in how the initial stages of local plan production are carried out and there is no requirement to have a further Regulation 18 consultation.

The Statement of Consultation (January 2023) together with the Summary of Responses reports, set out how the Local Plan has been changed to respond to the main issues raised in responses to the Preferred Approach Local Plan.

**Action:**

No changes as result of this representation

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**4093****Object**

**Document Element:** How the Plan has developed, 1.37

**Respondent:** Chichester Harbour Trust

## Object

### Summary of representations:

Some of my comments from the Preferred Approach consultation were deleted by the planning authority without warning. I only spotted this when I went back to see what I had written to help someone else with another matter. Their reason being that they 'thought they were a duplication' of comments written in another section. This was not the case - related points were linked by reference to each other but each was individually written and included proposed modifications to the wording.

### Summary of representation changes to plan:

The inspector should investigate how many people's comments were deleted. Given the amount of responses they actually acknowledge, the plan should have been re-consulted on before the S19 consultation

### Response:

The Council received over 3200 responses to the Preferred Approach consultation and in some cases the published comments were summarised but all the representations received were taken into account in deciding whether changes to the draft Local Plan should be made.

There is considerable flexibility open to LPAs in how the initial stages of local plan production are carried out and there is no requirement to have a further Regulation 18 consultation. The Regulation 19 consultation provides a further opportunity for making representations.

### Action:

No changes as result of this representation

4815

Object

**Document Element:** How the Plan has developed, 1.37

**Respondent:** Willowfield Farm

## Object

### Summary of representations:

Welcome proposed expansion of HDAs, however, the current approach to restrictions on co-location of functionally linked businesses and activities within the food park/cluster is impacting on business competitiveness and efficiency.

### Summary of representation changes to plan:

Reference to 'ancillary' with regard to the HDAs in relevant policies and supporting text should be modified to 'functionally linked'.

### Response:

Noted. See response to representations made by respondent to Policies E3 and E4.

### Action:

No changes as result of this representation

4952

Object

**Document Element:** How the Plan has developed, 1.37**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited**Agent:** Savills

Object

**Summary of representations:**

Concern over delay between Regulation 18 and 19 consultations and that Regulation 19 consultation only allows for comments relating to soundness of Plan, not its content, and there are a number of new policies. Number of events/changes since Regulation 18 e.g. Covid and NPPF changes, as well as new constraints such as water and nutrient neutrality.

Main concern is how up to date the evidence base remains.

**Summary of representation changes to plan:**

Concern over delay between Regulation 18 and 19 consultations and that Regulation 19 consultation only allows for comments relating to soundness of Plan, not its content, and there are a number of new policies. Number of events/changes since Regulation 18 e.g. Covid and NPPF changes, as well as new constraints such as water and nutrient neutrality.

Main concern is how up to date the evidence base remains.

**Response:**

Key evidence documents have been updated e.g. HEDNA, flood risk, retailing, transport assessment since the Regulation 18 consultation and the Council in conjunction with other affected local authorities has completed a water neutrality strategy.

**Action:**

No changes as result of this representation

5629

Object

**Document Element:** How the Plan has developed, 1.37**Respondent:** Thakeham Homes

## How the Plan has developed, 1.38

### Object

#### Summary of representations:

The SA's that have been undertaken appear to have been done to fit the proposed site allocations not vice versa. Sites that seem to have a better sustainability appraisal seem to have been ignored/modified/rejected for no apparent reasons or weighting has not been given to sustainable items such as distance from transport hubs and ability and propensity to offset/mitigate environmental factors have been ignored. I refer specifically to the Highgrove and French Gardens sites in the Bosham section.

#### Summary of representation changes to plan:

Sustainability Appraisals should be independently assessed for soundness and the sections they inform be rewritten on that basis.

#### Response:

A Sustainability Appraisal has been undertaken at all stages of the Local Plan preparation. However, the outcome of the SA is only one of a number of factors that needs to be weighed up in determining whether a site is suitable for allocation.

#### Action:

No changes as result of this representation

4826

Object

**Document Element:** How the Plan has developed, 1.38

**Respondent:** Willowfield Farm

### Object

#### Summary of representations:

The Chichester Transport Study has concluded the southern planning area can generally accommodate 700 dwellings per annum, with proposed mitigation. The SA conclusion that there is capacity for no more than 535dpa is therefore fundamentally flawed.

The SA must be revisited given that this factual flaw goes to the heart of the process of selecting and testing reasonable alternative options. Consequentially, the draft CLP decision-making making process will also need to be revisited, as this too has been infected by the factually incorrect SA.

#### Summary of representation changes to plan:

N/A

#### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need (July 2024) and Transport (July 2024) Background Papers.

#### Action:

No changes as result of this representation



4945

Object

**Document Element:** How the Plan has developed, 1.38

**Respondent:** Gleeson Strategic Land

Object

**Summary of representations:**

Welcome proposed expansion of HDAs, however, the current approach to restrictions on co-location of functionally linked businesses and activities within the food park/cluster is impacting on business competitiveness and efficiency.

**Summary of representation changes to plan:**

Reference to 'ancillary' with regard to the HDAs in relevant policies and supporting text should be modified to 'functionally linked'.

**Response:**

Noted. See response to representations made by respondent to Policies E3 and E4.

**Action:**

No changes as result of this representation

4953

Object

**Document Element:** How the Plan has developed, 1.38

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## How the Plan has developed, 1.39

### Object

#### Summary of representations:

Identification and protection of important environmental sites is supported, but we request that similar identification is made of other important areas that contribute positively to the economic and environmental well-being of the district; including landscape, economic and heritage assets. Policies to protect and enhance these areas as an essential component of a sustainable strategy is vital.

#### Summary of representation changes to plan:

Identification and protection of important environmental sites is supported, but we request that similar identification is made of other important areas that contribute positively to the economic and environmental well-being of the district; including landscape, economic and heritage assets. Policies to protect and enhance these areas as an essential component of a sustainable strategy is vital.

#### Response:

Comments noted, however, it is considered that the existing plan policies, particularly those related to natural environment and place making, address the points made by the respondent.

#### Action:

No change in response to this representation.

**4142****Object**

**Document Element:** How the Plan has developed, 1.39

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

### Support

#### Summary of representations:

Support in principle.

#### Summary of representation changes to plan:

Support in principle.

#### Response:

Noted.

#### Action:

No change in responses to this representation.

**6268****Support**

**Document Element:** How the Plan has developed, 1.39

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## How the Plan has developed, 1.41

## Object

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### Summary of representations:

The plan does not provide adequate provision for self-build or for people who would like to live in Passivhaus or similar standard buildings.

### Summary of representation changes to plan:

Greater weight should be given to these elements of the plan by encouraging smaller sites to be allocated driving innovation and in this context choice of lifestyle.

### Response:

The Council considers that the policy approach set out within Policy H6 (Custom and/or Self Build Homes) will ensure that demand on the register can be met. The Council have recently undergone a process of updating the Custom and Self-Build Register and this, combined with additional data on the level of self/custom build need in the Plan Area, has indicated a strong demand for self-build/custom plots. To address this, the Council are proposing to increase the level of self-build/custom provision on strategic sites.

In addition to the requirement for plots to be made available on strategic housing sites a proportion of self builds will also come forward on smaller sites and infill (windfall) sites. The policy also encourages provision to be made via Neighbourhood Plans.

### Action:

No change in responses to this representation.

---

**4834****Object**

**Document Element:** How the Plan has developed, 1.41

**Respondent:** Willowfield Farm

## Characteristics of the Plan Area – A Spatial Portrait, 2.1

### Object

#### Summary of representations:

Object. Paragraph should reference the number of parishes within the Chichester Harbour AONB. Understand that parishes partly within National Park will be subject to two plans but that is not the point. If Plan not written to give equal status to AONB, policies and interpretation will be affected – AONB will be seen as second class to National Park.

#### Summary of representation changes to plan:

N/A

#### Response:

Noted. It is considered appropriate to acknowledge the split of the district between two planning authorities. However, this does not in any way detract from the status of the AONB or the way in which the Plan responds to the AONB designation.

#### Action:

No changes as result of this representation

4077

Object

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.1

**Respondent:** Chichester Harbour Conservancy

### Object

#### Summary of representations:

Object. Risk of confusion and unsoundness on how Plan uses the word 'landscape'. Should adhere to European Landscape Convention definition. Plan text switches between terms such as 'rural setting', 'countryside' and 'natural landscape' of which only 'countryside' is defined in planning terms. Use of terms is inconsistent. Plan must be consistent and refer to landscape character.

#### Summary of representation changes to plan:

N/A

#### Response:

On the basis that the ELC Article I Definition of Landscape is "an area as perceived by people whose character is the result of the action and interaction of natural and/or human factors", it is not considered that the policy name is inconsistent with the European Landscape Convention Guidance.

#### Action:

No changes as result of this representation

4449

Object

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.1

**Respondent:** Plaistow and Ifold Parish Council

## Object

### Summary of representations:

Object. A27 huge barrier to accessing city and A259 under growing stress from increased housing.

### Summary of representation changes to plan:

N/A

### Response:

Noted.

### Action:

No changes as result of this representation

## 5115

## Object

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.1

**Respondent:** Lynn Reel

## Object

### Summary of representations:

Concern that LSS2 has not been updated to reflect emerging issues since last Local Plan consultation nor that outcome of discussions with National Highways and WSCC have been published or that Stagecoach South have been involved.

### Summary of representation changes to plan:

N/A

### Response:

It is acknowledged that preparation of LSS3 is in the early stages and progress has not advanced as quickly as the Council and others would have wished. However, in the absence of progress on the LSS3 update the Council has prepared statements of common ground with individual authorities.

Stagecoach are not one of the prescribed duty to cooperate bodies. However, they have been engaged during the preparation of the IDP in terms of the infrastructure (bus provision) required to support the proposed level and distribution of growth.

The Statement of Compliance published at the time of the Regulation 19 consultation set out the key cross boundary transport issues, the engagement undertaken by the Council with relevant bodies on these issues and the outcomes of that at that stage. The latest position is set out in the updated Statement of Compliance (April 2024) and Statements of Common Ground.

### Action:

No changes as result of this representation

## 5516

## Object

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.1

**Respondent:** Stagecoach South

## Support

### Summary of representations:

Support in principle.

### Summary of representation changes to plan:

N/A

### Response:

Noted

### Action:

No changes as result of this representation

6142

Support

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.1

**Respondent:** Plaistow and Ifold Parish Council

## Characteristics of the Plan Area – A Spatial Portrait, 2.2

## Object

### Summary of representations:

Object. Gross generalisation to say that east-west corridor has best transport connections and railway running throughout. Lack of rail infrastructure for majority of development in this corridor.

Wording should be amended to state that development at Tangmere will lack any direct access to rail with nearest rail station a 10km journey by road.

### Summary of representation changes to plan:

N/A

### Response:

Whilst Tangmere is not served by a train service, it still benefits from a bus service (to Chichester) with a good service frequency (every 20 – 30 minutes during weekday daytime). In addition, the opportunity for the provision of improved sustainable transport modes is recognised in Policy A14 (land west of Tangmere) and the reasoned justification. This is also reflected in the IDP and the outline planning application, which has a resolution to permit subject to the completion of a S106 Agreement.

### Action:

No changes as result of this representation

4377

Object

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.2

**Respondent:** Mr John Wolfenden

## Support

### Summary of representations:

Support. CDC's own evidence (Landscape Capacity Study) demonstrates rural nature of this area.

### Summary of representation changes to plan:

N/A

### Response:

Noted.

### Action:

No changes as result of this representation

## 4399

## Support

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.2

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

Object. Plan doesn't recognise that scale of settlements in north of Plan Area is materially different from rest of District. Settlements are 'small and dispersed' which give this part of District its landscape character. Paragraph wording should be amended to refer to 'small-scale dispersed settlements.'

### Summary of representation changes to plan:

N/A

### Response:

It is considered that the paragraph as currently worded is appropriate.

### Action:

No changes as result of this representation

## 4450

## Object

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.2

**Respondent:** Plaistow and Ifold Parish Council

## Support

### Summary of representations:

Support wording

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation

4689

Support

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.2

**Respondent:** Mr Phillip Luff

## Object

### Summary of representations:

North of the Plan Area is primarily rural in character with diverse landscapes, rich cultural and heritage assets and a number of dispersed settlements, some of which are relatively isolated and served by narrow lanes with limited public transport.

Existing infrastructure is strained and further development will exasperate this. Infrastructure should be improved before further development.

### Summary of representation changes to plan:

N/A

### Response:

As set out in paragraph 3.24 of the Local Plan (and explained more fully in the Housing Distribution (July 2024) and Transport (July 2024) Background Papers) the constraints on development in the southern plan area has led to the need to explore all possible means of meeting the Plan Area's local housing need, including looking again at the potential for development in the north east of the plan area. Any development proposal will be subject to the requirements of the Local Plan strategic natural environment and place making policies. The infrastructure required to support the proposed development at these locations has been assessed and is reflected in the IDP.

### Action:

No changes as result of this representation

4731

Object

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.2

**Respondent:** Mr Stuart Lockwood



## Object

### Summary of representations:

Spatial portrait makes no mention of road-based public transport, the role of the City as a public transport hub, or the range of bus services that provide local connectivity.

The potential role of bus in addressing the already-severe transport problems of the plan area and beyond seems entirely overlooked.

### Summary of representation changes to plan:

N/A

### Response:

Comments noted, however, the spatial portrait cannot cover every issue. Policies T1 and T2 set out how the council will work in partnership with other authorities, transport providers and developers to improve accessibility, including by sustainable modes of travel.

### Action:

No changes as result of this representation

5518

Object

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.2

**Respondent:** Stagecoach South

## Characteristics of the Plan Area – A Spatial Portrait, 2.3

## Object

### Summary of representations:

Object. As main settlement and centre for economic well-being and growth, correct Chichester should be focus for new sustainable development. But Plan must be confident that elements that make city special and contribute to character are not lost/damaged through inappropriately located, densities and forms of new development. Plan should identify/support specific policies that protect/enhance key elements.

### Summary of representation changes to plan:

N/A

### Response:

Noted. It is considered that Policy A1 (Chichester City Development Principles), together with relevant design policies, effectively address the matters referred to by the respondent.

### Action:

No changes as result of this representation

4223

Object

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.3

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

### Summary of representations:

No acknowledgement of the role current patterns of transport use contribute to carbon emissions, nor that substantial mode shift is necessary to address sustainably an acute lack of capacity on the local network and the SRN, especially around Chichester.

### Summary of representation changes to plan:

N/A

### Response:

The Vision sets out the need for people to be able to get about easily, safely and conveniently with less reliance on private cars, with more use of public transport and active travel modes. Objective 1 relating to climate change sets out that new development will be located and designed to be accessible and reduce reliance on the private car. This is supported by detailed design policies including P4 Layout and Access and a suite of detailed transport policies T1 Transport Infrastructure, T2 Transport and Development and T3 Active Travel. The transport chapter clearly sets out the issues for the plan area, the impacts on the Strategic Road Network and the need for modal shift.

### Action:

No change

**5528****Object**

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.3

**Respondent:** Stagecoach South

## Object

### Summary of representations:

Object. Role of Chichester Neighbourhood Plan in consolidating and enhancing Chichester as main centre should be referenced here and throughout the Plan.

### Summary of representation changes to plan:

N/A

### Response:

As this is the spatial portrait section of the Plan it is not considered appropriate to specifically reference one neighbourhood plan.

### Action:

No changes as result of this representation

**5743****Object**

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.3

**Respondent:** Chichester City Council Neighbourhood Plan Steering Group

## Support

### Summary of representations:

Support in principle.

### Summary of representation changes to plan:

N/A

### Response:

Noted.

### Action:

No changes as result of this representation

6274

Support

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.3

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Characteristics of the Plan Area – A Spatial Portrait, 2.4

## Object

### Summary of representations:

Object. Plan should address issues referenced in paragraph regarding lack of amenities and services normally associated with settlement of its size (Tangmere). Needs to be recognition that in doubling size of community needs to be funded scheme to double infrastructure. Also need for Traffic Management Plan which should include traffic lights, pedestrian crossings, provision of continuous pathways, restricted speed of traffic through the narrow Tangmere Road. This road is part of the existing Special Conservation Area and needs to be taken into account and the area protected. The county council is the beneficiary of the CPO and needs to set these costs aside and recognise this need in the plan

### Summary of representation changes to plan:

N/A

### Response:

The infrastructure required to support the proposed development at Tangmere has been assessed and is reflected in the IDP and also the outline planning application, which has a resolution to permit subject to the completion of a S106 Agreement.

### Action:

No changes as result of this representation

4379

Object

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.4

**Respondent:** Mr John Wolfenden

## Object

### Summary of representations:

Vision not achievable or deliverable. Should be re-worded to be aimed at key outcomes and switching to sustainable modes.

### Summary of representation changes to plan:

N/A

### Response:

The Vision is high level but does clearly set out the need for people to be able to get about easily, safely and conveniently with less reliance on private cars, with more use of public transport and active travel modes. The Vision does not set specific targets but the Monitoring Framework at the back of the plan shows how progress against the more detailed transport policies T1 -T3 will be monitored.

### Action:

No changes as result of this representation

5529

Object

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.4

**Respondent:** Stagecoach South

## Characteristics of the Plan Area – A Spatial Portrait, 2.5

## Object

### Summary of representations:

Object. Plan must acknowledge and plan for long term management and sustainability of important transportation links identified.

### Summary of representation changes to plan:

N/A

### Response:

The Local Plan Transport and Accessibility section provides detail on how the Council will work with partners to deliver transport proposals, including sustainable modes of travel, to support growth over the plan period.

### Action:

No changes as result of this representation

4135

Object

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.5

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

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### Summary of representations:

Support statement.

### Summary of representation changes to plan:

N/A

### Response:

Noted.

### Action:

No changes as result of this representation

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4426

Support

**Document Element:** Characteristics of the Plan Area – A Spatial Portrait, 2.5

**Respondent:** Wisborough Green Parish Council

## Social Characteristics, 2.7

## Object

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### Summary of representations:

Object. Retirement age is already beyond 64 so if Plan genuinely forward looking must assume work force age is later.

### Summary of representation changes to plan:

N/A

### Response:

Comments are noted. However, for the purposes of national population statistics, which are referenced in this paragraph, the working age population is defined as the population aged 16 – 64. The Housing and Economic Development Needs Assessment ( HEDNA) has, however, considered how economic activity rates may change over the plan period and the potential impact of this.

### Action:

No changes as result of this representation

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4873

Object

**Document Element:** Social Characteristics, 2.7

**Respondent:** Keith Furlong

## Social Characteristics, 2.8

Support

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**Summary of representations:**

Support statement.

**Summary of representation changes to plan:**

N/A

**Response:**

Noted.

**Action:**

No changes as result of this representation

4400

Support

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**Document Element:** Social Characteristics, 2.8

**Respondent:** Wisborough Green Parish Council

4428

Support

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**Document Element:** Social Characteristics, 2.8

**Respondent:** Wisborough Green Parish Council

## Social Characteristics, 2.9

## Support

---

**Summary of representations:**

Support statement.

**Summary of representation changes to plan:**

N/A

**Response:**

Noted.

**Action:**

No changes as result of this representation

4403

Support

---

**Document Element:** Social Characteristics, 2.9

**Respondent:** Wisborough Green Parish Council

## Object

---

**Summary of representations:**

Object. Development is unsustainable due to flooding and insufficient infrastructure.

**Summary of representation changes to plan:**

N/A

**Response:**

The Local Plan has been informed by a Strategic Flood Risk Assessment and the infrastructure required to support the development proposed through the Local Plan has been assessed and is reflected in the IDP.

**Action:**

No changes as result of this representation

5112

Object

---

**Document Element:** Social Characteristics, 2.9

**Respondent:** Lynn Reel

## Object

### Summary of representations:

Object. The 'good quality of life' is being undermined by central government imposed housing numbers that are unsustainable

### Summary of representation changes to plan:

N/A

### Response:

The starting point for assessing the housing requirement of the plan area is the Government's standard method. However, environmental and infrastructure constraints, and whether they can be mitigated, have been considered in determining whether a figure less than the standard method can be justified.

### Action:

No changes as result of this representation

5884

Object

Document Element: Social Characteristics, 2.9

Respondent: Save our South Coast Alliance

## Social Characteristics, 2.12

## Support

### Summary of representations:

Support. Should be noted that in 2011 census only 7.15% of households in Parish did not have car/van, demonstrating reliance on private vehicles.

### Summary of representation changes to plan:

N/A

### Response:

Noted.

### Action:

No changes as result of this representation

4430

Support

Document Element: Social Characteristics, 2.12

Respondent: Wisborough Green Parish Council



## Support

### Summary of representations:

Support. [National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment.] Note the figures regarding those who do not have access to car/van and that majority of existing employment/business space is around city and A27 corridor.

### Summary of representation changes to plan:

N/A

### Response:

Noted.

### Action:

No changes as result of this representation

5276

Support

**Document Element:** Social Characteristics, 2.12

**Respondent:** National Highways

## Economic Characteristics, 2.13

## Object

### Summary of representations:

Object. One of main economic drivers in District is the hospitality and visitor economy and should be reflected in paragraph. Sector adds significantly to local economy, greater than most of sectors listed.

### Summary of representation changes to plan:

N/A

### Response:

The visitor economy is specifically referenced in paragraph 2.21.

### Action:

No changes in response to this representation

4225

Object

**Document Element:** Economic Characteristics, 2.13

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

### Summary of representations:

Object. Government has tasked Growers to grow more home grown produce, increase productivity, reduce food miles and UK's reliance on imported food. Can achieve these aims but horticultural and food industries need planning policies in place enabling sustainable development. More flexibility is needed in the Local Plan to meet needs of horticultural sector.

### Summary of representation changes to plan:

N/A

### Response:

Noted. See council's response to representations made by respondent to Local Plan sections on Addressing Horticultural Needs and Horticultural Development.

### Action:

No changes in response to this representation

4792

Object

**Document Element:** Economic Characteristics, 2.13

**Respondent:** West Sussex Growers' Association

## Object

### Summary of representations:

Object. Welcome acknowledgement of importance of horticultural sector. Industry capable of supporting higher value jobs in areas such as R&D and associated business functions but constrained by Policies E3 and E4, which inhibit economic potential and competitiveness of industry.

### Summary of representation changes to plan:

N/A

### Response:

Noted. See council's response to representations made by respondent to Local Plan sections on Addressing Horticultural Needs and Horticultural Development.

### Action:

No changes in response to this representation

4966

Object

**Document Element:** Economic Characteristics, 2.13

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Object

---

**Summary of representations:**

Object. Why isn't visitor economy included in paragraph 2.13 as one of the area's major employers.

**Summary of representation changes to plan:**

N/A

**Response:**

Comments are noted but no changes are considered necessary. The importance of the visitor economy is specifically recognised in paragraph 2.21.

**Action:**

No changes in response to this representation.

---

6098

Object

---

**Document Element:** Economic Characteristics, 2.13

**Respondent:** Dr Carolyn Cobbold

## Support

---

**Summary of representations:**

Support in principle.

**Summary of representation changes to plan:**

N/A

**Response:**

Noted.

**Action:**

No changes in response to this representation

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6271

Support

---

**Document Element:** Economic Characteristics, 2.13

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Economic Characteristics, 2.14

### Object

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**Summary of representations:**

Object. No mention of provision of affordable housing; lack of infrastructure; lack of housing in city centre; communal work space, public services, retention of university students

**Summary of representation changes to plan:**

N/A

**Response:**

Noted. The matters identified by the respondent are covered in the section of the Plan outlining the 'Issues and opportunities facing the plan area'.

**Action:**

No changes in response to this representation

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**5113****Object**

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**Document Element:** Economic Characteristics, 2.14

**Respondent:** Lynn Reel

### Object

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**Summary of representations:**

Object. No mention of provision of affordable housing; lack of infrastructure; lack of housing in city centre; communal work space, public services, retention of university students

**Summary of representation changes to plan:**

N/A

**Response:**

Noted. The matters identified by the respondent are covered in the section of the Plan outlining the 'Issues and opportunities facing the plan area'.

**Action:**

No changes in response to this representation

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**5885****Object**

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**Document Element:** Economic Characteristics, 2.14

**Respondent:** Save our South Coast Alliance

## Economic Characteristics, 2.17

### Object

#### Summary of representations:

Object. Whilst plan acknowledges availability of further education for post 16 year olds, it is silent on primary and secondary school and requirement for places

#### Summary of representation changes to plan:

N/A

#### Response:

The Council has engaged with the local education authority (WSCC) on the primary and secondary education requirements arising from the development proposed in the Local Plan and these are set out in the IDP.

#### Action:

No changes in response to this representation

4381

Object

Document Element: Economic Characteristics, 2.17

Respondent: Mr John Wolfenden

## Economic Characteristics, 2.18

### Support

#### Summary of representations:

Support. Manhood Peninsula Partnership done significant work to improve tourism offer on Peninsula. It is a growing nature/outdoor activity destination based on its beaches, coastal countryside and wetlands environment – USP being last remaining rural coastal hinterland on south coast. Tourism key factor in helping landowners/businesses diversify.

#### Summary of representation changes to plan:

N/A

#### Response:

Noted.

#### Action:

No changes as result of this representation

3881

Support

Document Element: Economic Characteristics, 2.18

Respondent: Dr Carolyn Cobbold

## Object

### Summary of representations:

Object. Importance of economic and employment contribution made by Goodwood Estates and Rolls Royce should be acknowledged.

### Summary of representation changes to plan:

N/A

### Response:

Comments are noted, however, the reasoned justification to Policies A16 (Goodwood Motor Circuit and Airfield), which the Council propose should be modified in response to a separate representation from the respondent, and A21 (land east of Rolls Royce) clearly set out the contribution that each make to the local economy.

### Action:

No changes as result of this representation.

## 4718

## Object

**Document Element:** Economic Characteristics, 2.18

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

### Summary of representations:

Object. Paragraph states need to support economic activity in rural parts of the plan area and on policies map Runcton HDA would be located within the countryside. Need to change wording of relevant policies and supporting text to provide more flexibility.

### Summary of representation changes to plan:

N/A

### Response:

Noted. See council's response to representations made by respondent to Local Plan sections on Addressing Horticultural Needs and Horticultural Development.

### Action:

No changes as result of this representation.

## 4967

## Object

**Document Element:** Economic Characteristics, 2.18

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Support

---

**Summary of representations:**

Support. [National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment.] Note majority of existing employment and business space are focused around Chichester city and the A27 corridor.

**Summary of representation changes to plan:**

N/A

**Response:**

Noted.

**Action:**

No changes as result of this representation.

---

5277

Support

**Document Element:** Economic Characteristics, 2.18

**Respondent:** National Highways

## Support

---

**Summary of representations:**

Support in principle.

**Summary of representation changes to plan:**

N/A

**Response:**

Noted.

**Action:**

No changes as result of this representation.

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6290

Support

**Document Element:** Economic Characteristics, 2.18

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Economic Characteristics, 2.20

## Support

### Summary of representations:

Support. Manhood Peninsula has history of small-holding growers but potential for more organic growers and trainee growers/farmers to operate and create a stronger link to the area's tourism and foodie culture.

### Summary of representation changes to plan:

N/A

### Response:

Noted.

### Action:

No changes as result of this representation.

3882

Support

**Document Element:** Economic Characteristics, 2.20

**Respondent:** Dr Carolyn Cobbold

## Object

### Summary of representations:

Object. Welcome recognition of economic significance of horticultural industry. But Policy E4 will constrain future capability of industry to grow and contribute to local/UK economy.

### Summary of representation changes to plan:

N/A

### Response:

Noted. See council's response to representations made by respondent to Local Plan section on Horticultural Development.

### Action:

No changes as result of this representation.

4972

Object

**Document Element:** Economic Characteristics, 2.20

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills



## Economic Characteristics, 2.21

### Support

#### Summary of representations:

Support. Paragraph statements are true so why is visitor economy not included in paragraph 2.13 as major employer.

#### Summary of representation changes to plan:

N/A

#### Response:

Comments are noted but no changes are considered necessary. (The importance of the visitor economy is specifically recognised in paragraph 2.21.

#### Action:

No changes as result of this representation.

3883

Support

**Document Element:** Economic Characteristics, 2.21

**Respondent:** Dr Carolyn Cobbold

### Object

#### Summary of representations:

Object. Coastal economy not adequately represented. Paragraph should be amended to highlight importance of marine leisure economy to the Plan Area.

#### Summary of representation changes to plan:

N/A

#### Response:

Agree that additional wording could be added.

#### Action:

See council suggested modification CM018

4022

Object

**Document Element:** Economic Characteristics, 2.21

**Respondent:** Mrs Victoria Douglas

## Support

---

### Summary of representations:

Support. Chichester Harbour provides a significant economic benefit to the district's economy.

### Summary of representation changes to plan:

N/A

### Response:

Noted.

### Action:

No changes as result of this representation.

---

## 4095

## Support

---

**Document Element:** Economic Characteristics, 2.21

**Respondent:** Chichester Harbour Trust

## Object

---

### Summary of representations:

Object. Separate paragraph to 2.13 explaining role of visitor economy is justified because of its importance. However, paragraph should be amended to include references to equally important contributors to the local economy such as Goodwood Estate and Rolls-Royce alongside the Festival Theatre

### Summary of representation changes to plan:

N/A

### Response:

The reasoned justification to Policies A16 (Goodwood Motor Circuit and Airfield), which the Council propose should be modified in response to a separate representation from the respondent, and A21 (land east of Rolls Royce) both clearly set out the contribution that each make to the local economy.

### Action:

No changes as result of this representation.

---

## 4226

## Object

---

**Document Element:** Economic Characteristics, 2.21

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Environmental Characteristics, 2.22

### Object

---

**Summary of representations:**

Object. Medmerry managed retreat should be included in 2.22 since it is at least as important as Pagham Harbour and the others mentioned.

**Summary of representation changes to plan:**

N/A

**Response:**

The importance of Medmerry is covered in paragraph 2.25.

**Action:**

No changes as result of this representation.

---

**3870****Object**

---

**Document Element:** Environmental Characteristics, 2.22

**Respondent:** Mr David Akerman

## Environmental Characteristics, 2.23

### Object

---

**Summary of representations:**

Object. Final sentence is over simplification. Reference should be made to importance of marine businesses, cultural heritage and recognition of Chichester Harbour as a nationally important landscape.

**Summary of representation changes to plan:**

N/A

**Response:**

It is considered that read as a whole the spatial portrait (including the proposed additional wording to paragraph 2.21) reflects the matters referenced by the respondent.

**Action:**

No changes as result of this representation.

---

**4079****Object**

---

**Document Element:** Environmental Characteristics, 2.23

**Respondent:** Chichester Harbour Conservancy

## Object

### Summary of representations:

Object. Paragraph should be amended to refer to the 'high quality' landscapes in the north of the Plan Area and acknowledge its role in forming the setting to the South Downs National Park.

### Summary of representation changes to plan:

N/A

### Response:

It is considered that the wording as drafted is appropriate. In response to representations from the SDNPA, it is proposed to add reference to the setting of the National Park in paragraphs 3.19 and 3.21.

### Action:

No changes as result of this representation.

4456

Object

**Document Element:** Environmental Characteristics, 2.23

**Respondent:** Plaistow and Ifold Parish Council

## Environmental Characteristics, 2.25

## Object

### Summary of representations:

RECEIVED LATE: Replace word "site" with "area" and insert reference to forming part of diverse set of wetlands (Ditches, Rifes, Ponds, Saline lagoons and a small section of Canal). Medmerry site no longer the largest having been overtaken in area by the Steart Marshes, Somerset. Include mention of rare habitats and species and role of Selsey Bill in facilitating arrivals and departures of bats, butterflies and birds.

### Summary of representation changes to plan:

Replace word "site" with "area" and insert reference to forming part of diverse set of wetlands (Ditches, Rifes, Ponds, Saline lagoons and a small section of Canal). Medmerry site no longer the largest having been overtaken in area by the Steart Marshes, Somerset. Include mention of rare habitats and species and role of Selsey Bill in facilitating arrivals and departures of bats, butterflies and birds.

### Response:

Additional wording noted – not a soundness issue. The wording says Medmerry is "one of the largest" which remains correct.

### Action:

No changes in response to this representation.

6490

Object

**Document Element:** Environmental Characteristics, 2.25

**Respondent:** CPRE Sussex

**Agent:** CPRE Sussex

## Environmental Characteristics, 2.27

## Support

### Summary of representations:

Support statement.

### Summary of representation changes to plan:

N/A

### Response:

Noted.

### Action:

No changes as result of this representation.

## 4404

## Support

**Document Element:** Environmental Characteristics, 2.27

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

Object. Plan is unclear in use of term 'Landscape' for Conservation Areas and Designed Landscapes (parks and gardens). This is not the correct use of the word 'landscape' and change to 'designated historic landscapes' would be better. As currently drafted, paragraph does not comply with the European Landscape Convention.

### Summary of representation changes to plan:

N/A

### Response:

On the basis that the ELC Article I Definition of Landscape is "an area as perceived by people whose character is the result of the action and interaction of natural and/or human factors", it is not considered that the policy name is inconsistent with the European Landscape Convention Guidance.

### Action:

No changes as result of this representation

## 4453

## Object

**Document Element:** Environmental Characteristics, 2.27

**Respondent:** Plaistow and Ifold Parish Council

## Object

### Summary of representations:

Object. City centre in poor condition and roads congested due to traffic from outlying developments. In city centre should be greater encouragement for housing above shops/converting larger buildings, attracting younger people to live there with business hubs, entertainment etc.

### Summary of representation changes to plan:

N/A

### Response:

Noted. The Local Plan section on Chichester City Development Principles (Policy A1) acknowledges the matters referred to by the respondent and the opportunities to address them.

### Action:

No changes as result of this representation.

5114

Object

**Document Element:** Environmental Characteristics, 2.27

**Respondent:** Lynn Reel

## Object

### Summary of representations:

Heritage of city centre being undermined by empty shops, lack of trees, poor public realm and lack of night time economy. Should be greater encouragement for housing above shops/converting larger buildings, attracting younger people to live there with business hubs, entertainment etc.

### Summary of representation changes to plan:

N/A

### Response:

Noted. The Local Plan section on Chichester City Development Principles (Policy A1) acknowledges the matters referred to by the respondent and the opportunities to address them.

### Action:

No changes as result of this representation.

5886

Object

**Document Element:** Environmental Characteristics, 2.27

**Respondent:** Save our South Coast Alliance

## Environmental Characteristics, 2.28

### Object

#### Summary of representations:

Object. Should also reference historic trees. Finite resource for which management and protection is needed to ensure importance is retained.

#### Summary of representation changes to plan:

N/A

#### Response:

This paragraph deals specifically with built assets. However, both Policies NE5 (Biodiversity and biodiversity net gain) and NE8 (Trees, hedgerows and woodlands) seek to ensure that such trees are protected.

#### Action:

No changes as result of this representation.

4687

Object

**Document Element:** Environmental Characteristics, 2.28

**Respondent:** Chichester Tree Wardens

## Issues and Opportunities facing the Plan Area, 2.29

### Object

#### Summary of representations:

Support but suggest changes to objectives

#### Summary of representation changes to plan:

Objectives should include economic vitality

#### Response:

Economic vitality is included in Objective 4 which is about delivering a strong, thriving and diverse economy

#### Action:

No change in response to representation

4227

Object

**Document Element:** Issues and Opportunities facing the Plan Area, 2.29

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Mixed

**Summary of representations:**

Support but don't consider CDC/ other policy makers understand existing problems in NE parishes

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation

4412

Support

**Document Element:** Issues and Opportunities facing the Plan Area, 2.29

**Respondent:** Wisborough Green Parish Council

Support

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation

4431

Support

**Document Element:** Issues and Opportunities facing the Plan Area, 2.29

**Respondent:** Wisborough Green Parish Council

Support

**Summary of representations:**

Supports the Vision

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation



4559

Support

**Document Element:** Issues and Opportunities facing the Plan Area, 2.29**Respondent:** Gladman Developments Ltd

Object

**Summary of representations:**

- Wants more flexible HDA policies.

**Summary of representation changes to plan:**

- Change "ancillary" to "functionally linked" in HDA policies.

**Response:**

- The change proposed does not relate to this paragraph. The suggested change has been recorded against the relevant policies E3 and E4 and responded to there.

**Action:**

- No change in response to representation

4974

Object

**Document Element:** Issues and Opportunities facing the Plan Area, 2.29**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited**Agent:** Savills

Support

**Summary of representations:**

- Support – particularly environmental issues and need for rental and affordable housing

**Summary of representation changes to plan:**

- None

**Response:**

- Support noted

**Action:**

- No change in response to representation

5160

Support

**Document Element:** Issues and Opportunities facing the Plan Area, 2.29**Respondent:** John Newman

## Support

---

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Support.]

Support - reducing the need to travel

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation

---

5278

Support

**Document Element:** Issues and Opportunities facing the Plan Area, 2.29

**Respondent:** National Highways

## Mixed

---

### Summary of representations:

Support but don't consider CDC/ other policy makers understand existing problems in NE parishes

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation

---

6198

Object

**Document Element:** Issues and Opportunities facing the Plan Area, 2.29

**Respondent:** Wisborough Green Parish Council

## Responding to the Climate Emergency, 2.30

### Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation

3766

Support

---

**Document Element:** Responding to the Climate Emergency, 2.30

**Respondent:** Mr Joseph O'Sullivan

### Object

---

**Summary of representations:**

Says HDA policies hinder move to net zero

**Summary of representation changes to plan:**

Change "ancillary" to "functionally linked" in HDA policies and explain range of activities that could be included.

**Response:**

The change proposed does not relate to this paragraph. The suggested change has been recorded against the relevant policies E3 and E4 and responded to there.

**Action:**

No change in response to representation

4975

Object

---

**Document Element:** Responding to the Climate Emergency, 2.30

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Object

### Summary of representations:

Plan needs to plan for net zero and climate adaptation

### Summary of representation changes to plan:

Proposes a new policy "Delivering Net Zero" – suggests detailed wording

### Response:

The Government is implementing the Future Homes and Buildings Standard to improve the energy efficiency and reduce the carbon emissions of new buildings through changes to Building Regulations. An interim uplift came into effect in 2022 and consultation on further changes to make all new buildings zero carbon ready began on 13 December 2023, with the changes anticipated to take effect from 2025.

A Written Ministerial Statement on 13 December 2023, which replaces an earlier WMS from 2015, is clear that local plans should not impose energy efficiency requirements above existing or planned Building Regulations.

Climate adaptation is covered in design policy P1.

The Climate Change Background Paper sets out in more detail how climate mitigation and adaptation is covered throughout the Plan.

Suggest additional wording for 2.33 to clarify the scope of the Building Regulations and update reference to the latest Future Homes and Buildings Standard consultation.

### Action:

See suggested council Modifications CM20 and CM21.

5352

Object

**Document Element:** Responding to the Climate Emergency, 2.30

**Respondent:** Landlink Estates Ltd

**Agent:** Jackson Planning Ltd

## Responding to the Climate Emergency, 2.31

### Object

#### Summary of representations:

Climate Emergency Action Plan should come first and inform the plan.

#### Summary of representation changes to plan:

Climate Emergency Action Plan should come first and inform the plan

#### Response:

As set out in paragraphs 2.30 and 2.31, the Climate Emergency Action Plan is separate to the Local Plan as the Climate Emergency is not solely related to development and planning. The Climate Emergency Action Plan was first published in January 2021, well before publication of the Local Plan, and there have been annual progress updates.

#### Action:

No change in response to representation

4158

Object

**Document Element:** Responding to the Climate Emergency, 2.31

**Respondent:** Chidham and Hambrook Parish Council

### Support

#### Summary of representations:

Support but development in the northern parishes conflicts

#### Summary of representation changes to plan:

None

#### Response:

Comment noted

#### Action:

No change in response to representation

4432

Support

**Document Element:** Responding to the Climate Emergency, 2.31

**Respondent:** Wisborough Green Parish Council

## Object

---

### Summary of representations:

Climate Emergency Action Plan should come first and inform the plan.

### Summary of representation changes to plan:

Climate Emergency Action Plan should come first and inform the plan

### Response:

As set out in paragraphs 2.30 and 2.31, the Climate Emergency Action Plan is separate to the Local Plan as the Climate Emergency is not solely related to development and planning. The Climate Emergency Action Plan was first published in January 2021, well before publication of the Local Plan, and there have been annual progress updates.

### Action:

No change in response to representation

## 5430

## Object

---

**Document Element:** Responding to the Climate Emergency, 2.31

**Respondent:** Mayday! Action Group

## Object

---

### Summary of representations:

Support but development in the northern parishes conflicts

### Summary of representation changes to plan:

None

### Response:

Comment noted

### Action:

No change in response to representation

## 6203

## Object

---

**Document Element:** Responding to the Climate Emergency, 2.31

**Respondent:** Wisborough Green Parish Council

## Responding to the Climate Emergency, 2.32

### Object

#### Summary of representations:

Impact of climate change on area is not adequately addressed.

#### Summary of representation changes to plan:

None

#### Response:

Comment Noted

#### Action:

No change in response to representation

5005

Object

**Document Element:** Responding to the Climate Emergency, 2.32

**Respondent:** Hunston Parish Council

### Support

#### Summary of representations:

RECEIVED LATE: Agree – this (climate emergency) is the most urgent issue facing us all together with the Biodiversity Emergency (declared by IPBWS, 2019). The ESPACE project European Spatial Planning: Adapting to Climate Events (ESPACE) was a four-year project funded by the European Commission's north-west Europe INTERREG IIIB programme and the ODPM. It produced a Climate Action Plan for the Manhood Peninsula in 2008 and not much action has followed to implement this. Perhaps it needs dusting off and re-visiting and including within the Local Plan?

#### Summary of representation changes to plan:

The ESPACE project European Spatial Planning: Adapting to Climate Events (ESPACE) was a four-year project funded by the European Commission's north-west Europe INTERREG IIIB programme and the ODPM. It produced a Climate Action Plan for the Manhood Peninsula in 2008 and not much action has followed to implement this. Perhaps it needs dusting off and re-visiting and including within the Local Plan?

#### Response:

Support noted.

#### Action:

No change in response to this representation.

6493

Support

**Document Element:** Responding to the Climate Emergency, 2.32

**Respondent:** CPRE Sussex

**Agent:** CPRE Sussex

## Responding to the Climate Emergency, 2.35

## Object

### Summary of representations:

Should go beyond Building Regulations in light of climate emergency

### Summary of representation changes to plan:

Impose additional sustainability requirements – insulation, water saving, solar panels.

### Response:

The Government is implementing the Future Homes and Buildings Standard, to improve the energy efficiency and reduce the carbon emissions of new buildings through changes to Building Regulations. An interim uplift came into effect in 2022 and consultation on further changes to make all new buildings zero carbon ready began on 13 December 2023, with the changes anticipated to take effect from 2025.

A Written Ministerial Statement on 13 December 2023, which replaces an earlier WMS from 2015, is clear that local plans should not impose energy efficiency requirements above existing or planned Building Regulations.

Policy P1 Design Principles requires that residential and commercial development proposals are accompanied by a Sustainability Statement setting out how the design applies sustainability principles.

The Climate Change Background Paper sets out in more detail how climate mitigation and adaptation is covered throughout the Plan.

Suggest additional wording inserted for 2.33 to clarify the scope of the Building Regulations and update reference to the latest Future Homes and Buildings Standard consultation.

### Action:

See suggested council modifications CM20 and CM21.

4607

Object

**Document Element:** Responding to the Climate Emergency, 2.35

**Respondent:** Mr Allen McDonald



## Local Plan Vision, 2.36

Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None

**Response:**

Support Noted

**Action:**

No change in response to representation

5161

Support

---

**Document Element:** Local Plan Vision, 2.36

**Respondent:** John Newman

## Local Plan Vision, 2.37

## Object

### Summary of representations:

Support BUT (now recorded as object)

### Summary of representation changes to plan:

1. Plan should set out how the vision links to national policies and objectives and
2. require developers to submit evidence of compliance

### Response:

The changes proposed do not relate to this paragraph (objections have also been recorded against the relevant policies).

1.National policies are referred to throughout the plan but as set out in response to rep 6272 a table will be added to the Plan to link policies and objectives.

2.Sufficient evidence is already required with planning applications to assess policy compliance. The local list sets out the information needed for all applications and will be updated to reflect any new requirements when the plan is adopted.

### Action:

See council suggested modifications Appendix 7.

No change in response to 2nd part of representation

## 4228

## Object

**Document Element:** Local Plan Vision, 2.37

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Support.]  
Support

### Summary of representation changes to plan:

None

### Response:

Support Noted

### Action:

No change in response to representation

## 5162

## Support

**Document Element:** Local Plan Vision, 2.37

**Respondent:** John Newman

5279

Support

**Document Element:** Local Plan Vision, 2.37**Respondent:** National Highways**Object****Summary of representations:**

- Add a new para prioritising brownfield/ PDL in sustainable locations

**Summary of representation changes to plan:**

- Add a new para prioritising brownfield/ PDL in sustainable locations

**Response:**

Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

**Action:**

- No change in response to representation

5717

Object

**Document Element:** Local Plan Vision, 2.37**Respondent:** Metis Homes**Agent:** Nova Planning**Support****Summary of representations:**

- [National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Support.] Support

**Summary of representation changes to plan:**

- None

**Response:**

- Support Noted

**Action:**

- No change in response to representation

5895

Support

**Document Element:** Local Plan Vision, 2.37**Respondent:** GoVia Thameslink Railway

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation

---

6273

Support

**Document Element:** Local Plan Vision, 2.37

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

**The Vision is that by 2039,**

Mixed

---

**Summary of representations:**

Fine but volume of housing will make it impossible to achieve

**Summary of representation changes to plan:**

None

**Response:**

Comment Noted

**Action:**

No change in response to representation

---

3983

Object

**Document Element:** The Vision is that by 2039,

**Respondent:** Mrs Jane Towers

## Object

---

**Summary of representations:**

Lacks soundness in relation to vision

**Summary of representation changes to plan:**

Unclear – refers to “suggested changes” but no wording is proposed in this rep.

**Response:**

No specific changes have been proposed in this representation so the change sought is unclear.

**Action:**

No change in response to representation

---

4109

Object

**Document Element:** The Vision is that by 2039,

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

---

Mixed

**Summary of representations:**

Fine but volume of housing will make it impossible to achieve

**Summary of representation changes to plan:**

None

**Response:**

Comment Noted

**Action:**

No change in response to representation

---

4149

Support

**Document Element:** The Vision is that by 2039,

**Respondent:** Chidham and Hambrook Parish Council

## Mixed

---

**Summary of representations:**

Support but ask how bullet 5 applies to WG

**Summary of representation changes to plan:**

None

**Response:**

Comment noted

**Action:**

No change in response to representation

---

**4434**

**Support**

**Document Element:** The Vision is that by 2039,

**Respondent:** Wisborough Green Parish Council

## Mixed

---

**Summary of representations:**

Should refer to the characteristic set out in 2.2 and 2.3

**Summary of representation changes to plan:**

Should refer to the characteristic set out in 2.2 and 2.3

**Response:**

These are covered in more detail in the area specific text following the Vision.

**Action:**

No change in response to representation

---

**4647**

**Object**

**Document Element:** The Vision is that by 2039,

**Respondent:** Plaistow and Ifold Parish Council

## Object

### Summary of representations:

Strategic allocations should plan for working age people, a mix of uses and alternatives to the private car. No tangible solutions to out commuting or ageing population are identified. Vision is bland.

### Summary of representation changes to plan:

Not specific

### Response:

Unclear what change is sought. The Vision already refers to meeting the needs of a range of age groups. Out commuting has not been identified as an issue - there is currently in commuting to the Local Plan area.

The HEDNA considers the balance between homes and jobs and shows a good correlation.

### Action:

No change in response to representation

4762

Object

**Document Element:** The Vision is that by 2039,

**Respondent:** Wates Developments and Seaward Properties

**Agent:** Barton Willmore now Stantec

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

None

### Response:

Support Noted

### Action:

No change in response to representation

5693

Support

**Document Element:** The Vision is that by 2039,

**Respondent:** Church Commissioners for England

**Agent:** Lichfields

## Object

---

### Summary of representations:

Plan will not meet the housing ambitions set out in the Vision

### Summary of representation changes to plan:

Either change vision to recognise housing needs will not be met or change housing policies.

### Response:

The Vision is intended to be ambitious and looks ahead to 2039. The plan will be reviewed before then to see if circumstances mean a different housing number can be delivered.

### Action:

No change in response to representation.

---

5774

Object

---

**Document Element:** The Vision is that by 2039,

**Respondent:** Beechcroft Developments Limited

**Agent:** Genesis Town Planning Ltd

## Object

---

### Summary of representations:

Suggests wording additions in relation to water supply.

### Summary of representation changes to plan:

Add "water scarcity" to bullet 1 and "(including water supply)" to bullet 6 after "natural".

### Response:

Agree with first point.

The Vision is high level and the part about water supply seems to be too specific for that bullet with is referring to natural and cultural assets which make Chichester a good place for particular types of business.

Met with NE 27/07 and agreed the addition is not necessary for soundness.

### Action:

See council suggested modification CM022

---

5786

Object

---

**Document Element:** The Vision is that by 2039,

**Respondent:** Natural England



## Object

### Summary of representations:

Not locally distinctive enough. Should recognise active travel not possible in some locations

### Summary of representation changes to plan:

Include designations, E-W corridor and Manhood Peninsula, refer to water quality, water and nutrient neutrality and SPZs.  
Be realistic.

### Response:

The 3rd bullet refers to protecting, managing and enhancing the natural environment which encompasses protecting water quality. The supporting text below gives additional information about each sub area. It is intended to be an ambitious Vision.

### Action:

No change in response to representation

5795

Object

**Document Element:** The Vision is that by 2039,

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

Mixed

### Summary of representations:

Should refer to the characteristic set out in 2.2 and 2.3

### Summary of representation changes to plan:

Should refer to the characteristic set out in 2.2 and 2.3

### Response:

These are covered in more detail in the area specific text following the Vision.

### Action:

No change in response to representation

6144

Support

**Document Element:** The Vision is that by 2039,

**Respondent:** Plaistow and Ifold Parish Council

## Mixed

---

**Summary of representations:**

Support but ask how bullet 5 applies to WG

**Summary of representation changes to plan:**

None

**Response:**

Comment noted

**Action:**

No change in response to representation

6204

Object

---

**Document Element:** The Vision is that by 2039,

**Respondent:** Wisborough Green Parish Council

### Chichester City and the East West Corridor, 2.38

Support

---

**Summary of representations:**

Support subject to comments on 2.3

**Summary of representation changes to plan:**

None

**Response:**

See response to Rep 4223 which relates to 2.3

**Action:**

No change in response to representation

4230

Support

---

**Document Element:** Chichester City and the East West Corridor, 2.38

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Mixed

---

### Summary of representations:

Support BUT consider NE parishes have been allocated housing just to make up the number when key infrastructure is focussed on Chichester.

### Summary of representation changes to plan:

None

### Response:

Support noted. Rest of comment relates to Policies S1/ H2/H3 and is responded to there).

### Action:

No change in response to representation.

---

## 4415

## Support

**Document Element:** Chichester City and the East West Corridor, 2.38

**Respondent:** Wisborough Green Parish Council

## Object

---

### Summary of representations:

Add reference to neighbourhood plan

### Summary of representation changes to plan:

Add reference to neighbourhood plan

### Response:

The paragraph is not solely about Chichester City but also about the East West corridor so if one NP is mentioned all should be. NPs are mentioned throughout the plan – do not consider a reference is particularly needed here.

### Action:

No change in response to representation.

---

## 5744

## Object

**Document Element:** Chichester City and the East West Corridor, 2.38

**Respondent:** Chichester City Council Neighbourhood Plan Steering Group

## Mixed

**Summary of representations:**

Support BUT consider NE parishes have been allocated housing just to make up the number when key infrastructure is focussed on Chichester.

**Summary of representation changes to plan:**

None

**Response:**

Support noted. Rest of comment relates to Policies S1/ H2/H3 and is responded to there).

**Action:**

No change in response to representation.

**6199****Object**

**Document Element:** Chichester City and the East West Corridor, 2.38

**Respondent:** Wisborough Green Parish Council

**Chichester City and the East West Corridor, 2.39****Support****Summary of representations:**

Chichester City needs more facilities for young people

**Summary of representation changes to plan:**

None specified

**Response:**

Comment noted

**Action:**

No change in response to representation.

**4113****Support**

**Document Element:** Chichester City and the East West Corridor, 2.39

**Respondent:** Chidham and Hambrook Parish Council

## Object

---

**Summary of representations:**

■ Add reference to neighbourhood plan

**Summary of representation changes to plan:**

■ Add reference to neighbourhood plan

**Response:**

■ Change not considered necessary.

**Action:**

■ No change in response to representation.

---

5749

Object

---

**Document Element:** Chichester City and the East West Corridor, 2.39

**Respondent:** Chichester City Council Neighbourhood Plan Steering Group

### Chichester City and the East West Corridor, 2.40

## Object

---

**Summary of representations:**

■ Development proposed is not well located

**Summary of representation changes to plan:**

■ Development proposed is not well located

**Response:**

■ Comment noted

**Action:**

■ No change in response to representation.

---

3986

Object

---

**Document Element:** Chichester City and the East West Corridor, 2.40

**Respondent:** Mrs Jane Towers

## Object

---

### Summary of representations:

- Policies need to specify minimum standards and evidence

### Summary of representation changes to plan:

- Plan should specify how new development takes account of listed issues (social, environmental and economic)

### Response:

- Policies in the plan set out detailed criteria against which development proposals will be considered.

### Action:

- No change in response to representation.

---

4232

Object

---

**Document Element:** Chichester City and the East West Corridor, 2.40

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Chichester City and the East West Corridor, 2.41

## Object

---

### Summary of representations:

- Overreliance on East West Corridor

### Summary of representation changes to plan:

- Reduce housing allocation – particularly along edge of Chi Harbour AONB

### Response:

- The change proposed does not relate to this paragraph. The suggested change has also been recorded against the relevant policies – S1, H2, H3 and responded to there.

### Action:

- No change in response to representation.

---

4096

Object

---

**Document Element:** Chichester City and the East West Corridor, 2.41

**Respondent:** Chichester Harbour Trust

## Support

---

### Summary of representations:

Welcomes acknowledgment of the location of HDAs within the East West corridor.

### Summary of representation changes to plan:

None

### Response:

Comment noted

### Action:

Comment noted

---

4977

Support

---

**Document Element:** Chichester City and the East West Corridor, 2.41

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Object

---

### Summary of representations:

Questions reference to "highly accessible transit corridor" - A27 is a barrier, A259 at stress

### Summary of representation changes to plan:

None specified

### Response:

The East- West corridor is served by 2 major A roads, a railway line and regular bus services. This means it is considered one of the more accessible locations in the Plan Area.

### Action:

No change in response to representation.

---

5887

Object

---

**Document Element:** Chichester City and the East West Corridor, 2.41

**Respondent:** Save our South Coast Alliance

## Chichester City and the East West Corridor, 2.42

### Object

---

**Summary of representations:**

Asks for clarification of "carefully managed by maintaining and enhancing the countryside between settlement"

**Summary of representation changes to plan:**

Asks for clarification of "carefully managed by maintaining and enhancing the countryside between settlements"

**Response:**

More detail is set out in Policy NE3 and supporting text.

**Action:**

No change in response to representation.

---

4236

Object

---

**Document Element:** Chichester City and the East West Corridor, 2.42

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

### Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None

**Response:**

Support Noted

**Action:**

No change in response to representation.

---

5164

Support

---

**Document Element:** Chichester City and the East West Corridor, 2.42

**Respondent:** John Newman



## Chichester City and the East West Corridor, 2.45

### Object

---

**Summary of representations:**

Chidham and Hambrook should not be a service village due to lack of facilities

**Summary of representation changes to plan:**

Reduce housing in Chidham and Hambrook

**Response:**

The changes proposed do not relate to this paragraph. The suggested change has also been recorded against the relevant policies – S1, S2 and responded to there

**Action:**

No change in response to representation

3988

Object

---

**Document Element:** Chichester City and the East West Corridor, 2.45

**Respondent:** Mrs Jane Towers

### Object

---

**Summary of representations:**

Chidham and Hambrook should not be a service village due to lack of facilities

**Summary of representation changes to plan:**

Reduce housing in Chidham and Hambrook

**Response:**

The changes proposed do not relate to this paragraph. The suggested change has also been recorded against the relevant policies – S1, S2 and responded to there

**Action:**

No change in response to representation

4116

Object

---

**Document Element:** Chichester City and the East West Corridor, 2.45

**Respondent:** Chidham and Hambrook Parish Council

## Manhood Peninsula, 2.46

### Object

---

**Summary of representations:**

Promoting Stubcroft Farm - international designations mentioned in 2.46 aren't relevant to Stubcroft Farm so a blanket approach to development on Manhood isn't appropriate.

**Summary of representation changes to plan:**

Not specified

**Response:**

Comments noted. There is not a blanket approach to development. Para 3.20 of the Publication Plan sets out why no strategic allocations are proposed on the Manhood Peninsula. Add reference to additional constraints for clarity.

**Action:**

See Council's Suggested Modifications CM023

---

**5755****Object**

---

**Document Element:** Manhood Peninsula, 2.46

**Respondent:** Barratt David Wilson Homes

**Agent:** Henry Adams LLP

## Manhood Peninsula, 2.47

### Support

---

**Summary of representations:**

Support but notes inadequate infrastructure and employment opportunities

**Summary of representation changes to plan:**

None proposed

**Response:**

Support noted. Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement.

**Action:**

No change in response to representation.

---

**3767****Support**

---

**Document Element:** Manhood Peninsula, 2.47

**Respondent:** Mr Joseph O'Sullivan

## Manhood Peninsula, 2.48

### Object

---

**Summary of representations:**

Should address the value of marine leisure and recreation

**Summary of representation changes to plan:**

Should address the value of marine leisure and recreation

**Response:**

This is encompassed by "tourism" but could be made more explicit.

**Action:**

See Council's suggested modification CM024

---

**4024****Object**

---

**Document Element:** Manhood Peninsula, 2.48

**Respondent:** Mrs Victoria Douglas

## North of the Plan Area, 2.49

### Object

---

**Summary of representations:**

principle but would like a specific policy for the north of the plan area as in the current plan policy 25

**Summary of representation changes to plan:**

Propose a distinctive policy for development in the North of the Plan, which would more explicitly link the nature and capacity of the spatial areas with the proposed housing allocations. This was achieved in Policy 25 of the current adopted Local Plan

**Response:**

The content of Policy 25 is considered to be covered by other policies - H2 and H3 cover the housing numbers, NE2 covers landscape, P9-12 cover heritage, P17 covers local and community facilities, T1-3 cover accessibility

**Action:**

No change in response to representation

---

**4409****Object**

---

**Document Element:** North of the Plan Area, 2.49

**Respondent:** Plaistow and Ifold Parish Council

## Mixed

**Summary of representations:**

Support but consider it cannot happen with the level of housing proposed.

**Summary of representation changes to plan:**

None proposed.

**Response:**

Comment noted

**Action:**

No change in response to representation.

**4416****Support**

**Document Element:** North of the Plan Area, 2.49

**Respondent:** Wisborough Green Parish Council

**4436****Support**

**Document Element:** North of the Plan Area, 2.49

**Respondent:** Wisborough Green Parish Council

**Support****Summary of representations:**

Concerned about existing infrastructure

**Summary of representation changes to plan:**

None proposed

**Response:**

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is not the role of the Local Plan to make up existing deficits which are the responsibility of the relevant infrastructure providers – the use of S106 and CIL are limited to addressing the impacts of new development

**Action:**

No change in response to representation

**4692****Support**

**Document Element:** North of the Plan Area, 2.49

**Respondent:** Mr Phillip Luff

## Object

### Summary of representations:

Consider headings are needed to explain the 3 plan areas.

What is meant by becoming more self reliant?

No local infrastructure

### Summary of representation changes to plan:

Add a heading or explanations

### Response:

Each of the plan areas has a heading in bold above the relevant paragraphs.

The next para 2.50 explains more about opportunities to maintain or enhance local services.

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement

### Action:

No change in response to representation

5796

Object

**Document Element:** North of the Plan Area, 2.49

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Support

### Summary of representations:

principle but would like a specific policy for the north of the plan area as in the current plan policy 25.

### Summary of representation changes to plan:

Add a specific policy for the north of the plan area

### Response:

The content of Policy 25 is considered to be covered by other policies - H2 and H3 cover the housing numbers, NE2 covers landscape, P9-12 cover heritage, P17 covers local and community facilities, T1-3 cover accessibility

### Action:

No change in response to representation

6141

Support

**Document Element:** North of the Plan Area, 2.49

**Respondent:** Plaistow and Ifold Parish Council

## Mixed

**Summary of representations:**

Support but consider it cannot happen with the level of housing proposed.

**Summary of representation changes to plan:**

None proposed.

**Response:**

Comment noted

**Action:**

No change in response to representation.

**6200****Object**

**Document Element:** North of the Plan Area, 2.49

**Respondent:** Wisborough Green Parish Council

**6205****Object**

**Document Element:** North of the Plan Area, 2.49

**Respondent:** Wisborough Green Parish Council

**North of the Plan Area, 2.50**

## Mixed

**Summary of representations:**

In principle support but concerned about enhancement of local in services and facilities as this could imply meeting the needs of greater numbers of people

**Summary of representation changes to plan:**

Ensure all development in the area is driven by evidenced existing local need rather than potential local need.

**Response:**

Enhanced local services could serve both existing and new residents. No change required.

**Action:**

No change in response to representation.

**4460****Object**

**Document Element:** North of the Plan Area, 2.50

**Respondent:** Plaistow and Ifold Parish Council

**6143****Support**

**Document Element:** North of the Plan Area, 2.50

**Respondent:** Plaistow and Ifold Parish Council

## Cross Boundary Strategic Objectives, 2.52

### Object

---

**Summary of representations:**

Lower housing number does not align with the objectives of LSS2

**Summary of representation changes to plan:**

Either change 2.52 or the housing number

**Response:**

Comment noted – this paragraph does not refer to the housing target

**Action:**

No change in response to representation

---

**5775****Object**

---

**Document Element:** Cross Boundary Strategic Objectives, 2.52

**Respondent:** Beechcroft Developments Limited

**Agent:** Genesis Town Planning Ltd

## Cross Boundary Strategic Objectives, 2.53

### Object

---

**Summary of representations:**

to restriction on uses in HDAs

**Summary of representation changes to plan:**

Change HDA policies to allow functionally linked development

**Response:**

The change proposed does not relate to this paragraph. The suggested change has been recorded against the relevant policies E3 and E4 and responded to there.

**Action:**

No change in response to representation

---

**4979****Object**

---

**Document Element:** Cross Boundary Strategic Objectives, 2.53

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Support

---

**Summary of representations:**

■ Spatial Priority 2 – consider development best means of delivery

**Summary of representation changes to plan:**

■ None

**Response:**

■ Support noted

**Action:**

■ No change in response to representation

---

5365

Support

**Document Element:** Cross Boundary Strategic Objectives, 2.53

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

### Strategic Objectives, 2.54

## Support

---

**Summary of representations:**

■ objectives 1 and 2

**Summary of representation changes to plan:**

■ None

**Response:**

■ Support noted

**Action:**

■ No change in response to representation

---

5037

Support

**Document Element:** Strategic Objectives, 2.54

**Respondent:** Sussex Wildlife Trust



## Support

---

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Support.]  
Support Objectives 1, 4 and 7

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation

---

5280

Support

**Document Element:** Strategic Objectives, 2.54

**Respondent:** National Highways

## Object

---

### Summary of representations:

Objectives should say more about water neutrality

### Summary of representation changes to plan:

Add a measurable objective for water neutrality

### Response:

Water neutrality will be added to Objective 2

### Action:

No change to paragraph 2.54 in response to representation.

See Council's suggested modification CM029

---

5812

Object

**Document Element:** Strategic Objectives, 2.54

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation

---

6181

Support

---

**Document Element:** Strategic Objectives, 2.54

**Respondent:** Hallam Land Management Limited

**Agent:** LRM Planning

## Object

---

**Summary of representations:**

but suggest policies are linked to objectives

**Summary of representation changes to plan:**

Plan should link policies to objectives

**Response:**

Agree this could be set out more clearly. Suggest a table linking policies and objectives is added.

**Action:**

See Council's suggested modifications Appendix 7

---

6272

Object

---

**Document Element:** Strategic Objectives, 2.54

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Objective 1: Climate Change

# Mixed

### Summary of representations:

Support but policies aren't consistent with the objectives (need more bus services in Loxwood and higher building standards)

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation.

## 3810

## Object

**Document Element:** Objective 1: Climate Change

**Respondent:** Mr James Jewell

## Object

### Summary of representations:

The plan strategy will not deliver this objective as East West corridor is largely reliant on cars.

### Summary of representation changes to plan:

Reduce housing in East West corridor. Direct development away from areas reliant on cars in favour of city brownfield sites.

### Response:

The East West corridor is served by bus and rail services as well as community transport.

The suggested change is not a change to this paragraph. The suggested change has also been recorded against Policy S1 (rep 4122) and responded to there.

### Action:

No change in response to representation

## 3989

## Object

**Document Element:** Objective 1: Climate Change

**Respondent:** Mrs Jane Towers

## Support

---

### Summary of representations:

objective but the plan will not deliver it

### Summary of representation changes to plan:

None

### Response:

Comment noted

### Action:

No change in response to representation

---

## 4099

## Support

**Document Element:** Objective 1: Climate Change

**Respondent:** Chichester Harbour Trust

## Object

---

### Summary of representations:

The plan strategy will not deliver this objective as East West corridor is largely reliant on cars.

### Summary of representation changes to plan:

Reduce housing in East West corridor. Direct development away from areas reliant on cars in favour of city brownfield sites.

### Response:

The East West corridor is served by bus and rail services as well as community transport.

The suggested change is not a change to this paragraph. The suggested change has also been recorded against Policy S1 (rep 4122) and responded to there.

### Action:

No change in response to representation

---

## 4200

## Object

**Document Element:** Objective 1: Climate Change

**Respondent:** Chidham and Hambrook Parish Council

## Object

---

### Summary of representations:

but want more evidence on accessibility to be required from developers

### Summary of representation changes to plan:

Developers must evidence alternatives to the private car

### Response:

The suggested change is too detailed for this Strategic level Objective which already refers to reducing reliance on private cars.

Policy T1 sets out detailed requirements for developers to evidence how their scheme will avoid or reduce the need to travel by private car, enable access to sustainable means of travel, manage travel demand and mitigate impacts of travel by car. Policy T2 contains further detail on how this should be done. Policy P4 also covers relevant design aspects.

### Action:

No change in response to representation

---

4238

Object

---

**Document Element:** Objective 1: Climate Change

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

### Summary of representations:

but disappointed that environmental and sustainability requirements do not exceed Building Regulations requirements

### Summary of representation changes to plan:

None

### Response:

The Government is implementing the Future Homes and Buildings Standard, to improve the energy efficiency and reduce the carbon emissions of new buildings through changes to Building Regulations. An interim uplift came into effect in 2022 and consultation on further changes to make all new buildings zero carbon ready began on 13 December 2023, with the changes anticipated to take effect from 2025.

A Written Ministerial Statement on 13 December 2023, which replaces an earlier WMS from 2015, is clear that local plans should not require energy efficiency standards above existing or planned Building Regulations.

In addition, viability testing showed that a net zero requirement ahead of Building Regulations changes anticipated through the Government's Future Homes and Buildings Standard would not be viable without cutting another requirement such as affordable housing, particularly when the costs related to the A27 were taken into account.

Policy P1 Design Principles requires that residential and commercial development proposals are accompanied by a Sustainability Statement setting out how the design applies sustainability principles.

The Climate Change Background Paper sets out in more detail how climate mitigation and adaptation is covered throughout the Plan.

### Action:

No change to the Objective in response to this representation

4617

Support

**Document Element:** Objective 1: Climate Change

**Respondent:** Mr Allen McDonald

## Object

### Summary of representations:

to restriction on uses in HDAs

### Summary of representation changes to plan:

Change HDA policies to allow functionally linked development

### Response:

The change proposed does not relate to this paragraph. The suggested change has been recorded against the relevant policies E3 and E4 and responded to there.

### Action:

No change in response to representation None

4981

Object

**Document Element:** Objective 1: Climate Change

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

Mixed

**Summary of representations:**

Support but policies aren't consistent with the objectives (need more bus services in Loxwood and higher building standards)

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation.

6240

Support

**Document Element:** Objective 1: Climate Change

**Respondent:** Mr James Jewell

## Objective 1: Climate Change

### Object

---

**Summary of representations:**

■ New developments on the Manhood are causing flooding

**Summary of representation changes to plan:**

■ none

**Response:**

■ Comment noted. The plan does not propose any development on the Manhood Peninsula other than 50 at North Mundham which already have permission.

**Action:**

■ No change in response to representation.

---

**5116****Object**

---

**Document Element:** Objective 1: Climate Change

**Respondent:** Lynn Reel

### Support

---

**Summary of representations:**

■ [National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Support.]  
Support

**Summary of representation changes to plan:**

■ None

**Response:**

■ Support noted

**Action:**

■ No change in response to representation

---

**5713****Support**

---

**Document Element:** Objective 1: Climate Change

**Respondent:** National Highways



## Object

### Summary of representations:

Plan will not deliver this objective by locating development in rural, inaccessible locations

### Summary of representation changes to plan:

Provide measured outcomes in line with Climate Emergency Action Plan

### Response:

The Climate Emergency Action Plan is monitored and reported on separately to the Local Plan, in regular Progress reports published on the council website Climate change - Chichester District Council

It sets an area wide target to reduce emissions across the District by 10% year on year to 2025 – which is referred to in para 2.31 of the plan. Targets beyond that are still to be set.

The objective as currently worded refers to being in line with the council's Climate Emergency Action Plan which allows flexibility as the targets in that evolve.

### Action:

No change in response to representation

5797

Object

**Document Element:** Objective 1: Climate Change

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Object

### Summary of representations:

New developments on the Manhood are causing flooding

### Summary of representation changes to plan:

none

### Response:

Comment noted. The plan does not propose any development on the Manhood Peninsula other than 50 at North Mundham which already have permission.

### Action:

No change in response to representation.

5888

Object

**Document Element:** Objective 1: Climate Change

**Respondent:** Save our South Coast Alliance

## Support

### Summary of representations:

Supports but suggests a change

### Summary of representation changes to plan:

"New development will be in accessible locations with local access at the core of the design linked by high quality active travel walking and cycle routes that also link to bus stops and railway stations where access is required that cannot be provided locally."

### Response:

Will amend wording largely as proposed, recognising that rail stations won't be applicable everywhere

### Action:

See Council's suggested modification CM027

5896

Support

**Document Element:** Objective 1: Climate Change

**Respondent:** GoVia Thameslink Railway

## Object

### Summary of representations:

Plan doesn't say what climate is planned for up to 2039

### Summary of representation changes to plan:

Plan needs to set out forecast climate changes and how the plan will adapt. Need to consider relocation of some homes in the Manhood Peninsula

### Response:

The effects of climate change are difficult to predict with any certainty. In relation to sea level rise, bullet 3 of Policy NE14 Integrated Coastal Zone Management for the Manhood Peninsula refers to the relocation of current settlement areas.

The issue of relocation is also intertwined with issues around the renewal of flood defences, and as such is linked to Shoreline Management Plans.

### Action:

No change in response to representation

6059

Object

**Document Element:** Objective 1: Climate Change

**Respondent:** Mr Colin Mckenna

## Object

### Summary of representations:

The objective does not include any mention of the requirement for renewable energy development.

### Summary of representation changes to plan:

Add reference to renewable energy.

### Response:

The overarching objective is to mitigate and adapt to climate change, reducing greenhouse gas emissions in line with the council's Climate Emergency Action Plan and the objective of net zero by 2050. It does not seek to identify all the ways this might be achieved - renewable energy is likely to be part of that and is supported through other policies in the plan including NE1.

### Action:

No change

## 6305

## Object

**Document Element:** Objective 1: Climate Change

**Respondent:** Landlink Estates Ltd

**Agent:** Jackson Planning Ltd

## Object

### Summary of representations:

RECEIVED LATE: Section does not reflect urgency of issue nor vulnerability of parts of Sussex; Objective's actions need to be included in all objectives; policies need to include not building on areas below 5m high Water Level; reference to be made to UK Climate Resilience Programme and findings as well as report: The importance of Adaptive Resilience Solutions in the Face of Climate Threats.

### Summary of representation changes to plan:

Objective's actions need to be included in all objectives; policies need to include not building on areas below 5m high Water Level; reference to be made to UK Climate Resilience Programme and findings as well as report: The importance of Adaptive Resilience Solutions in the Face of Climate Threats.

### Response:

The objectives are to be delivered through the full range of policies set out in the plan. It is proposed that a table be added to the plan setting out which policies relate to the delivery of each objective.

Sea level rise and flood risk are covered by policies NE11-NE16. Additional wording referring to the national coastal risk management work of the Environment Agency has been proposed in discussion with Natural England - for Policy NE10 Development around the Coast.

### Action:

No change to this section.

See council suggested modification Appendix 7.

6491

Object

**Document Element:** Objective 1: Climate Change**Respondent:** CPRE Sussex**Agent:** CPRE Sussex**Objective 2: Natural Environment**

Support

**Summary of representations:**

Support but plan will not deliver it.

**Summary of representation changes to plan:**

None

**Response:**

Comment noted

**Action:**

No change in response to representation

4105

Support

**Document Element:** Objective 2: Natural Environment**Respondent:** Chichester Harbour Trust

Object

**Summary of representations:**

High level of housing close to Chichester Harbour conflicts with this objective

**Summary of representation changes to plan:**

Reduce overall housing number

**Response:**

The suggested change is not a change to this Objective. The suggested change has also been recorded against Policy H1 and responded to there.

**Action:**

No change in response to representation

4199

Object

**Document Element:** Objective 2: Natural Environment**Respondent:** Chidham and Hambrook Parish Council

## Object

---

### Summary of representations:

Plan should set out where these benefits will be sought and go beyond wildlife corridors

### Summary of representation changes to plan:

Identify important areas for landscape, and areas for woodland and nature recovery.

### Response:

The wording is not limited to strategic wildlife corridors which are given as an example.

Landscape gaps will be identified in Neighbourhood Plans. Areas of strategic significance for biodiversity will be identified within the Local Nature Recovery Strategy.

### Action:

No change in response to representation

---

## 4240

## Object

---

**Document Element:** Objective 2: Natural Environment

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

---

### Summary of representations:

Support but ask how it could apply to Wisborough Green

### Summary of representation changes to plan:

None

### Response:

Comment noted

### Action:

No change in response to representation

---

## 4422

## Support

---

**Document Element:** Objective 2: Natural Environment

**Respondent:** Wisborough Green Parish Council

## Mixed

---

### Summary of representations:

Explanatory text does not reflect the whole objective

### Summary of representation changes to plan:

Refer to landscape character in the text

### Response:

The text underneath is intended to be read with the objective rather than repeat. Policy NE2 and its supporting text set out more detail.

### Action:

No change in response to representation

## 4648

## Object

---

**Document Element:** Objective 2: Natural Environment

**Respondent:** Plaistow and Ifold Parish Council

## Support

---

### Summary of representations:

Support

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation

## 4688

## Support

---

**Document Element:** Objective 2: Natural Environment

**Respondent:** Chichester Tree Wardens

## Object

---

### Summary of representations:

Objects because harbour waters are contaminated and there is a threat to biodiversity

### Summary of representation changes to plan:

None

### Response:

The objective is to achieve net gains in biodiversity and improvements in the condition of designated sites including Chichester and Pagham harbours.

### Action:

No change in response to representation

---

5119

Object

---

**Document Element:** Objective 2: Natural Environment

**Respondent:** Lynn Reel

## Object

---

### Summary of representations:

We are pleased to see the South Downs National Park reference alongside the Chichester Harbour AONB in the 'Issues and opportunities facing the plan area' section. We note that the strategic objectives of the Plan do not address the National Park designation.

### Summary of representation changes to plan:

Add reference to conserving and enhancing the South Downs National Park and its setting.

### Response:

Add wording.

### Action:

See Council suggested modifications CM028

---

5128

Object

---

**Document Element:** Objective 2: Natural Environment

**Respondent:** South Downs National Park Authority

## Object

### Summary of representations:

Natural England maintains its advice, provided both as part of the Regulation 18 statutory consultation in 2019 and through subsequent, non-statutory consultations during 2021 and 2022.

### Summary of representation changes to plan:

Add "and where relevant will be water neutral" to final sentence.

Add " SuDs will be incorporated to manage run off"

### Response:

Will add reference to water neutrality, which sits well alongside the existing reference to nutrient neutrality.

Met NE 27/7 – agreed reference to SuDs was not necessary for soundness.

### Action:

See Council's suggested modification CM029

5787

Object

**Document Element:** Objective 2: Natural Environment

**Respondent:** Natural England

## Object

### Summary of representations:

Suggests addition/ clarifications and asks how it will be measured.

### Summary of representation changes to plan:

1. Clarify there are more designated sites than listed.
2. Set out how much biodiversity net gain is required.
3. Add a new objective on landscape

### Response:

1. "including" indicates the list is not exhaustive.
2. The requirement for biodiversity net gain is set out in policy NE5.
3. Landscape is covered by Objective 2 – the text underneath is intended to be read with the objective rather than repeat. Policy NE2 and its supporting text set out more detail.

### Action:

No change in response to representation



5799

Object

**Document Element:** Objective 2: Natural Environment**Respondent:** Kirdford Parish Council**Agent:** Troy Planning + Design

Support

**Summary of representations:**

Strongly support

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation.

5897

Support

**Document Element:** Objective 2: Natural Environment**Respondent:** GoVia Thameslink Railway

Mixed

**Summary of representations:**

Explanatory text does not reflect the whole objective

**Summary of representation changes to plan:**

Refer to landscape character in the text

**Response:**

The text underneath is intended to be read with the objective rather than repeat. Policy NE2 and its supporting text set out more detail.

**Action:**

No change in response to representation

6145

Support

**Document Element:** Objective 2: Natural Environment**Respondent:** Plaistow and Ifold Parish Council

## Object

### Summary of representations:

RECEIVED LATE: Objective needs to be reflected in all parts of plan to include Wildlife Corridors, Biodiversity Net Gain and the Nature Recovery Network; emergency concerning Biodiversity also needs to be communicated.

### Summary of representation changes to plan:

Objective needs to be reflected in all parts of plan to include Wildlife Corridors, Biodiversity Net Gain and the Nature Recovery Network; emergency concerning Biodiversity also needs to be communicated.

### Response:

The objectives are to be delivered through the full range of policies set out in the plan. It is proposed that a table be added to the plan setting out which policies relate to the delivery of each objective.

Policy NE4 covers Strategic Wildlife Corridors, NE5 covers Biodiversity.

### Action:

No change to this section.

See council suggested modification Appendix 7.

**6492****Object**

Document Element: Objective 2: Natural Environment

Respondent: CPRE Sussex

Agent: CPRE Sussex

## Objective 3: Housing

## Object

### Summary of representations:

Stop

### Summary of representation changes to plan:

Stop second homes

### Response:

The objective is to deliver affordable housing to meet local needs.

Measures to reduce second homes where these are an issue can be implemented outside of the planning system as planning permission is not currently required to purchase and use an existing dwelling as a second home. However the previous government announced an intention to introduce a permission requirement where such properties are used as short term lets.

### Action:

No change in response to representation.

**3898****Object**

Document Element: Objective 3: Housing

Respondent: Mrs Nina Davies

## Object

### Summary of representations:

Housing will have to satisfy the mandatory Future Homes Standard from 2025.

### Summary of representation changes to plan:

Good design should include community or PV power generation.

### Response:

As noted developments will have to comply with mandatory standards including the changes to the Building Regulations introduced by the Future homes and Buildings Standard. As these are required by other legislation they do not need to be repeated in policy.

The Government is implementing the Future Homes and Buildings Standard, to improve the energy efficiency and reduce the carbon emissions of new buildings through changes to Building Regulations. An interim uplift came into effect in 2022 and consultation on further changes to make all new buildings zero carbon ready began on 13 December 2023, with the changes anticipated to take effect from 2025.

A Written Ministerial Statement on 13 December 2023, which replaces an earlier WMS from 2015, is clear that local plans should not impose energy efficiency requirements above existing or planned Building Regulations.

In addition, viability testing showed that a net zero requirement ahead of Building Regulations changes anticipated through the Government's Future Homes and Buildings Standard would not be viable without cutting another requirement such as affordable housing, particularly when the costs related to the A27 were taken into account.

Policy P1 Design Principles requires that residential and commercial development proposals are accompanied by a Sustainability Statement setting out how the design applies sustainability principles.

The Climate Change Background Paper sets out in more detail how climate mitigation and adaptation is covered throughout the Plan.

### Action:

No change in response to representation

---

**4034****Object**

**Document Element:** Objective 3: Housing

**Respondent:** Mr Jan Davis

## Object

---

**Summary of representations:**

Need to increase design standards

**Summary of representation changes to plan:**

Plan should set higher design standards, prefer smaller developers, and identify which areas aren't suited for development.

**Response:**

The Objective is to ensure such high standards of design. Design Standards are set out in Policies P1 to P8.

**Action:**

No change in response to representation

---

4241

Object

---

**Document Element:** Objective 3: Housing

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation

---

4423

Support

---

**Document Element:** Objective 3: Housing

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

Support principle, but should set requirements beyond Building Regulations

### Summary of representation changes to plan:

Set requirements beyond Building Regulations

### Response:

The Government is implementing the Future Homes and Buildings Standard, to improve the energy efficiency and reduce the carbon emissions of new buildings through changes to Building Regulations. An interim uplift came into effect in 2022 and consultation on further changes to make all new buildings zero carbon ready began on 13 December 2023, with the changes anticipated to take effect from 2025.

A Written Ministerial Statement on 13 December 2023, which replaces an earlier WMS from 2015, is clear that local plans should not impose energy efficiency requirements above existing or planned Building Regulations.

In addition, viability testing showed that a net zero requirement ahead of Building Regulations changes anticipated through the Government's Future Homes and Buildings Standard would not be viable without cutting another requirement such as affordable housing, particularly when the costs related to the A27 were taken into account.

Policy P1 Design Principles requires that residential and commercial development proposals are accompanied by a Sustainability Statement setting out how the design applies sustainability principles.

The Climate Change Background Paper sets out in more detail how climate mitigation and adaptation is covered throughout the Plan.

### Action:

No change in response to representation

4622

Object

Document Element: Objective 3: Housing

Respondent: Mr Allen McDonald

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation

4679

Support

**Document Element:** Objective 3: Housing**Respondent:** Merrow Wood**Agent:** Intelligent Land

Support

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None.

**Response:**

Support noted

**Action:**

No change in response to representation

4796

Support

**Document Element:** Objective 3: Housing**Respondent:** Miller Homes and Vistry Group**Agent:** Tetra Tech

Object

**Summary of representations:**

Object because of a lack of affordable housing. Refuse greenfield development.

**Summary of representation changes to plan:**

None

**Response:**

The objective is to deliver affordable housing to meet local needs.

Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

**Action:**

No change in response to representation

5120

Object

**Document Element:** Objective 3: Housing**Respondent:** Lynn Reel

## Object

---

### Summary of representations:

Part of objective relating to accessible neighbourhoods cannot be met by housing in Kirdford.

References to design are confusing as overlap with Objective 6

### Summary of representation changes to plan:

Objective should refer to Accessibility Standards and Space Standards

### Response:

Accessibility standards are covered in Policy H10 and space standards in P6.

It is not considered that they need to be specifically referred to in strategic objectives.

Agree the design references overlap with Objective 6.

### Action:

See Council's suggested modification CM030

5807

Object

---

**Document Element:** Objective 3: Housing

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Object

---

### Summary of representations:

1.Housing is too expensive.

2.Housing doesn't have energy efficient systems, solar panels or electric car charging.

3.Long waiting list for affordable homes.

### Summary of representation changes to plan:

4.All new development should be on brownfield sites.

**Response:**

- 1 and 3. The objective is to deliver affordable housing to meet local needs so unclear which part of that is objected to.
- 2 The Government is implementing the Future Homes and Buildings Standard, to improve the energy efficiency and reduce the carbon emissions of new buildings through changes to Building Regulations. An interim uplift came into effect in 2022 and consultation on further changes to make all new buildings zero carbon ready began on 13 December 2023, with the changes anticipated to take effect from 2025.
- A Written Ministerial Statement on 13 December 2023, which replaces an earlier WMS from 2015, is clear that local plans should not impose energy efficiency requirements above existing or planned Building Regulations.
- In addition, viability testing showed that a net zero requirement ahead of Building Regulations changes anticipated through the Government's Future Homes and Buildings Standard would not be viable without cutting another requirement such as affordable housing, particularly when the costs related to the A27 were taken into account.
- Policy P1 Design Principles requires that residential and commercial development proposals are accompanied by a Sustainability Statement setting out how the design applies sustainability principles.
- The Climate Change Background Paper sets out in more detail how climate mitigation and adaptation is covered throughout the Plan.
4. Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

**Action:**

No change in response to representation

**5891****Object**

**Document Element:** Objective 3: Housing

**Respondent:** Save our South Coast Alliance

**Support****Summary of representations:**

Support

**Summary of representation changes to plan:**

None.

**Response:**

Support noted

**Action:**

No change in response to representation



5898

Support

**Document Element:** Objective 3: Housing**Respondent:** GoVia Thameslink Railway

## Object

**Summary of representations:**

Importance of housing delivery and affordability issues should be clearer

**Summary of representation changes to plan:**

Be more explicit about the housing crisis and affordability, and role of housing in delivering economic, social and environmental objectives.

**Response:**

The Objective does refer to the delivery of affordable housing, which is recognised as a significant issue as set out in para 2.9. More detail about the high demand for affordable homes is set out in the housing chapter, in the supporting text to Policy H4 Affordable Housing.

**Action:**

No change in response to representation

6034

Object

**Document Element:** Objective 3: Housing**Respondent:** Miller Homes and Vistry Group**Agent:** Tetra Tech

## Support

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None.

**Response:**

Support noted

**Action:**

No change in response to representation

6049

Support

**Document Element:** Objective 3: Housing**Respondent:** Mr Allen McDonald

## Support

---

**Summary of representations:**

Support in principle.

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to this representation.

---

6241

Support

**Document Element:** Objective 3: Housing

**Respondent:** Mr Jan Davis

### Objective 4: Employment and Economy

## Object

---

**Summary of representations:**

Should refer to marine/ leisure

**Summary of representation changes to plan:**

Should refer to marine/ leisure

**Response:**

This is encompassed by "tourism" but could be made more explicit.

**Action:**

See Council's suggested modification CM031

---

4025

Object

**Document Element:** Objective 4: Employment and Economy

**Respondent:** Mrs Victoria Douglas

## Object

---

### Summary of representations:

Plan fails to recognise the full contribution of Goodwood and Rolls Royce to the local economy

### Summary of representation changes to plan:

Plan should reflect up to date information on this contribution

### Response:

This objective is to support a diverse economy, including the sectors mentioned but a more explicit reference to hospitality and vehicle manufacture can be added.

### Action:

See Council's suggested modification CM031

---

4130

Object

---

**Document Element:** Objective 4: Employment and Economy

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

---

### Summary of representations:

Need leisure facilities for young people in the city

### Summary of representation changes to plan:

None

### Response:

Comment noted

### Action:

No change in response to representation

---

4198

Support

---

**Document Element:** Objective 4: Employment and Economy

**Respondent:** Chidham and Hambrook Parish Council

## Object

---

### Summary of representations:

Plan fails to recognise the full contribution of Goodwood and Rolls Royce to the local economy

### Summary of representation changes to plan:

Plan should reflect up to date information on this contribution

### Response:

This objective is to support a diverse economy, including the sectors mentioned but a more explicit reference to hospitality and vehicle manufacture can be added.

### Action:

See Council's suggested modification CM031

---

4243

Object

---

**Document Element:** Objective 4: Employment and Economy

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

---

### Summary of representations:

Wants more flexibility in HDA policies

### Summary of representation changes to plan:

Not specified – refers to need for more space for growing and for ancillary development

### Response:

The change proposed does not relate to this paragraph. The suggested change has been recorded against the relevant policies E3 and E4 and responded to there

### Action:

No change in response to representation

---

4795

Object

---

**Document Element:** Objective 4: Employment and Economy

**Respondent:** West Sussex Growers' Association

## Object

---

**Summary of representations:**

Wants more flexible HDA policies

**Summary of representation changes to plan:**

Change "ancillary" to "functionally linked".

**Response:**

The change proposed does not relate to this paragraph. The suggested change has been recorded against the relevant policies E3 and E4 and responded to there.

**Action:**

No change in response to representation

---

**4983****Object**

---

**Document Element:** Objective 4: Employment and Economy

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Object

---

**Summary of representations:**

to greenfield development and replacement of tourist accommodation

**Summary of representation changes to plan:**

None

**Response:**

Comment noted

**Action:**

No change in response to representation

---

**5121****Object**

---

**Document Element:** Objective 4: Employment and Economy

**Respondent:** Lynn Reel

## Object

### Summary of representations:

Plan is unrealistic

### Summary of representation changes to plan:

Plan should be more specific about future investment and initiatives, use of volunteers and support for existing businesses.

### Response:

This level of detail is more for the inward investment and growth/economic strategy

### Action:

No change in response to representation

5391

Object

**Document Element:** Objective 4: Employment and Economy

**Respondent:** Mr Keith Tunstall

## Support

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Support.]  
Support

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation

5714

Support

**Document Element:** Objective 4: Employment and Economy

**Respondent:** National Highways

## Object

---

### Summary of representations:

Identify jobs and floorspace target and objectives for employment in villages/rural areas

### Summary of representation changes to plan:

Identify jobs and floorspace target and objectives for employment in villages/rural areas

### Response:

Employment floorspace targets are set out in the monitoring framework at Appendix F., and in Policy E1. Employment growth forecasts on which the employment requirement is based are only available at District level. Whilst an adjustment has been made to convert this to a requirement for the Plan Area (i.e. minus the SDNPA) we do not have information to disaggregate this further to particular villages or areas

### Action:

No change in response to representation

---

5808

Object

---

**Document Element:** Objective 4: Employment and Economy

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Object

---

### Summary of representations:

Concerned about impact of development on coastal plan, agricultural land, tourism

### Summary of representation changes to plan:

None

### Response:

Comment noted

### Action:

No change in response to representation

---

5892

Object

---

**Document Element:** Objective 4: Employment and Economy

**Respondent:** Save our South Coast Alliance

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation

---

5899

Support

**Document Element:** Objective 4: Employment and Economy

**Respondent:** GoVia Thameslink Railway

### Objective 5: Health and Well-being

## Object

---

**Summary of representations:**

Additional housing won't help meet this objective

**Summary of representation changes to plan:**

Reduce number of houses

**Response:**

The change proposed does not relate to this paragraph. The suggested change has been recorded against the relevant policy H1 and responded to there

**Action:**

No change in response to representation

---

4197

Object

**Document Element:** Objective 5: Health and Well-being

**Respondent:** Chidham and Hambrook Parish Council



## Object

---

### Summary of representations:

Linked green spaces are important. Definition of land as countryside is insufficient protection from development

### Summary of representation changes to plan:

Plan should offer additional protection from development for areas such as open countryside and land outside of settlement boundaries. Designate landscape gaps

### Response:

Policy NE10 sets out when development in the countryside is acceptable – a blanket ban would not be appropriate. Green infrastructure is covered by P14 and landscape gaps by NE3

### Action:

No change in response to representation

---

## 4245

## Object

---

**Document Element:** Objective 5: Health and Well-being

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

---

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change in response to representation

---

## 5166

## Support

---

**Document Element:** Objective 5: Health and Well-being

**Respondent:** John Newman

## Object

### Summary of representations:

Be more specific with targets for health indicators and life expectancy

### Summary of representation changes to plan:

Be more specific with targets for health indicators and life expectancy

### Response:

Life expectancy rates are set out in para 2.11 and are currently above the national average.

Other health indicators set out in the Health Impact Assessment accompanying the plan also show a healthy population compared to the England average.

In this context a specific target rather than ongoing improvement is not considered necessary.

### Action:

No change in response to representation

5809

Object

**Document Element:** Objective 5: Health and Well-being

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

Replace "opportunities for active travel" with "with active travel designed into communities".

### Response:

Agree

### Action:

See council suggested modification CM032

5901

Support

**Document Element:** Objective 5: Health and Well-being

**Respondent:** GoVia Thameslink Railway

## Objective 6: Design and Heritage

# Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation

---

### 4424

### Support

---

**Document Element:** Objective 6: Design and Heritage

**Respondent:** Wisborough Green Parish Council

# Mixed

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

Suggest additional ref to landscape character

**Response:**

Landscape character is covered in Objective 2 but Natural England have suggested some additional wording relating to landscape which will be added (rep 5788).

**Action:**

See suggested council modification CM033.

---

### 4649

### Object

---

**Document Element:** Objective 6: Design and Heritage

**Respondent:** Plaistow and Ifold Parish Council

## Object

---

### Summary of representations:

Local communities are not involved in design and location of new development

### Summary of representation changes to plan:

N/A

### Response:

The preparation of local design code/s will involve local people

### Action:

No change in response to representation

---

5122

Object

**Document Element:** Objective 6: Design and Heritage

**Respondent:** Lynn Reel

---

5893

Object

**Document Element:** Objective 6: Design and Heritage

**Respondent:** Save our South Coast Alliance

## Mixed

---

### Summary of representations:

Support

### Summary of representation changes to plan:

Suggest additional ref to landscape character

### Response:

Landscape character is covered in Objective 2 but Natural England have suggested some additional wording relating to landscape which will be added (rep 5788).

### Action:

See suggested council modification CM033.

---

6146

Support

**Document Element:** Objective 6: Design and Heritage

**Respondent:** Plaistow and Ifold Parish Council

## Objective 6: Design and Heritage

### Object

**Summary of representations:**

Natural England maintains its advice, provided both as part of the Regulation 18 statutory consultation in 2019 and through subsequent, non-statutory consultations during 2021 and 2022.

**Summary of representation changes to plan:**

Add "development to be sensitively designed, incorporating the special qualities of designated landscapes where required"

**Response:**

Add "incorporating the special qualities of designated landscapes where required" to end of 1st sentence.

Agreed at meeting with NE 27/7

**Action:**

See council suggested modification CM033

**5788****Object**

**Document Element:** Objective 6: Design and Heritage

**Respondent:** Natural England

### Object

**Summary of representations:**

Objective doesn't say anything about heritage. Local design codes are mentioned but not picked up on policy P1

**Summary of representation changes to plan:**

1. Objective should cover heritage.
2. P1 should refer to local design codes

**Response:**

1. Heritage is in the first line of the objective.

2. An amendment is proposed to policy P1 which will address the issue concerning local design codes (please see response to representation 5859).

**Action:**

No change in relation to heritage.

**5810****Object**

**Document Element:** Objective 6: Design and Heritage

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation

---

5900

Support

---

**Document Element:** Objective 6: Design and Heritage

**Respondent:** GoVia Thameslink Railway

## Support

---

**Summary of representations:**

Support in principle

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change

---

6278

Support

---

**Document Element:** Objective 6: Design and Heritage

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Objective 7: Strategic Infrastructure

Object

---

### Summary of representations:

Improving A27 should be the priority

### Summary of representation changes to plan:

Plan should focus on improvements and development along the A27

### Response:

Comment noted

### Action:

No change in response to representation

3847

Object

---

Document Element: Objective 7: Strategic Infrastructure

Respondent: Mr simon urry

Mixed

---

### Summary of representations:

Support BUT

Concerned about development along East West Corridor

### Summary of representation changes to plan:

None

### Response:

Comment noted

### Action:

No change in response to representation

3978

Object

---

Document Element: Objective 7: Strategic Infrastructure

Respondent: Elizabeth Lawrence Ltd

## Object

### Summary of representations:

Agrees with objective but policies will not achieve it

### Summary of representation changes to plan:

Need to agree with infrastructure providers when deficiencies will be rectified, phase development accordingly and set this out in a Statement of Common Ground.

Active travel policies lack teeth and investment must precede development

### Response:

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

S106 has to meet the requirements set out in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended) meaning that its use is limited to addressing the impacts of its development. CIL is to be used to address the cumulative impacts of new development, and cannot be used to address underlying infrastructure deficits unless these are also required to support the new development.

The intention is that infrastructure providers take responsibility to ensure that the infrastructure it provides is maintained into the future. It is up to the developer to make such arrangements to ensure this happens. This often happens by the developer after the first year or so setting up a management company, whereby the residents pay a management fee to maintain the up-keep of communal facilities.

As much information as the Council has at present is included within the Infrastructure Delivery Plan which accompanies this Local Plan.

Critical infrastructure would have to be delivered in advance, but all other infrastructure would be delivered in tandem with development, particularly that infrastructure to be delivered through S106 linked to triggers in the S106 agreement.

### Action:

No change in response to representation

## 4014

## Object

**Document Element:** Objective 7: Strategic Infrastructure

**Respondent:** Chichester and District Cycle Forum



## Support

### Summary of representations:

Support. Key infrastructure should include renewable energy distribution, electric vehicle charging and solar power generation

### Summary of representation changes to plan:

N/A

### Response:

Comment noted

### Action:

No change in response to representation

## 4036

## Support

**Document Element:** Objective 7: Strategic Infrastructure

**Respondent:** Mr Jan Davis

## Object

### Summary of representations:

Need to consider infrastructure requirements of existing residents first.

### Summary of representation changes to plan:

Objective 7: Strategic Infrastructure To work with infrastructure providers to ensure the timely delivery of key infrastructure to ensure that the needs of existing residents are met, and provide for all of the infrastructure requirements of existing dwellings prior to considering any new development, and then after that, to support delivery of new development. New development will be supported by sufficient provision of infrastructure to enable the sustainable delivery of the development strategy for the plan area. Key infrastructure to support the Local Plan will include improvements to transport, open space and green infrastructure, education, health, water supply and removal, telecommunications, flood risk and coastal change management and the provision of minerals and energy first for existing and then for new developments only if it can be demonstrated that there is resilience in the infrastructure to accommodate growth. A sustainable and integrated transport system will be achieved through improvements to walking and cycling networks and links to accessible public transport, including new train stop to serve any development that is located in Tangmere, using the existing railway between Barnham and Chichester to place a new station stop in Oving. Highway improvements will be delivered to mitigate congestion, including measures to mitigate potential impacts on the A27 through a predict and provide process. Sewerage undertakers will need to work with regulators to deliver improvements in wastewater infrastructure to support existing and new development and to ensure adverse environmental impacts are avoided in domestic properties, businesses on internationally designated habitats. Development proposals will be considered only after it can be demonstrated that there is a sustainable source of fresh water supply to meet the needs of existing requirement for the foreseeable future, and taking climate change into account. Improvements to water efficiency, conservation and storage capacity will be made. Infrastructure requirements will be kept under review through the Infrastructure Delivery and Business Plans and development will be phased to align with provision of essential infrastructure.

**Response:**

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

S106 has to meet the requirements set out in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended) meaning that its use is limited to addressing the impacts of its development. CIL is to be used to address the cumulative impacts of new development, and cannot be used to address underlying infrastructure deficits unless these are also required to support the new development.

The intention is that infrastructure providers take responsibility to ensure that the infrastructure it provides is maintained into the future. It is up to the developer to make such arrangements to ensure this happens. This often happens by the developer after the first year or so setting up a management company, whereby the residents pay a management fee to maintain the upkeep of communal facilities.

As much information as the Council has at present is included within the Infrastructure Delivery Plan which accompanies this Local Plan.

Critical infrastructure would have to be delivered in advance, but all other infrastructure would be delivered in tandem with development, particularly that infrastructure to be delivered through S106 linked to triggers in the S106 agreement.

**Action:**

No change in response to representation

---

**4101**
**Object**

**Document Element:** Objective 7: Strategic Infrastructure

**Respondent:** Mr Matthew Rees

## Support

### Summary of representations:

BUT fear infrastructure will not be delivered

### Summary of representation changes to plan:

N/A

### Response:

Support noted

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

S106 has to meet the requirements set out in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended) meaning that its use is limited to addressing the impacts of its development. CIL is to be used to address the cumulative impacts of new development, and cannot be used to address underlying infrastructure deficits unless these are also required to support the new development.

The intention is that infrastructure providers take responsibility to ensure that the infrastructure it provides is maintained into the future. It is up to the developer to make such arrangements to ensure this happens. This often happens by the developer after the first year or so setting up a management company, whereby the residents pay a management fee to maintain the up-keep of communal facilities.

As much information as the Council has at present is included within the Infrastructure Delivery Plan which accompanies this Local Plan.

Critical infrastructure would have to be delivered in advance, but all other infrastructure would be delivered in tandem with development, particularly that infrastructure to be delivered through S106 linked to triggers in the S106 agreement.

### Action:

No change in response to representation

## 4107

## Support

**Document Element:** Objective 7: Strategic Infrastructure

**Respondent:** Chichester Harbour Trust

## Object

---

### Summary of representations:

- Need to say how a sustainable and integrated transport system will be provided

### Summary of representation changes to plan:

- Plan for a fully integrated public transport system

### Response:

- This is set out in Chapter 8 , particularly Policies T1 and T2

### Action:

- No change in response to representation

---

4196

Object

**Document Element:** Objective 7: Strategic Infrastructure

**Respondent:** Chidham and Hambrook Parish Council

## Object

### Summary of representations:

Emphasis should be on providing infrastructure up front

### Summary of representation changes to plan:

Plan should set out the precise relationship between new development and the provision of infrastructure

### Response:

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

S106 has to meet the requirements set out in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended) meaning that its use is limited to addressing the impacts of its development. CIL is to be used to address the cumulative impacts of new development, and cannot be used to address underlying infrastructure deficits unless these are also required to support the new development.

The intention is that infrastructure providers take responsibility to ensure that the infrastructure it provides is maintained into the future. It is up to the developer to make such arrangements to ensure this happens. This often happens by the developer after the first year or so setting up a management company, whereby the residents pay a management fee to maintain the up-keep of communal facilities.

As much information as the Council has at present is included within the Infrastructure Delivery Plan which accompanies this Local Plan.

Critical infrastructure would have to be delivered in advance, but all other infrastructure would be delivered in tandem with development, particularly that infrastructure to be delivered through S106 linked to triggers in the S106 agreement.

### Action:

No change in response to representation

4260

Object

**Document Element:** Objective 7: Strategic Infrastructure

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

---

**Summary of representations:**

Concerned about current public transport performance which makes the plan ineffective

**Summary of representation changes to plan:**

N/A

**Response:**

Comment noted. A key objective of Policy T1 is to improve access to sustainable means of travel including public transport, walking and cycling. The strategy that the policy sets out will lead to increased investment in planned improvements in all forms of transport infrastructure

**Action:**

No change in response to representation

---

**4388****Object**

---

**Document Element:** Objective 7: Strategic Infrastructure

**Respondent:** Ms Anna Glanville-Hearson

## Object

---

**Summary of representations:**

Object on grounds of lack of infrastructure/infrastructure not adequately addressed

**Summary of representation changes to plan:**

N/A

**Response:**

This objective is about securing such infrastructure.

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

S106 has to meet the requirements set out in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended) meaning that its use is limited to addressing the impacts of development. CIL is to be used to address the cumulative impacts of new development, and cannot be used to address underlying infrastructure deficits unless these are also required to support the new development.

The intention is that infrastructure providers take responsibility to ensure that the infrastructure it provides is maintained into the future. It is up to the developer to make such arrangements to ensure this happens. This often happens by the developer after the first year or so setting up a management company, whereby the residents pay a management fee to maintain the up-keep of communal facilities.

As much information as the Council has at present is included within the Infrastructure Delivery Plan which accompanies this Local Plan.

Critical infrastructure would have to be delivered in advance, but all other infrastructure would be delivered in tandem with development, particularly that infrastructure to be delivered through S106 linked to triggers in the S106 agreement.

**Action:**

No change in response to representation

**4410****Object**

**Document Element:** Objective 7: Strategic Infrastructure

**Respondent:** Mrs Debbie Carter

**Support****Summary of representations:**

Support

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation

**4425****Support****Document Element:** Objective 7: Strategic Infrastructure**Respondent:** Wisborough Green Parish Council**4439****Support****Document Element:** Objective 7: Strategic Infrastructure**Respondent:** Wisborough Green Parish Council**Object****Summary of representations:**

Object on grounds of lack of infrastructure/infrastructure not adequately addressed

**Summary of representation changes to plan:**

N/A

**Response:**

This objective is about securing such infrastructure.

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

S106 has to meet the requirements set out in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended) meaning that its use is limited to addressing the impacts of development. CIL is to be used to address the cumulative impacts of new development, and cannot be used to address underlying infrastructure deficits unless these are also required to support the new development.

The intention is that infrastructure providers take responsibility to ensure that the infrastructure it provides is maintained into the future. It is up to the developer to make such arrangements to ensure this happens. This often happens by the developer after the first year or so setting up a management company, whereby the residents pay a management fee to maintain the up-keep of communal facilities.

As much information as the Council has at present is included within the Infrastructure Delivery Plan which accompanies this Local Plan.

Critical infrastructure would have to be delivered in advance, but all other infrastructure would be delivered in tandem with development, particularly that infrastructure to be delivered through S106 linked to triggers in the S106 agreement.

**Action:**

No change in response to representation



**5123****Object****Document Element:** Objective 7: Strategic Infrastructure**Respondent:** Lynn Reel**5431****Object****Document Element:** Objective 7: Strategic Infrastructure**Respondent:** Mayday! Action Group**Support****Summary of representations:**

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Support.]

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change in response to representation

**5715****Support****Document Element:** Objective 7: Strategic Infrastructure**Respondent:** National Highways**Object****Summary of representations:**

Add "and that nature based solutions are incorporated into new development".

**Summary of representation changes to plan:**

Add "and that nature based solutions are incorporated into new development".

**Response:**

Agree

**Action:**

See council suggested modifications CM035

**5789****Object****Document Element:** Objective 7: Strategic Infrastructure**Respondent:** Natural England

## Object

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**Summary of representations:**

Objective should be to identify and deliver the infrastructure required to deliver the spatial strategy

**Summary of representation changes to plan:**

Amend objective to be to identify and deliver the infrastructure required to deliver the spatial strategy

**Response:**

The objective does say "to ensure the timely delivery of key infrastructure to support delivery of new development". The council is not the infrastructure provider so cannot deliver the infrastructure itself

**Action:**

No change in response to representation

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5811

Object

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**Document Element:** Objective 7: Strategic Infrastructure

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Object

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**Summary of representations:**

Object on grounds of lack of infrastructure/infrastructure not adequately addressed

**Summary of representation changes to plan:**

N/A

**Response:**

This objective is about securing such infrastructure.

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

S106 has to meet the requirements set out in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended) meaning that its use is limited to addressing the impacts of development. CIL is to be used to address the cumulative impacts of new development, and cannot be used to address underlying infrastructure deficits unless these are also required to support the new development.

The intention is that infrastructure providers take responsibility to ensure that the infrastructure it provides is maintained into the future. It is up to the developer to make such arrangements to ensure this happens. This often happens by the developer after the first year or so setting up a management company, whereby the residents pay a management fee to maintain the up-keep of communal facilities.

As much information as the Council has at present is included within the Infrastructure Delivery Plan which accompanies this Local Plan.

Critical infrastructure would have to be delivered in advance, but all other infrastructure would be delivered in tandem with development, particularly that infrastructure to be delivered through S106 linked to triggers in the S106 agreement.

**Action:**

No change in response to representation

**5894****Object**

**Document Element:** Objective 7: Strategic Infrastructure

**Respondent:** Save our South Coast Alliance

## Object

### Summary of representations:

Support but suggest wording amendments

### Summary of representation changes to plan:

the Local plan will include improvements to active travel infrastructure, public transport

And

Highway capacity will be reallocated to design in Hierarchy for Road User, with priority for people walking, cycling, public transport so that people choose active travel or active travel combined with public transport as the obvious way to access what they need. This will eliminate congestion and remove the need to expand the A27

### Response:

Agree additional wording can be included, with a slight change to the A27 reference

### Action:

See council suggested modification CM034

5902

Object

**Document Element:** Objective 7: Strategic Infrastructure

**Respondent:** GoVia Thameslink Railway

Mixed

### Summary of representations:

Support BUT

Concerned about development along East West Corridor

### Summary of representation changes to plan:

None

### Response:

Comment noted

### Action:

No change in response to representation

6103

Support

**Document Element:** Objective 7: Strategic Infrastructure

**Respondent:** Elizabeth Lawrence Ltd

## Support

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Support.]

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change in response to representation

## 6115

## Support

**Document Element:** Objective 7: Strategic Infrastructure

**Respondent:** GoVia Thameslink Railway

## Object

### Summary of representations:

BUT concerned about infrastructure

### Summary of representation changes to plan:

Notes plan incorrectly says WG is served by Loxwood WWTW

### Response:

Support noted. The Objective doesn't mention which WtW serves each area - unable to find where else in the Plan it says Wisborough Green is served by Loxwood WwTW.

### Action:

No change in response to representation

## 6202

## Object

**Document Element:** Objective 7: Strategic Infrastructure

**Respondent:** Wisborough Green Parish Council

## Object

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### Summary of representations:

The objective does not include any mention of the requirement for renewable energy development. There is no plan for renewable energy in the district, this demonstrates therefore that the plan fails in its legal duty to contribute to the mitigation and adaptation to climate change.

### Summary of representation changes to plan:

Refer to renewable energy.

### Response:

The objective refers to the provision of energy - which implicitly includes renewable sources. The Climate Change Background paper provides more detail about how the plan as a whole contributes to the mitigation of and adaptation to climate change.

### Action:

No change in response to representation.

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6306

Object

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**Document Element:** Objective 7: Strategic Infrastructure

**Respondent:** Landlink Estates Ltd

**Agent:** Jackson Planning Ltd

## Sustainable development, 3.1

## Object

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### Summary of representations:

Plan in conflict with NPPF definition of sustainable development. Not allocating sites on the Manhood Peninsula, particularly settlement hubs, means the plan fails to deliver 'sufficient supply of homes and facilitating a variety of sites to come forward where needed' as required by the NPPF.

### Summary of representation changes to plan:

Plan in conflict with NPPF definition of sustainable development. Not allocating sites on the Manhood Peninsula, particularly settlement hubs, means the plan fails to deliver 'sufficient supply of homes and facilitating a variety of sites to come forward where needed' as required by the NPPF.

### Response:

The Local Plan does make provision for a limited amount of new housing development on the Manhood Peninsula. Consideration has been given to the making of strategic allocations but as the Local Plan has progressed this approach has been revised to take account of the large amount of development that has received planning permission or updated technical evidence.

### Action:

No change in response to this representation

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**5367****Object**

**Document Element:** Sustainable development, 3.1

**Respondent:** Deerhyde Limited

**Agent:** Vail Williams LLP

## Sustainable development, 3.3

### Object

#### Summary of representations:

The proposed A11 will adversely affect the character, quality, and amenity of Bosham and Chichester Harbour AONB. The text in Section 3.3 is inconsistent with Policy A11.

#### Summary of representation changes to plan:

Delete Policy A11.

#### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail in the Sustainability Appraisal and Housing Distribution Background Paper.

Where potential adverse impacts of development have been identified, it is considered that these are not insurmountable and could potentially be mitigated. Development proposals will be subject to the requirements of the natural environment policies and site specific requirements set out in the site allocations policies.

#### Action:

No change in response to this representation.

4332

Object

**Document Element:** Sustainable development, 3.3

**Respondent:** Chichester Harbour Conservancy

### Object

#### Summary of representations:

New development must achieve sustainable development principles and must not adversely affect the character, quality, amenity or safety of the built environment, wherever it occurs." The Council cannot achieve sustainable development and deliver Policy A11. The proposed A11 will adversely affect the character, quality, and amenity of Bosham and Chichester Harbour AONB. The text in Section 3.3 is inconsistent with Policy A11.

#### Summary of representation changes to plan:

Delete Policy A11.

#### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail in the Sustainability Appraisal and Housing Distribution Background Paper.

Where potential adverse impacts of development have been identified, it is considered that these are not insurmountable and could potentially be mitigated. Development proposals will be subject to the requirements of the natural environment policies and site specific requirements set out in the site allocations policies.

#### Action:

No change in response to this representation.



4333

Object

**Document Element:** Sustainable development, 3.3**Respondent:** Chichester Harbour Conservancy**Sustainable development, 3.4**

Object

**Summary of representations:**

Plan should require developers of unallocated sites to demonstrate how housing proposed meets needs of local people living and working within the district to reduce potential for generic speculative development.

The plan must be more robust in its resistance to further generic estate development, requiring such proposals to present true and demonstrable evidence:

- it can make appropriate provision for future residents,
- it is truly sustainable in all aspects of the term, and
- makes a positive and measurable contribution to the district in terms of economics, infrastructure and general well-being.

**Summary of representation changes to plan:**

Plan should require developers of unallocated sites to demonstrate how housing proposed meets needs of local people living and working within the district to reduce potential for generic speculative development.

The plan must be more robust in its resistance to further generic estate development, requiring such proposals to present true and demonstrable evidence:

- it can make appropriate provision for future residents,
- it is truly sustainable in all aspects of the term, and
- makes a positive and measurable contribution to the district in terms of economics, infrastructure and general well-being.

**Response:**

Comments noted, however, it is considered that the existing plan policies, particularly those related to housing and place making, address the points made by the respondent.

**Action:**

No change in response to this representation.

6284

Object

**Document Element:** Sustainable development, 3.4**Respondent:** The Goodwood Estates Company Limited**Agent:** HMPC Ltd

## Spatial strategy, 3.5

### Object

#### Summary of representations:

Provide local developers and experts the time to review the new climate change map and for discussion re: funding the A27 roundabout at Stockbridge to be completed.

#### Summary of representation changes to plan:

The spatial strategy needs to be placed on hold until the above is achieved.

#### Response:

The SFRA has been prepared with the latest climate change allowances and in collaboration with the Environment Agency and other relevant stakeholders.

The Council has had discussions regarding funding for the A27 mitigation package but there is currently no public funding available. Although the A27 is included as a pipeline scheme for evaluation as part of the development of the national Road Investment Strategy (RIS4), National Highways have made clear that the Local Plan should not place reliance on a scheme being funded and included in the RIS4 programme (beyond 2030).

#### Action:

No change in response to this representation.

3980

Object

Document Element: Spatial strategy, 3.5

Respondent: Elizabeth Lawrence Ltd

### Support

#### Summary of representations:

Support principle of the strategic policies and purpose in setting out the development needs of the district and the spatial strategy.

#### Summary of representation changes to plan:

Support principle of the strategic policies and purpose in setting out the development needs of the district and the spatial strategy.

#### Response:

Noted.

#### Action:

No change in response to this representation

4078

Support

Document Element: Spatial strategy, 3.5

Respondent: Berkeley Strategic Group

## Support

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### Summary of representations:

Support principle of the strategic policies and purpose in setting out the development needs of the district and the spatial strategy.

### Summary of representation changes to plan:

Support principle of the strategic policies and purpose in setting out the development needs of the district and the spatial strategy.

### Response:

Noted.

### Action:

No change in response to this representation

---

## 4231

## Support

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**Document Element:** Spatial strategy, 3.5

**Respondent:** Mr David Lock and Ms Melanie Jenkins

**Agent:** Mr Jonathan Lambert

## Object

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### Summary of representations:

Spatial strategy is flawed as it fails to prioritise those areas with a choice of sustainable transport modes.

### Summary of representation changes to plan:

Change strategy to make clear priority is to provide growth in areas with choice of sustainable transport modes - especially areas with a train station and those with a regular bus service

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail in the Sustainability Appraisal and Housing Distribution Background Paper.

### Action:

No change in response to this representation.

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## 4341

## Object

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**Document Element:** Spatial strategy, 3.5

**Respondent:** Mr Stephen Jupp

## Object

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### Summary of representations:

Plan for Tangmere does not have assurances relating to flooding, protection of environmental designations, the landscape quality or the historic environment and settlement character.

This broad brushing gives no reassurance that these issues will be catered for.

No mention of the Tangmere Conservation Area Consultation 2014 which refers to development to the south or west of Tangmere respecting views and rural character of Church Lane or that traffic was identified as major issue and relief road to divert traffic from village centre was necessary.

### Summary of representation changes to plan:

Time these issues were addressed and not whitewashed over.

The idea that this plan meets these promises in this area is a distortion of the facts. The plan should state that there will be detrimental impacts to all of these environmental issues and that the CPO will decimate the area

### Response:

Any development proposal will be subject to the requirements of the Local Plan natural environment and place making policies. The 2014 consultation issues referred to by the respondent are recognised in the Tangmere strategic allocation policy (A14). In particular criterion 8 which indicates that primary access to the site will be from the A27/A285 junction and criterion 10 regarding the setting of the village. The masterplan for the development was also informed by the made Tangmere Neighbourhood Plan.

### Action:

No change in response to this representation.

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**4382****Object**

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**Document Element:** Spatial strategy, 3.5

**Respondent:** Mr John Wolfenden

## Object

### Summary of representations:

Would like to see positive and strengthened policy within the Spatial Strategy in relation to the environment rather than solely constraints. Should include the opportunity to restore, enhance, or create priority biodiversity areas and contribute to the delivery of the upcoming Local Nature Recovery Strategy which will be a mandatory requirement of CDC during the timeline of this Local Plan.

### Summary of representation changes to plan:

Would like to see positive and strengthened policy within the Spatial Strategy in relation to the environment rather than solely constraints. Should include the opportunity to restore, enhance, or create priority biodiversity areas and contribute to the delivery of the upcoming Local Nature Recovery Strategy which will be a mandatory requirement of CDC during the timeline of this Local Plan.

### Response:

Biodiversity opportunity areas and nature recovery strategies are covered by the strategic natural environment policies, in particular Policy NE5 (Biodiversity and Biodiversity Net Gain).

### Action:

No change in response to this representation.

4924

Object

**Document Element:** Spatial strategy, 3.5

**Respondent:** Royal Society for the Protection of Birds (RSPB)

## Object

### Summary of representations:

Planning for nature's recovery will be vital to support ambitions of plan. Vital for the spatial element of the Plan to consider how Objective 2 will be achieved through its own actions and also policy hooks. Will enable the emerging Local Nature Recovery Strategy to work effectively with the Local Plan and be a key driver for nature's recovery over the lifetime of the plan (NPPG Paragraph: 010).

### Summary of representation changes to plan:

Section of plan should demonstrate more clearly how spatial strategy is enabling nature's recovery. The plan should seek to demonstrate how the delivery of the Nature Recovery Network and the more localised Local Nature Recovery Strategies are going to be incorporated in the spatial element of identifying allocations for development. This would be consistent with section 179 of the National Planning Policy Framework (NPPF) 2021.

### Response:

Biodiversity opportunity areas and nature recovery strategies are covered by the strategic natural environment policies, in particular Policy NE5 (Biodiversity and Biodiversity Net Gain).

### Action:

No change in response to this representation.

**5039****Object****Document Element:** Spatial strategy, 3.5**Respondent:** Sussex Wildlife Trust**Object****Summary of representations:**

Notably missing from the Council's list of factors that informed the spatial strategy are:

- Sustainable access to facilities and services; and
- Water neutrality and specifically the Sussex North Water Resource Zone.

**Summary of representation changes to plan:**

Notably missing from the Council's list of factors that informed the spatial strategy are:

- Sustainable access to facilities and services; and
- Water neutrality and specifically the Sussex North Water Resource Zone.

**Response:**

Comments noted, however, the bullet point list is not exhaustive and the issues identified by the respondent are addressed in relevant sections of the Plan.

**Action:**

No change in response to this representation.

**5813****Object****Document Element:** Spatial strategy, 3.5**Respondent:** Kirdford Parish Council**Agent:** Troy Planning + Design

## Spatial strategy, 3.6

## Support

### Summary of representations:

Question how approach could be applied to Wisborough Green.

Wisborough Green is not well located to other uses. Limited public transport and no provision to employment or student requirements. Private car use is essential.

### Summary of representation changes to plan:

Question how approach could be applied to Wisborough Green.

Wisborough Green is not well located to other uses. Limited public transport and no provision to employment or student requirements. Private car use is essential.

### Response:

Support noted.

### Action:

No change in response to this representation

4459

Support

Document Element: Spatial strategy, 3.6

Respondent: Wisborough Green Parish Council

## Object

### Summary of representations:

Kirdford is not well located to other uses and nor is it serviced by any choice of transport modes apart from the private car and a poor bus service.

### Summary of representation changes to plan:

Kirdford is not well located to other uses and nor is it serviced by any choice of transport modes apart from the private car and a poor bus service.

### Response:

Noted.

### Action:

No change in response to this representation.

5814

Object

Document Element: Spatial strategy, 3.6

Respondent: Kirdford Parish Council

Agent: Troy Planning + Design

## Object

### Summary of representations:

WGPC supports this approach but questions how it could be applied to Wisborough Green.

The proposal related to WG is purely for housing development. 'The strategy is to locate development in areas which are well located to other uses'; Wisborough Green is not.

WG is currently serviced by two bus routes solely for shopping trips on 4 days out of 7, giving 2 hrs at the desintation.

There is no provision to link with employment or student requirements to the railway station in Billingshurst.

Private car use is essential.

### Summary of representation changes to plan:

N/A

### Response:

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The Council's updated facilities research in the Settlement Hierarchy Background Paper (2024) concludes that Wisborough Green has the range of services and facilities to be classified as a service village.

### Action:

No change in response to representation.

6206

Object

Document Element: Spatial strategy, 3.6

Respondent: Wisborough Green Parish Council

## Spatial strategy, 3.7

## Object

### Summary of representations:

See objection to S1 under Policy A14 Tangmere

### Summary of representation changes to plan:

see proposed changes under Policy 14

### Response:

See respondent's other representations to spatial strategy section relating to development at Tangmere - 4382, 4384 and 4385.

### Action:

No change in response to this representation.

4383

Object

Document Element: Spatial strategy, 3.7

Respondent: Mr John Wolfenden



## Spatial strategy, 3.8

## Object

### Summary of representations:

180 dwellings in Chichester city cannot be considered a 'significant proportion' compared to 75 in Wisborough Green. Plan should prioritise urban development and small villages should be allowed to grow slowly.

### Summary of representation changes to plan:

Plan should give priority to all available urban sites, prior to involving less well-suited small rural villages.

### Response:

Paragraph 3.8 refers to development 'in or around Chichester city' not just the Southern Gateway allocation.

Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

### Action:

No change in response to this representation.

**3875****Object**

Document Element: Spatial strategy, 3.8

Respondent: Mr simon urry

## Object

### Summary of representations:

Paragraph should clarify the strategic change now imposed which removes land from previous site allocations – Policy A9 and MapA9a Westhampnett/North East Chichester

### Summary of representation changes to plan:

Paragraph should clarify the strategic change now imposed which removes land from previous site allocations – Policy A9 and MapA9a Westhampnett/North East Chichester

### Response:

As the reasoned justification to Policy A9 references the fact that the allocations are within a broad strategic development location in the adopted Local Plan, it is considered unnecessary to amend the plan as suggested.

### Action:

No change in response to this representation

**4262****Object**

Document Element: Spatial strategy, 3.8

Respondent: The Goodwood Estates Company Limited

Agent: HMPC Ltd

## Support

### Summary of representations:

Support in principle

### Summary of representation changes to plan:

Support in principle

### Response:

Noted.

### Action:

No change in response to this representation.

6280

Support

Document Element: Spatial strategy, 3.8

Respondent: The Goodwood Estates Company Limited

Agent: HMPC Ltd

## Spatial strategy, 3.9

## Object

### Summary of representations:

The plan states Chichester city is the most sustainable area for development and that there is potential for a further 270 dwellings on 'mainly brownfield sites within the city'. These locations should take priority to be developed

### Summary of representation changes to plan:

The plan should be clear that it will ensure prioritized urban development is carried out and that small rural villages will not be unsustainably developed to support lack of progress elsewhere.

### Response:

Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

To support services and meeting local housing needs, some development in identified in a number of Service Villages.

### Action:

No change in response to this representation.

3876

Object

Document Element: Spatial strategy, 3.9

Respondent: Mr simon urry

## Object

### Summary of representations:

There is a once-in-a-generation opportunity to redevelop the city centre Southern Gateway area of Chichester to provide many more affordable houses than that included in the Local Plan including the provision of a major hotel, retail, restaurants, a health centre, music venues, modernised Law Courts, a transport hub based at the train station and an innovation centre in the historic bus depot.

### Summary of representation changes to plan:

The plan should acknowledge the potential of the Southern Gateway to deliver AT LEAST 270 dwellings, potentially many more, and state that work will continue to create a visionary masterplan for the area through liaison with WSCC, the Post Office, British Rail, the Department of Justice and other large landowners in the town centre

### Response:

The number of dwellings proposed is based on the land currently available. It is recognised in the Local Plan (paragraph 10.17) that further land within the Southern Gateway Regeneration Area may become available during the plan period and Policy A3 sets out the development principles against which these sites could be brought forward.

### Action:

No change in response to this representation.

3884

Object

**Document Element:** Spatial strategy, 3.9

**Respondent:** Dr Carolyn Cobbold

## Object

### Summary of representations:

Previously undertaken comprehensive review of the stalled Southern Gateway Masterplan. This increased total end space, additional uses, created car free neighbourhoods; pedestrian and cycle routes through the city and more than doubled the completed development value.

Focus must be given on delivery, higher value, more community uses and a greener solution.

### Summary of representation changes to plan:

Plan focuses on only two sites and should include other land and opportunity presented to include wider mix of uses.

### Response:

The number of dwellings proposed is based on the land currently available. It is recognised in the Local Plan (paragraph 10.17) that further land within the Southern Gateway Regeneration Area may become available during the plan period and Policy A3 sets out the development principles against which these sites could be brought forward.

### Action:

No change in response to this representation.

3975

Object

**Document Element:** Spatial strategy, 3.9

**Respondent:** Mr James Birkett

## Object

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**Summary of representations:**

The strategic housing locations all place a huge reliance on Chichester and the A27 ring road. The Council should wait until they know if funding can be raised for various improvements to the A27 ring road and whether the new climate change flood risk map is sound. Then an informed assessment can be made regarding the more sustainable locations for development. In particular The Wittering's have the potential to be made more sustainable and less reliant on Chichester.

**Summary of representation changes to plan:**

The Draft plan is premature and so should be held until the A27 improvements are agreed and the climate change flood risk assessment has been scrutinised.

**Response:**

The SFRA has been prepared with the latest climate change allowances and in collaboration with the Environment Agency and other relevant stakeholders.

The Council has had discussions regarding funding for the A27 mitigation package but there is currently no public funding available. Although the A27 is included as a pipeline scheme for evaluation as part of the development of the national Road Investment Strategy (RIS4), National Highways have made clear that the Local Plan should not place reliance on a scheme being funded and included in the RIS4 programme (beyond 2030).

**Action:**

No change in response to this representation.

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**3981****Object**

**Document Element:** Spatial strategy, 3.9

**Respondent:** Elizabeth Lawrence Ltd

## Object

### Summary of representations:

Chichester City has more brownfield sites than other areas and yet only 270 houses are planned for the City Centre area and upwards of 2000 in rural locations. The Southern Gateway project plans for leisure and retail when those facilities in the city are dying. There is a very clear need to rethink the distribution of housing and use more brownfield sites in the city to reduce the dependence on cars.

### Summary of representation changes to plan:

Chichester City has more brownfield sites than other areas and yet only 270 houses are planned for the City Centre area and upwards of 2000 in rural locations. The Southern Gateway project plans for leisure and retail when those facilities in the city are dying. There is a very clear need to rethink the distribution of housing and use more brownfield sites in the city to reduce the dependence on cars.

### Response:

The figures for housing delivery within Chichester City reflects the availability and suitability of sites as assessed through the HELAA.

A strategic allocation has been made on a brownfield site at Southern Gateway and it will be for the Chichester Neighbourhood Plan to identify sites to deliver the strategic parish requirement of 270 dwellings, which could include brownfield sites.

Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as at Southern Gateway.

### Action:

No changes in response to this representation

4195

Object

**Document Element:** Spatial strategy, 3.9

**Respondent:** Chidham and Hambrook Parish Council

## Spatial strategy, 3.10

## Object

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### Summary of representations:

Local Plan does not fully take into account need of horticultural industry to develop functionally linked development in proximity to existing horticultural operations.

### Summary of representation changes to plan:

Should allow for siting of functionally linked developments within the Runcton HDA, which is currently prohibited by the wording of Policy E4 in only allowing ancillary developments rather than the suite of development uses required to support a world class food cluster.

### Response:

Noted. See response to representations made by respondent to Policy E4.

### Action:

No changes in response to this representation

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4984

Object

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**Document Element:** Spatial strategy, 3.10

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Spatial strategy, 3.14

## Object

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### Summary of representations:

Not legally compliant because it is incompatible with SA (p90), which warned of the risk of "over-development". 1,300 homes is not compatible with the neighbourhood plan for 1,000 homes and represents an over-development through an excessive concentration in a single location.

### Summary of representation changes to plan:

Amend second sentence of para 3.14 to read:

'New development will consider whether and how the role of these settlement hubs as centres providing a range of dwellings, workplaces, social and community facilities provides economic, social and environmental benefits over and above the retention of land for agriculture, or to address unmet demand for viticulture or horticulture.'

### Response:

As explained in the reasoned justification to Policy A14 it has been demonstrated that the site allocated in the adopted Local Plan can satisfactorily accommodate an additional 300 dwellings. This is reflected in the endorsed masterplan and the outline planning application.

The reference in the SA refers to development over and above that already committed via allocations or planning permissions, which includes the 1,300 dwellings on the strategic allocation where the Council have resolved to grant outline planning permission (subject to completion of a S106 agreement).

### Action:

No changes in response to this representation

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**4102****Object**

**Document Element:** Spatial strategy, 3.14

**Respondent:** Mr Matthew Rees

## Object

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**Summary of representations:**

There is 'over development' as stated in the sustainability assessment (p90) which makes the Local Plan not legally compliant. Sheer number of proposed houses (increased to 1300) is disproportionate and excessive - it will increase the number of houses in one area by over double. This is an overdevelopment and not in keeping or sympathetic with an area which has conservation status.

**Summary of representation changes to plan:**

Reduce number of houses so density is significantly lowered and is not concentrated in one area to 'dwarf' existing houses at Saxon Meadow.

**Response:**

As explained in the reasoned justification to Policy A14 it has been demonstrated that the site allocated in the adopted Local Plan can satisfactorily accommodate an additional 300 dwellings. This is reflected in the endorsed masterplan and the outline planning application.

The reference in the SA refers to development over and above that already committed via allocations or planning permissions, which includes the 1,300 dwellings on the strategic allocation where the Council have resolved to grant outline planning permission (subject to completion of a S106 agreement).

**Action:**

No change in response to this representation.

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**5578****Object**

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**Document Element:** Spatial strategy, 3.14

**Respondent:** Richard Hedgecock



## Spatial strategy, 3.15

## Object

### Summary of representations:

Contradicts previous comment that Tangmere lacks many facilities normally associated with a village of that size

### Summary of representation changes to plan:

Ensure plan doesn't contradict itself and reduce housing in a village where everyone will have to travel to most services

### Response:

Tangmere does have a good range of facilities but not in the same number as compared to some settlements of a similar size.

As explained in the reasoned justification to Policy A14 it has been demonstrated that the site allocated in the adopted Local Plan can satisfactorily accommodate an additional 300 dwellings. This is reflected in the endorsed masterplan and the outline planning application.

### Action:

No change in response to this representation.

4342

Object

Document Element: Spatial strategy, 3.15

Respondent: Mr Stephen Jupp

## Object

### Summary of representations:

Contradicts previous comment that Tangmere lacks many facilities normally associated with a village of that size

Does not adequately reflect infrastructure and facilities required to build 1000 dwellings let alone a further 300.

### Summary of representation changes to plan:

Additional 300 dwellings should be removed as there is a lack of justification regarding the supporting infrastructure.

Reference to local facilities should be replaced by original assertion that currently lacks the amenities and services normally associated with a settlement of its size.

### Response:

As explained in the reasoned justification to Policy A14 it has been demonstrated that the site allocated in the adopted Local Plan can satisfactorily accommodate an additional 300 dwellings. This is reflected in the endorsed masterplan and the outline planning application.

The infrastructure required to support the proposed development at Tangmere has been assessed and is reflected in the IDP and also the outline planning application, which has a resolution to permit subject to the completion of a S106 Agreement.

### Action:

No change in response to this representation.

4384

Object

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**Document Element:** Spatial strategy, 3.15

**Respondent:** Mr John Wolfenden

## Spatial strategy, 3.18

## Object

### Summary of representations:

These settlements are very small and the proposed allocations will simply place more reliance on car use and congestion along the A27

### Summary of representation changes to plan:

These allocations should be removed and more reliance should be placed on settlement hubs outside Chichester.

### Response:

Both Southbourne and Tangmere are identified in the Local Plan for a reasonable amount of growth over the plan period.

### Action:

No change in response to this representation.

## 3984

## Object

**Document Element:** Spatial strategy, 3.18

**Respondent:** Elizabeth Lawrence Ltd

## Object

### Summary of representations:

Neither Hambrook, Nutbourne or Bosham are capable of accommodating growth of 600. The expansion of these villages is not matched by an increase in infrastructure. They are no more capable of it than Fishbourne, with just as many constraints.

### Summary of representation changes to plan:

Reduce the number of housing in these A259 corridor villages.

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail in the Sustainability Appraisal and Housing Distribution Background Paper.

Development in the southern plan area will be subject to the requirements of the Local Plan natural environment policies, particularly Policy NE2 (Natural Landscape), NE5 (Biodiversity) and NE13 (Chichester Harbour AONB) and the site specific requirements set out in the strategic allocation policies.

The infrastructure required to support the proposed development at these locations has been assessed and is reflected in the IDP.

### Action:

No change in response to this representation.

## 3993

## Object

**Document Element:** Spatial strategy, 3.18

**Respondent:** Mrs Jane Towers

## Object

### Summary of representations:

Nutbourne and Hambrook do not function as one service village. Along with Bosham this area is not capable of accommodating growth of this magnitude. All sites available have severe restrictions which have not been taken into account; they are on good quality agricultural land, in wildlife corridors or within the setting of the AONB. To build this large scale housing will be contrary to many other policies. To build such large scale housing it will be contrary to many other policies.

### Summary of representation changes to plan:

A reclassification of Nutbourne and Hambrook as a genuinely poorly served service village.

Reduce the allocated housing for Bosham and Nutbourne and Hambrook commensurate with Fishbourne.

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail in the Sustainability Appraisal and Housing Distribution Background Paper.

Development in the southern plan area will be subject to the requirements of the Local Plan natural environment policies, particularly Policy NE2 (Natural Landscape), NE5 (Biodiversity) and NE13 (Chichester Harbour AONB) and the site specific requirements set out in the strategic allocation policies

### Action:

No change in response to this representation.

## 4160

## Object

**Document Element:** Spatial strategy, 3.18

**Respondent:** Chidham and Hambrook Parish Council

## Object

### Summary of representations:

Planning permission for 50 dwellings on land at Highgrove Farm has lapsed. Should allocation in the Site Allocation DPD for 50 dwellings not be deleted and replaced by single allocation for proposed 295 dwellings.

### Summary of representation changes to plan:

Policy A11 be amended to allocation for 295 dwellings.

### Response:

As set out in the Local Plan Appendix H, the allocation (Policy BO1) made in the Site Allocation DPD has been 'saved' for continued use.

The reasoned justification to Policy A11 (Highgrove Farm) makes clear that development of the larger allocation will need to take account of and seek to integrate with this extant allocation.

However, it should be noted that permission has now been granted on appeal (21/00571/FUL) for 300 dwellings and supporting infrastructure on the land comprising site allocations A11 and BO1.

### Action:

No change in response to this representation.

4334

Object

**Document Element:** Spatial strategy, 3.18

**Respondent:** Chichester Harbour Conservancy

## Object

### Summary of representations:

Nutbourne and Hambrook is highly sustainable with a very good bus service and train station.

Previous analysis demonstrated it could accommodate 500 dwellings and the figure has been reduced to 300 SOLELY due to local political pressure - this is not a sound approach when the council is trying to argue a reduced housing figure

### Summary of representation changes to plan:

Increase allocation in Nutbourne and Hambrook to 500

### Response:

The strategic parish requirement has been reduced following further consideration of landscape capacity and to take account of the development that has, since the Preferred Approach consultation, received planning permission.

### Action:

No change in response to this representation.

4343

Object

**Document Element:** Spatial strategy, 3.18

**Respondent:** Mr Stephen Jupp

## Object

### Summary of representations:

Object to the allocation of all of the houses to one site in Bosham. The reasons to justify this decision appear to conflict with the NPPF and other adopted policies.

### Summary of representation changes to plan:

25-30 units should be allocated to HBO0003

### Response:

It is acknowledged that there are a number of sites around Bosham that have been assessed by the HELAA as developable, including the promoted site. However, the Council's preferred site for allocation is that at Highgrove Farm.

It should be noted that permission has now been granted on appeal (21/00571/FUL) for 300 dwellings and supporting infrastructure on the land allocated under Policy A11.

### Action:

No change in response to this representation

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**4927****Object**

**Document Element:** Spatial strategy, 3.18

**Respondent:** Willowfield Farm

## Spatial strategy, 3.19

## Object

### Summary of representations:

The 'service villages' of Boxgrove and Westbourne both sit on the A27 and could be developed towards the main road without impinging on open countryside.

### Summary of representation changes to plan:

The emphasis on developing Chichester and the surrounding A27 corridor is clear in intent but is not carried through at every opportunity. Actual proposed development should more closely reflect the stated aim.

### Response:

The Local Plan proposes parish housing numbers for both Boxgrove and Westbourne (Policy H3) with sites to be identified through neighbourhood plans.

### Action:

No change in response to this representation.

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**3877****Object**

**Document Element:** Spatial strategy, 3.19

**Respondent:** Mr simon urry

## Object

### Summary of representations:

Paragraph is supported subject to our comments made in respect of paragraph 1.20 and the identification of important areas of countryside (see comments in respect of Objective 5) and the need to sustain and evolve business and environmental interests to the north of the A27.

### Summary of representation changes to plan:

Important areas of countryside/landscape should be identified in the plan and protected from development by an appropriate policy.

### Response:

In addition to the natural environment policies regarding the AONB and the identification/protection of landscape gaps, Policy P14 seeks to ensure development proposals protect existing and improve provision of green infrastructure.

### Action:

No change in response to this representation.

**4268****Object**

**Document Element:** Spatial strategy, 3.19

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

### Summary of representations:

We are pleased to see the South Downs National Park referenced in paragraph 3.19 and 3.21, particularly highlighting the area north of the A27 in provide a transition to the South Downs National Park. However, we advise that these paragraphs would benefit from acknowledging the setting of the South Downs National Park as a consideration in these areas.

### Summary of representation changes to plan:

We advise that these paragraphs would benefit from acknowledging the setting of the South Downs National Park as a consideration in these areas.

### Response:

Agree that reference could be made to setting of the National Park and amendments to paragraphs 3.19 and 3.21 are proposed.

### Action:

See council suggested modifications CM038 and CM038

**5129****Object**

**Document Element:** Spatial strategy, 3.19

**Respondent:** South Downs National Park Authority

## Support

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**Summary of representations:**

Support in principle.

**Summary of representation changes to plan:**

Support in principle.

**Response:**

Noted.

**Action:**

No change in response to this representation.

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6281

Support

---

**Document Element:** Spatial strategy, 3.19

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

### Spatial strategy, 3.20

Support

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**Summary of representations:**

Need affordable and social housing on Manhood Peninsula

**Summary of representation changes to plan:**

Need affordable and social housing on Manhood Peninsula

**Response:**

Noted. The housing development permitted includes the provision of affordable housing as part of the development.

**Action:**

No change in response to representation.

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3768

Support

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**Document Element:** Spatial strategy, 3.20

**Respondent:** Mr Joseph O'Sullivan



## Object

### Summary of representations:

The statement that there are issues with the A27 junction is not correct. There may be queues at peak times but generally the traffic flows freely and benefits from there being a roundabout at the Stockbridge junction as it can travel in any direction rather than being forced to turn left as is proposed.

### Summary of representation changes to plan:

The proposed strategic changes to the A27 which were rejected by Chichester residents during the Highways Agency consultation should not be put forward by the District Council and should be removed.

### Response:

There is currently no proposal to implement the Stockbridge roundabout improvements previously proposed.

### Action:

No change in response to representation.

3828

Object

**Document Element:** Spatial strategy, 3.20

**Respondent:** Mrs Clare Gordon-Pullar

## Object

### Summary of representations:

Manhood Peninsular has not been explored sufficiently regarding its development potential.

Recent talks about funding the A27 Stockbridge roundabout from development are on-going and the background papers and models relating to the recent Climate change flood risk maps have not been made available to the public for scrutinising and testing.

### Summary of representation changes to plan:

The spatial strategy should be put on hold until the potential for upgrading the A27 Stockbridge roundabout from developer contributions has been decided and the flood risk maps have been subject to public comment.

At that stage the most sustainable options for the District can be established.

### Response:

The Council has had discussions regarding funding for the A27 mitigation package but there is currently no public funding available. Although the A27 is included as a pipeline scheme for evaluation as part of the development of the national Road Investment Strategy (RIS4), National Highways have made clear that the Local Plan should not place reliance on a scheme being funded and included in the RIS4 programme (beyond 2030).

### Action:

No change in response to this representation

3987

Object

**Document Element:** Spatial strategy, 3.20

**Respondent:** Elizabeth Lawrence Ltd

## Support

### Summary of representations:

Believe CDC right to place no demands for further large developments in the western Manhood Peninsula apart from windfall sites. In our opinion even these should NOT be approved until suggestions regarding infrastructure improvements, environmental assessment and giving priority to Parish Council advice are implemented.

### Summary of representation changes to plan:

Believe CDC right to place no demands for further large developments in the western Manhood Peninsula apart from windfall sites. In our opinion even these should NOT be approved until suggestions regarding infrastructure improvements, environmental assessment and giving priority to Parish Council advice are implemented.

### Response:

Noted.

### Action:

No change in response to this representation

5256

Support

Document Element: Spatial strategy, 3.20

Respondent: Manhope

## Support

### Summary of representations:

We support that the Plan does not include any strategic allocations on the Manhood because all traffic from the peninsular ultimately joins or crosses the A27. The A27 is also the main route for tourism traffic to Bognor Regis.

### Summary of representation changes to plan:

We support that the Plan does not include any strategic allocations on the Manhood because all traffic from the peninsular ultimately joins or crosses the A27. The A27 is also the main route for tourism traffic to Bognor Regis.

### Response:

Noted.

### Action:

No change in response to this representation

5282

Support

Document Element: Spatial strategy, 3.20

Respondent: National Highways

## Spatial strategy, 3.21

## Object

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### Summary of representations:

This paragraph, as currently drafted, does not correctly orientate The North of the Plan Area with the South Downs National Park (SDNP) and should therefore be corrected. The SDNP is both North and East of the SDNP boundary.

### Summary of representation changes to plan:

Amend first sentence to read:

“The north of the plan area covers those parts of Chichester District which lie north AND EAST of the South Downs National Park boundary.”

### Response:

It is agreed that the amended wording suggested by the respondent should be made for factual accuracy.

### Action:

See council suggested modification CM038

4650

Object

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**Document Element:** Spatial strategy, 3.21

**Respondent:** Plaistow and Ifold Parish Council

## Spatial strategy, 3.22

## Object

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### Summary of representations:

Increasing Loxwood's housing by a further 220, on top of substantial building in recent years, would not be conserving the rural character of this area. Why should all the housing be dumped in the North? Our village facilities have decreased since September 2022 with the closure of the village stores and post office.

### Summary of representation changes to plan:

This should not be to the detriment of the current village character in Loxwood.

### Response:

As set out in paragraph 3.24, the constraints on development in the southern plan area has led to the need to explore all possible means of meeting the LHN, including looking again at the potential for development in the north east of the plan area.

The Housing Distribution Background Paper (July 2024) explains the development of the proposed distribution of housing.

Loxwood is one of the larger settlements in the north of the Plan Area with a good range of existing services and facilities. The Council's updated facilities research in the Settlement Hierarchy Update Background Paper (May 2024) concludes that it is appropriately classified in the Local Plan Settlement Hierarchy as a service village

### Action:

No change in response to this representation

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**3770****Object**

**Document Element:** Spatial strategy, 3.22

**Respondent:** Mrs ALISON REDFORD

## Support

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**Summary of representations:**

CDC Landscape Capacity Study determines sensitivity around Wisborough Green to be high and capacity for development low; specific conclusions assert that there is limited scope for development outside the existing Settlement Area. Report gives a clear indication that high scale growth would be a loss of important rural landscape and countryside; whilst defining 'high scale' could be subjective, development that adds double-digit inflation of housing numbers should qualify.

**Summary of representation changes to plan:**

CDC Landscape Capacity Study determines sensitivity around Wisborough Green to be high and capacity for development low; specific conclusions assert that there is limited scope for development outside the existing Settlement Area. Report gives a clear indication that high scale growth would be a loss of important rural landscape and countryside; whilst defining 'high scale' could be subjective, development that adds double-digit inflation of housing numbers should qualify.

**Response:**

The Landscape Capacity Study indicated there was some potential for development around Wisborough Green and the HELAA assessed several sites as being suitable.

**Action:**

No change in response to this representation

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**4619****Support**

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**Document Element:** Spatial strategy, 3.22

**Respondent:** Wisborough Green Parish Council

## Object

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### Summary of representations:

Justification for selected Spatial Strategy in relation to the North of the Plan Area is difficult to follow and fails to effectively justify decision to look to Kirdford for additional housing. Paragraph states that "Conserving the rural character of the area, with its high quality landscape and environment is a key objective" yet this is not the actual Strategic Objective of the Local Plan, therefore what exactly is the Local Plan referring to here? Do not see where there is an "identified need" set out in evidence for additional housing need in Kirdford.

### Summary of representation changes to plan:

Justification for selected Spatial Strategy in relation to the North of the Plan Area is difficult to follow and fails to effectively justify decision to look to Kirdford for additional housing. Paragraph states that "Conserving the rural character of the area, with its high quality landscape and environment is a key objective" yet this is not the actual Strategic Objective of the Local Plan, therefore what exactly is the Local Plan referring to here? Do not see where there is an "identified need" set out in evidence for additional housing need in Kirdford.

### Response:

As set out in the SA and Housing Distribution Background Paper (July 2024) a range of growth scenarios were considered across the north Plan Area. The Landscape Capacity Study identifies that the landscape around Kirdford is generally of high sensitivity but with some opportunities for small scale development. To avoid landscape or visual harm, therefore, the lower growth scenario is considered appropriate for Kirdford.

### Action:

No change in response to this representation

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**5815****Object**

**Document Element:** Spatial strategy, 3.22

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Object

### Summary of representations:

However, the statement of fact and the key conclusion lacks adequate specification - WG lacks 'Landscape Capacity'. The LP Review includes the Landscape Capacity Study that includes the NE Parishes. The assessment for WG correctly determines the sensitivity to be High and the Capacity for development is Low; specific conclusions assert that there is limited scope for development outside the existing Settlement Area. The report gives a clear indication that high scale growth would be a loss of important rural landscape and countryside; whilst defining 'high scale' could be subjective, development that adds double-digit inflation of housing numbers should qualify.

### Summary of representation changes to plan:

However, the statement of fact and the key conclusion lacks adequate specification - WG lacks 'Landscape Capacity'. The LP Review includes the Landscape Capacity Study that includes the NE Parishes. The assessment for WG correctly determines the sensitivity to be High and the Capacity for development is Low; specific conclusions assert that there is limited scope for development outside the existing Settlement Area. The report gives a clear indication that high scale growth would be a loss of important rural landscape and countryside; whilst defining 'high scale' could be subjective, development that adds double-digit inflation of housing numbers should qualify.

### Response:

The Landscape Capacity Study indicated there was some potential for development around Wisborough Green and the HELAA assessed several sites as being suitable.

### Action:

No change in response to this representation

6232

Object

Document Element: Spatial strategy, 3.22

Respondent: Wisborough Green Parish Council

### Spatial strategy, 3.23

## Support

### Summary of representations:

Support statement.

### Summary of representation changes to plan:

Support statement.

### Response:

Noted.

### Action:

No change in response to this representation

4609

Support

Document Element: Spatial strategy, 3.23

Respondent: Wisborough Green Parish Council

## Support

### Summary of representations:

Support approach.

### Summary of representation changes to plan:

Support approach.

### Response:

Noted.

### Action:

No change in response to this representation

## 4612

## Support

**Document Element:** Spatial strategy, 3.23

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

Want to highlight that there is very limited sport provision is provided in WG and is reliant upon volunteer support to run clubs. Many, of all age groups, already look for different leisure opportunities outside the village. Increasing provision in the village is an unrealistic aspiration as there is no space; the recreation area in the village centre is a registered village green, in the centre of the Conservation Area.

### Summary of representation changes to plan:

Want to highlight that there is very limited sport provision is provided in WG and is reliant upon volunteer support to run clubs. Many, of all age groups, already look for different leisure opportunities outside the village. Increasing provision in the village is an unrealistic aspiration as there is no space; the recreation area in the village centre is a registered village green, in the centre of the Conservation Area.

### Response:

Comments noted, however, the village does have a range of leisure facilities.

### Action:

No change in response to this representation

## 6230

## Object

**Document Element:** Spatial strategy, 3.23

**Respondent:** Wisborough Green Parish Council



## Object

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**Summary of representations:**

Question how it could be applied to Wisborough Green. Whilst the definition of the term 'larger villages' is not specified, any claim of WG offering 'a range of local facilities and play an important role in providing services to their local communities' is not the case; WG has three pubs (one closed) and a village shop, solely used for top-up purchases. The community facilities rely upon volunteers and recruitment to support village facilities is becoming increasing difficult.

**Summary of representation changes to plan:**

Question how it could be applied to Wisborough Green. Whilst the definition of the term 'larger villages' is not specified, any claim of WG offering 'a range of local facilities and play an important role in providing services to their local communities' is not the case; WG has three pubs (one closed) and a village shop, solely used for top-up purchases. The community facilities rely upon volunteers and recruitment to support village facilities is becoming increasing difficult.

**Response:**

Larger villages are those designated as local service centres in hierarchy.

**Action:**

No change in response to this representation

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**6231****Object**

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**Document Element:** Spatial strategy, 3.23

**Respondent:** Wisborough Green Parish Council

## Spatial strategy, 3.24

## Object

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### Summary of representations:

There are also constraints in the North particularly on the A281 and no reference has been made to this. What about conserving the rural character of Loxwood?

### Summary of representation changes to plan:

It should be recognised that there are also constraints in the North particularly along the A281 and this additional housing will further add to this.

### Response:

A transport assessment was undertaken to understand the impact of alternative growth options on the local highway network in the north east plan area and the network further afield. One of the routes assessed was the A281.

The assessment found that whilst there would be some increase in traffic, this was based on assessing the option proposing the highest level of growth (1,477 dwellings), as it would have the biggest impact on the highway network. Lower growth scenarios, including the scale of development now being proposed in the northern plan area would in comparison be expected to have significantly less impact and below the threshold to require mitigation.

A further transport assessment of the distribution of housing in the northern plan area (2024) has reinforced the findings of the earlier transport assessment. The most recent assessment indicated that because of the relatively small numbers and the dispersed nature of the development, the additional trip numbers were unlikely to have a material impact.

### Action:

No change in response to this representation

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**3771****Object**

**Document Element:** Spatial strategy, 3.24

**Respondent:** Mrs ALISON REDFORD

## Object

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### Summary of representations:

There may well be constraints on the A27, but also substantial constraints elsewhere. Wisborough Green fresh water provision is marginal and sewerage and waste water capabilities are stretched, regularly fail and are easily over-run. Stating higher levels were considered is not helpful, particularly when it is apparent that not all options were fully reviewed for the A27.

### Summary of representation changes to plan:

The plan should say it will rigorously pursue its stated objective of developing urban areas and the A27 corridor. This should include positive plans to overcome or at least mitigate the constraints on the A27 and not just push the problem elsewhere.

If the A27 is the problem.... fix it.

### Response:

Reflecting the spatial strategy the majority of the growth proposed in the Local Plan is located within or around Chichester city and in the east west corridor. However, as set out in paragraph 3.24 (and explained more fully in the Housing Distribution and Transport Background Papers (July 2024)) the Council has had to look at increasing the supply of dwellings from the north of the north east of the plan area.

In relation to water provision and wastewater infrastructure the current position is set out in the Statement of Common Ground with Southern Water and the Environment Agency (April 2024).

### Action:

No change in response to this representation

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**3878****Object**

**Document Element:** Spatial strategy, 3.24

**Respondent:** Mr simon urry

## Object

### Summary of representations:

There should be an equal commitment to conserving the special character of those sites close to Chichester Harbour. The area between the SDNP and AONB is very special and needs conserving too. Not to do so is contrary to Climate Change and Environment policies.

### Summary of representation changes to plan:

There should be an equal commitment to conserving the special character of those sites close to Chichester Harbour. The area between the SDNP and AONB is very special and needs conserving too. Not to do so is contrary to Climate Change and Environment policies.

### Response:

The special character of the area is recognised in the Local Plan. Development will be subject to the requirements of the Local Plan natural environment and place making policies, particularly Policy NE2 (Natural Landscape), NE5 (Biodiversity) and NE13 (Chichester Harbour AONB) and the site specific requirements set out in the strategic allocation policies.

### Action:

No change in response to this representation

4216

Object

**Document Element:** Spatial strategy, 3.24

**Respondent:** Chidham and Hambrook Parish Council

## Object

### Summary of representations:

Attempts to explain that the due to the constraints on the A27 in the south of the plan area, that a "moderate level of growth in the north to help make up the overall shortfall of dwellings". However it does not state what the "constraints on the A27" actually are. It does not explain what the "overall shortfall of dwellings" is due to the "constraints on the A27".

### Summary of representation changes to plan:

Attempts to explain that the due to the constraints on the A27 in the south of the plan area, that a "moderate level of growth in the north to help make up the overall shortfall of dwellings". However it does not state what the "constraints on the A27" actually are. It does not explain what the "overall shortfall of dwellings" is due to the "constraints on the A27".

### Response:

The Plan should be read as a whole. Section 3 (Housing) and 8 (Transport and Accessibility) of the Local Plan provide more detail on the matters referred to.

### Action:

No change in response to this representation

5817

Object

**Document Element:** Spatial strategy, 3.24

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Spatial strategy, 3.25

## Support

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### Summary of representations:

Endorse the strategic approach to housing allocation and the proposal that Plaistow and Ifold should accommodate a maximum of 25 new dwellings on sites to be identified in a neighbourhood planning exercise. Consider this number to be properly assessed, given the capacity of this isolated rural community.

### Summary of representation changes to plan:

Endorse the strategic approach to housing allocation and the proposal that Plaistow and Ifold should accommodate a maximum of 25 new dwellings on sites to be identified in a neighbourhood planning exercise. Consider this number to be properly assessed, given the capacity of this isolated rural community.

### Response:

Noted.

### Action:

No change in response to this representation

4370

Support

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**Document Element:** Spatial strategy, 3.25

**Respondent:** Plaistow and Ifold Parish Council

## Object

### Summary of representations:

National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment – Seeking to understand impacts.]

We acknowledge that the Plan has ruled out high growth in Kirdford, Wisborough Green and Plaistow and Ifold, but seek to understand the impacts and mitigation measures associated with the A27

### Summary of representation changes to plan:

National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment – Seeking to understand impacts.]

We acknowledge that the Plan has ruled out high growth in Kirdford, Wisborough Green and Plaistow and Ifold, but seek to understand the impacts and mitigation measures associated with the A27

### Response:

A transport assessment was undertaken to understand the impact of alternative growth options on the local highway network in the north east plan area and the network further afield, including the A27.

Based on assessing the growth option proposing the highest level of growth (1,477 dwellings), the assessment found that trip increases on roads in Chichester, including the A27, were predicted to be minimal and would not materially impact the A27.

A further transport assessment of the distribution of housing in the northern plan area (2024) reinforced the findings of the earlier transport assessment. The most recent assessment indicated that because of the relatively small numbers and the dispersed nature of the development, the additional trip numbers were unlikely to have a material impact.

### Action:

No change in response to this representation

**5283****Object**

**Document Element:** Spatial strategy, 3.25

**Respondent:** National Highways

## Object

### Summary of representations:

Distribution of housing to Northern Plan Area (Kirdford and Wisborough Green) is based on flawed assumptions regarding capacity of the A27. These locations are not well served by existing facilities and amenities and are sequentially less sustainable than locations in Southern Plan Area where A27 capacity is presented as only relevant constraint to increased/additional allocations. The additional numbers that have been added to Northern Plan Area at this late stage are unnecessary given the comments at paragraphs 5.6.5 and 11.2.3 of Stantec Transport Study, which confirm that capacity exists for up to 700 dwellings per annum in the Southern Plan Area. Proposed approach does not deliver the most sustainable distribution of development.

### Summary of representation changes to plan:

Distribution of housing to Northern Plan Area (Kirdford and Wisborough Green) is based on flawed assumptions regarding capacity of the A27. These locations are not well served by existing facilities and amenities and are sequentially less sustainable than locations in Southern Plan Area where A27 capacity is presented as only relevant constraint to increased/additional allocations. The additional numbers that have been added to Northern Plan Area at this late stage are unnecessary given the comments at paragraphs 5.6.5 and 11.2.3 of Stantec Transport Study, which confirm that capacity exists for up to 700 dwellings per annum in the Southern Plan Area. Proposed approach does not deliver the most sustainable distribution of development.

### Response:

Reflecting the spatial strategy the majority of the growth proposed in the Local Plan is located within or around Chichester city and in the east west corridor. However, as set out in paragraph 3.24 (and explained more fully in the Housing Distribution and Transport Background Papers (July 2024)) the Council has had to look at increasing the supply of dwellings from the north of the north east of the plan area.

### Action:

No change in response to this representation.

5718

Object

**Document Element:** Spatial strategy, 3.25

**Respondent:** Metis Homes

**Agent:** Nova Planning

## Spatial strategy, 3.26

## Object

### Summary of representations:

Public transport for Loxwood is totally inadequate and has not improved even with the huge amount of additional housing in recent years.

### Summary of representation changes to plan:

No specific changes to be made.

### Response:

Whilst it is recognised that Loxwood is served by a more limited public transport service it has a good range of local services and facilities and a moderate level of growth over the plan period is considered appropriate.

### Action:

No change in response to this representation.

3772

Object

Document Element: Spatial strategy, 3.26

Respondent: Mrs ALISON REDFORD

## Object

### Summary of representations:

It is illogical to plan for increased housing predicated on only exploring the possibilities of remedying the obstacles, notably transport. It is particularly illogical to plan social housing in a location of zero local employment prospects and car dependency. The additional housing requires expanded capacity in the local school. Is the education authority committed to that?

### Summary of representation changes to plan:

Not to commit to additional housing until concrete plans have been made to remove obstacles and accommodate expansion of relevant services

### Response:

Policies T1 and T2 state that the Council will work in partnership with other authorities, transport providers and developers to improve accessibility, including by sustainable modes of travel.

The education authority, WSCC, has advised the Council that the additional pupil numbers could be accommodated through the expansion of primary and secondary schools.

### Action:

No change in response to this representation.

3811

Object

Document Element: Spatial strategy, 3.26

Respondent: Mr James Jewell



## Support

### Summary of representations:

Support this approach.

### Summary of representation changes to plan:

Support this approach.

### Response:

Noted.

### Action:

No change in response to this representation

## 4461

## Support

**Document Element:** Spatial strategy, 3.26

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

The suggestion that Kirdford should access its services and facilities from Dunsfold Park which is over 10 miles away and a 20 minute drive away and not yet built is a very considerable stretch by CDC to attempt to justify proposing development at Kirdford.

### Summary of representation changes to plan:

The suggestion that Kirdford should access its services and facilities from Dunsfold Park which is over 10 miles away and a 20 minute drive away and not yet built is a very considerable stretch by CDC to attempt to justify proposing development at Kirdford.

### Response:

This is not the case. Rather it recognises that new development can provide the opportunity to improve accessibility, including by sustainable modes of travel, in accordance with Policies T1 and T2.

### Action:

No change in response to this representation

## 5816

## Object

**Document Element:** Spatial strategy, 3.26

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Object

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### Summary of representations:

Question how it could be applied to Wisborough Green. 'Opportunities should also be explored' and 'presents an opportunity to explore' are weak statements and provide no justification or support to additional housing development within WG or the north-eastern parishes; they elicit no confidence that improvements will be made.

It is an almost incontrovertible fact that any development in the northern-eastern parishes will be reliant upon the private car.

### Summary of representation changes to plan:

Question how it could be applied to Wisborough Green. 'Opportunities should also be explored' and 'presents an opportunity to explore' are weak statements and provide no justification or support to additional housing development within WG or the north-eastern parishes; they elicit no confidence that improvements will be made.

It is an almost incontrovertible fact that any development in the northern-eastern parishes will be reliant upon the private car.

### Response:

Policies T1 and T2 state that the Council will work in partnership with other authorities, transport providers and developers to improve accessibility, including by sustainable modes of travel.

### Action:

No change in response to this representation

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**6207****Object**

**Document Element:** Spatial strategy, 3.26

**Respondent:** Wisborough Green Parish Council

## Spatial strategy, 3.27

### Object

#### Summary of representations:

Loxwood only has a butchers and hairdressers since the village stores and post office closed in September 2022. There is also a woodstove shop. The medical practice which also serves all the surrounding villages is already at capacity. The primary school is also at capacity since the closure of Kirdford Junior school. The Onslow Arms pub is a welcome addition to the village. Loxwood should not have to accommodate a further 220 houses after huge development in recent years. The 2021 census shows Loxwood as having a population of 1597 and it is now being overdeveloped.

#### Summary of representation changes to plan:

3.27 needs to be removed.

#### Response:

The Council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities. The Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed.

#### Action:

No change in response to this representation

## 3773

### Object

Document Element: Spatial strategy, 3.27

Respondent: Mrs ALISON REDFORD

### Object

#### Summary of representations:

Loxwood is not sustainable for that amount of growth and there will be travel out of the village for work.

#### Summary of representation changes to plan:

Reduce Loxwood allocation

#### Response:

Loxwood has a good range of local services and facilities and a moderate level of growth over the plan period is considered appropriate.

#### Action:

No change in response to this representation.

## 4344

### Object

Document Element: Spatial strategy, 3.27

Respondent: Mr Stephen Jupp

## Object

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### Summary of representations:

Distribution of housing to Northern Plan Area (Loxwood) is based on flawed assumptions regarding capacity of the A27. These locations are not well served by existing facilities and amenities and are sequentially less sustainable than locations in the Southern Plan Area, where A27 capacity is being presented as only relevant constraint to increased/additional allocations. This is unnecessary given additional capacity in the A27 as outlined at paragraphs 5.6.5 and 11.2.3 of the report. For this reason, Spatial Strategy is not properly 'justified' and consequently the draft Plan is unsound.

### Summary of representation changes to plan:

Distribution of housing to Northern Plan Area (Loxwood) is based on flawed assumptions regarding capacity of the A27. These locations are not well served by existing facilities and amenities and are sequentially less sustainable than locations in the Southern Plan Area, where A27 capacity is being presented as only relevant constraint to increased/additional allocations. This is unnecessary given additional capacity in the A27 as outlined at paragraphs 5.6.5 and 11.2.3 of the report. For this reason, Spatial Strategy is not properly 'justified' and consequently the draft Plan is unsound.

### Response:

Reflecting the spatial strategy the majority of the growth proposed in the Local Plan is located within or around Chichester city and in the east west corridor. However, as set out in paragraph 3.24 (and explained more fully in the Housing Distribution and Transport Background Papers (July 2024)) the Council has had to look at increasing the supply of dwellings from the north of the north east of the plan area.

### Action:

No change in response to this representation

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**5719****Object**

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**Document Element:** Spatial strategy, 3.27

**Respondent:** Metis Homes

**Agent:** Nova Planning

## Spatial strategy, 3.28

### Object

#### Summary of representations:

The Local Plan should be protecting the countryside across the district, not only in the northern wards. Chichester Harbour needs protecting and the rural villages south of the Plan area. There seems to be an imbalance here.

#### Summary of representation changes to plan:

The Local Plan should be protecting the countryside across the district, not only in the northern wards. Chichester Harbour needs protecting and the rural villages south of the Plan area. There seems to be an imbalance here.

#### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail in the Sustainability Appraisal and Housing Distribution Background Paper.

Development in the southern plan area will be subject to the requirements of the Local Plan natural environment policies, particularly Policy NE2 (Natural Landscape), NE5 (Biodiversity) and NE13 (Chichester Harbour AONB) and the site specific requirements set out in the strategic allocation policies.

#### Action:

No change in response to this representation.

## 3995

### Object

Document Element: Spatial strategy, 3.28

Respondent: Mrs Jane Towers

### Support

#### Summary of representations:

WGPC supports this statement

#### Summary of representation changes to plan:

WGPC supports this statement

#### Response:

Noted.

#### Action:

No change in response to this representation

## 4462

### Support

Document Element: Spatial strategy, 3.28

Respondent: Wisborough Green Parish Council

## Spatial strategy, 3.29

## Object

### Summary of representations:

Key Diagram has a number of deficiencies:

1. Key Diagram map titled "North East of Plan Area" is referred to in Local Plan as 'North of the Plan Area' (the area that includes Kirdford, Wisborough Green, Plaistow & Ifold, and Loxwood) which creates confusion to the reader when comparing with Paragraph 1.9 of the Local Plan
2. Legend includes SAC yet neither the Ebernoe Common SAC or the Mens SAC are indicated.
3. In South of Plan Area confusing as to what is being proposed. Most users not aware of what acronyms stand for.

### Summary of representation changes to plan:

Clarify terminology and simplify Key Diagram

### Response:

1. It is agreed that for consistency with the wording of paragraph 1.9 and Map A3 in Appendix A, the Key Diagram should be amended.
2. Although the boundary of the Ebernoe Common and Mens SACs abut the northern plan area they lie outside of the plan area (within the South Downs National Park) and, as such, it would not be appropriate to illustrate them on the Key Diagram.
3. Paragraph 1.11 in the section on 'How to use the Plan', indicates that an explanation of acronyms used can be found in the Glossary. However, to easily understand the Key Diagram it would be beneficial for acronyms in the legend to be written in full.

### Action:

See council suggested modifications CM043 and CM044

## 5823

## Object

**Document Element:** Spatial strategy, 3.29

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Policy S1 Spatial Development Strategy

### Object

#### Summary of representations:

Question whether the plan is procedurally sound – marked shift in LPA obligations on housing requirements, Regulation 18 feedback outdated; there is a need to return to the Regulation 18 stage.

#### Summary of representation changes to plan:

Plan for a range of new housing that meets the needs of local people over their lifetimes including affordable housing and specialist accommodation. Should not overburden any one place, local infrastructure to support new development should be provided before development is approved, existing infrastructure problems should be addressed.

#### Response:

There is considerable flexibility open to LPAs in how the initial stages of local plan production are carried out and there is no requirement to have a further Regulation 18 consultation.

There has been no change in how the LHN is calculated since the publication of the Preferred Approach as the HEDNA (2018) used the Government's standard method approach, which was emerging at that time. As set out in the NPPF, this remains the methodology to be used in calculating the LHN.

The Local Plan seeks to address the issues raised by the respondent. In respect of the timing of infrastructure, this will be agreed with the relevant infrastructure provider but there may be instances where infrastructure requirements will only become necessary on completion of a certain amount of development.

#### Action:

No change in response to this representation

3890

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Westhampnett Parish Council

### Object

#### Summary of representations:

Dependence on individual parishes to allocate housing to meet requirements/targets may not be met in sustainable way and in sufficient time to meet local needs or for Local Plan housing target to be deliverable over plan period.

For the Plan to fulfil its strategic role must allocate individual housing sites, including non-strategic provision.

#### Summary of representation changes to plan:

Policy S1 should be amended to include specific non-strategic allocations of land and remove the requirement for Neighbourhood Plans to deliver at this more local scale.

#### Response:

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period

#### Action:

No change in response to this representation

**3911****Object****Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Loxwood (Mellow) Ltd**Agent:** Ms Megan Smith**Object****Summary of representations:**

Support allocation of Loxwood as a 'Service Village' given its proximity and connections to Billingshurst, and the local services and facilities available.

Acknowledge, Point 6.a which allows small scale housing developments consistent with housing numbers set out in Policy H3.

**Summary of representation changes to plan:**

The site at Land South West of Willetts Way, is appropriate for up to 10 units and therefore fits the definition of 'small scale housing developments'.

Allocate individual housing sites across the District including non-strategic provision across towns, villages and Parishes.

**Response:**

Where the Local Plan makes a parish housing requirement it will be for a Neighbourhood Plan to identify potential development sites.

It is noted that part of the submitted site now has planning permission for 5 dwellings (23/01104/FUL, permitted August 2023).

**Action:**

No change in response to this representation

**3922****Object****Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Loxwood (Mellow) Ltd**Agent:** Ms Megan Smith



## Object

### Summary of representations:

Recognise role of Southbourne as a settlement hub and the potential for expansion, delivering housing for local people and improvements to local infrastructure.

### Summary of representation changes to plan:

Local infrastructure improvements should include both a road bridge and a separate pedestrian bridge over the railway, improved community facilities, more and better quality recreational open space and better protection for wildlife.

### Response:

The infrastructure required to support the proposed development at Southbourne has been assessed and is reflected in the IDP.

The findings of the Council's evidence in respect of the need for a railway bridge is that there is no conclusive requirement in transport terms for a bridge. The modelling undertaken indicates that beyond a certain amount of development a new rail bridge is likely to be of some benefit if the forecast traffic conditions cannot otherwise be mitigated by other traffic management measures.

### Action:

No change in response to this representation

3935

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Southbourne Parish Council

## Object

### Summary of representations:

As a settlement hub, East Wittering should be the focus of more development. However, the policy seeks to restrict development in the settlement.

East Wittering is a large settlement and with correctly planned infrastructure could be made less reliant on Chichester and the A27.

The potential of the settlement is unknown until the recently published climate change flood risk map models are assessed/tested.

### Summary of representation changes to plan:

East Wittering should be treated like other settlement hubs and development should be focused there.

### Response:

Consideration has been given to the making of a strategic allocation at East Wittering and the Preferred Approach Local Plan did propose a parish housing requirement for 350 dwellings with sites to be allocated through the East Wittering Neighbourhood Plan. However, as the Local Plan has progressed this approach has been revised to take account of the large amount of development that has, since the Preferred Approach consultation, received planning permission.

### Action:

No change in response to this representation

**3990****Object****Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Elizabeth Lawrence Ltd**Object****Summary of representations:**

Focusing such a large volume of housing in the East/ West corridor will result in urban sprawl, coalescence, harm to Chichester Harbour, the environment, agricultural land and impact on climate change. Whereas the north of the District will be protected.

**Summary of representation changes to plan:**

As only 30% of the plan area is developable the volume of housing should be reduced and exceptional circumstances apply.

The NPPF consultation makes it clear that the standard methodology will no longer need to be rigidly applied so why aren't the Council taking advantage of that?

**Response:**

Environmental and infrastructure constraints, and whether they can be mitigated, have been considered in determining whether a figure less than the standard method can be justified.

A revised NPPF was published in December 2023. The NPPF contains transitional arrangements whereby Local Plans that have reached Regulation 19 stage before 19 March 2024 will be examined under the relevant previous version of the NPPF. These transitional arrangements, therefore, apply to the Chichester Local Plan as it reached Regulation 19 stage in January 2023.

**Action:**

No change in response to this representation

**3997****Object****Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Mrs Jane Towers

## Object

### Summary of representations:

Greater capacity to deliver housing at Chichester City than is identified in the draft plan, on sites, such as Lawrence Farm, which are consistent with the spatial strategy and free from constraints.

### Summary of representation changes to plan:

Additional housing sites should be allocated at Chichester City to better reflect the Spatial Strategy and more fully meet the identified housing need.

### Response:

The figures for housing delivery within Chichester City reflects the availability and suitability of sites as assessed through the HELAA.

The specific site referred to has been considered through the HELAA but was assessed as not suitable as there is significant flood risk as a result of climate change.

### Action:

No change in response to this representation

4085

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Berkeley Strategic Group

## Object

### Summary of representations:

Over-reliance on developing the east-west corridor, with unsustainable levels of development between Chichester and Havant, in the narrow corridor between Chichester Harbour AONB/SSSI and the South Downs National Park.

Ecological and landscape implications of this over-development are huge; both for biodiversity and for local communities.

### Summary of representation changes to plan:

A significant reduction in the housing allocation in the east-west corridor is required.

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail in the Sustainability Appraisal and Housing Distribution Background Paper.

Development of the strategic allocations will be subject to the requirements of the Local Plan natural environment policies, particularly Policy NE2 (Natural Landscape), NE5 (Biodiversity) and NE13 (Chichester Harbour AONB) and the site specific requirements set out in the strategic allocation policies.

### Action:

No change in response to this representation

4108

Object

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**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Chichester Harbour Trust

## Policy S1 Spatial Development Strategy

## Object

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### Summary of representations:

Development is not well located - poor transport links to Tangmere and Southbourne.

### Summary of representation changes to plan:

Development is not well located - poor transport links to Tangmere and Southbourne.

### Response:

Southbourne has good public transport links providing access to locations locally and further afield.

Whilst Tangmere is not served by a train service, it still benefits from a bus service (to Chichester) with a good service frequency. In addition, the opportunity for the provision of improved sustainable transport modes is recognised in Policy A14 (land west of Tangmere).

Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

### Action:

No change in response to this representation

4114

Object

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**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Mrs Jane Towers

## Object

**Summary of representations:**

Direct development away from areas where there is reliance on cars in favour of more housing in the city on brownfield sites.

**Summary of representation changes to plan:**

Direct development away from areas where there is reliance on cars in favour of more housing in the city on brownfield sites.

**Response:**

The figures for housing delivery within Chichester City reflects the availability and suitability of sites as assessed through the HELAA.

A strategic allocation has been made on a brownfield site at Southern Gateway and it will be for the Chichester Neighbourhood Plan to identify sites to deliver the parish allocation of 270 dwellings, which could include brownfield sites.

Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

**Action:**

No change in response to this representation.

**4122****Object**

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Mrs Jane Towers

## Object

**Summary of representations:**

Development should be more focused on Chichester City to minimise traffic generation

**Summary of representation changes to plan:**

Housing allocation to be located more to the city.

**Response:**

The figures for housing delivery within Chichester City reflects the availability and suitability of sites as assessed through the HELAA.

**Action:**

No change in response to this representation

**4126****Object**

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Mrs Jane Towers

## Object

### Summary of representations:

Majority of the housing is located in the East-West Corridor while only 270 are in Chichester City.

The absence of any masterplan for city or entire District shows lack of vision and overly simplistic desire to create an unacceptable urban sprawl between Chichester and the borders with Havant and Arun.

### Summary of representation changes to plan:

Plan for more housing for the city. Exhaust brownfield sites rather than using greenfield sites.

### Response:

The figures for housing delivery within Chichester City reflects the availability and suitability of sites as assessed through the HELAA. In addition to the parish requirement (270 dwellings) the Southern Gateway is also allocated for 180 dwellings.

Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail in the Sustainability Appraisal and Housing Distribution Background Paper.

Development of the strategic allocations will be subject to the requirements of the Local Plan natural environment policies, particularly Policy NE2 (Natural Landscape), NE5 (Biodiversity) and NE13 (Chichester Harbour AONB) and the site specific requirements set out in the strategic allocation policies.

### Action:

No change in response to this representation

4194

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Chidham and Hambrook Parish Council

## Object

### Summary of representations:

Plan doesn't go far enough in addressing climate crisis/threats to local environment; lack of detail regarding adequate walking and cycling provision; strategy won't prevent coastal squeeze; loss of prime agricultural land and separation of villages along A259; continued damage to Chichester Harbour.

### Summary of representation changes to plan:

Do not build on greens spaces just because they are 'desirable' places to live. Use brownfield sites or convert office blocks into flats.

New housing should be dispersed throughout an area not in large chunks just because it's advantageous for developers to build large-scale developments.

### Response:

Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

Development in the southern plan area will be subject to the requirements of the Local Plan natural environment policies, particularly Policy NE2 (Natural Landscape), NE5 (Biodiversity) and NE13 (Chichester Harbour AONB) and the site specific requirements set out in the strategic allocation policies.

### Action:

No change in response to representation.

4209

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Mrs Georgina Armour Glasius



## Object

### Summary of representations:

Greater capacity to deliver housing at Chichester City than is identified in the draft plan, on sites, such as Raughmere Farm. Not constrained by issues such as the capacity of the A27, sewage treatment and water neutrality, purported by the Council as reasons why the housing need cannot be met in full.

### Summary of representation changes to plan:

Additional housing sites should be allocated at Chichester City to better reflect the Spatial Strategy and more fully meet the identified housing need.

### Response:

The figures for housing delivery within Chichester City reflects the availability and suitability of sites as assessed through the HELAA.

The specific site referred to has been considered through the HELAA but was assessed as not suitable for housing due to noise issues, particularly as the site falls within the Goodwood Aerodrome Noise Preferred Route Corridor.

### Action:

No change in response to this representation.

4237

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Mr David Lock and Ms Melanie Jenkins

**Agent:** Mr Jonathan Lambert

## Object

### Summary of representations:

Cross referencing and further explanation is required

### Summary of representation changes to plan:

1. Criterion 4 Reference to Westhampnett (Policy A9 and Policy A10) should be cross referenced to relevant pages to indicate the removal of land previously allocated.
2. Criterion 5b should also reference the need for development promoted, its contribution to wider benefits and to evolution and sustainability of existing employment, and include tourism and leisure proposals. Heritage interests should be added to the list of proposals.

### Response:

1. As the wording of this criterion already references the relevant strategic policy a cross reference as suggested is considered unnecessary.
2. As any development proposal would need to be considered against other relevant Local Plan policies the suggested additional wording is not considered necessary.

### Action:

No change in response to this representation.

4269

Object

**Document Element:** Policy S1 Spatial Development Strategy**Respondent:** The Goodwood Estates Company Limited**Agent:** HMPC Ltd

Object

**Summary of representations:**

Objects to Policy A11, A12 and A13. Difficult to accept this is sustainable development.

**Summary of representation changes to plan:**

Delete A11, revised A12 and A13.

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail in the Sustainability Appraisal and Housing Distribution Background Paper.

See also responses to the respondent's representations to the individual site allocations.

**Action:**

No change in response to this representation.

4336

Object

**Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Chichester Harbour Conservancy

Object

**Summary of representations:**

Loxwood is not sustainable for that amount of growth and there will be travel out of the village for work.

**Summary of representation changes to plan:**

Remove Loxwood from this policy

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail in the Sustainability Appraisal and Housing Distribution Background Paper.

Loxwood is one of the larger settlements in the north of the Plan Area with a good range of existing services and facilities. The Council's updated facilities research in the Settlement Hierarchy Background Paper (May 2024) concludes that it is appropriately classified in the Local Plan Settlement Hierarchy as a service village.

**Action:**

No change in response to this representation.

**4345****Object****Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Mr Stephen Jupp**Object****Summary of representations:**

Policy S1 requires amendment as use of 'small-scale' is not specific. Should be reworded to accord with NPPF paragraph 35(c).

Unique characteristics of district should be considered in terms of offering further specific development opportunities to sustain economic viability and required housing capacity.

**Summary of representation changes to plan:**

Amend Policy criteria 6b and 6c to read:

- b. Local community facilities, including village shops, that meet identified needs both within the village, neighbouring villages and surrounding smaller communities, and also the wider needs of the District in relation to the strategic aims of the Plan, and will help make the settlement more self-sufficient in the immediate and long term; and
- c. Small-scale employment, tourism or leisure proposals related to sustaining and enhancing existing sites and communities.

**Response:**

As any development proposal would need to be considered against other relevant Local Plan policies the suggested additional wording is not considered necessary.

**Action:**

No change in response to this representation.

**4608****Object****Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Premier Marinas Limited**Agent:** CBRE Limited

## Object

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### Summary of representations:

Policy S1 requires amendment as use of 'small-scale' is not specific. Should be reworded to accord with NPPF paragraph 35(c).

Unique characteristics of district should be considered in terms of offering further specific development opportunities to sustain economic viability and required housing capacity.

Unsound as spatial strategy focuses most future growth in the south of district in an area that is highly constrained in planning terms, with only a moderate amount of growth proposed in the North of the Plan Area which is objectively and comparatively less constrained.

Evidence demonstrates that additional housing could be delivered in the comparatively less-constrained North of the Plan Area, including at Crouchlands Farm.

### Summary of representation changes to plan:

More sites should be allocated to help bridge gap in the extent of the housing shortfall and, given its deliverability, Crouchlands Farm should be considered as first choice for allocation.

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail in the Sustainability Appraisal and Housing Distribution Background Paper.

As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north east plan area but not considered appropriate.

### Action:

No change in response to this representation.

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**4645****Object**

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Artemis Land and Agriculture Limited

**Agent:** DLBP

## Object

### Summary of representations:

Ambition to support landscape quality in the North of the Plan Area is undermined by identifying all the settlements as 'Service Villages'.

Risk smaller villages being treated as larger 'Service Villages' in time, losing their character and settlement hierarchy within this area.

Compared to Fishbourne, Boxgrove, and Westhampnett, Wisborough Green is an isolated exceptionally rural village; however, compared to Ifold, Wisborough Green is akin to a 'Service Village'.

### Summary of representation changes to plan:

Smaller villages should be reclassified as "Rest of Plan Area".

### Response:

The Council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities. The Settlement Hierarchy Update Background Paper (May 2024) concludes that Plaistow and Ifold has the range of services and facilities to be classified as a service village.

Any development proposal will be subject to the requirements of the Local Plan strategic natural environment and place making policies.

### Action:

No change in response to this representation.

4651

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Plaistow and Ifold Parish Council

## Support

### Summary of representations:

East/West Corridor most appropriate and sustainable location for new development in the District.

Congestion in A27 corridor creates significant social, environmental and economic impact both in plan area and sub-region. Locating new development where benefits from existing facilities, including rail and bus services essential if A27 congestion not to be made worse.

### Summary of representation changes to plan:

N/A

### Response:

Noted.

### Action:

No change in response to this representation.

4680

Support

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Merrow Wood

**Agent:** Intelligent Land

Support

**Summary of representations:**

Support Loxwood as a Service Centre

**Summary of representation changes to plan:**

Support Loxwood as a Service Centre

**Response:**

Noted.

**Action:**

No change in response to this representation.

4707

Support

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Mr Phillip Luff

## Object

### Summary of representations:

Absence of growth at East Wittering is based on flawed flood data and omission of growth scenario testing within the SA.

Manhood Peninsula/East Wittering could accommodate a moderate level of growth and should be reinstated for 350 dwellings.

Failing that 150 – 160 dwellings could be accommodated on Land to the West of Church Lane (ref HWW0002a).

Reliance on existing provision would not meet the housing needs of the settlement of East Wittering.

### Summary of representation changes to plan:

Reinforce role of Manhood Peninsula as location for moderate growth and home to existing communities, tourism and agricultural enterprise.

East Wittering should be added to the list of Settlement Hubs suitable for a strategic development location.

### Response:

Consideration has been given to the making of a strategic allocation at East Wittering and the Preferred Approach Local Plan did propose a strategic parish requirement for 350 dwellings with sites to be allocated through the East Wittering Neighbourhood Plan. However, as the Local Plan has progressed this approach has been revised to take account of the large amount of development that has, since the Preferred Approach consultation, received planning permission.

### Action:

No change in response to this representation.

4711

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Welbeck Strategic Land IV LLP

**Agent:** Mrs Sarah Hufford

## Object

### Summary of representations:

Agree with the settlement hierarchy and identification of Boxgrove as a service village.

Boxgrove should be re-assessed as a location for strategic level residential development.

### Summary of representation changes to plan:

Boxgrove should be included in Tier 3, as a settlement to accommodate a strategic development location.

### Response:

Whilst the Regulation 19 Local Plan proposes an increase in the parish housing number allocated to Boxgrove, it does not compare as favourably as other settlements for a Strategic Development Location (SDL).

### Action:

No change in response to this representation

4754

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Rydon Homes Limited

**Agent:** DMH Stallard LLP

Support

**Summary of representations:**

Support overall spatial strategy and identification of Southbourne as a settlement hub with potential for new residential development.

**Summary of representation changes to plan:**

Support overall spatial strategy and identification of Southbourne as a settlement hub with potential for new residential development.

**Response:**

Noted.

**Action:**

No change in response to this representation.

4765

Support

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Wates Developments and Seaward Properties

**Agent:** Barton Willmore now Stantec



## Object

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### Summary of representations:

Justification for constrained 535 dpa figure due to the A27 is not correct interpretation of Transport Study evidence, appears to be additional capacity.

Any site that can be developed sustainably should be allocated in the plan and supported, to address large unmet housing need.

Proposed Site Allocations DPD does not give certainty over delivery.

### Summary of representation changes to plan:

Housing number should be increased as appears to be additional capacity on the A27 beyond that stated.

Sites currently in the planning system without technical problems and recommended by officers for planning permission should be allocated in the Local Plan to meet the housing need.

More certainty needed on what happens if Neighbourhood Plans and the District Council do not deliver the housing numbers expected in a timely manner.

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (July 2024).

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period.

### Action:

No change in response to this representation.

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**4783****Object**

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Reside Developments Ltd

**Agent:** Tetra Tech

## Object

### Summary of representations:

Support inclusion of Hambrook and Nutbourne as a service village in the settlement hierarchy.

Question need for inclusion of 'small-scale' when referring to housing developments (point 6a).

No definition of what constitutes 'small-scale' and risk that could be inferred as excluding 'major development' as defined in NPPF.

### Summary of representation changes to plan:

Inclusion of 'small-scale' wording is superfluous and should be deleted.

### Response:

It is considered that as drafted the wording ensures consistency with Policy H3. 'Small scale' need not necessarily exclude major development provided it was consistent with the size and character of the settlement and local area.

### Action:

No change in response to this representation.

4896

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Gleeson Land

## Object

### Summary of representations:

A27 capacity issues not sufficient reason to rule out new housing on Manhood Peninsula.

Without addressing housing need, significant in-commuting associated with the planned quantum of employment space will result in even more traffic on the A27, not less.

### Summary of representation changes to plan:

Allocate housing figures in service villages such as Birdham and make provision for sites to come forward in/adjacent service villages where development would sustain existing facilities.

### Response:

The Local Plan does make provision for a limited amount of new housing development on the Manhood Peninsula. Consideration has been given to making a parish housing requirement for Birdham and the Preferred Approach Local Plan did propose a parish housing requirement for 125 dwellings with sites to be allocated through a Neighbourhood Plan. However, as the Local Plan has progressed this approach has been revised to take account of the large amount of development that has, since the Preferred Approach consultation, received planning permission on the Manhood Peninsula.

### Action:

No change in response to this representation.

4902

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Mr Graham Pick

**Agent:** Batcheller Monkhouse

Object

**Summary of representations:**

The Development Strategy is not positively prepared or justified because it leaves a significant level of unmet need unresolved and may have cross boundary A27 capacity and development viability implications for planned and committed development in Arun as well as for ADC's future plan making.

**Summary of representation changes to plan:**

Development strategy should account for the cross boundary contributions and positive steps to secure phased development needs allied to infrastructure to address its unmet need (including via the WSGBSPB LSS3 update) as far as possible.

**Response:**

The Council have sought to address unmet needs during the preparation of this Local Plan and, in the absence of progress on the LSS3 update, have engaged with both neighbouring authorities and those in the wider region but, as set out in the updated Statement of Compliance (April 2024), no authority has confirmed that it is in a position to accommodate any of the Plan Area's unmet need.

As set out in Policy T1 (Transport Infrastructure) development may be phased to align with the provision of new transport infrastructure.

**Action:**

No change in response to this representation.

4909

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Arun District Council

## Object

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### Summary of representations:

Fishbourne is highly sustainable location with suitable and deliverable locations for growth. No rationale to identify it for provision of only 30 homes. Has comparable number of services and facilities compared to other Service Villages.

Promoting site at land West of Clay Lane, Fishbourne.

### Summary of representation changes to plan:

Fishbourne should be identified for strategic-scale growth and housing requirement revert to that in the Preferred Approach for 250 homes.

### Response:

During the course of the plan's preparation, consideration has been given to the making of a strategic allocation. However, this approach has been revised to take account of the identification of the Strategic Wildlife Corridor (SWC) and the impact of this on the capacity of developable HELAA sites to the east of the settlement.

The site being promoted at Clay Lane falls within the SWC.

### Action:

No changes in response to this representation.

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4939

Object

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**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Gleeson Strategic Land

## Support

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### Summary of representations:

Recognition of the sustainable location of the Runcton HDA.

### Summary of representation changes to plan:

Recognition of the sustainable location of the Runcton HDA.

### Response:

Noted.

### Action:

No changes in response to this representation.

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4985

Support

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**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Object

### Summary of representations:

Council have failed to provide sufficient justification for not meeting housing need in full and have not suitably considered unmet need from adjoining authorities. Council's position of growth is predicated on basis of A27 not having sufficient capacity to accommodate higher growth. Evidence base (Transport Study 2023) contradicts position.

### Summary of representation changes to plan:

Council should at least be meeting local housing need and also considering what part it can play with meeting unmet needs for adjoining authorities.

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (July 2024).

As the council is currently unable to meet its own housing need it would be illogical to seek to accommodate the needs of another local authority.

### Action:

No changes in response to this representation.

5009

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Landacre (Chichester) Limited

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

Agree spatial strategy should focus on Chichester city as the main sub-regional centre and most sustainable location with a wide range of services and facilities.

Self-evident constraints to further strategic scale development because of historic setting, the A27 to the south and east, the harbour AONB to the west and the national park in the north.

### Summary of representation changes to plan:

Focusing growth close to the city would still reinforce role as sub-regional centre and locating a significant proportion of development in or around Chichester city ahead of the settlement hubs would reduce the need to travel to facilities and deliver sustainable development.

### Response:

Reflecting the spatial strategy the majority of the growth proposed in the Local Plan is located within or around Chichester city.

However, both Southbourne and Tangmere are also considered to be sustainable locations for a reasonable amount of growth over the plan period.

### Action:

No changes in response to this representation.

**5031****Object****Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Northgate Properties Ltd**Agent:** Smith Simmons Partners**Object****Summary of representations:**

Object on grounds that higher level of growth could be accommodated and plan does not address unmet need of neighbouring authorities.

Allocation in Loxwood should be based on higher growth scenario.

**Summary of representation changes to plan:**

Object on grounds that higher level of growth could be accommodated and plan does not address unmet need of neighbouring authorities.

Allocation in Loxwood should be based on higher growth scenario.

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (July 2024).

As the council is currently unable to meet its own housing need it would be illogical to seek to accommodate the needs of another local authority.

As set out in the SA and Housing Distribution Background Paper (July 2024) a range of scenarios were considered in the north plan area, including a higher growth figure for Loxwood, but not considered appropriate.

**Action:**

No changes in response to this representation.

**5038****Object****Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Crownhall Estates Limited & Martin Grant Homes**Agent:** Henry Adams LLP

## Object

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**Summary of representations:**

Council have failed to provide sufficient justification for not meeting housing need in full and have not suitably considered unmet need from adjoining authorities. Council's position of growth is predicated on basis of A27 not having sufficient capacity to accommodate higher growth. Evidence base (Transport Study 2023) contradicts position.

Support approach to Boxgrove and parish allocation of 50 houses. Promoting site that could deliver 50 dwellings

**Summary of representation changes to plan:**

Council should at least be meeting local housing need and also considering what part it can play with meeting unmet needs for adjoining authorities.

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (July 2024).

Comments regarding site are noted. It will be for a review of the Boxgrove Neighbourhood Plan or subsequent DPD to identify appropriate sites to deliver the parish housing number.

**Action:**

No changes in response to this representation.

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**5083****Object**

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**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** The Brooks Family

**Agent:** Henry Adams LLP

## Object

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### Summary of representations:

535 dpa is significantly lower than standard method figure or that in Preferred Approach. Transport Study indicates 700 dpa could be accommodated (in southern plan area) by mitigation proposed for 535 dpa scenario plus additional mitigation at Portfield roundabout.

Do not appear to have considered increased housing requirement could assist with funding necessary highway improvements.

Council have failed to provide sufficient justification for not meeting housing need in full and have not suitably considered unmet need from adjoining authorities.

### Summary of representation changes to plan:

Increase housing number per annum;

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (July 2024).

As the council is currently unable to meet its own housing need it would be illogical to seek to accommodate the needs of another local authority.

### Action:

No changes in response to this representation.

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**5156****Object**

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**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Spiby Partners Ltd

**Agent:** Henry Adams LLP



## Object

### Summary of representations:

Policy S1 (6) only refers to small scale housing developments and does not identify an approach to medium scale sites.

Policy should ensure there is the ability to mitigate delays on allocations being brought forward by alternative proposals in order to meet the housing requirement over the plan period

### Summary of representation changes to plan:

Policy S1 should be amended to also refer to medium scale sites.

Amend final paragraph of Policy S1 to state flexibility 'will' be needed rather than 'may'.

### Response:

It is considered that as drafted the wording ensures consistency with Policy H3 and reflects that development should be consistent with the size and character of the settlement and local area.

Whether flexibility needs to be applied will depend on several factors and the wording as drafted is, therefore, considered appropriate

### Action:

No change in response to this representation

5234

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Hallam Land Management Limited

**Agent:** LRM Planning

## Object

### Summary of representations:

535 dpa is significantly lower than standard method figure or that in Preferred Approach. Transport Study indicates 700 dpa could be accommodated (in southern plan area) by mitigation proposed for 535 dpa scenario plus additional mitigation at Portfield roundabout.

Do not appear to have considered increased housing requirement could assist with funding necessary highway improvements

### Summary of representation changes to plan:

Reconsider housing figures and consider proposed site to accommodate additional housing number

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (July 2024).

As the council is currently unable to meet its own housing need it would be illogical to seek to accommodate the needs of another local authority

### Action:

No change in response to this representation

5243

Object

**Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Chichester Grain Ltd**Agent:** Henry Adams LLP

Object

**Summary of representations:**

Support policy in principle, but consider it is not justified as stands.

Acknowledge position not able to meet entire identified housing need; welcome that significant effort has been put into identifying development capacity in a way that reflects the principle of positive planning; support that planned growth is directed to sustainable locations where access to local services and access to transport links are easier to access than remote rural areas; acknowledge Chichester City is the most populous settlement in district as well as being most sustainable; support that growth and future development should be focussed in East-West Corridor, and in particular in or close to City; also acknowledge wider infrastructure deficiencies will need to be addressed in strategic locations before they can accommodate more growth; support continued dialogue with National Highways to support improvements to the strategic road network and note SoCG will be published and updated as part of a continuous dialogue with National Highways.

**Summary of representation changes to plan:**

SoCG should transparently demonstrate why constraints on the A27 will not allow higher growth in the East West corridor.

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (July 2024).

The Council is preparing Statements of Common Ground with National Highways and WSCC.

**Action:**

No change in response to this representation

5261

Object

**Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Horsham District Council

## Support

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment].

Acknowledge that quantum and locations of development presented in Local Plan are clear and understandable.

### Summary of representation changes to plan:

N/A

### Response:

Noted

### Action:

No change in response to this representation

## 5281

## Support

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** National Highways

## Object

### Summary of representations:

Policy does not address net zero and climate change adaptation and mitigation. Should address strategic allocation of climate change management area and issue of coastal retreat, including strategy for replacement homes lost to climate change.

Para 4.76 inconsistent with SA that excludes strategic development on Manhood Peninsula due to climate change. Evidence base does not consider re-provision of homes and infrastructure required for climate adaptation.

Removal of strategic site at Selsey unsound.

### Summary of representation changes to plan:

Policy S1 should be amended to reference achieving net zero, identifying coastal change management area and resilience of Manhood Peninsula. Strategic allocation AL12 from Reg 18 should be reinstated.

**Response:**

The Local Plan already recognises that climate change is an issue to be addressed and sets out a strategic approach to development on the Manhood Peninsula (Policy NE14 Integrated Coastal Zone Management for the Manhood Peninsula) and requirements for new development around the coast (Policies NE12 Development Around the Coast and NE15 Flood Risk and Water Management).

As set out in the Planning Practice Guidance, the primary source of evidence for defining coastal change management areas is the shoreline management plan. However, the relevant SMPs for the Plan Area do not currently require the identification of such areas.

The Local Plan also addresses achieving net zero particularly in respect of sustainable transport modes. However, viability testing showed that requiring new development to meet higher standards ahead of Building Regulation changes would not be viable even if other contributions such as affordable housing were reduced. See also response to respondent's representation to paragraph 2.30 (5352).

The removal of a strategic allocation in Selsey followed updated flood risk evidence, which showed that the B2145 was at risk of flooding under certain climate change scenarios. The Level 2 interim SFRA recommended that the council's Emergency Planning Officer should be consulted prior to the allocation of the site, who advised that without improvements to the flood resilience of the B2145 further residential development in Selsey south of the section of road at risk of flooding should be avoided.

**Action:**

No change in response to this representation

**5353****Object**

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Landlink Estates Ltd

**Agent:** Jackson Planning Ltd

**Support****Summary of representations:**

intent of Policy S1 but suggest minor clarification

**Summary of representation changes to plan:**

Point 7 requires clarification as 'the above' is a little ambiguous and unclear whether relates to entire policy or just the non-strategic provision.

**Response:**

Point 7 is applicable to the whole policy and it is agreed this could be made clearer

**Action:**

See council suggested modification CM040

**5366****Support**

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

535 dpa is significantly lower than standard method figure or that in Preferred Approach. Transport Study indicates 700 dpa could be accommodated (in southern plan area) by mitigation proposed for 535 dpa scenario plus additional mitigation at Portfield roundabout.

Do not appear to have considered increased housing requirement could assist with funding necessary highway improvements.

Council have failed to provide sufficient justification for not meeting housing need in full and have not suitably considered unmet need from adjoining authorities.

### Summary of representation changes to plan:

Accommodate higher housing figure

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (July 2024).

As the council is currently unable to meet its own housing need it would be illogical to seek to accommodate the needs of another local authority.

### Action:

No change in response to this representation

## 5378

## Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Reside Developments Ltd

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

Increased dwelling requirement could be accommodated without need to significantly alter the proposed spatial strategy.

Additional development could be accommodated through re-appraisal of the settlement boundaries, particularly those around Chichester City.

### Summary of representation changes to plan:

Inclusion of land north of Clay Lane through an amendment to the settlement boundary on plans A6a and SB1.

Logical extension of settlement boundary and aligns with the strategic allocation land to the west of Chichester, and the recently developed land to the south of Clay Lane.

### Response:

There is no justification for extending the settlement boundary

### Action:

No change in response to this representation

5388

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Elivia Homes

**Agent:** Genesis Town Planning Ltd

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**Support****Summary of representations:**

Largely supportive of broad approach to providing sustainable development in the plan area.

Strongly support criterion 3 that where opportunities arise, new development will be provided to support the village and rural communities in the North of the plan area.

Highlight that land at Champions Farm presents opportunity for development which would support and sustain the village of Wisborough Green.

**Summary of representation changes to plan:**

Largely supportive of broad approach to providing sustainable development in the plan area.

Strongly support criterion 3 that where opportunities arise, new development will be provided to support the village and rural communities in the North of the plan area.

Highlight that land at Champions Farm presents opportunity for development which would support and sustain the village of Wisborough Green.

**Response:**

Noted. It will be for a review of the Wisborough Green Neighbourhood Plan or subsequent DPD to identify appropriate sites to deliver the parish housing number.

**Action:**

No change in response to this representation

5405

Support

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Landowner at Champions Farm, Wisborough Green

**Agent:** Southern Planning Practice

## Object

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**Summary of representations:**

Majority of strategic allocations appear to be greenfield sites. Little reference to development of brownfield sites.

Could result in Grade 1 and 2 farmland being built upon. UK not self-sufficient in food security.

**Summary of representation changes to plan:**

Majority of strategic allocations appear to be greenfield sites. Little reference to development of brownfield sites.

Could result in Grade 1 and 2 farmland being built upon. UK not self-sufficient in food security.

**Response:**

Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

**Action:**

No change in response to this representation

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**5443****Object**

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Mayday! Action Group

## Support

### Summary of representations:

Strongly endorse strategy that sustainably meeting development needs exist in and close to Chichester and east-west corridor where sustainable modes can credibly provide for much higher proportion of movement demands, mitigating most effectively the potential traffic impacts of development.

On Manhood Peninsula public transport and other sustainable modes cannot provide attractive alternatives, and significant further development risks reinforcing already high levels of car use.

Endorse conclusion regarding significant development in the north of District as being inappropriate.

### Summary of representation changes to plan:

Strongly endorse strategy that sustainably meeting development needs exist in and close to Chichester and east-west corridor where sustainable modes can credibly provide for much higher proportion of movement demands, mitigating most effectively the potential traffic impacts of development.

On Manhood Peninsula public transport and other sustainable modes cannot provide attractive alternatives, and significant further development risks reinforcing already high levels of car use.

Endorse conclusion regarding significant development in the north of District as being inappropriate.

### Response:

Noted.

### Action:

No change in response to this representation

5530

Support

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Stagecoach South

## Support

### Summary of representations:

Spatial Strategy flows clearly and logically from the Spatial Portrait, and the opportunities and constraints identifiable across the Plan area.

### Summary of representation changes to plan:

Spatial Strategy flows clearly and logically from the Spatial Portrait, and the opportunities and constraints identifiable across the Plan area.

### Response:

Noted.

### Action:

No change in response to this representation



5531

Support

**Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Stagecoach South

Support

**Summary of representations:**

Support focus on increasing development in the north of the plan area.

**Summary of representation changes to plan:**

Support focus on increasing development in the north of the plan area.

**Response:**

Noted.

**Action:**

No change in response to this representation

5551

Support

**Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Millwood Designer Homes**Agent:** Savills

Object

**Summary of representations:**

Needs to be more focused on non-strategic housing provision, even at service village level.

Encouraging moderate growth and new infrastructure will benefit service villages, assist with creating sustainable communities and reducing the need to travel.

**Summary of representation changes to plan:**

Point 6 should be encouraging new development, suggesting small scale housing would be suitable.

**Response:**

Development that supports services in the identified Service Villages will be supported where this is consistent with the development strategy.

**Action:**

No change in response to this representation

5604

Object

**Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Thakeham Homes

## Object

### Summary of representations:

535 dpa is significantly lower than standard method figure or that in Preferred Approach. Transport Study indicates 700 dpa could be accommodated (in southern plan area) by mitigation proposed for 535 dpa scenario plus additional mitigation at Portfield roundabout.

Do not appear to have considered increased housing requirement could assist with funding necessary highway improvements.

Council have failed to provide sufficient justification for not meeting housing need in full.

### Summary of representation changes to plan:

Figure of 535 should be seen as an absolute minimum and other land should be considered to be allocated

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (July 2024).

### Action:

No change in response to this representation

5659

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** The Pick Family

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

535 dpa is significantly lower than standard method figure or that in Preferred Approach. Transport Study indicates 700 dpa could be accommodated (in southern plan area) by mitigation proposed for 535 dpa scenario plus additional mitigation at Portfield roundabout.

Figure of 535 should be seen as an absolute minimum and other land should be considered to be allocated.

Promoting additional land west of Stoney Meadow, North Mundham for 225 dwellings.

### Summary of representation changes to plan:

Allocate additional land.

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (July 2024).

### Action:

No change in response to this representation

5661

Object

**Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Mr & Mrs Bell**Agent:** Henry Adams LLP

Support

**Summary of representations:**

Support strategy, particularly development at the settlement hubs of Southbourne (Policy A13) and Tangmere (Policy A14).

Also support that provision is made for extant Site Allocations and the Tangmere strategic site remains allocated under draft Policy A14.

**Summary of representation changes to plan:**

Support strategy, particularly development at the settlement hubs of Southbourne (Policy A13) and Tangmere (Policy A14).

Also support that provision is made for extant Site Allocations and the Tangmere strategic site remains allocated under draft Policy A14.

**Response:**

Noted.

**Action:**

No change in response to this representation

5694

Support

**Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Church Commissioners for England**Agent:** Lichfields

Object

**Summary of representations:**

Land at Maudlin Farm not featured at Regulation 18 stage.

SA stated Southbourne development unlikely to be deliverable in first 5 years. Planning Ref. SB/22/01283/FULEIA for 'Land at Harris Scrapyard & Oaks Farm', would provide at least 50 dwellings in period to 2026 and 103 dwellings by 2027. Southern Water have confirmed suitable foul drainage can be accommodated.

SA therefore incorrect as proposed development can provide early housing delivery as part of BLD.

Loxwood also identified as SDL, results in less sustainable distribution of housing than if transport evidence had been properly applied.

Loxwood is sequentially less sustainable than a number of other Service Villages in South.

**Summary of representation changes to plan:**

Land at Maudlin Farm not featured at Regulation 18 stage.

SA stated Southbourne development unlikely to be deliverable in first 5 years. Planning Ref. SB/22/01283/FULEIA for 'Land at Harris Scrapyard & Oaks Farm', would provide at least 50 dwellings in period to 2026 and 103 dwellings by 2027. Southern Water have confirmed suitable foul drainage can be accommodated.

SA therefore incorrect as proposed development can provide early housing delivery as part of BLD.

Loxwood also identified as SDL, results in less sustainable distribution of housing than if transport evidence had been properly applied.

Loxwood is sequentially less sustainable than a number of other Service Villages in South.

**Response:**

The site at Maudlin Farm was promoted to the Preferred Approach consultation (under Regulation 18) and subsequently assessed through the HELAA and SA.

It is acknowledged that there is currently headroom available at Thornham WwTW but this serves development not only in the Plan Area but also from Havant Borough. In addition available headroom can, depending on weather conditions, fluctuate year on year. As such, there is no certainty that capacity would be available to serve development. Southern Water's DWMP identifies the need for capacity improvements at Thornham WwTW to serve future development, which are planned for the next AMP period (2025-2030).

It should also be noted that there is a difference between Southern Water's legal obligation to provide developers with the right to connect to a public sewer regardless of capacity issues at the time a planning application is determined and which may be managed through the imposition of a planning condition and delivering strategic infrastructure capacity through the AMP to accommodate future Local Plan growth.

Loxwood is one of the larger settlements in the north of the Plan Area with a good range of existing services and facilities. The Council's updated facilities research in the Settlement Hierarchy Update Background Paper (May 2024) concludes that it is appropriately classified in the Local Plan Settlement Hierarchy as a service village.

**Action:**

No change in response to this representation

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**5720**
**Object**

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Metis Homes

**Agent:** Nova Planning

## Object

### Summary of representations:

Do not accept A27 capacity presents a ceiling in terms of housing delivery or Plan and associated SA demonstrates reasonable alternatives being considered.

Approach to housing figures not justified and Plan does not appear to meet the exceptional circumstances allowed for within NPPF to justify alternative approach.

### Summary of representation changes to plan:

Do not accept A27 capacity presents a ceiling in terms of housing delivery or Plan and associated SA demonstrates reasonable alternatives being considered.

Approach to housing figures not justified and Plan does not appear to meet the exceptional circumstances allowed for within NPPF to justify alternative approach.

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (July 2024).

As the council is currently unable to meet its own housing need it would be illogical to seek to accommodate the needs of another local authority.

### Action:

No change in response to this representation

5725

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Dandara Southern Limited

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

Consider Plan area is capable of accommodating greater housing quantum. Council has failed to provide sufficient justification for not meeting housing need in full or considering unmet need from adjoining authorities.

Council should consider allocation of additional housing sites to meet full or higher housing provision within plan area.

Promoting additional land at Stubcroft Farm, East Wittering.

### Summary of representation changes to plan:

Allocate additional land

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (July 2024).

As the council is currently unable to meet its own housing need it would be illogical to seek to accommodate the needs of another local authority.

### Action:

No change in response to this representation

5759

Object

**Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Barratt David Wilson Homes**Agent:** Henry Adams LLP

Object

**Summary of representations:**

Increased dwelling requirement could be accommodated without need to significantly alter spatial strategy.

Additional development could be accommodated at less constrained Service Villages in northern parts of Manhood Peninsula.

Hunston sustainable location, is relatively unconstrained compared to other parts of Manhood Peninsula with good accessibility to road network and which would be consistent with Policy T1.

Previous work on emerging Local Plan and now withdrawn Neighbourhood Plan demonstrate capable of delivering at least 200 homes during Plan period.

Site promoted at Land at Hunston Village Dairy.

**Summary of representation changes to plan:**

Make a strategic scale allocation as part of Policy H2; set a housing figure of at least 200 homes for Hunston in Policy H3 which could be delivered as part of Neighbourhood Plan process.

**Response:**

Consideration has been given to the making of a strategic allocation at Hunston and the Preferred Approach Local Plan did propose a strategic parish requirement for 200 dwellings with sites to be allocated through the Hunston Neighbourhood Plan. However, as the Local Plan has progressed this approach has been revised to take account of the recently permitted growth on the Manhood Peninsula and specifically the infrastructure constraint at Hunston/North Mundham regarding the availability of primary school capacity to accommodate additional pupil numbers. The education authority, WSCC, has advised the Council that there would only be primary school capacity to accommodate the additional pupil numbers from 50 dwellings and that the remaining 150 dwellings (as proposed in the Preferred Approach) would need to be relocated elsewhere in the Plan Area. As set out in Policy H3, it is proposed that the 50 dwellings come forward through the North Mundham Neighbourhood Planning process (which will likely be made up from sites that have received planning permission after the base date of the plan).

**Action:**

No change in response to this representation

5776

Object

**Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Beechcroft Developments Limited**Agent:** Genesis Town Planning Ltd

Object

**Summary of representations:**

1. Policy confusing, does not state quantum of housing, employment or critical infrastructure required for each area or when development will come forward including need for Water Neutrality solution in North of Plan Area.
2. First sentence: dispersing development inconsistent with principle of sustainable development and concept of place-making.
3. Point 1: Does Plan make provision for unplanned sustainable growth or planned growth that is not sustainable?
4. Point 2: Unclear what this actually means;
5. Point 3: Why does Policy make out North of Plan Area villages should wait for opportunities to arise?
6. Point 6: Does definition of small-scale housing/employment relate to NPPF definition of major development? Define local community facilities and define (c);
7. Point 7: In Kirdford, will all development be handled through NP?
8. Final paragraph: does not actually state what the distribution of development is and reference to flexibility demonstrates lack of confidence in robustness of policy.

**Summary of representation changes to plan:**

1. Policy confusing, does not state quantum of housing, employment or critical infrastructure required for each area or when development will come forward including need for Water Neutrality solution in North of Plan Area.
2. First sentence: dispersing development inconsistent with principle of sustainable development and concept of place-making.
3. Point 1: Does Plan make provision for unplanned sustainable growth or planned growth that is not sustainable?
4. Point 2: Unclear what this actually means;
5. Point 3: Why does Policy make out North of Plan Area villages should wait for opportunities to arise?
6. Point 6: Does definition of small-scale housing/employment relate to NPPF definition of major development? Define local community facilities and define (c);
7. Point 7: In Kirdford, will all development be handled through NP?
8. Final paragraph: does not actually state what the distribution of development is and reference to flexibility demonstrates lack of confidence in robustness of policy.

**Response:**

1. The Plan needs to be read as a whole. Policy H1 sets out the overall quantum of housing and how that breaks down by sub-area, E1 quantum of employment land and the IDP the infrastructure required to support development. In terms of housing, the trajectory sets out the expected delivery of sites taking into account known infrastructure constraints. In north of plan area, the updated trajectory forecasts delivery from 2032/33 onwards. However, there is no restriction on when sites can come forward if it can be demonstrated that the requirements of Policy NE17 are met in full.
2. This needs to be read in the context of the wording that follows it i.e. the type of development proposed by the Local Plan for each of the sub-areas.
3. This refers to the making of specific allocations or parish housing numbers.
4. This reflects that development on the Manhood Peninsula will be more limited and focused on supporting the Vision for the area
5. It is agreed that Point 3 should be amended to reflect that this Local Plan is proposing more planned development in the North of the Plan Area.
6. 'Small scale' need not necessarily exclude major development provided it was consistent with the size and character of the settlement and local area and will also be subject to the requirements of other relevant policies. Community facilities is defined in the glossary (Appendix J).
7. As set out in Policy H3, the intention is that suitable sites to deliver the Parish housing number will be identified through a Neighbourhood Plan or, in the event that this does not progress, a DPD.
8. Policy S1 sets out the overall strategy but, as set out in 1 above the Plan should be read as a whole. The Council consider the policy is robust.

**Action:**

See council suggested modification CM039

No other changes in response to this representation

**5819**

**Object**

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design



## Policy S1 Spatial Development Strategy

## Object

### Summary of representations:

Plan is considered unsound on basis that:

- AONBs and natural environment insufficiently protected;
- Insufficient consideration of threat of climate change and mitigations;
- Unrealistic housing targets;
- Lack of challenge of water companies regarding sewage discharges;
- Inadequate transport infrastructure

### Summary of representation changes to plan:

Plan is considered unsound on basis that:

- AONBs and natural environment insufficiently protected;
- Insufficient consideration of threat of climate change and mitigations;
- Unrealistic housing targets;
- Lack of challenge of water companies regarding sewage discharges;
- Inadequate transport infrastructure

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail in the Sustainability Appraisal and Housing Distribution Background Paper. Any development proposal will be subject to the requirements of the Local Plan strategic natural environment and place making policies.

Environmental and infrastructure constraints, and whether they can be mitigated, have been considered in determining whether a figure less than the Government's standard method for calculating the local housing need can be justified.

In terms of infrastructure, it is accepted that new development may affect existing infrastructure and local services and may require new or enhanced provision to meet needs. Therefore, all relevant service providers are consulted to identify if the services they provide have existing capacity or if additional capacity is needed to accommodate the proposed development. This is outlined in the Infrastructure Delivery Plan (IDP) that supports the Local Plan.

In relation to wastewater infrastructure the current position is set out in the Statement of Common Ground with Southern Water and the Environment Agency (April 2024). In relation to the highway network, CDC have worked with both National Highways and WSCC to assess the impact of development, and the potential for cumulative effects, on the highway network. Where site specific mitigation is required, this is identified in the site specific policies and IDP.

### Action:

No change in response to this representation

5883

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Libby Alexander

## Support

### Summary of representations:

Ancient woodlands, veteran and ancient trees are irreplaceable habitats, and it is essential that they are considered appropriately to avoid any direct or indirect effects that could cause their loss or deterioration.

Development strategy should prioritise the protection of trees and woodlands with the highest priority being given to ancient woodland, ancient and veteran trees as individual habitats and as part of wider ecological networks.

### Summary of representation changes to plan:

Ancient woodlands, veteran and ancient trees are irreplaceable habitats, and it is essential that they are considered appropriately to avoid any direct or indirect effects that could cause their loss or deterioration.

Development strategy should prioritise the protection of trees and woodlands with the highest priority being given to ancient woodland, ancient and veteran trees as individual habitats and as part of wider ecological networks.

### Response:

Noted. Policies NE2 (Biodiversity and Biodiversity Net Gain) and NE8 (Trees, Hedgerows and Woodlands), which would be applicable to any development proposal, seek to ensure that such trees are protected.

### Action:

No change in responses to this representation.

5986

Support

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Forestry Commission

## Object

### Summary of representations:

Delivery of the Plan is overly reliant on development in the countryside. Of the 3,225 homes proposed between Chichester and Southbourne, overwhelmingly they will be built on greenfield sites. We would hope to see much greater focus on delivery of brownfield sites and urban locations.

### Summary of representation changes to plan:

Delivery of the Plan is overly reliant on development in the countryside. Of the 3,225 homes proposed between Chichester and Southbourne, overwhelmingly they will be built on greenfield sites. We would hope to see much greater focus on delivery of brownfield sites and urban locations.

### Response:

Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

### Action:

No change in response to this representation.

6084

Object

**Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Chichester Harbour Trust**Object****Summary of representations:**

Additional policy required to support discretion in planning decisions when consultees provide advice contrary to public and parish experience i.e. where formally submitted local and Parish advice is not aligned to other consultees then take the Parishes advice. To avoid using this discretion is not consistent with exercising a duty of care.

**Summary of representation changes to plan:**

Additional policy required to support discretion in planning decisions when consultees provide advice contrary to public and parish experience i.e. where formally submitted local and Parish advice is not aligned to other consultees then take the Parishes advice. To avoid using this discretion is not consistent with exercising a duty of care.

**Response:**

A local planning authority must take into account the representations of Parish Councils and due weight is given to these comments as they can often offer particular insights or more detailed information which is relevant to the consideration of an application. However, whilst Parish Council representations are important, they are not necessarily entitled to any more weight than any other representation and in some cases will be given less weight than comments of statutory consultees

**Action:**

No change in response to this representation.

6129

Object

**Document Element:** Policy S1 Spatial Development Strategy**Respondent:** Manhope**Support****Summary of representations:**

Support in principle

**Summary of representation changes to plan:**

Support in principle

**Response:**

Noted.

**Action:**

No change in response to this representation.

6149

Support

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

Support

**Summary of representations:**

Aspiration of policy generally supported

**Summary of representation changes to plan:**

Aspiration of policy generally supported

**Response:**

Noted.

**Action:**

No change in response to this representation

6255

Support

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Thakeham Homes

Support

**Summary of representations:**

Support in principle

**Summary of representation changes to plan:**

Support in principle

**Response:**

Noted.

**Action:**

No change in response to this representation

6262

Support

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** Southbourne Parish Council

## Object

### Summary of representations:

Increased dwelling requirement could be accommodated without need to significantly alter the proposed spatial strategy.

Additional development could be accommodated through re-appraisal of the settlement boundaries, particularly those around Chichester City.

### Summary of representation changes to plan:

Inclusion of land to the north of Brandy Hole Lane and west of Plainwood Close, through an amendment to the settlement boundary on Plan SB1.

### Response:

There is no justification for extending the settlement boundary.

### Action:

No change in response to this representation

6293

Object

**Document Element:** Policy S1 Spatial Development Strategy

**Respondent:** DG Phillips (Bosham) Ltd and Phillips Build Ltd

**Agent:** Genesis Town Planning Ltd

## Settlement Hierarchy, 3.30

## Object

### Summary of representations:

Simply no justification with any substance to explain of how the Council has arrived at the policy or hierarchy.

### Summary of representation changes to plan:

Simply no justification with any substance to explain of how the Council has arrived at the policy or hierarchy.

### Response:

The Council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities. The Settlement Hierarchy Background Paper (May 2024) concludes that Kirdford has the range of services and facilities to be classified

### Action:

No change in response to this representation.

5825

Object

**Document Element:** Settlement Hierarchy, 3.30

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Settlement Hierarchy, 3.31

### Support

#### Summary of representations:

Development in WG will neither enhance nor maintain the vitality of this rural community. WG cannot access services and facilities easily, and there is little choice in transport modes with residents essentially reliant upon a car; this reliance is amplified within volunteer services.

#### Summary of representation changes to plan:

Development in WG will neither enhance nor maintain the vitality of this rural community. WG cannot access services and facilities easily, and there is little choice in transport modes with residents essentially reliant upon a car; this reliance is amplified within volunteer services.

#### Response:

The Council's updated facilities research in the Settlement Hierarchy Update Background Paper (May 2024) concludes that Wisborough Green has the range of services and facilities to be classified as a service village.

#### Action:

No change in response to this representation.

4464

Support

**Document Element:** Settlement Hierarchy, 3.31

**Respondent:** Wisborough Green Parish Council

### Object

#### Summary of representations:

WGPC supports this approach.

#### Summary of representation changes to plan:

WGPC supports this approach.

#### Response:

Noted.

#### Action:

No change in response to this representation.

6208

Object

**Document Element:** Settlement Hierarchy, 3.31

**Respondent:** Wisborough Green Parish Council

## Settlement Hierarchy, 3.32

### Object

#### Summary of representations:

Until the recent climate change flood risk maps are checked for accuracy it is disputed that East Wittering has more constraints than other settlements.

#### Summary of representation changes to plan:

The constraints of the settlements should be reassessed objectively, bearing in mind with more development East Wittering could be made one of the most sustainable settlements in the district, with less reliance on Chichester and the A27.

#### Response:

Consideration has been given to the making of a strategic allocation at East Wittering and the Preferred Approach Local Plan did propose a strategic parish requirement for 350 dwellings with sites to be allocated through the East Wittering Neighbourhood Plan. However, as the Local Plan has progressed this approach has been revised to take account of the large amount of development that has, since the Preferred Approach consultation, received planning permission.

#### Action:

No change in response to this representation.

**3991****Object**

Document Element: Settlement Hierarchy, 3.32

Respondent: Elizabeth Lawrence Ltd

## Settlement Hierarchy, 3.35

### Object

#### Summary of representations:

Neither Hambrook nor Nutbourne have a range of everyday facilities which characterises a service village.

#### Summary of representation changes to plan:

Neither Hambrook nor Nutbourne have a range of everyday facilities which characterises a service village.

#### Response:

The Council's updated facilities research in the Settlement Hierarchy Update Background Paper (May 2024) concludes that Hambrook/Nutbourne have the range of services and facilities to be classified as a service village.

#### Action:

No change in response to this representation.

**3998****Object**

Document Element: Settlement Hierarchy, 3.35

Respondent: Mrs Jane Towers

## Object

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### Summary of representations:

Inadequate planning for basic infrastructure services at Tangmere, which need to be doubled as a minimum in line with the proposed doubling in size of the community.

### Summary of representation changes to plan:

Plan needs updating to recognise this omission

### Response:

The infrastructure required to support the proposed development at Tangmere has been assessed and is reflected in the IDP and also the outline planning application, which has a resolution to permit.

### Action:

No change in response to this representation.

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## 4385

## Object

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**Document Element:** Settlement Hierarchy, 3.35

**Respondent:** Mr John Wolfenden

## Support

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### Summary of representations:

Question WG's designation as service village.

### Summary of representation changes to plan:

Question WG's designation as service village.

### Response:

The Council's updated facilities research in the Settlement Hierarchy Update Background Paper (May 2024) concludes that Wisborough Green has the range of services and facilities to be classified as a service village.

### Action:

No change in response to this representation.

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## 4465

## Support

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**Document Element:** Settlement Hierarchy, 3.35

**Respondent:** Wisborough Green Parish Council



## Object

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**Summary of representations:**

Support this statement.

**Summary of representation changes to plan:**

Support this statement.

**Response:**

Noted.

**Action:**

No change in response to this representation.

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**6209****Object**

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**Document Element:** Settlement Hierarchy, 3.35

**Respondent:** Wisborough Green Parish Council

### Policy S2 Settlement Hierarchy

## Object

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**Summary of representations:**

Many of the sites chosen in the local plan are outside of settlement boundaries which means the presumption in favour of sustainable development does not apply.

This is the case with policy A11 where the whole development lies outside of the settlement boundary.

**Summary of representation changes to plan:**

Policy A11 needs to be removed from the plan. Other sites outside of settlement boundaries should be reviewed and removed from the plan.

**Response:**

Allocated sites do not need to be within a settlement boundary. In accordance with the Council's methodology for reviewing settlement boundaries (as set out in the Settlement Boundaries Background Paper (May 2024)), settlement boundaries will be extended to include allocated sites once they have been built out.

**Action:**

No change in response to this representation.

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**3852****Object**

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**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** The Bosham Association

## Object

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**Summary of representations:**

East Wittering/Bracklesham should be downgraded to a service village as it has no schooling/training facilities beyond the age of 11, no access to a train station or the major road network, has lost all its major employers with few opportunities to attract large employers (other than those in the tourism sector) due to its poor access at the bottom of a peninsula

**Summary of representation changes to plan:**

East Wittering/Bracklesham should be downgraded to a service village as it has no schooling/training facilities beyond the age of 11, no access to a train station or the major road network, has lost all its major employers with few opportunities to attract large employers (other than those in the tourism sector) due to its poor access at the bottom of a peninsula

**Response:**

The Council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities. The Settlement Hierarchy Update Background Paper (May 2024) concludes that East Wittering/Bracklesham has the range of services and facilities to be classified as a settlement hub.

**Action:**

No change in response to this representation.

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**3885****Object**

---

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Dr Carolyn Cobbold

## Object

### Summary of representations:

Support presumption in favour of sustainable development within settlement boundary of Service Villages.

Consider definition of settlement boundaries should not be left to Neighbourhood Plans when suitable, available and achievable sites are left fragmented and overlooked by Parish Councils creating piecemeal plots outside of the settlement boundary for often unjustified reasons, the Neighbourhood Plan process being subject to lesser scrutiny (having only to meet basic conditions) than local plans.

### Summary of representation changes to plan:

Support presumption in favour of sustainable development within settlement boundary of Service Villages.

Consider definition of settlement boundaries should not be left to Neighbourhood Plans when suitable, available and achievable sites are left fragmented and overlooked by Parish Councils creating piecemeal plots outside of the settlement boundary for often unjustified reasons, the Neighbourhood Plan process being subject to lesser scrutiny (having only to meet basic conditions) than local plans.

### Response:

Where a Neighbourhood Plan is being prepared then it is considered appropriate that a review of the settlement boundary is undertaken as part of that review. A methodology for undertaking a boundary review, which is available to Neighbourhood Plan groups to use, is set out in the Settlement Boundaries Background Paper (May 2024).

### Action:

No change in response to this representation.

## 3912

## Object

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Loxwood (Mellow) Ltd

**Agent:** Ms Megan Smith

## Support

### Summary of representations:

Recognise function of Southbourne as a Settlement Hub and support settlement boundaries as a means of directing development to sustainable locations.

Agree development in the "Rest of the Plan Area" should be restricted as set out in Local Plan Policy S2.

### Summary of representation changes to plan:

Recognise function of Southbourne as a Settlement Hub and support settlement boundaries as a means of directing development to sustainable locations.

Agree development in the "Rest of the Plan Area" should be restricted as set out in Local Plan Policy S2.

### Response:

Noted.

### Action:

No change in response to representation.

3947

Support

**Document Element:** Policy S2 Settlement Hierarchy**Respondent:** Southbourne Parish Council

## Object

**Summary of representations:**

Outside of settlement boundaries development is restricted to that which requires a countryside location. However, much of the proposed development has been allocated to locations outside the settlement boundaries where there is no evidence of an essential local rural need, whilst being in the countryside.

**Summary of representation changes to plan:**

Scale of the development proposed should be reduced to reflect no longer a requirement to meet mandatory target numbers set by government.

Some 80% of the district falls within AONB and National Park landscape, which is protected against development. Suggests CDC would be justified in further reducing the government allocated figure for housing by a proportionate amount

**Response:**

Environmental and infrastructure constraints, and whether they can be mitigated, have been considered in determining whether a figure less than the standard method can be justified.

A revised NPPF was published in December 2023. The NPPF contains transitional arrangements whereby Local Plans that have reached Regulation 19 stage before 19 March 2024 will be examined under the relevant previous version of the NPPF. These transitional arrangements, therefore, apply to the Chichester Local Plan as it reached Regulation 19 stage in January 2023

**Action:**

No change in response to representation

4044

Object

**Document Element:** Policy S2 Settlement Hierarchy**Respondent:** Bosham Parish Council

## Support

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### Summary of representations:

Support Spatial Strategy and focus of majority of growth at Chichester City.

### Summary of representation changes to plan:

Support Spatial Strategy and focus of majority of growth at Chichester City.

### Response:

Noted.

### Action:

No change in response to this representation

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4084

Support

---

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Berkeley Strategic Group

## Object

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### Summary of representations:

Redefine the service village criteria. Chidham and Hambrook should not be service villages.

### Summary of representation changes to plan:

Redefine the service village criteria.

### Response:

The Council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities. The Settlement Hierarchy Update Background Paper (May 2024) concludes that Chidham and Hambrook has the range of services and facilities to be classified as a service village.

### Action:

No change in response to this representation.

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4119

Object

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**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Mrs Jane Towers

## Object

### Summary of representations:

Nutbourne and Hambrook do not have good access to local facilities and are therefore not the right locations for 300 houses.

### Summary of representation changes to plan:

Reduce the number of houses.

### Response:

The Council's updated facilities research in the Settlement Hierarchy Update Background Paper (May 2024) concludes that Chidham and Hambrook has the range of services and facilities to be classified as a service village and is a sustainable location for development over the plan period.

### Action:

No change in response to this representation

## 4193

## Object

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Chidham and Hambrook Parish Council

## Support

### Summary of representations:

Support Spatial Strategy and focus of majority of growth at Chichester City.

### Summary of representation changes to plan:

Support Spatial Strategy and focus of majority of growth at Chichester City.

### Response:

Noted.

### Action:

No change in response to this representation

## 4242

## Support

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Mr David Lock and Ms Melanie Jenkins

**Agent:** Mr Jonathan Lambert

## Object

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### Summary of representations:

Further explanation or clarification about what is included or meant by wording of the three points under settlement boundaries section is needed.

For example, what is to be included in identifying setting, form and character, and what is meant by 'good accessibility'.

### Summary of representation changes to plan:

Amend supporting text to clarify points identified.

### Response:

As this section of the policy should be read alongside the place making, natural environment and transport policies the amendment suggested by the respondent is considered unnecessary.

### Action:

No change in response to this representation

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4270

Object

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**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

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### Summary of representations:

Support statement and policy relating to settlement boundaries.

### Summary of representation changes to plan:

Support statement and policy relating to settlement boundaries.

### Response:

Noted.

### Action:

No change in response to this representation

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4467

Support

---

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

Chichester Marina should be considered as being part of Birdham service village, or its own service village.

Opportunity to provide residential development is important to the long term future of Chichester Marina.

### Summary of representation changes to plan:

Chichester Marina should be considered as being part of Birdham service village, or its own service village.

Opportunity to provide residential development is important to the long term future of Chichester Marina.

### Response:

The Marina does not have the range of local facilities in its own right to be classified as a service village.

Development to support the marina, including non-boat related uses, would be considered against Policy NE12 (Development around the Coast).

### Action:

No change in response to this representation

## 4610

## Object

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

## Support

### Summary of representations:

The inclusion of East Wittering/Bracklesham as a Settlement Hub is supported.

### Summary of representation changes to plan:

The inclusion of East Wittering/Bracklesham as a Settlement Hub is supported.

### Response:

Noted.

### Action:

No change in response to this representation

## 4712

## Support

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Welbeck Strategic Land IV LLP

**Agent:** Mrs Sarah Hufford



## Support

### Summary of representations:

Support classification of Southbourne as a settlement hub, reflective of the settlement size, number of key services and facilities and with good access to regional road network and public transport.

### Summary of representation changes to plan:

Support classification of Southbourne as a settlement hub, reflective of the settlement size, number of key services and facilities and with good access to regional road network and public transport.

### Response:

Noted.

### Action:

No change in response to this representation

4771

Support

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Seaward Strategic Land Ltd and Owners of Land on Cooks Lane, Southbourne

**Agent:** Luken Beck MDP Ltd

## Support

### Summary of representations:

Support classification of Southbourne as a settlement hub, reflective of the settlement size, number of key services and facilities and with good access to regional road network and public transport.

### Summary of representation changes to plan:

Support classification of Southbourne as a settlement hub, reflective of the settlement size, number of key services and facilities and with good access to regional road network and public transport.

### Response:

Noted.

### Action:

No change in response to this representation

4791

Support

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Seaward Strategic Land Ltd and Owners of Land on Penny Lane, Hermitage

**Agent:** Luken Beck MDP Ltd

## Object

### Summary of representations:

NPPF paragraph 79 encourages housing delivery where it will enhance or maintain the vitality of rural communities. The Local Plan must acknowledge this and the importance of maintaining existing services within settlements such as Birdham.

### Summary of representation changes to plan:

NPPF paragraph 79 encourages housing delivery where it will enhance or maintain the vitality of rural communities. The Local Plan must acknowledge this and the importance of maintaining existing services within settlements such as Birdham.

### Response:

Noted. Development that supports services in the identified Service Villages will be supported where this is consistent with the development strategy.

### Action:

No change in response to this representation

4884

Object

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Mr Graham Pick

**Agent:** Batcheller Monkhouse

## Support

### Summary of representations:

Support inclusion of Hambrook and Nutbourne as a service village.

### Summary of representation changes to plan:

Support inclusion of Hambrook and Nutbourne as a service village.

### Response:

Noted.

### Action:

No change in response to this representation

4898

Support

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Gleeson Land

## Object

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### Summary of representations:

In principle, support approach in seeking to focus development towards the most sustainable towns and villages capable of accommodating new growth opportunities.

Support identification of Birdham as a 'Service Village' but concerned over amount of growth allocated to Birdham and Service Villages in general. Development should be encouraged which will enhance their roles through the provision of housing, employment, retail and other key services opportunities via allocations.

### Summary of representation changes to plan:

In principle, support approach in seeking to focus development towards the most sustainable towns and villages capable of accommodating new growth opportunities.

Support identification of Birdham as a 'Service Village' but concerned over amount of growth allocated to Birdham and Service Villages in general. Development should be encouraged which will enhance their roles through the provision of housing, employment, retail and other key services opportunities via allocations.

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (July 2024).

Development that supports services in the identified Service Villages will be supported where this is consistent with the development strategy.

### Action:

No change in response to this representation

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**4905****Object**

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Gladman Developments Ltd

## Object

### Summary of representations:

The North Mundham/Runcton settlement policy boundary is out of date and last revised in the 2015 Local Plan. The boundary should be reviewed as part of the current Local Plan Review

### Summary of representation changes to plan:

The wording of S2 should be revised to better reflect the methodology for settlement policy boundary reviews in the settlement policy boundary background paper.

Amend 1st sentence of section on settlement boundaries in Policy S2 to read:

There is a presumption in favour of sustainable development within the settlement boundaries which will be reviewed through the preparation of the 2021-2039 Local Plan and/or neighbourhood plans,. Boundaries may be redrawn to include the whole curtilage of homes and other buildings and land where they relate well to the existing built-up area reflecting the following general approach: ....'

The settlement policy boundary of North Mundham/Runcton should also be redrawn to include recent implemented consents and land to the east of Pigeon House Farm on the south side of the village.

### Response:

As a methodology for settlement boundary reviews is set out in the Settlement Boundaries Background Paper (May 2024) and it is not considered necessary to repeat elements of it in Policy S2.

### Action:

No change in response to this representation

5017

Object

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Mr Alan Hutchings

**Agent:** Smith Simmons Partners

## Support

### Summary of representations:

Agree that Plaistow & Ifold has been properly identified as a service village in the settlement hierarchy.

### Summary of representation changes to plan:

Agree that Plaistow & Ifold has been properly identified as a service village in the settlement hierarchy.

### Response:

Noted.

### Action:

No change in response to this representation.

5019

Support

**Document Element:** Policy S2 Settlement Hierarchy**Respondent:** Domusea**Agent:** Smith Simmons Partners

## Object

**Summary of representations:**

Settlement Hierarchy background paper has not been updated but still provides justification for the Local Plan hierarchy.

Disagree with classification of Sidlesham in hierarchy in 'rest of plan area' and believe it should be included as a 'service village' based on its population and range of available facilities.

A modest amount of development would support its existing facilities and not lead to critical impacts on the A27 as travel impacts would not necessarily be attracted towards Chichester.

**Summary of representation changes to plan:**

Sidlesham should be included as a 'service village' in the settlement hierarchy of S2. The description of Sidlesham should recognise that this includes Highleigh.

**Response:**

In addition to the availability of certain services and facilities to be identified in the settlement hierarchy a settlement also needs to have a pattern of development that would generally allow for a well-defined built up area to be identified rather than a dispersed settlement form with facilities spread apart.

**Action:**

No change in response to this representation.

5023

Object

**Document Element:** Policy S2 Settlement Hierarchy**Respondent:** Greenwood Group Ltd**Agent:** Smith Simmons Partners

## Object

### Summary of representations:

Settlement Hierarchy background paper has not been updated but still provides justification for the Local Plan hierarchy. Agree prioritising development in accordance with the settlement hierarchy is reasonable. Nor is there any justification or explanation for the change in the quantum of strategic and non-strategic housing to the different categories of settlement in the background paper or the Local Plan itself.

### Summary of representation changes to plan:

Settlement Hierarchy background paper has not been updated but still provides justification for the Local Plan hierarchy. Agree prioritising development in accordance with the settlement hierarchy is reasonable. Nor is there any justification or explanation for the change in the quantum of strategic and non-strategic housing to the different categories of settlement in the background paper or the Local Plan itself.

### Response:

The Housing Distribution Background Paper (July 2024) explains the development of the proposed distribution of housing and the split between strategic and non-strategic provision. The SA report (January 2023, Section 7, sets out the Council's reasoning for the preferred growth strategy having considered reasonable alternatives. The Settlement Hierarchy Background Paper has been updated (May 2024).

### Action:

No change in response to this representation.

**5027****Object**

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Hanbury Properties

**Agent:** Smith Simmons Partners

## Object

### Summary of representations:

Settlement Hierarchy background paper has not been updated but still provides justification for the Local Plan hierarchy. Agree prioritising development in accordance with the settlement hierarchy is reasonable. Nor is there any justification or explanation for the change in the quantum of strategic and non-strategic housing to the different categories of settlement in the background paper or the Local Plan itself.

### Summary of representation changes to plan:

Settlement Hierarchy background paper has not been updated but still provides justification for the Local Plan hierarchy. Agree prioritising development in accordance with the settlement hierarchy is reasonable. Nor is there any justification or explanation for the change in the quantum of strategic and non-strategic housing to the different categories of settlement in the background paper or the Local Plan itself.

### Response:

The Housing Distribution Background Paper (July 2024) explains the development of the proposed distribution of housing and the split between strategic and non-strategic provision. The SA report (January 2023, Section 7, sets out the Council's reasoning for the preferred growth strategy having considered reasonable alternatives. The Settlement Hierarchy Background Paper has been updated (May 2024).

### Action:

No change in response to this representation.

5032

Object

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Northgate Properties Ltd

**Agent:** Smith Simmons Partners

Object

**Summary of representations:**

Settlement Hierarchy background paper has not been updated but still provides justification for the Local Plan hierarchy. Agree prioritising development in accordance with the settlement hierarchy is reasonable. Nor is there any justification or explanation for the change in the quantum of strategic and non-strategic housing to the different categories of settlement in the background paper or the Local Plan itself.

Loxwood allocation could still be considered an under provision of development for the NE part of the district as a whole. Given capacity constraints for development in the south part of the district, the NE sub region could have played a more significant role in helping rebalance the development needs of the district with a more equal split between the north and south areas.

**Summary of representation changes to plan:**

Given the capacity constraints for development in the south part of the district, the NE sub region could play a more significant role in helping rebalance the development needs of the district with a more equal split between the north and south areas. This should be given further consideration.

**Response:**

The Housing Distribution Background Paper (July 2024) explains the development of the proposed distribution of housing and the split between strategic and non-strategic provision. The SA report (January 2023, Section 7, sets out the Council's reasoning for the preferred growth strategy having considered reasonable alternatives. The Settlement Hierarchy Background Paper has been updated (May 2024)

**Action:**

No change in response to this representation.

5105

Object

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Seaward Properties Ltd

**Agent:** Smith Simmons Partners

## Object

### Summary of representations:

Generally supportive of approach to new residential development in the North East of Plan Area but Wisborough Green Settlement boundary should be amended.

### Summary of representation changes to plan:

Amend Wisborough Green Settlement boundary to reflect Neighbourhood Plan Allocations that have now been completed.

### Response:

Where a Neighbourhood Plan is being prepared then it is considered appropriate that a review of the settlement boundary is undertaken as part of that review or a subsequent Development Plan Document following adoption of the new Local Plan.

### Action:

No change in response to this representation

5127

Object

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Runnymede Homes Ltd

**Agent:** Henry Adams LLP

## Support

### Summary of representations:

Policy is positively prepared and justified, and consistent with national policy promoting sustainable patterns of development.

### Summary of representation changes to plan:

Policy is positively prepared and justified, and consistent with national policy promoting sustainable patterns of development.

### Response:

Noted.

### Action:

No change in response to this representation

5235

Support

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Hallam Land Management Limited

**Agent:** LRM Planning



## Object

### Summary of representations:

Function of each settlement tier in guiding development not explicit in policy wording.

Welcome spatial depiction set out in key diagram. Agree with Councils' stance on development within settlement boundaries and that settlement boundaries must respect setting form and character of settlement.

### Summary of representation changes to plan:

1. Amend first sentence to read: 'while sustaining the vitality of communities the location of settlements identified in table are shown on the key diagram'.

Replace second sentence with 'Each category within the settlement hierarchy contributes towards future growth in the plan area, with the largest levels of growth directed towards the sub-regional centre, settlement hubs outside the Manhood Peninsula and service villages located on the Key Diagram'.

Amend policy to make clear what quantum of development is envisaged (allocation or windfall) at each tier.

2. Remove capitalisation of 'rest' in first line of final paragraph.

### Response:

1. As Policy S1 sets out the expected scale/type of development in each settlement tier the amendments suggest by the respondent are considered unnecessary.

2. Agree with respondent's suggested amendment

### Action:

See council suggested modification CM047

5368

Object

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

Support settlement hierarchy, particularly in connection with Selsey but surprising more housing sites not allocated within and around Selsey.

Unlikely due to potential environmental constraints sites of any excessive size would come forward and large numbers of dwellings would not necessarily result once environmental constraints of sites are taken into account. Non-strategic sites, proportionate to size of settlement can have an important part to play in the delivery of sufficient housing numbers in the right location at the right time in accordance with the NPPF.

### Summary of representation changes to plan:

Support settlement hierarchy, particularly in connection with Selsey but surprising more housing sites not allocated within and around Selsey.

Unlikely due to potential environmental constraints sites of any excessive size would come forward and large numbers of dwellings would not necessarily result once environmental constraints of sites are taken into account. Non-strategic sites, proportionate to size of settlement can have an important part to play in the delivery of sufficient housing numbers in the right location at the right time in accordance with the NPPF.

### Response:

Consideration has been given to the making of a strategic allocation at Selsey and the Preferred Approach Local Plan did propose a strategic allocation for 250 dwellings. However, updated flood risk evidence indicated that under certain climate change scenarios there was the potential for the B2145 between Selsey and Chichester to be affected by flooding, giving rise to being able to demonstrate that a safe access/egress could be achieved. As alternative locations not affected by flood risk and consistent with the proposed spatial strategy were available, no allocations are made in Selsey.

### Action:

No change in response to this representation

5369

Object

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Deerhyde Limited

**Agent:** Vail Williams LLP

## Object

### Summary of representations:

Support approach that development requirements for service villages will be delivered through site allocations and windfall development. However, to be genuinely plan-led clear need to provide small to medium site allocations within service villages. Particularly in the service village of Wisborough Green where a housing number of 75 dwellings has been identified.

### Summary of representation changes to plan:

Support approach that development requirements for service villages will be delivered through site allocations and windfall development. However, to be genuinely plan-led clear need to provide small to medium site allocations within service villages. Particularly in the service village of Wisborough Green where a housing number of 75 dwellings has been identified.

### Response:

As set out in Policy H3, the approach taken in the Local Plan is for suitable sites to deliver the Parish housing number to be identified through a Neighbourhood Plan or, in the event that this does not progress, a DPD.

### Action:

No change in response to this representation

5406

Object

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Landowner at Champions Farm, Wisborough Green

**Agent:** Southern Planning Practice

## Object

### Summary of representations:

Fishbourne settlement boundary should be amended to include site at Fourways, Clay Lane. It would allow development to come forward without need for formal allocation. Consider objectives set out in Policy S2 for amendments to the Settlement Boundary would be met in this case.

### Summary of representation changes to plan:

Amend Fishbourne settlement boundary to include submitted site.

### Response:

Where a Neighbourhood Plan is being prepared then it is considered appropriate that a review of the settlement boundary is undertaken as part of that review.

### Action:

No change in response to this representation

5412

Object

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Mr and Miss . Butterfield and Waldron

**Agent:** Rodway Planning Consultancy Ltd

## Object

### Summary of representations:

Settlement Boundaries should be left to the determination of Parish Councils to make and nobody else. The proposed policy outlined in the Local Plan to allow development on plots of land adjacent to existing settlement boundaries is ill-conceived and will lead to coalescence which is in contradiction of Policy NE3

### Summary of representation changes to plan:

Settlement Boundaries should be left to the determination of Parish Councils to make and nobody else. The proposed policy outlined in the Local Plan to allow development on plots of land adjacent to existing settlement boundaries is ill-conceived and will lead to coalescence which is in contradiction of Policy NE3

### Response:

The circumstances when a settlement boundary will be reviewed are set out in the Settlement Boundaries Background Paper (May 2024).

Where there are insufficient suitable sites within a settlement boundary to meet the housing or employment numbers proposed then it is necessary for sites adjoining the settlement boundary to be considered for allocation.

### Action:

No change in response to this representation

5437

Object

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Mayday! Action Group

## Support

### Summary of representations:

Settlement hierarchy clearly reflects service availability and potential self-containment of the settlements e.g. settlement hubs include secondary schools, which are major peak trip generating uses. Service villages, in the main, also benefit from bus services running at least hourly, so level of development to meet local needs in this tier is relatively sustainable.

Quite broad range of service village settlements and to north of National Park concern that, service villages have no realistic public transport choice.

### Summary of representation changes to plan:

Settlement hierarchy clearly reflects service availability and potential self-containment of the settlements e.g. settlement hubs include secondary schools, which are major peak trip generating uses. Service villages, in the main, also benefit from bus services running at least hourly, so level of development to meet local needs in this tier is relatively sustainable.

Quite broad range of service village settlements and to north of National Park concern that, service villages have no realistic public transport choice.

### Response:

Noted.

### Action:

No change in response to this representation.

5532

Support

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Stagecoach South

Support

**Summary of representations:**

Support the identification of a need for development in Service Villages in the north part of the plan area and considers that there is opportunity for CDC to allocate further homes within the northern area to accommodate their entire housing need.

**Summary of representation changes to plan:**

Support the identification of a need for development in Service Villages in the north part of the plan area and considers that there is opportunity for CDC to allocate further homes within the northern area to accommodate their entire housing need.

**Response:**

Noted.

**Action:**

No change in response to this representation.

5552

Support

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Millwood Designer Homes

**Agent:** Savills

## Object

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**Summary of representations:**

South Mundham is in close proximity to service village of North Mundham/Runcton. Whilst South Mundham does not contain any services, development in the hamlet would enable sustainable growth to support facilities in North Mundham and Runcton.

Development outside settlements listed in policy is restricted to proposals which meet certain criteria. Have number of smaller land holdings in Tangmere, Oving, South Mundham, Birdham, Chidham and Sidlesham, which may be suitable for conversion for residential use or via windfall housing.

**Summary of representation changes to plan:**

South Mundham should be considered as part of North Mundham as a Service Village.

**Response:**

As South Mundham does not possess any services and is some distance from either North Mundham or Runcton it is not considered appropriate to be considered a service village.

**Action:**

No change in response to this representation.

---

**5696****Object**

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**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Church Commissioners for England

**Agent:** Lichfields

## Policy S2 Settlement Hierarchy

### Object

#### Summary of representations:

No definition in Policy or supporting text of what each tier of hierarchy actually means; no reference to an evidence base used to justify the Policy.

#### Summary of representation changes to plan:

No definition in Policy or supporting text of what each tier of hierarchy actually means; no reference to an evidence base used to justify the Policy.

#### Response:

Policy S1 sets out the expected scale/type of development in each settlement tier. The Council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (May 2024).

#### Action:

No change in response to this representation.

5828

Object

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

### Support

#### Summary of representations:

Support in principle

#### Summary of representation changes to plan:

Support in principle

#### Response:

Comments noted

#### Action:

No change in response to this representation.

6100

Support

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Dr Carolyn Cobbold

## Object

### Summary of representations:

Ambition to support landscape quality in the North of the Plan Area is undermined by identifying all the settlements as 'Service Villages'.

Risk smaller villages being treated as larger 'Service Villages' in time, losing their character and settlement hierarchy within this area.

Compared to Fishbourne, Boxgrove, and Westhampnett, Wisborough Green is an isolated exceptionally rural village; however, compared to Ifold, Wisborough Green is akin to a 'Service Village'.

### Summary of representation changes to plan:

Smaller villages should be reclassified as "Rest of Plan Area".

### Response:

The Council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities. The Settlement Hierarchy Background Paper (May 2024) concludes that Plaistow and Ifold has the range of services and facilities to be classified as a service village.

Any development proposal will be subject to the requirements of the Local Plan strategic natural environment and place making policies.

### Action:

No change in response to this representation.

6147

Object

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Plaistow and Ifold Parish Council

Support

### Summary of representations:

Support in principle

### Summary of representation changes to plan:

Support in principle

### Response:

Noted.

### Action:

No change in response to this representation

6150

Support

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited



## Support

### Summary of representations:

Supportive of Settlement Hierarchy and approach taken to new residential development. Support Wisborough Green being categorised as a Service Village

### Summary of representation changes to plan:

Supportive of Settlement Hierarchy and approach taken to new residential development. Support Wisborough Green being categorised as a Service Village

### Response:

Noted.

### Action:

No change in response to this representation

6174

Support

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Runnymede Homes Ltd

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

Questions WG's designation as a Service Village.

### Summary of representation changes to plan:

Questions WG's designation as a Service Village.

### Response:

The Council's updated facilities research in the Settlement Hierarchy Update Background Paper (May 2024) concludes that Wisborough Green has the range of services and facilities to be classified as a service village.

### Action:

No change in response to this representation

6210

Object

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Wisborough Green Parish Council

## Support

---

**Summary of representations:**

Support identification of Birdham as a Service Village, which recognises the range of services available.

**Summary of representation changes to plan:**

Support identification of Birdham as a Service Village, which recognises the range of services available.

**Response:**

Noted.

**Action:**

No change in response to this representation

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6237

Support

---

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** Mr Graham Pick

**Agent:** Batcheller Monkhouse

## Support

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**Summary of representations:**

Generally support policy.

**Summary of representation changes to plan:**

Generally support policy.

**Response:**

Noted.

**Action:**

No change in response to this representation

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6282

Support

---

**Document Element:** Policy S2 Settlement Hierarchy

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Background, 4.1

## Object

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### Summary of representations:

More must be done to promote renewable energy in new developments but not at expense of wildlife

### Summary of representation changes to plan:

No change

### Response:

The policy requires any development proposal for renewable energy to demonstrate no significant adverse impact upon ecology and wildlife

### Action:

No change

3776

Object

---

Document Element: Background, 4.1

Respondent: Mr Edward Bowring

## Support

---

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

6236

Support

---

Document Element: Background, 4.1

Respondent: Mr Edward Bowring

## Background, 4.2

Support

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### Summary of representations:

█ Favour renewable energy measures along E-W corridor within 25-year time frame.

### Summary of representation changes to plan:

█ N/A

### Response:

█ Support and comment noted

### Action:

█ No change

4337

Support

---

Document Element: Background, 4.2

Respondent: Chichester Harbour Conservancy

## Policy NE1 Stand-alone Renewable Energy

Support

---

### Summary of representations:

█ Support

### Summary of representation changes to plan:

█ N/A

### Response:

█ Support noted

### Action:

█ No change

3777

Support

---

Document Element: Policy NE1 Stand-alone Renewable Energy

Respondent: Mr Edward Bowring

## Object

---

### Summary of representations:

Seek that policy clarifies "unacceptable visual intrusion".

### Summary of representation changes to plan:

No change

### Response:

Development proposals will vary in terms of their impact including whether they amount to an unacceptable visual intrusion. This consideration along with the other factors detailed in the policy criterion will be determined at the planning application stage on a site-by-site basis

### Action:

No change

---

3798

Object

---

**Document Element:** Policy NE1 Stand-alone Renewable Energy

**Respondent:** Mr Andrew Gould

## Object

---

### Summary of representations:

Provided sites are able to be returned to former use, should encourage renewables as much as possible

### Summary of representation changes to plan:

As per rep summary

### Response:

Comment noted and change made in supporting text recognising that development sites could be returned to original use if renewable technology no longer required

### Action:

See Council's suggested Modification CM048.

---

4396

Object

---

**Document Element:** Policy NE1 Stand-alone Renewable Energy

**Respondent:** Chichester Harbour Conservancy

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

---

4740

Support

**Document Element:** Policy NE1 Stand-alone Renewable Energy

**Respondent:** Environment Agency

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

None

**Action:**

No change

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4987

Support

**Document Element:** Policy NE1 Stand-alone Renewable Energy

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Object

---

### Summary of representations:

Request reference to views in and out of SDNP

### Summary of representation changes to plan:

As per rep summary

### Response:

Reference to views into and from South Downs National Park as well as the Chichester Harbour AONB will be incorporated into criterion 1 of the policy

### Action:

See Council's suggested Modification CM049.

---

5136

Object

---

**Document Element:** Policy NE1 Stand-alone Renewable Energy

**Respondent:** South Downs National Park Authority

## Support

---

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

---

5167

Support

---

**Document Element:** Policy NE1 Stand-alone Renewable Energy

**Respondent:** John Newman

## Object

### Summary of representations:

Object: Net zero by 2050 requires development of large-scale renewables to be addressed in plan to meet NPPF. No evidence base considering renewable energy production - cites South Gloucestershire's Renewable Energy Resource Assessment Study. No evidence on how renewable energy intersects with other draft land use policies. Large-scale PV production supported by DNO at South Mundham pre-app yet CDC climate report states lack of grid capacity for large-scale. Seek policy reference to renewables and low carbon energy including "heat" as well as Battery Energy Storage Systems to support PV installations; district heat networks in largescale dev; green hydrogen as fuel alternative. Seek reference to Council considering whether benefits of scheme outweigh harm.

### Summary of representation changes to plan:

NE1 Standalone Renewable and low carbon energy (including heat) revised policy wording in attached submission written representation document. Proposed wording includes a requirement to identify the increase in renewable energy required to meet net zero by the end of the plan period, and support for battery energy storage systems and green hydrogen.

### Response:

The policy is supportive of renewable energy schemes. The Council's plan and progress made with renewable energy generation is reported in the Climate Emergency Detailed Action Plan and its Annual Progress Report, both of which have been added to the evidence base on the Council's website and reference will be made within the supporting text. West Sussex County Council's Climate Change Annual Report also details the collaborative working of the District Councils with the County Council in relation to climate action.

Policy I1 Infrastructure Provision seeks to safeguard the requirements of infrastructure providers including renewable energy whilst Policy P9 The Historic Environment makes provision for the use of renewable generation.

Heat is included within the glossary definition of renewable and low carbon energy that accompanies the NPPF.

### Action:

See Council's suggested Modification CM048.

5354

Object

**Document Element:** Policy NE1 Stand-alone Renewable Energy

**Respondent:** Landlink Estates Ltd

**Agent:** Jackson Planning Ltd

## Object

### Summary of representations:

Questions ability to provide new and enhanced habitats where development sites have no open space

### Summary of representation changes to plan:

N/A

### Response:

Comment noted. Whilst the policy requires development proposals to take opportunities available to provide for such habitats, NE1 is strengthened in relation to providing for Biodiversity Net Gain/environmental benefits.

### Action:

See Council's suggested Modification CM050.



5445

Object

**Document Element:** Policy NE1 Stand-alone Renewable Energy

**Respondent:** Mayday! Action Group

Support

**Summary of representations:**

but need to be appropriate in their scale and location.

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted

**Action:**

No change

5790

Support

**Document Element:** Policy NE1 Stand-alone Renewable Energy

**Respondent:** Natural England

Support

**Summary of representations:**

Support.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

6057

Support

**Document Element:** Policy NE1 Stand-alone Renewable Energy

**Respondent:** Mr Andrew Gould

## Support

---

### Summary of representations:

Favour renewable energy measures along E-W corridor within 25-year time frame.

### Summary of representation changes to plan:

N/A

### Response:

Support and comment noted

### Action:

No change

---

6082

Support

**Document Element:** Policy NE1 Stand-alone Renewable Energy

**Respondent:** Chichester Harbour Conservancy

## Background, 4.7

## Object

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### Summary of representations:

At 4.7, incorrect reference to CHC Chichester Harbour AONB MP; 4.9 needs to acknowledge character and setting of protected landscape.

### Summary of representation changes to plan:

As per rep summary.

### Response:

Suggested change to reference to the AONB Management Plan agreed. Amendment also proposed in relation to paragraph 4.9 to include reference to character and setting of AONB.

### Action:

See Council's suggested Modifications CM051 and CM054.

---

4340

Object

**Document Element:** Background, 4.7

**Respondent:** Chichester Harbour Conservancy

## Object

### Summary of representations:

At 4.7, incorrect reference to CHC Chichester Harbour AONB MP; 4.9 needs to acknowledge character and setting of protected landscape.

### Summary of representation changes to plan:

As per rep summary.

### Response:

Suggested change to reference to the AONB Management Plan agreed. Amendment also proposed in relation to paragraph 4.9 to include reference to character and setting of AONB.

### Action:

See Council's suggested Modifications CM051 and CM054.

4398

Object

**Document Element:** Background, 4.7

**Respondent:** Chichester Harbour Conservancy

## Background, 4.8

## Object

### Summary of representations:

Threshold of 20 hectares too low. Stipulations insufficiently clear to prevent coalescence of settlements. Strategic allocations such as A11 breach point 4 which requires development of poorer quality agricultural land to be fully considered in preference to BMV land. A11 in contradiction with Plan, should be removed

### Summary of representation changes to plan:

The Highgrove site at policy A11 needs to be removed from the local plan as it contradicts the statement in paragraph 4.8.

### Response:

The threshold of 20 hectares follows the requirements of Natural England's Guidance on assessing development proposals on agricultural land and as referred to at paragraph 001 of the National Planning Practice Guidance: Natural Environment. Policy NE3 Landscape Gaps Between Settlements seeks to prevent coalescence of settlements. The Sustainability Appraisal considers the loss of best and most versatile land

### Action:

No change

3813

Object

**Document Element:** Background, 4.8

**Respondent:** The Bosham Association

## Object

### Summary of representations:

Threshold of 20 hectares too low. Stipulations insufficiently clear to prevent coalescence of settlements. Strategic allocations such as A11 breach point 4 which requires development of poorer quality agricultural land to be fully considered in preference to BMV land. A11 in contradiction with Plan, should be removed

### Summary of representation changes to plan:

Policy A11 should be removed from the plan. Other policy sites that are agricultural land that has been in production should be removed from the plan

### Response:

The threshold of 20 hectares follows the requirements of Natural England's Guidance on assessing development proposals on agricultural land and as referred to at paragraph 001 of the National Planning Practice Guidance: Natural Environment. Policy NE3 Landscape Gaps Between Settlements seeks to prevent coalescence of settlements. The Sustainability Appraisal considers the loss of best and most versatile land

### Action:

No change

3858

Object

**Document Element:** Background, 4.8

**Respondent:** The Bosham Association

## Support

### Summary of representations:

Support although policy at odds with delivery of housing on greenfield. Welcome inclusion of para 4.9.

### Summary of representation changes to plan:

N/A

### Response:

Support and comment noted

### Action:

No change

4110

Support

**Document Element:** Background, 4.8

**Respondent:** Chichester Harbour Trust

## Support

---

**Summary of representations:**

Support although land identified in HELAA for development is good grade agricultural land. Not possible for allocation under A12 for remaining housing not to use this.

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted

**Action:**

No change

---

4192

Support

**Document Element:** Background, 4.8

**Respondent:** Chidham and Hambrook Parish Council

## Support

---

**Summary of representations:**

although 4.8 conflicts with A11.

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted

**Action:**

No change

---

4368

Support

**Document Element:** Background, 4.8

**Respondent:** Chichester Harbour Conservancy

## Background, 4.9

Support

---

**Summary of representations:**

■ although policy at odds with delivery of housing on greenfield. Welcome inclusion of para 4.9.

**Summary of representation changes to plan:**

■ N/A

**Response:**

■ Support and comment noted

**Action:**

■ No change

4111

Support

---

**Document Element:** Background, 4.9

**Respondent:** Chichester Harbour Trust

Support

---

**Summary of representations:**

■ although 4.8 conflicts with A11.

**Summary of representation changes to plan:**

■ N/A

**Response:**

■ Support and comment noted

**Action:**

■ No change

4369

Support

---

**Document Element:** Background, 4.9

**Respondent:** Chichester Harbour Conservancy

## Object

### Summary of representations:

At 4.7, incorrect reference to CHC Chichester Harbour AONB MP; 4.9 needs to acknowledge character and setting of protected landscape.

### Summary of representation changes to plan:

As per rep summary.

### Response:

Suggested change to reference to the AONB Management Plan agreed. Amendment also proposed in relation to paragraph 4.9 to include reference to character and setting of AONB.

### Action:

See Council's suggested Modifications CM051 and CM054.

6080

Object

**Document Element:** Background, 4.9

**Respondent:** Chichester Harbour Conservancy

## Policy NE2 Natural Landscape

## Object

### Summary of representations:

Threshold of 20 hectares too low. Stipulations insufficiently clear to prevent coalescence of settlements. Strategic allocations such as A11 breach point 4 which requires development of poorer quality agricultural land to be fully considered in preference to BMV land. A11 in contradiction with Plan, should be removed

### Summary of representation changes to plan:

The site proposed at Policy A11 needs to be removed from the plan.

Issue raised previously

Bosham Association has raised objections through the planning portal and at the planning hearing to site A11. They have also commented previously during the local plan consultation

### Response:

The threshold of 20 hectares follows the requirements of Natural England's Guidance on assessing development proposals on agricultural land and as referred to at paragraph 001 of the National Planning Practice Guidance: Natural Environment. Policy NE3 Landscape Gaps Between Settlements seeks to prevent coalescence of settlements. The Sustainability Appraisal considers the loss of best and most versatile land

### Action:

No change

3814

Object

**Document Element:** Policy NE2 Natural Landscape

**Respondent:** The Bosham Association

## Object

---

### Summary of representations:

No reference to Landscape Capacity Study, areas of medium/low capacity should be avoided.

### Summary of representation changes to plan:

As a results of the conclusions in the Landscape Capacity Study of Sub-area 91 between Bosham and Fishbourne, the proposed allocations should avoid areas of medium / low capacity, which are constrained by its rural character

### Response:

The Landscape Capacity Study which informed the preparation of the Local Plan is referred to at paragraph 4.7 of the policy background text

### Action:

No change

---

## 4045

## Object

---

**Document Element:** Policy NE2 Natural Landscape

**Respondent:** Bosham Parish Council

## Support

---

### Summary of representations:

although policy at odds with delivery of housing on greenfield. Welcome inclusion of para 4.9.

### Summary of representation changes to plan:

N/A

### Response:

Support and comment noted

### Action:

No change

---

## 4112

## Support

---

**Document Element:** Policy NE2 Natural Landscape

**Respondent:** Chichester Harbour Trust



## Object

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**Summary of representations:**

Development should not be permitted in areas where important views will be lost or degraded.

**Summary of representation changes to plan:**

Introduce policy protection for key views.

**Response:**

Criterion 1 requires that it is demonstrated that there is no adverse impact on the openness of views

**Action:**

No change

---

4288

Object

---

**Document Element:** Policy NE2 Natural Landscape

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

---

4492

Support

---

**Document Element:** Policy NE2 Natural Landscape

**Respondent:** Portsmouth Water Ltd

# Object

## Summary of representations:

Re-title policy 'NE2 Landscape'; Point 3 – change to “maintain the distinctive character of settlements” – links policy to evidence base. New criteria 6 “Development proposals within setting of SDNP should recognise its status as a landscape of the highest quality and should be landscape-led in their design; sensitively located and designed to reflect this with scale and extent of development limited and designed to avoid or minimise adverse effects upon NP and its Purposes. Proposals must comply with SDLP and MP which are material planning considerations. Penultimate para – define “identified character schemes”. Suggest all apps supported by LVIA or LVA. Policy doesn't ref key perceptual qualities, highly valued aspects of landscape (NPPF 174). Suggest dark night skies and tranquillity referenced (NE21 fails to provide equal weight to lighting between two protected landscapes).

## Summary of representation changes to plan:

Re-title policy 'NE2 Landscape';

Amend criteria #3 to 'Development proposals maintain the [insert distinctive character] of settlements and...' to ensure policy links to evidence base;

Addition of criteria #6 to state 'Development proposals within the setting of the South Downs National Park should recognise its status as a landscape of the highest quality and should be landscape-led in their design; sensitively located and designed to reflect this with scale and extent of development limited and designed to avoid or minimise adverse effects upon the National Park and its Purposes. Proposals must comply with the South Downs Local Plan and Management Plan which are material planning considerations';

Suggest all applications are supported by either an LVIA or LVA (Landscape Visual Appraisal - a 'light touch' LVIA) to avoid the need to specifically refer to identified character areas.

Suggest key perceptual qualities of dark night skies and tranquillity are explicitly referenced.

Issue not raised previously

The drafting of the Plan and how the policies and supporting text flow, link and cross-reference with each other and the evidence base is now fully apparent

## Response:

On the basis that the ELC Article I Definition of Landscape is “an area as perceived by people whose character is the result of the action and interaction of natural and/or human factors”, it is not considered that the policy name is inconsistent with the European Landscape Convention Guidance. Criterion 3 reflects the wording “identity of settlements” also used in Policy NE3 whilst Policy P2 covers “Local Character and Distinctiveness”.

Criterion 5 has been removed as it is considered this is already reflected within the Chichester Harbour AONB policy. Whilst the SDNP is not within the Local Plan area, reference to views and the setting of the SDNP is made at criterion 1 of the policy. Landscape character areas appear at Figure 4 of Appendix A to the Landscape Capacity Study. Wording has also been added to the policy as a result of a representation from the SDNPA providing that LVIA's may be required for small-scale development proposals within the setting of the SDNP/ Chichester Harbour AONB.

The pollution policies which include NE21 are referenced in the final paragraph of the policy.

## Action:

No change

4495

Object

**Document Element:** Policy NE2 Natural Landscape**Respondent:** Plaistow and Ifold Parish Council

Support

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No change

4601

Support

**Document Element:** Policy NE2 Natural Landscape**Respondent:** Wisborough Green Parish Council

Object

**Summary of representations:**

Point 5 to be amended to reflect paras 35b and c of NPPF 2 "...should be designed to reflect this with the scale and extent of development limited consistent with the existing site and locational context, .."

**Summary of representation changes to plan:**

Accordingly, Premier suggest the wording of Policy NE2 (Part 5) is amended to ensure it is justified and consistent with national policy in accordance with paragraph 35 (b and c) of the NPPF as follows:

"5) Development proposals within the setting of Chichester Harbour AONB should recognise its status as a landscape of the highest quality and should be designed to reflect this with the scale and extent of development limited consistent with the existing site and locational context, sensitively located and designed to avoid or minimise adverse impacts on the AONB in accordance with national policy. Development proposals must comply with the Chichester Harbour AONB Management Plan and the Chichester Harbour AONB Joint SPD which are material planning considerations".

**Response:**

Criterion 5 has been removed as it is considered this is already reflected within the Chichester Harbour AONB policy.

**Action:**

See Council's suggested modification CM056.

4613

Object

**Document Element:** Policy NE2 Natural Landscape**Respondent:** Premier Marinas Limited**Agent:** CBRE Limited

Object

**Summary of representations:**

- Broader wording required

**Summary of representation changes to plan:**

- A broader wording in Plan Policy NE2 and an overall re-assessment of development in Boxgrove Parish

**Response:**

- Comment noted

**Action:**

- No change

4764

Object

**Document Element:** Policy NE2 Natural Landscape**Respondent:** Rydon Homes Limited**Agent:** DMH Stallard LLP

Object

**Summary of representations:**

- Natural landscape term unclear, inconsistent with European Landscape Convention (2004), recommend references to natural landscape and rural character be changed throughout plan to "landscape character". Similar criterion required to criteria 5 for SDNP – 3 key points suggested in attachment. Clarification sought on "identified character areas". LVIAs should also be appropriate for smaller developments in the setting of the NP.

**Summary of representation changes to plan:**

- As per rep summary.

**Response:**

- On the basis that the ELC Article I Definition of Landscape is "an area as perceived by people whose character is the result of the action and interaction of natural and/or human factors", it is not considered that the policy name is inconsistent with the European Landscape Convention Guidance. Criterion 5 has been removed as it is considered this is already reflected within the Chichester Harbour AONB policy. Whilst the SDNP is not within the Local Plan area, reference to views and the setting of the SDNP is made at criterion 1 of the policy. Landscape character areas are referred to at paragraph 4.7 and these areas are further sub-divided and identified in the Landscape Capacity Study appearing at Figure 4 of Appendix A. Wording has been added to the policy providing that LVIAs may be required for small-scale development proposals within the setting of the SDNP/ Chichester Harbour AONB.

**Action:**

- See Council's suggested Modification CM057.

5131

Object

**Document Element:** Policy NE2 Natural Landscape**Respondent:** South Downs National Park Authority

Support

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

5168

Support

**Document Element:** Policy NE2 Natural Landscape**Respondent:** John Newman

Object

**Summary of representations:**

Policy must acknowledge need to achieve net zero, facilitate climate change mitigation/adaptation – see recommended policy changes. Point 4 – significant loss of BMV not quantified in policy– should refer to 20ha limited imposed by Sch 4(y) of DM Procedure Order 2015; temporary losses of agr. Land should be treated differently.

**Summary of representation changes to plan:**

Revised policy proposed in attached written representation and includes considerations of climate change, mitigation and adaptation to achieve net zero.

**Response:**

As referred to at paragraph 4.6, the plan takes account of and seeks to avoid and reduce the impact of development on the plan area's natural landscape, safeguarding areas for climate change adaptation.

Reference to the relevant legislation has been inserted at paragraph 4.8 in relation to the loss or likely cumulative loss of 20 hectares or more of BMV land and criterion 4 of the policy has a small amendment to reflect NPPF paragraph 174b and paragraph 001 of the Natural Environment Planning Practice Guidance.

The temporary use, solar development, referred to is supported by the Plan's renewable energy policy. Applications for temporary uses would still be considered against all relevant local plan policy criteria.

**Action:**

See Council's suggested Modifications CM053 and CM055.

5355

Object

**Document Element:** Policy NE2 Natural Landscape**Respondent:** Landlink Estates Ltd**Agent:** Jackson Planning Ltd

Object

**Summary of representations:**

No focus on connectivity for wildlife between AONB and SDNP.

**Summary of representation changes to plan:**

No change

**Response:**

Development within/near to strategic wildlife corridors will be subject to the provisions of Policy NE4 Strategic Wildlife Corridors. The SWCs in Policy NE4 are to provide connectivity between the AONB and the SDNP

**Action:**

No change

5446

Object

**Document Element:** Policy NE2 Natural Landscape**Respondent:** Mayday! Action Group

Object

**Summary of representations:**

Suggest changes to penultimate para including further detail as to the purpose of the assessment and when required in accordance with NPPF 2021 para 174 and Annex IV of EIA Directive 2014/52/EU.

**Summary of representation changes to plan:**

We advise that the requirement for Landscape and Visual Impact Assessments (LVIAs) should more clearly articulate the need for such assessments to identify, describe and assess the likely significant effects of a project on the landscape (i.e. the direct and indirect change to the landscape character and the landscape condition), as well as the visual amenity and visual receptors, in accordance with Annex IV of the Environmental Impact Assessment (EIA) Directive 2014/52/EU, and NPPF 2021 para 174, rather than the current wording which simply describes the landscape "as an environmental resource."

Further, we advise that the thresholds for triggering the requirement for an LVIA should be more clearly stated, which should include the scale of the development proposal and the sensitivity of the identified character areas

**Response:**

Suggestion regarding providing further clarity in relation to the Landscape and Visual Impact Assessment is agreed. Proposed changes made in relation to the purpose of the LVIA.

**Action:**

See Council's suggested Modification CM057.

5791

Object

**Document Element:** Policy NE2 Natural Landscape**Respondent:** Natural England**Support****Summary of representations:**

particularly criteria 1 and 2. Welcome reference to guidance at para 4.8

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted

**Action:**

No change

6108

Support

**Document Element:** Policy NE2 Natural Landscape**Respondent:** Natural England**Support****Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

6151

Support

**Document Element:** Policy NE2 Natural Landscape**Respondent:** Premier Marinas Limited**Agent:** CBRE Limited

## Object

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**Summary of representations:**

Parish allocation conflicts. LP lacks evidence to support housing allocation of 75. HELAA fails to draw upon detailed assessments in NP process such as Glebe Fields – would have significant impact on landscape character and rural setting of Grade 1 listed church

**Summary of representation changes to plan:**

N/A

**Response:**

The revised housing distribution is explained in the relevant background paper. The HELAA study is a technical study rather than an in-depth consideration of sites. Further detail and consideration of sites would be undertaken as part of the subsequent Neighbourhood Plan process

**Action:**

No change

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**6227****Object**

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**Document Element:** Policy NE2 Natural Landscape

**Respondent:** Wisborough Green Parish Council



## Policy NE2 Natural Landscape

## Object

### Summary of representations:

RECEIVED LATE: Propose an Ecosystem Services policy (an adaptation of SDNPA's Core Policy SD2) - see full submission/attachment for wording.

### Summary of representation changes to plan:

Propose an Ecosystem Services policy (an adaptation of SDNPA's Core Policy SD2) - see full submission/attachment for wording.

### Response:

In respect of the proposed policy, it is believed that the suggested criterion are already covered within the new Local Plan as follows: Paragraph 4.5 recognises the social, environmental and economic benefits of the natural landscape and Policy NE2 aims to conserve and enhance the plan area's natural landscape with criterion 2 requiring development proposals to be designed to respect and enhance nationally designated sites, distinctive local landscape character and public amenity. Policies NE4 Strategic Wildlife Corridors and NE5 Biodiversity and Biodiversity Net Gain both emphasise protection and enhancement of habitats. Policy NE16 deals with water management and water quality whilst Policy NE15 deals with flood risk. Resilience to and mitigation of climate change are a common thread throughout the policies within the local plan and the Climate Change Background Paper details the specific areas within the new local plan. Rural economic development is recognised within the countryside policy NE10 and in relation to the horticultural industry within Policies E3 and E4. Whilst the impact of pollution is addressed throughout the plan's policies, NE20 Pollution acts as an overarching policy. Opportunities for health and wellbeing and access to natural and cultural resources are covered within the Placemaking, health and wellbeing suite of policies.

### Action:

No change in response to this representation.

6494

Object

**Document Element:** Policy NE2 Natural Landscape

**Respondent:** CPRE Sussex

**Agent:** CPRE Sussex

## Background, 4.10

## Object

### Summary of representations:

Situations like this should be considered as a separate issue. We would advocate that any planning application which will trigger such coalescence is refused. Particularly relevant if a gap is preserved between Southbourne Parish and Hambrook Parish this will automatically provide much better protection for the wildlife corridor and the unique Hambrook chalk stream.

### Summary of representation changes to plan:

N/A

### Response:

Comments noted. The detailed location and boundaries of landscape gaps will be considered and assessed through either the subsequent Site Allocations DPD that will follow on from the Local Plan or be undertaken as part of a relevant neighbourhood plan.

### Action:

No change to plan

## 4215

## Object

**Document Element:** Background, 4.10

**Respondent:** Chidham and Hambrook Parish Council

## Object

### Summary of representations:

A previous strategic development allocation has potentially eroded the physical separation of Chichester and Westhampnett, but opportunity remains to ensure some separation or sense of place to be retained or re-established. Removal of land from the former allocation (Policy A9) is welcomed and supported fully but the land should be offered long term protection through a specific designation.

### Summary of representation changes to plan:

Land removed from the former strategic allocation as identified through Policy A9 should be formally designated as land unsuitable for housing delivery due to material constraints applicable to it. The land should be identified as an important open area.

### Response:

Designation of areas as either landscape gaps and/or potentially important open space, including local green space, will be designated as part of a subsequent Site Allocations DPD or through a relevant neighbourhood plan.

### Action:

No change to plan

## 4301

## Object

**Document Element:** Background, 4.10

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

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**Summary of representations:**

This is absolutely on the money, and one that we wholeheartedly agree with. However, this is at odds with the policy on Settlement Boundaries which allows adjacent plots of land to be deemed to developable given their proximity to the Settlement Boundary. This is one sure-fire way of causing coalescence and the suburbanisation of whole swathes of the District before there is any improvement in infrastructure.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

The detailed location and boundaries of landscape gaps will be considered and assessed through either the subsequent Site Allocations DPD that will follow on from the Local Plan or be undertaken as part of a relevant neighbourhood plan.

**Action:**

No change to plan.

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**5447****Support**

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**Document Element:** Background, 4.10

**Respondent:** Mayday! Action Group

## Background, 4.11

## Object

### Summary of representations:

The plan does not provide sufficient long term protection for open areas that perform strategic gap functions or represent important open areas.

### Summary of representation changes to plan:

The strategic gap assessment should be revisited as a matter of urgency and key gaps identified through the local plan and protected by robust policy. Land north of Madgewick Lane Westhampnett should be so identified and included. The land unsuitable for housing and the removal of land from allocation is supported.

### Response:

The assessment considered a small range of potential areas for future local landscape gaps rather than seeking to define strategic gaps.

Designation of areas as either landscape gaps and/or potentially important open space, including local green space, will be designated as part of a subsequent Site Allocations DPD or through relevant neighbourhood plan.

### Action:

No change to plan

## 4302

## Object

**Document Element:** Background, 4.11

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

### Summary of representations:

WGPC supports this statement. The concept, identification and maintenance of landscape/green gaps are critical to the definition of rural villages and, quite often, serve to define the settlement boundary; WG has devoted considerable energy to defining these gaps which are clearly identified within all iterations of the NP.

### Summary of representation changes to plan:

N/A

### Response:

Support welcome.

### Action:

No change to plan

## 4468

## Support

**Document Element:** Background, 4.11

**Respondent:** Wisborough Green Parish Council

## Background, 4.12

## Object

### Summary of representations:

The strategic gap between Fishbourne and Bosham has been placed in the wrong place during the assessment as it is not a clear break between settlements. The land at Highgrove is the first clear break with open fields on either side. If development is allowed on the site proposed at policy A11 there will be no open field space between Bosham and Fishbourne.

### Summary of representation changes to plan:

Policy A11 needs to be taken out of the plan

### Response:

Comments noted. The detailed location and boundaries of landscape gaps will be considered and assessed through either the subsequent Site Allocations DPD that will follow on from the Local Plan or be undertaken as part of a relevant neighbourhood plan.

### Action:

No change to plan

## 3842

## Object

Document Element: Background, 4.12

Respondent: The Bosham Association

## Support

### Summary of representations:

WGPC supports this statement.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

## 4470

## Support

Document Element: Background, 4.12

Respondent: Wisborough Green Parish Council

## Policy NE3 Landscape Gaps between settlements

### Object

#### Summary of representations:

There is a logical inconsistency between this statement and the policy advanced for Highgrove Farm, Bosham (A11) as the historic separation of Fishbourne and Bosham Settlement Areas is compromised and whilst the emerging Local Plan proposes the site for development, the Bosham Parish Neighbourhood Plan specifically rejects it. Again, I think Chichester District Council are confusing the duty to consult with a duty to co-operate. As the Neighbourhood Plan has not been co-operated with, nor has the advice from SDNPA or Chichester Harbour been taken into account.

#### Summary of representation changes to plan:

The site proposed at Policy A11 for Highgrove should be removed from the local plan.

#### Response:

The new Local Plan will update policy and where there is a conflict of existing policy the most recent up to date version will apply. However, the parish may choose to give future consideration as to whether or not it wishes to review the neighbourhood plan to consider, assess and identify landscape gaps within the parish once the new Local Plan is adopted. Alternatively, this process could be undertaken by CDC.

#### Action:

No change to plan

3815

Object

**Document Element:** Policy NE3 Landscape Gaps between settlements

**Respondent:** The Bosham Association

### Support

#### Summary of representations:

This needs to be rigorously applied. The 300 homes planned for Highgrove in Bosham would remove the gap between there and Fishbourne so must be in conflict with this policy. Individual councils have little control over the settlement gaps in neighbouring parishes.

#### Summary of representation changes to plan:

N/A

#### Response:

Support welcome. The detailed location and boundaries of landscape gaps will be considered and assessed through either the subsequent Site Allocations DPD that will follow on from the Local Plan or be undertaken as part of a relevant neighbourhood plan. No development has therefore been allocated in a landscape gap.

#### Action:

No change to plan

4005

Support

**Document Element:** Policy NE3 Landscape Gaps between settlements

**Respondent:** Mrs Jane Towers

## Object

### Summary of representations:

This policy states that development will only be permitted within gaps provided that it would not diminish the physical, visual and/or perceived gaps between settlements. However, proposed allocations within the East/West corridor would not comply with this policy.

### Summary of representation changes to plan:

Remove proposed development allocated to landscape gaps between existing settlements.

### Response:

Comments noted. The detailed location and boundaries of landscape gaps will be considered and assessed through either the subsequent Site Allocations DPD that will follow on from the Local Plan or be undertaken as part of a relevant neighbourhood plan. No development has therefore been allocated in a landscape gap.

### Action:

No change to plan

4047

Object

**Document Element:** Policy NE3 Landscape Gaps between settlements

**Respondent:** Bosham Parish Council

## Support

### Summary of representations:

We welcome the inclusion of this policy in this iteration of the Plan. This is particularly important to protect the cohesion and identity of settlements along the A259 between Chichester and Emsworth.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

4115

Support

**Document Element:** Policy NE3 Landscape Gaps between settlements

**Respondent:** Chichester Harbour Trust

## Support

### Summary of representations:

The Landscape Gap Assessment should be routinely referred to when considering planning applications. Gaps need to be defined and protected.

### Summary of representation changes to plan:

N/A

### Response:

Comments noted.

Landscape gaps, will be designated as part of a subsequent Site Allocations DPD or through relevant neighbourhood plans.

### Action:

No change to plan

## 4191

## Support

**Document Element:** Policy NE3 Landscape Gaps between settlements

**Respondent:** Chidham and Hambrook Parish Council

## Object

### Summary of representations:

While it is acknowledged that precise boundaries of gaps will be defined through a Site Allocations DPD or Neighbourhood Plans, the Plan should provide guidance on strategically important areas that should be included within any such designation. Land North of Madgwick Lane is a strategic gap which should be protected.

### Summary of representation changes to plan:

The Plan should provide guidance on strategically important areas that should be included within landscape gap designations.

### Response:

No areas have been identified as being of strategic importance but landscape gaps will be designated as part of a subsequent Site Allocations DPD or through relevant neighbourhood plans.

### Action:

No change to plan

## 4303

## Object

**Document Element:** Policy NE3 Landscape Gaps between settlements

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd



## Object

### Summary of representations:

This is an open ended policy with no direct applicability without a secondary policy document.

The plan should either specify the gaps so one can consider to object or not

### Summary of representation changes to plan:

Either show the proposed gaps or remove the policy and it is then up to NPs to have a gap policy.

If this is a strategic policy then the gaps should be shown within the Plan.

### Response:

The policy applies to the whole plan area; gaps may be considered, evidenced and identified through either a subsequent Site Allocations DPD or relevant neighbourhood plan.

### Action:

No change to plan

4346

Object

**Document Element:** Policy NE3 Landscape Gaps between settlements

**Respondent:** Mr Stephen Jupp

## Support

### Summary of representations:

The concept, identification and maintenance of landscape/green gaps are critical to the definition of rural villages and, quite often, serve to define the settlement boundary; WG has devoted considerable energy to defining these gaps which are clearly identified within all iterations of the NP.

### Summary of representation changes to plan:

N/A

### Response:

Support welcome

### Action:

No change to plan

4473

Support

**Document Element:** Policy NE3 Landscape Gaps between settlements

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

As landscape is referenced in the title of this policy, it should make reference to 'landscape character', as this should be where the 'gap evidence' is derived from. By referencing 'landscape character' it links back to Chichester's own evidence base and avoid spurious gaps being created - ensuring all gaps are identified using the same robust methodology.

### Summary of representation changes to plan:

The policy should make reference to 'landscape character'.

### Response:

Agree policy would benefit from the addition of such a reference.

### Action:

See council suggested modification CM059

4646

Object

**Document Element:** Policy NE3 Landscape Gaps between settlements

**Respondent:** Plaistow and Ifold Parish Council

## Object

### Summary of representations:

See attached letter. Policy NE3 "Landscape Gaps between Settlements" is too broad and should be caveated that the gaps will only be protected if there is demonstrable harm. As currently written, there could be a long distance between settlements that technically diminishes the physical gap and strictly speaking could be argued to result in the perceived coalescence of settlements.

### Summary of representation changes to plan:

Policy NE3 "Landscape Gaps between Settlements" is too broad and should be caveated that the gaps will only be protected if there is demonstrable harm.

### Response:

Comments noted.

The detailed location and boundaries of landscape gaps will be considered and assessed through either the subsequent Site Allocations DPD that will follow on from the Local Plan or be undertaken as part of a relevant neighbourhood plan.

### Action:

No change to plan

4786

Object

**Document Element:** Policy NE3 Landscape Gaps between settlements

**Respondent:** Reside Developments Ltd

**Agent:** Tetra Tech

## Object

### Summary of representations:

Policy NE3 on Landscape Gaps Between Settlements is overly restrictive for all sites outside of the settlement boundaries. In relation to the Plan focus on landscape considerations and the Chichester Landscape Capacity Study from March 2019, we feel that development within the Boxgrove Parish and in particular, the 9 HELAA sites and the 4 settlements outlined in the attached representation, do not involve areas which are so geographically close as to prevent strategic gaps from being safeguarded and thereby secure their individual settlement characteristics.

### Summary of representation changes to plan:

Need a less restrictive policy with a focus on sites outside of settlement boundaries.

### Response:

The detailed location and boundaries of landscape gaps will be considered and assessed through either the subsequent Site Allocations DPD that will follow on from the Local Plan or be undertaken as part of a relevant neighbourhood plan.

The need for any gap will be taken into account in relation to delivering required and identified development.

### Action:

No change to plan

4794

Object

**Document Element:** Policy NE3 Landscape Gaps between settlements

**Respondent:** Rydon Homes Limited

**Agent:** DMH Stallard LLP

## Support

### Summary of representations:

I agree with Policies NE2, NE3, NE4, NE5, NE6, NE7, NE8, and NE10.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

5169

Support

**Document Element:** Policy NE3 Landscape Gaps between settlements

**Respondent:** John Newman

## Object

### Summary of representations:

Object on grounds that policy not justified in relation to delivering net zero; proposed gaps not identified in plan; needs to be examination of reasonable alternatives so that plan reflects sustainability objectives; proposed landscape gaps may contain important sites for delivery of renewable energy to allow Council to reach binding net zero targets such as solar farms; no examination in the SA of the impacts of gap designations in preventing development of critical climate adaptation development.

Policy should not proceed to Regulation 20 until the compatibility with the ability of the District to achieve net zero has been demonstrated, and this is tested through the SA process.

### Summary of representation changes to plan:

Remove the policy from the plan as it has not been assessed in terms of reasonable alternatives in the sustainability appraisal and has therefore not met the requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 -Regulation 12(2)b.

### Response:

Gaps will be identified at a later stage in the plan process, either by way of a Site Allocations DPD or relevant neighbourhood plan and the policy itself does not prevent consideration of potential solar farms.

### Action:

No change to plan

5356

Object

**Document Element:** Policy NE3 Landscape Gaps between settlements

**Respondent:** Landlink Estates Ltd

**Agent:** Jackson Planning Ltd

## Support

### Summary of representations:

It is important for Chidham and Hambrook that the gaps between Nutbourne East and West are so defined, likewise Flatt Farm between Broad Road and Drift Lane and to the east between Chidham and Bosham. The same is true of the Highgrove site to the east of Broadbridge (north of Bosham). Our Neighbourhood Plans need to echo this very sound policy.

### Summary of representation changes to plan:

N/A

### Response:

Comments noted.

Landscape gaps, will be designated as part of a subsequent Site Allocations DPD or through relevant neighbourhood plans.

### Action:

No change to plan

5448

Support

**Document Element:** Policy NE3 Landscape Gaps between settlements**Respondent:** Mayday! Action Group

## Object

**Summary of representations:**

Policy suggests landscape gaps are required to prevent coalescence between built up areas however, this is not always the case. There may well be other designations preventing development in these locations, therefore imposing a landscape gap is unnecessary. If landscape gaps are considered to be necessary, it is recommended these are clearly established and shown on a proposals map for clarity. The suggestion of boundaries being shown in a Site Allocations DPD would not be practical unless the document were to be made alongside the emerging Local Plan.

**Summary of representation changes to plan:**

It is recommended policy NE3 is either withdrawn or significantly re-considered with supporting maps.

**Response:**

The detailed location and boundaries of landscape gaps will be considered and assessed through either the subsequent Site Allocations DPD that will follow on from the Local Plan or be undertaken as part of a relevant neighbourhood plan. The need for any gap will be taken into account in relation to delivering required and identified development.

**Action:**

No change to plan

5605

Object

**Document Element:** Policy NE3 Landscape Gaps between settlements**Respondent:** Thakeham Homes

## Object

**Summary of representations:**

Consider this policy to be unsound due it not being effective and not justified. Generally supportive of Policy and where it states neighbourhood plans can define precise Landscape Gaps. However, having reviewed the Landscape Gap Assessment (May 2019) it is disappointing to learn that CDC only had the south of the plan area assessed and not North of the Plan Area.

**Summary of representation changes to plan:**

It should be made clear that this Policy applies to all settlements in the District including North of the Plan Area.

**Response:**

The policy applies to the whole plan area; the gap study was not intended to be comprehensive across the whole plan area and only considered a small number of potential locations which may be subject to potentially higher development pressures; gaps may be considered, evidenced and identified through either a subsequent Site Allocations DPD or relevant neighbourhood plan.

**Action:**

No change to plan

5829

Object

**Document Element:** Policy NE3 Landscape Gaps between settlements

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Background, 4.15

Object

### Summary of representations:

but should be expanded upon to be effective and be preserved in perpetuity.

Corridors should be 100m wide. Connectivity between Chichester Harbour AONB and South Downs National Park should not be interrupted.

### Summary of representation changes to plan:

None suggested.

### Response:

Comment noted. The width of the corridors needs to be based on technical information relating to location and presence of species. In the absence of further evidence it is not considered justified to widen corridors

### Action:

No change to plan

4151

Object

**Document Element:** Background, 4.15

**Respondent:** Chidham and Hambrook Parish Council

## Background, 4.16

## Object

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### Summary of representations:

■ fails to identify corridor between Medmerry and Pagham Harbour

### Summary of representation changes to plan:

■ Add new corridor connecting Medmerry and Pagham Harbour

### Response:

■ Comment noted. The corridors have a specific and limited job of linking existing habitat within and between the South Downs National Park and Chichester Harbour AONB. Development pressures along the east-west corridor have meant that priority has been given to identifying north-south corridors along this route

### Action:

■ No change to plan.

3871

Object

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**Document Element:** Background, 4.16

**Respondent:** Mr David Akerman

## Object

### Summary of representations:

paragraph unsound as fails to mention HRA findings that a number of planned developments (including Tangmere) would have potentially likely significant effects and this site could exacerbate this given its proximity to the two wildlife corridors east of the city.

Wildlife move without restrictions so the corridors are too narrow

### Summary of representation changes to plan:

Cancellation, or significant reduction, of development on land west of Tangmere.

Amend paragraph 4.16 to read:

The council has commissioned and undertaken significant habitat surveys, data collection and evidence gathering to enable the mapping of the proposed corridors. This has enabled the council to identify hedgerows, treelines, woodland, chalk streams, ditches and rifes which are used as ecological corridors by species of bats, birds and water voles. The ecological networks, in addition to high concentrations of species records and the location of priority habitats and designated sites, has enabled the council to identify seven strategic wildlife corridors which connect Chichester and Pagham Harbours with the South Downs National Park (as shown on the policies map). These corridors do not stop at the plan area boundaries and the council appreciates that no wildlife can be expected to have any regard to such corridors, and that it is appropriate to consider much wider corridors, including the entirety of the corridor between Chichester and Tangmere given that successive exercises have identified different corridors from time to time.

### Response:

Comment noted. The Council acknowledges that wildlife does not recognise boundaries of corridors. The corridors have been established through extensive evidence gathering and habitat surveys, locations of high concentrations of species records and locations of priority habitats and sites to enable an understanding of likely routes for species movement. Different corridors have been identified over the years of preparation of the Local Plan 2021-2039 due to ongoing data collection and habitat surveys which have strengthened the justification for alterations to the corridors. The evidence does not necessitate widening of the corridors.

### Action:

No change to plan

4103

Object

Document Element: Background, 4.16

Respondent: Mr Matthew Rees



## Object

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### Summary of representations:

Paragraph fails to mention that corridors stop before the North of the Plan Area boundary

### Summary of representation changes to plan:

None suggested

### Response:

Comment noted. The corridors have a specific job of linking existing habitat within and between the South Downs National Park and the Chichester Harbour AONB

### Action:

No change to plan

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5833

Object

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**Document Element:** Background, 4.16

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Background, 4.18

## Object

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### Summary of representations:

The corridors are in fact small scale and local with minimal width and length.

### Summary of representation changes to plan:

Remove Policy A11 Highgrove Farm from the plan

### Response:

Comment noted. The width of the corridors has been based on technical information relating to location and presence of species

### Action:

No change to plan

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3816

Object

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**Document Element:** Background, 4.18

**Respondent:** The Bosham Association

## Object

### Summary of representations:

Paragraph 4.18 does not read clearly.

### Summary of representation changes to plan:

Question whether paragraph should state "it will be necessary to demonstrate that land within the corridors will not be available for development. Land outside of the corridors will need to demonstrate that it will not have an adverse impact on the integrity of the corridor."

### Response:

Comment noted. The wording of the policy will be amended to reflect the removal of the sequential test.

### Action:

See Council's suggested Modification CM061.

5371

Object

**Document Element:** Background, 4.18

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

ecology-led masterplanning can ensure development is accommodated within the SWCs while fully maintaining the functional elements of the corridors. Wording inconsistent with NPPF paragraph 180, in that it only provides for development avoidance measures within the SWCs. The 'integrity' test relates to undertaking Appropriate Assessments. The protection afforded must be proportionate to the locally important status of the designation.

### Summary of representation changes to plan:

Amend paragraph wording:

The Council will apply an additional layer of planning restraint to the countryside protection policies within these strategic wildlife corridors to ensure that connectivity between the South Downs National Park and the Chichester Harbour AONB and Pagham Harbour is maintain in the long term Amend paragraph wording:

The Council will apply an additional layer of planning restraint to the countryside protection policies within these strategic wildlife corridors to ensure that connectivity between the South Downs National Park and the Chichester Harbour AONB and Pagham Harbour is maintain in the long term. Within the corridors it will be necessary to demonstrate that no land outside the corridor is available for development and the development will not have an adverse impact on the integrity of the corridor. If a significant adverse impact on the function of the corridor resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then it will not be permitted.

### Response:

This representation appears to be a duplicate of representation number 4899. See further down this schedule for the Council's response

### Action:

No change to plan

**6021****Object****Document Element:** Background, 4.18**Respondent:** Gleeson Land**Policy NE4 Strategic Wildlife Corridors****Object****Summary of representations:**

the limited wildlife corridors are integral to the local environment and should be protected at all cost.

**Summary of representation changes to plan:**

None suggested

**Response:**

Comment noted

**Action:**

No change to plan

**3778****Object****Document Element:** Policy NE4 Strategic Wildlife Corridors**Respondent:** Mr Edward Bowring**Object****Summary of representations:**

no wildlife corridors have been assessed or included between Chichester Harbour, Medmerry and Pagham Harbour presumably as no large housing allocations have been made. Need to acknowledge importance of maintaining strong connectivity between wetland areas

**Summary of representation changes to plan:**

None suggested

**Response:**

Comment noted. The corridors have been established to connect habitat between and within the South Downs National Park and Chichester Harbour AONB, irrespective of the locations of large housing allocations. Development pressure is highest along the east-west corridor therefore identifying corridors along this route is of greatest importance at this time.

**Action:**

No change to plan

**3886****Object****Document Element:** Policy NE4 Strategic Wildlife Corridors**Respondent:** Dr Carolyn Cobbold

## Support

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**Summary of representations:**

but must be applied rigorously and protected at all costs

**Summary of representation changes to plan:**

None suggested

**Response:**

Support noted

**Action:**

No change to plan

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4006

Support

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Mrs Jane Towers

## Object

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**Summary of representations:**

newly included Nutbourne to Hambrook corridor is not wide enough at northern end, missing out major water vole networks

**Summary of representation changes to plan:**

None suggested

**Response:**

Comment noted. The width of the corridor needs to be based on technical information relating to location and presence of species. The corridor is considered to be functional based on its current width, and it is not considered justified to widen the corridor in the absence of further technical evidence

**Action:**

No change to plan

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4069

Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Southbourne Parish Council

## Support

### Summary of representations:

would prefer that these were safeguarded to prevent any development. Policy lacks ambition and would benefit from being strengthened. Not clear from policies map how the corridors have changed since consultation in 2018/2019.

### Summary of representation changes to plan:

None suggested

### Response:

Comment noted. The Council considers that the policy is ambitious as it is the first proposed of its kind across the country.

The Strategic Wildlife Corridors Background Paper has been updated to include detail relating to the evolution of the corridors.

### Action:

No change to plan

## 4118

## Support

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Chichester Harbour Trust

## Support

### Summary of representations:

but must be adhered to and protected. Any development would have an adverse effect and undermine connectivity and ecological value

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan.

## 4190

## Support

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Chidham and Hambrook Parish Council

## Support

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### Summary of representations:

proposals within or adjacent to defined corridors should not be determined by a strict interpretation of corridor boundaries as shown on the proposals map, but by detailed assessment on the ground both of the development site and that immediately adjoining to avoid undermining connectivity and ecological value.

Corridors defined in Map NE4b are supported in principle subject to detailed discussion on the ground

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan

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## 4304

## Support

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

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### Summary of representations:

Policy contradictory and unclear.

### Summary of representation changes to plan:

Amend policy to provide greater clarity.

### Response:

Comment noted. The policy wording will be amended for clarity purposes.

### Action:

See Council's suggested modifications CM060 to CM064.

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## 4348

## Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Mr Stephen Jupp

## Support

### Summary of representations:

to be effective the corridors must be protected with buffer zones and their connectivity must be protected in site allocations and planning applications.

Ancient, veteran and notable trees within corridors should have root protection areas defined and protected in line with NE8 point 5.

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan

## 4357

## Support

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** The Woodland Trust

## Object

### Summary of representations:

disappointing that they are not more ambitious with greater coverage. Query whether should have east-west links and corridors across Manhood Peninsula, connecting Pagham Harbour, Chichester Harbour and Medmerry

### Summary of representation changes to plan:

None suggested

### Response:

Comment noted. The Council considers that the policy is ambitious as it is the first proposed of its kind across the country. The width and coverage of the corridors needs to be based on technical information relating to location and presence of species. In the absence of further evidence it is not considered justified to widen corridors. The corridors have, in the first instance, been established to link functional habitat between and within the South Downs National Park and Chichester Harbour AONB, as the east-west corridor is the location subject to the greatest development pressure. This does not preclude the future identification of further wildlife corridors in this location, or elsewhere within the Plan area.

### Action:

No change to plan

## 4380

## Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Chichester Harbour Conservancy

## Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

None suggested

**Response:**

Support noted

**Action:**

No change to plan

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**4474**

**Support**

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Wisborough Green Parish Council

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## Support

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None suggested

**Response:**

Support noted.

**Action:**

No change to plan

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**4520**

**Support**

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Portsmouth Water Ltd



## Object

### Summary of representations:

Considers Council's approach to be inconsistent with national policy (paragraph 180(a)).

### Summary of representation changes to plan:

Policy should be updated to reflect and be consistent with paragraph 180(a) of NPPF. Should be set out in hierarchy where development will be permitted where there is no adverse impact to the corridors. Where this is not possible, proposals will be expected to mitigate or, as a last resort, compensate for any adverse impact.

### Response:

Comment noted. Paragraph 179(a) of the NPPF is clear that plans should identify and safeguard corridors. Paragraph 180 does not then refer to how this may be achieved. It is not considered that the wording is inconsistent with paragraph 180, however modifications to the policy are being proposed.

### Action:

See Council's suggested Modification CM064.

4705

Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates

## Support

### Summary of representations:

will work with the LPA to expand upon proposed corridors especially around circuit and aerodrome.

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan

4725

Support

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

### Summary of representations:

encourage consideration of natural flood management wherever possible

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan

4742

Support

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Environment Agency

## Object

### Summary of representations:

Ham Brook corridor should be wider as shown in Southbourne proposed Neighbourhood Plan.  
Confirm whether boundaries are definitive as discussions with the National Park (Duty to Cooperate Statement of Compliance Jan 2023, page 38) agrees that details would be defined in Neighbourhood Plans

### Summary of representation changes to plan:

Policy should state how boundaries are defined (e.g. through local plan or neighbourhood plans).  
Ham Brook corridor should be widened to accord with that proposed in Southbourne neighbourhood plan

### Response:

Comment noted. The boundaries of corridors are being defined through the Local Plan 2021-2039 as shown on the policies map.  
The width and coverage of the corridors needs to be based on technical information relating to location and presence of species. In the absence of further evidence it is not considered justified to widen corridors

### Action:

No change to plan.

4778

Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Mrs Sue Talbot

## Object

### Summary of representations:

Policy needs to be rewritten for clarification.

### Summary of representation changes to plan:

Amend policy as follows:

Development will only be permitted where it would not lead to an adverse effect upon the ecological value, function, integrity and connectivity of the strategic wildlife corridors

All proposals for new development (with the exception of householder applications) within or in close proximity to wildlife corridors should take opportunities available in order to extend or enhance those corridors.

### Response:

Comment noted. The policy wording will be modified.

### Action:

See Council's suggested Modification CM064.

4789

Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Reside Developments Ltd

**Agent:** Tetra Tech

## Object

### Summary of representations:

Requirement for new development adjacent to SWCs to "take opportunities available in order to extend and enhance those corridors" introduces uncertainty and conflict with draft Policy A8. The final paragraph to NE4 should be deleted.

The requirement in criterion 2 for development to "not have an adverse effect" is similar to Requirement 10 of draft Policy A8: "no adverse effects" is not the threshold advocated by the NPPF (paragraph 179) which instead requires Local Plans to "promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species..." Paragraph 180 establishes the correct threshold, which is "significant harm". Criterion 2 should be amended accordingly.

### Summary of representation changes to plan:

Delete final paragraph of policy.

Amend criterion 2 to accord with paragraph 180 of NPPF.

### Response:

Comment noted. It is not considered that the wording of the policy conflicts with Policy A8. Development proposals adjacent to wildlife corridors, such as that proposed in Policy A8, can make use of opportunities to extend and enhance corridors through careful masterplanning. It is important that development proposals do not undermine the function and integrity of the wildlife corridors.

### Action:

See Council's suggested Modification CM064.

4890

Object

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**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd

**Agent:** DWD Ltd

Object

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**Summary of representations:**

Fails soundness test on basis that a) ecology led masterplanning can ensure development is accommodated within SWCs while fully maintaining the functional elements of the corridors; b) the policy is inconsistent with NPPF paragraph 180 as it only provides for development avoidance measures within the SWCs; and c) the integrity test element of the policy relates to undertaking Appropriate Assessment.

**Summary of representation changes to plan:**

Suggest amending policy wording as follows:

Development will only be permitted where it would not lead to a significant adverse effect upon the ecological value, function and connectivity of the strategic wildlife corridors.

Development proposals within strategic wildlife corridors will only be granted where it can be demonstrated that:

1. The development will not have a significant adverse impact on the integrity and function of the wildlife corridor and protects and enhances its features and habitats. 2. The proposal will not undermine the connectivity and ecological value of the corridor.

Development proposals outside, but in close proximity to the strategic wildlife corridor will be acceptable where it can be demonstrated that: a) The development will not have a significant adverse impact on the integrity and function of the wildlife corridor; and b) The proposal will not undermine the connectivity and ecological value of the corridor.

All proposals for new development (with the exception of householder applications) within or in close proximity to wildlife corridors should take opportunities available in order to extend or enhance those corridors.

Supporting Text 4.18 The Council will apply an additional layer of planning restraint to the countryside protection policies within these strategic wildlife corridors to ensure that connectivity between the South Downs National Park and the Chichester Harbour AONB and Padgham Harbour is maintained in the long term

Suggest amending policy wording as follows:

Development will only be permitted where it would not lead to a significant adverse effect upon the ecological value, function and connectivity of the strategic wildlife corridors.

Development proposals within strategic wildlife corridors will only be granted where it can be demonstrated that: 1.

There are no sequentially preferable sites available outside of the wildlife corridor; and 2. 1. The development will not have a significant adverse impact on the integrity and function of the wildlife corridor and protects and enhances its features and habitats. 2. The proposal will not undermine the connectivity and ecological value of the corridor.

Development proposals outside, but in close proximity to the strategic wildlife corridor will be acceptable where it can be demonstrated that: a) The development will not have a significant adverse impact on the integrity and function of the wildlife corridor; and b) The proposal will not undermine the connectivity and ecological value of the corridor.

All proposals for new development (with the exception of householder applications) within or in close proximity to wildlife corridors should take opportunities available in order to extend or enhance those corridors.

Supporting Text 4.18 The Council will apply an additional layer of planning restraint to the countryside protection policies within these strategic wildlife corridors to ensure that connectivity between the South Downs National Park and the Chichester Harbour AONB and Padgham Harbour is maintained in the long term. Within the corridors it will be necessary to demonstrate that no land outside of the corridor is available for development and the development will not have a significant adverse impact on the function of the corridor resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then it will not be permitted.

**Response:**

Comment noted. Careful masterplanning exercises are important for development proposals within close proximity to, adjacent to, or within corridors. This does not preclude the ability of the Council to decide whether to grant permission for a proposal or not.

The function of the corridor relies on it being contiguous and providing a continuous route of habitat. Proposals which would impact upon the integrity of the corridor such that it would result in breaks or gaps within the corridor would not be acceptable.

The last sentence of paragraph 4.18 will be updated to reflect the removal of the sequential test from the policy.

**Action:**

See Council's suggested Modification CM064.

**4899**

**Object**

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**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Gleeson Land

## Policy NE4 Strategic Wildlife Corridors

## Object

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### Summary of representations:

support the policy and concept but does not support changes made since the technical consultation in 2021. There is a lack of justification and evidence to inform modifications in the policy.

### Summary of representation changes to plan:

Reinstate former boundary of the proposed Pagham to Westhampnett SWC as detailed in the technical consultation 2021

### Response:

Comment noted. The Strategic Wildlife Corridors Background Paper sets out the detail relating to the evolution of the corridors.

### Action:

No change to plan.

4901

Object

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**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Royal Society for the Protection of Birds (RSPB)

## Object

### Summary of representations:

requirement to demonstrate there are no “sequentially preferable sites” outside a corridor, and that any proposed development would not have a significant adverse impact on the integrity of a corridor should be removed because this conflicts with requirements of paragraph 180 of the NPPF, and an integrity test relates to paragraph 182 of the NPPF and the assessment of effects on SPAs/SACs/Ramsar sites in the context of an Appropriate Assessment, which is a higher level of designation than the SWCs.

### Summary of representation changes to plan:

Amend policy wording to:

Development proposals will only be permitted where it would not lead to a significant adverse effect upon the ecological value, function and connectivity of the strategic wildlife corridors.

Development proposals within strategic wildlife corridors will only be granted where it can be demonstrated that:

1. The development will not have a significant adverse impact on the function of the wildlife corridor and protects and enhances its features and habitats.
2. The proposal will not undermine the connectivity and ecological value of the corridor

Development proposals outside, but in close proximity to the strategic wildlife corridor will be acceptable where it can be demonstrated that:

- a) the development will not have a significant adverse impact on the function of the wildlife corridor; and
- b) the proposal will not undermine the connectivity and ecological value of the corridor.

All proposals for new development (with the exception of householder applications) within or in close proximity to wildlife corridors should take opportunities available in order to extend or enhance those corridors.

### Response:

Comment noted. Agree to inclusion of ‘proposals’ in first paragraph of the policy. The sequential test element of the policy is also being removed, and the wording of the policy will be updated. The function of the corridor relies on it being contiguous and providing a continuous route of habitat. Proposals which would impact upon the integrity of the corridor such that it would result in breaks or gaps within the corridor would not be acceptable.

### Action:

See Council's suggested Modification CM064.

**4926****Object**

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Gleeson Strategic Land



## Object

### Summary of representations:

technical documents have not been updated for Regulation 19 plan, it is not clear whether ecological interest has changed and whether it can still inform the extent and location of corridors, on the basis that standard habitat surveys are usually required to be reviewed and updated after 18 months.

Policy principle of not resisting development in principle and so long as impacts can be adequately mitigated means that criterion 1 is redundant.

Development outside or in close proximity to a corridor should not be subject to requirements of NE4. "Close proximity" is a vague term.

### Summary of representation changes to plan:

Amend policy wording to:

Development proposals within strategic wildlife corridors will only be granted where it can be demonstrated that:

1. The development will not have an adverse impact on the integrity and function of the wildlife corridor and protects and enhances its features and habitats;
- 2) The proposal will not undermine the connectivity and ecological value of the corridor and take opportunities to enhance those corridors.

### Response:

Comment noted. The Strategic Wildlife Corridors Background Paper and appendices contain the justification for the extent and location of the corridors.

Modifications to the policy are proposed, including the removal of the sequential test.

The policy should continue to cover development in close proximity to the corridors, as such development may impact upon the corridor, for example through the presence of artificial lighting.

### Action:

See Council's suggested Modification CM064.

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**5036****Object**

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Northgate Properties Ltd

**Agent:** Smith Simmons Partners

## Object

### Summary of representations:

support decision to identify and map corridors and the amendments presented in consultation in 2021. Raise concern over narrowing of Pagham to Westhampnett Corridor around location of Policy A8. Request confirmation of narrowing of the corridor and justification for amendment.

Notes that other policies e.g. E3 overlays NE4. Suggest that policy should consider making it clear that not only should development protect and enhance the features of the corridor but also to restore them.

Wording around sequentially preferable sites is unclear and requires definition.

### Summary of representation changes to plan:

Amend policy criterion 2 as follows:

2. The development will not have an adverse impact on the integrity and function of the wildlife corridor and protects, and enhances and restores its features and habitats.

### Response:

Comment noted. The justification for the amendments to the corridors is set out in the Strategic Wildlife Corridors Background Paper.

The policy will be amended to remove the sequential test.

Modifications to Policy E3 are proposed which would ensure that there is no overlap of the proposed extension to the Runction HDA with the Westhampnett-Pagham Strategic Wildlife Corridor.

### Action:

See Council's suggested Modifications CM064 and CM390.

5042

Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Sussex Wildlife Trust

Support

### Summary of representations:

Support

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan

5133

Support

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** South Downs National Park Authority

## Support

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### Summary of representations:

Support

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan

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## 5170

## Support

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**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** John Newman

## Object

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### Summary of representations:

maps and policy text should be amended to reflect flexibility to allow appropriate breaks in the corridor for those areas that are of low ecological value

### Summary of representation changes to plan:

Amend policy wording and maps to reflect flexibility to allow appropriate breaks in the corridor for those areas that are of low ecological value.

### Response:

Comment noted. It would not be appropriate to amend the corridors to allow appropriate breaks for those areas that are of low ecological value. The corridors link known high quality habitat; there will not be a continuous connection of habitat but it is likely that species are moving through these areas to reach the higher quality habitat. If breaks were allowed in corridors, then it is considered that this connectivity may be lost, and habitat may become isolated.

### Action:

No change to plan

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## 5244

## Object

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**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Chichester Grain Ltd

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

a) wildlife corridors have not been assessed for impact on delivering net zero; b) may contain important sites for delivery of renewable energy; c) renders proposals for solar farm unacceptable, requiring unjustified sequential testing not supported in national policy; d) SA did not consider impact of removing best and most versatile land within the proposed corridors which exceeds NE threshold.

### Summary of representation changes to plan:

Delete policy from plan.

### Response:

Comment noted. The policy does not preclude all forms of development within the corridor. Some limited development may be acceptable and would need to be considered on a case by case basis. The supporting text to the policy will be strengthened for clarity. The policy is seeking to protect wildlife from damaging forms of development. It does not require existing uses of land, including agricultural uses, within the corridors to cease.

### Action:

See Council's suggested Modification CM064.

5357

Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Landlink Estates Ltd

**Agent:** Jackson Planning Ltd

## Object

### Summary of representations:

Policy is not consistent with paragraph 180 of the NPPF.

### Summary of representation changes to plan:

Amend policy wording to include "adequately mitigated, or, as a last resort, compensated for" in accordance with NPPF paragraph 180.

### Response:

Comment noted. Paragraph 179(a) of the NPPF is clear that plans should identify and safeguard corridors. Paragraph 180 does not then refer to how this may be achieved. It would be hard to argue how you could compensate for the loss of a corridor. It is not considered that the wording is inconsistent with paragraph 180, however modifications to the policy are being proposed.

### Action:

See Council's suggested Modification CM064.

5374

Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

Pagham to Westhampnett corridor should not include land within Sherwood Nursery

### Summary of representation changes to plan:

Amend wildlife corridor to exclude Sherwood Nursery

### Response:

Comment noted. The Strategic Wildlife Corridors Background Paper sets out the justification for the inclusion of land within the corridors. It is considered that this land should remain within the corridor, as the evidence indicates the presence of a bat movement network (including commuting, foraging and feeding) in this part of the corridor.

### Action:

No change to plan

## 5427

## Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Mr AJ Renouf, Mr DA Renouf, & Mrs SJ Renouf

**Agent:** Rodway Planning Consultancy Ltd

## Object

### Summary of representations:

does not define the minimum size of a wildlife corridor.

Need to define close proximity.

Exceptions which allow development within a corridor need to have clear measures and accountability for providing evidence of no adverse impact.

### Summary of representation changes to plan:

Amend corridors to enlarge them and should be protected fully from any development

### Response:

Comment noted. It is not possible to define the minimum size of a corridor, as the width needs to be based on technical information relating to location and presence of species

### Action:

No change to plan

## 5439

## Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

Part of client's land is allocated in Westbourne Neighbourhood Plan so concerned that location within the Westbourne SWC will restrict development on a site which has already been deemed suitable for the district and parish council.

### Summary of representation changes to plan:

Remove client's land (shown on plan) from corridor, and revisit evidence base to consider further as there is no justification for location.

### Response:

Comment noted. There is an extensive bat movement network across and around this land, which justifies its inclusion. This is set out in the Background Paper. The policy is to be modified to remove the sequential test element. This would mean that proposals for development in a corridor will need to demonstrate that they will not have an adverse impact upon the integrity and function of the corridor. This would not necessarily preclude further development from coming forward on this site.

### Action:

See Council's suggested Modification CM064.

5639

Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Landowners at Chantry Farm

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

to inclusion of land south of Brandy Hole Lane and west of West of Chichester. This land does not possess qualities of land further to the south of justify designation as a corridor

### Summary of representation changes to plan:

Delete proposed corridor north of Brandy Hole Lane.  
Amend policy wording as does not accord with NPPF

### Response:

Comment noted. It would not be appropriate to amend the corridors to allow appropriate breaks for those areas that are of low ecological value. The corridors link known high quality habitat; there will not be a continuous connection of habitat but it is likely that species are moving through these areas to reach the higher quality habitat. If breaks were allowed in corridors, then it is considered that this connectivity may be lost, and habitat may become isolated.

### Action:

No change to plan

5648

Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** DG Phillips (Bosham) Ltd and Phillips Build Ltd

**Agent:** Genesis Town Planning Ltd

## Object

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**Summary of representations:**

a) no methodology or evidence base has been published; b) development potential of sites has not been considered; c) have not fully consulted those affected by corridors; and d) applying additional layer of restraint in district which is already highly constrained

**Summary of representation changes to plan:**

None suggested

**Response:**

Comment noted. The Strategic Wildlife Corridors Background Paper and corresponding appendices contain the evidence and the methodology for identifying habitat.

The Council has undertaken three separate rounds of consultation on the strategic wildlife corridors, as proposed in their various forms, since 2018. Landowners who had submitted sites to the Council for the HELAA were targeted through a technical consultation in 2021.

It is acknowledged that the District (and Plan area) is highly constrained; this has concentrated development pressures the least constrained areas and has increased the need for wildlife corridors to be established in order to protect those routes of highest quality habitat for protected species.

**Action:**

No change to plan

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**5682****Object**

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**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Salthill Trust

**Agent:** Henry Adams LLP

## Object

**Summary of representations:**

policy unsound, unjustified and inconsistent with national policy for following reasons: a) CDC has not published its evidence base for applying this new constraint layer; b) the current use of the corridors is not stated and there is no consideration of future development potential; c) blanket policy designations are not required particularly in a district which is already highly constrained; and d) locations adjacent to existing settlements appear unjustified and inappropriate in current form.

**Summary of representation changes to plan:**

Amend policy

**Response:**

Comment noted. A background paper and corresponding appendices containing evidence and the methodology for identifying habitat will be available upon submission of the Plan.

The Council has undertaken three separate rounds of consultation on the strategic wildlife corridors, as proposed in their various forms, since 2018. Landowners who had submitted sites to the Council for the HELAA were targeted through a technical consultation in 2021.

It is acknowledged that the District (and Plan area) is highly constrained; this has concentrated development pressures in the least constrained areas, including the east-west corridor, and has increased the need for wildlife corridors to be established in order to protect those routes of highest quality habitat for protected species.

**Action:**

No change to plan

**5684****Object**

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Barratt David Wilson Homes

**Agent:** Henry Adams LLP

## Object

**Summary of representations:**

a) relocated East of City corridor encroaches onto CCE land at Drayton Lane; b) proposals for development on this land would be required to undertake statutory wildlife protection and therefore corridor is considered unnecessary; c) criterion 1 is redundant and conflicts with underlying purpose of policy which is safeguard corridors from harmful impacts that cannot be mitigated.

**Summary of representation changes to plan:**

Remove CCE land from corridor.

Delete criterion 1 of policy

**Response:**

Comment noted. The Strategic Wildlife Corridors Background Paper sets out the justification for the inclusion of land within the corridors. It is considered that this land should remain within the corridor, as the evidence indicates the presence of a bat movement network (including commuting, foraging and feeding) in this part of the corridor.

**Action:**

No change to plan



5697

Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors**Respondent:** Church Commissioners for England**Agent:** Lichfields

Object

**Summary of representations:**

concerned that the Westhampnett to Pagham corridor has been reduced significantly since technical consultation in 2021, in a manner that has not been justified, undermines the value of the corridor and will lead to harm to biodiversity

**Summary of representation changes to plan:**

Restore the Westhampnett-Pagham corridor to that set out in the technical consultation (2021).

**Response:**

Comment noted. It was not considered that the evidence available supports the width of the Westhampnett-Pagham wildlife corridor as it was proposed in the Technical Consultation in 2021. The corridor is considered to be functional based on its current width, and it is not considered justified to widen the corridor in the absence of further technical evidence

**Action:**

No change to plan

5703

Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors**Respondent:** Sussex Ornithological Society

Object

**Summary of representations:**

Policy seeks to limit and control development, assuming that land is already in a natural state and therefore protection is the only consideration. This is not the case for the Breakers Yard in Southbourne which is within the corridor.

**Summary of representation changes to plan:**

Include new first bullet:

1. The development is in a form that supports the delivery of the wildlife corridor.

**Response:**

Comment noted. It is acknowledged that not all land within the corridors is within a natural state. The corridors link known high quality habitat; there will not be a continuous connection of high quality habitat but it is likely that species are moving through these areas to reach the higher quality habitat. Agree that where possible, any development within a corridor should be in a form that supports the delivery of the corridor. The policy has proposed amendments.

**Action:**

See Council's suggested Modification CM064.

5721

Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors**Respondent:** Metis Homes**Agent:** Nova Planning

Object

**Summary of representations:**

a) evidence base in support not published; b) current use of corridors not stated - could have future sustainable development potential; c) blanket designation unnecessary as built environment and nature can work in unison; d) methodology not set out; e) those affected by SWC and other stakeholders not consulted; f) District already highly constrained

**Summary of representation changes to plan:**

None suggested

**Response:**

Comment noted. The Strategic Wildlife Corridors Background Paper and corresponding appendices contain the evidence and the methodology for identifying habitat.

The Council has undertaken three separate rounds of consultation on the strategic wildlife corridors, as proposed in their various forms, since 2018. Landowners who had submitted sites to the Council for the HELAA were targeted through a technical consultation in 2021.

It is acknowledged that the District (and Plan area) is highly constrained; this has concentrated development pressures in the least constrained areas, such as the east-west corridor, and has increased the need for wildlife corridors to be established in order to protect those routes of highest quality habitat for protected species.

**Action:**

No change to plan

5741

Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors**Respondent:** The Sadler Family**Agent:** Henry Adams LLP

## Object

### Summary of representations:

evidence base not published, current use of corridors not stated, blanket policy designation not required, those affected not consulted and plan area already highly constrained

### Summary of representation changes to plan:

None suggested

### Response:

This rep appears to be a duplication of 5684 (see row above). The above response remains relevant

### Action:

No change to plan

5753

Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Barratt David Wilson Homes

**Agent:** Henry Adams LLP

## Support

### Summary of representations:

Support and welcome opportunity to explore how these corridors will fit with the future Local Nature Recovery Strategy (LNRS) for Sussex.

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan

5792

Support

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Natural England

## Object

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### Summary of representations:

unsound as not effective or justified. Support principle however the corridors should be extended to north of plan area too.

### Summary of representation changes to plan:

None suggested

### Response:

Comment noted. The corridors have, in the first instance, been established to link functional habitat between and within the South Downs National Park and Chichester Harbour AONB, as the east-west corridor is the location subject to the greatest development pressure. This does not preclude the future identification of further wildlife corridors in this location, or elsewhere within the Plan area.

### Action:

No change to plan

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5832

Object

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**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Support

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### Summary of representations:

Support in principle

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan

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6081

Support

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**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Chichester Harbour Conservancy

## Support

### Summary of representations:

Support in principle

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan

## 6101

## Support

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Dr Carolyn Cobbold

## Object

### Summary of representations:

Support with suggested modifications.

### Summary of representation changes to plan:

Propose amendments to policy as follows:

- a) reference in supporting text to Draft Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol (2018).
- b) amend criterion 1 to state "...there are no sequentially preferable sites available outside the wildlife corridor that also do not compromise the integrity and connectivity of sites, as identified through the LNRS."
- c) policy could be more explicit about development outside of but in close proximity to corridors.
- d) amend final paragraph to "All proposals for new development (with the exception of householder applications) within or in close proximity to wildlife corridors should take opportunities available in order to extend and enhance those corridors and have regard to opportunities identified in nature recovery strategies."

### Response:

Support noted. Agree the inclusion of reference to the Draft Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol. The policy will be modified to remove the sequential test part.

### Action:

See Council's suggested Modifications CM060 and CM064.

## 6109

## Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Natural England

## Support

---

**Summary of representations:**

■ recognise importance of corridors in facilitating movement

**Summary of representation changes to plan:**

■ None suggested

**Response:**

■ Support noted

**Action:**

■ No change to plan

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6168

Support

---

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates

## Support

---

**Summary of representations:**

■ Support concept

**Summary of representation changes to plan:**

■ None suggested

**Response:**

■ Support noted

**Action:**

■ No change to plan

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6171

Support

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**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Royal Society for the Protection of Birds (RSPB)

## Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

None suggested

**Response:**

Support noted

**Action:**

No change to plan

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6264

Support

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** Southbourne Parish Council

## Object

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**Summary of representations:**

amend boundaries of Fishbourne corridor to only include boundaries of site HFB0012

**Summary of representation changes to plan:**

Amend boundary of Fishbourne corridor to include boundaries of HFB0012 only

**Response:**

The site HFB0012 is located within the Fishbourne and Chalk Streams Biodiversity Opportunity Area. The background evidence also indicates that there is a bat network within this area, which contributes towards the justification for the inclusion of the entirety of the site within the West of Chichester to Fishbourne Strategic Wildlife Corridor

**Action:**

No change to plan

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6265

Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** The Bramley Family

**Agent:** PowerHaus Consultancy

## Support

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### Summary of representations:

RECEIVED LATE: CPRE Sussex supports this policy as part of the Local Plan process, conforms with section 179 of the NPPF 2021 which is well-evidenced.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

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6495

Support

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**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** CPRE Sussex

**Agent:** CPRE Sussex



## Object

### Summary of representations:

RECEIVED LATE: Question size of corridors ie the width - information provided in 2021 consultation demonstrates areas have been downsized such as those alongside East of City Corridor; appears there has been a narrowing of the Strategic Wildlife Corridor around the location of proposed allocations A8, Land East of Chichester and potential A7, Land at Shopwyke; Corridor to East of Chichester was proposed for connectivity and functional links to area for rare and European Protected Species of Barbastelle Bats - shown on CDC technical consultation documents as bat network; Does not conform with Natural Environment & Rural Communities Act, NERC, 2006 and Section 40 subsection 3a as would destroy a habitat over which Barbastelle Bat has been recorded, a Section 41 species; duty of Local Authority to safeguard these species; should be no recreational use in buffer zones.

No wildlife corridor running east to west along the Manhood Peninsula ie Pagham to East Head - undermines the importance of a positive barrier zone to protect the habitat. CDC have used the corridors for this barrier purpose possibly more than as a pathway throughout other parts of the plan.

### Summary of representation changes to plan:

N/A

### Response:

Comment noted. It was not considered that the evidence available supported the width of the Westhampnett-Pagham wildlife corridor as it was proposed in the Technical Consultation in 2021. The corridor is considered to be functional based on its current width. The justification for the amendments to this corridor has been set out in the Strategic Wildlife Corridors Background Paper.

The corridors have a specific and limited job of linking existing habitat within and between the South Downs National Park and Chichester Harbour AONB. Development pressures along the east-west corridor have meant that priority has been given to identifying north-south corridors along this route.

### Action:

No change in response to this representation.

6496

Object

**Document Element:** Policy NE4 Strategic Wildlife Corridors

**Respondent:** CPRE Sussex

**Agent:** CPRE Sussex

**Background, 4.19****Object****Summary of representations:**

- i) Wildlife 'stepping stones' are not defined or delimited spatially;
- ii) Building on farmland will not produce measurable BNG;
- iii) A11 will involve disturbance of hedgerows and requires removal from the plan

**Summary of representation changes to plan:**

N/A

**Response:**

Objection noted.

- i) Stepping stones are defined within the proposed Glossary (Appendix J). Proposed policy NE5 specifically requires their consideration by development at H. The identification and mapping of stepping stones, where recognised as an area of particular importance for biodiversity, is an iterative process which will be further addressed by the mandatory development of a Local Nature Recovery Strategy;
- ii) It is recognised that the strategic significance of agricultural land in terms of existing biodiversity may be low. Proposed policy NE5 requires a minimum of 10% biodiversity net gain against a pre-development baseline, calculated using the national Biodiversity Metric. The Metric enables consideration of land parcels containing multiple habitats, such as hedgerows surrounding cropland, ensuring the site and proposed BNG is accurately measured;
- iii) The conservation of trees and hedgerow is specifically addressed by Policy NE8. The changes proposed do not relate to this policy (objections have also been recorded against Policy A11).

**Action:**

No change in response to representation

**3817****Object**

**Document Element:** Background, 4.19

**Respondent:** The Bosham Association

## Background, 4.20

## Object

### Summary of representations:

Unclear definition of 'locally off-site' in relation to BNG provision. Suggestion focus should be on SWC, AONB, SSSIs, LNRs, NNRs, SACs, SPAs, Medmerry etc where enhancement is most needed.

### Summary of representation changes to plan:

N/A

### Response:

Objection noted. Further to paragraph 4.20, Point 1. c) of Policy NE5 clarifies that local off-site provision should contribute towards strategic networks such as green infrastructure, wildlife corridors or nature recovery networks. It is considered this makes clear that BNG should be located where it is needed most, within strategically significant areas.

### Action:

No change in response to representation

## 4401

## Object

Document Element: Background, 4.20

Respondent: Chichester Harbour Conservancy

## Background, 4.22

## Support

### Summary of representations:

Fully Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

## 3779

## Support

Document Element: Background, 4.22

Respondent: Mr Edward Bowring

## Support

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**Summary of representations:**

Support reference to SuDS.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

N/A

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4748

Support

**Document Element:** Background, 4.22

**Respondent:** Environment Agency

### Background, 4.23

## Support

---

**Summary of representations:**

Support in principle [proposed change extracted as objection – see 6025]

**Summary of representation changes to plan:**

N/A

**Response:**

Support in principle noted.

**Action:**

N/A

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4163

Support

**Document Element:** Background, 4.23

**Respondent:** Chidham and Hambrook Parish Council

## Support

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**Summary of representations:**

Specific reference to trees and hedgerows is welcome and appropriate.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

N/A

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4690

Support

**Document Element:** Background, 4.23

**Respondent:** Chichester Tree Wardens

## Object

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**Summary of representations:**

Seeks reclarification and redefinition of biodiversity net gain baseline to prevent pre-emptive clearing and loss of evidence. Details of evidence requirement and penalties sought.

**Summary of representation changes to plan:**

N/A

**Response:**

Proposed change noted. The issue of pre-emptive clearance is addressed by the Biodiversity Metric, referenced in Policy NE5 Point 1 a). It is therefore considered unnecessary to duplicate the Metric's detail within the Local Plan policy.

**Action:**

No change in response to representation

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6025

Object

**Document Element:** Background, 4.23

**Respondent:** Chidham and Hambrook Parish Council

## Policy NE5 Biodiversity and Biodiversity Net Gain

### Object

#### Summary of representations:

Removal of A11 strategic site allocation on grounds of limited information on how BNG (on or off-site) will be achieved.

#### Summary of representation changes to plan:

N/A

#### Response:

Objection noted. The change proposed (removal of Policy A11) does not relate to this policy (objections have also been recorded against Policy A11).

#### Action:

No change in response to representation

3818

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** The Bosham Association

### Support

#### Summary of representations:

Support inclusion of policy but observe that proposed development in close proximity to Chichester Harbour makes its delivery problematic.

#### Summary of representation changes to plan:

N/A

#### Response:

Support and comment noted.

#### Action:

N/A

4121

Support

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Chichester Harbour Trust

## Support

---

**Summary of representations:**

Support for the policy [concerns and proposed changes extracted as objection – see 6301]

**Summary of representation changes to plan:**

N/A

**Response:**

Support in principle noted.

**Action:**

N/A

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4218

Support

---

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Chidham and Hambrook Parish Council

## Support

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**Summary of representations:**

Support in principle [proposed change extracted as objection – see 6026]

**Summary of representation changes to plan:**

N/A

**Response:**

Support in principle noted.

**Action:**

N/A

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4305

Support

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**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

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### Summary of representations:

Unclear as to what development policy applies to: point 1 indicates solely for housing; point 2 suggests applicable to all applications. Suggests clarification to policy.

### Summary of representation changes to plan:

N/A

### Response:

Objection noted. We will consider a minor modification to Policy NE5 to ensure the applicability of the policy criteria to all development, except that exempt as defined by the Biodiversity Gain Requirements Regulations or other relevant legislation, is clear.

### Action:

See council suggested modification CM070

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4349

Object

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**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Mr Stephen Jupp

## Support

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### Summary of representations:

Supports the policy to protect ancient woodland and to exclude irreplaceable habitats from BNG calculations [proposed change extracted as objection – see 6066]

### Summary of representation changes to plan:

N/A

### Response:

Support in principle noted

### Action:

N/A

---

4374

Support

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**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** The Woodland Trust



## Support

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**Summary of representations:**

Support for comprehensive policy. Comment regarding disappointment AONB not included, but understands rationale.

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted.

**Action:**

N/A

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**4406**

**Support**

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**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Chichester Harbour Conservancy

## Support

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**Summary of representations:**

Supports policy intent.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

N/A

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**4477**

**Support**

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**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Wisborough Green Parish Council

## Support

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**Summary of representations:**

Support for policy

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

N/A

4522

Support

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain**Respondent:** Portsmouth Water Ltd

## Object

**Summary of representations:**

- i) Objection and suggestion for Point 1 d) 'last resort' scenario to allow for off-site BNG provision outside of the Local Plan Area on land controlled or owned by applicants or other landowners, or for a solution to be delivered via a BNG company (such as Environment Bank), with units secured by condition or legal agreement;
- ii) Suggestion for policy to refer to the extended implementation timetable for small sites.

**Summary of representation changes to plan:**

N/A

**Response:**

Objection and proposed changes noted.

- i) We will consider a minor amendment to Policy NE5 that enhances its flexibility by allowing for off-site provision outside of, but neighbouring, the Local Plan Area, recognising that BNG can contribute to wider nature recovery plans as well as local objectives. This will be caveated by the need to ensure land is deliverable in areas of strategic significance for biodiversity such as those identified within future Local Nature Recovery Strategies. The purchase of units or credits for schemes further afield, other than the national scheme, is unlikely to be considered appropriate.
- ii) The anticipated timescale for adoption of the Proposed Local Plan is such that reference to the small sites extension period (until April 2024) is considered not to be necessary as it will have concluded prior to Plan's adoption.

**Action:**

- i) See council suggested modification CM073
- ii) No change in response to representation.

4587

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain**Respondent:** Gladman Developments Ltd

## Object

### Summary of representations:

Suggests policy amended to reference completion of the relevant DEFRA biodiversity metric 3.1 (or equivalent) as part of the Biodiversity Appraisal requirement to ensure effective and consistent with national policy [support in principle extracted – see 6176]

### Summary of representation changes to plan:

Suggests policy amended to reference completion of the relevant DEFRA biodiversity metric 3.1 (or equivalent) as part of the Biodiversity Appraisal requirement to ensure effective and consistent with national policy

### Response:

Proposed change noted. Policy 1 a) makes reference to use of the most recent national Biodiversity Metric for the calculation of BNG within development proposals, with 1b) specifying the application of the Small Sites Metric, where applicable. These references are considered sufficient to ensure consistency with DEFRA guidance.

### Action:

No change in response to representation.

**4614****Object**

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

## Object

### Summary of representations:

Proposed change to plan to ensure consistency (addition of ancient before “and veteran trees” within Point 3 c) [support in principle extracted - see 6177]

### Summary of representation changes to plan:

Proposed change to plan to ensure consistency (addition of ancient before “and veteran trees” within Point 3 c)

### Response:

Proposed change noted. We will consider a minor amendment to Policy NE5 to ensure consistent reference is made to ancient and veteran trees as per Point B.

### Action:

See council suggested modification CM076

**4694****Object**

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Chichester Tree Wardens

## Policy NE5 Biodiversity and Biodiversity Net Gain

### Object

#### Summary of representations:

Proposed change to plan to include reference to i) LNRs and ii) providing a suitable buffer for water courses. Proposed wording: "Opportunities to conserve, protect, enhance and recover biodiversity and contribute to wildlife and habitats connectivity will be undertaken, including the preservation, restoration and recreation of priority habitats, ecological networks and the protection and recover of priority species populations. The Local Nature Recovery Strategy will be utilised to inform opportunities for nature recovery" Reflecting a suitable buffer (10 metres plus) for watercourses.

#### Summary of representation changes to plan:

Proposed change to plan to include reference to i) LNRs and ii) providing a suitable buffer for water courses. Proposed wording: "Opportunities to conserve, protect, enhance and recover biodiversity and contribute to wildlife and habitats connectivity will be undertaken, including the preservation, restoration and recreation of priority habitats, ecological networks and the protection and recover of priority species populations. The Local Nature Recovery Strategy will be utilised to inform opportunities for nature recovery" Reflecting a suitable buffer (10 metres plus) for watercourses.

#### Response:

Proposed change noted. i) We will consider a minor amendment to Policy NE5 to include reference to LNRs to ensure the policy is futureproofed. ii) Policy NE5 does not refer to buffers for other types of habitat. The proposed inclusion of a specific reference to watercourse buffers is considered an unnecessary change to ensure the soundness of the plan.

#### Action:

- i) See council suggested modification CM069
- ii) No change in response to representation.

4745

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Environment Agency

### Support

#### Summary of representations:

Support for minimum 10% BNG requirement.

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted.

#### Action:

N/A

4766

Support

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Wates Developments and Seaward Properties

**Agent:** Barton Willmore now Stantec

## Object

### Summary of representations:

Objection and proposed changes:

- i) Policy should allow for off-site provision on land outside of the LPA area that is controlled by applicants or other landowners, or for a solution to be delivered via a BNG broker. Proposed wording 1.c) Net gain should be provided on-site in the first instance, and then locally off-site (as close as possible to the development site, or if that is not possible, elsewhere within Chichester District or the South Coast Plain NCA) where it should contribute towards strategic networks such as green infrastructure, wildlife corridors. or nature recovery networks;
- ii) the requirement to avoid "any adverse impact" is more onerous than the NPPF threshold for refusal of planning permission, which is "significant harm".

### Summary of representation changes to plan:

Objection and proposed changes:

- i) Policy should allow for off-site provision on land outside of the LPA area that is controlled by applicants or other landowners, or for a solution to be delivered via a BNG broker. Proposed wording 1.c) Net gain should be provided on-site in the first instance, and then locally off-site (as close as possible to the development site, or if that is not possible, elsewhere within Chichester District or the South Coast Plain NCA) where it should contribute towards strategic networks such as green infrastructure, wildlife corridors. or nature recovery networks;
- ii) the requirement to avoid "any adverse impact" is more onerous than the NPPF threshold for refusal of planning permission, which is "significant harm".

### Response:

Objection and proposed changes noted. i) We will consider a minor amendment to Policy NE5 that enhances its flexibility by allowing for off-site provision outside, but neighbouring, the Local Plan Area, recognising that BNG can contribute to wider nature recovery plans as well as local objectives. This will be caveated by the need to ensure land is deliverable in areas of strategic significance in accordance with future Local Nature Recovery Strategies. The proposed reference to the South Coast Plain NCA will be resisted as the wider area extends beyond this landscape e.g. to the north of the district. ii) We will consider a minor amendment to Policy NE5 to clarify our expectations in accordance with the mitigation hierarchy but to avoid suggestion of an absolute requirement regarding any adverse impact that is overly onerous and inflexible.

### Action:

See council suggested modifications CM067 and CM073

4889

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd

**Agent:** DWD Ltd

## Object

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**Summary of representations:**

Objection. Proposes implementation of minimum 20% BNG within District and around the country of Sussex in order to gain a greater level of certainty for genuine net gain as a result of BNG policy and to see tangible benefits for priority species and habitats.

**Summary of representation changes to plan:**

Proposes implementation of minimum 20% BNG within District and around the country of Sussex in order to gain a greater level of certainty for genuine net gain as a result of BNG policy and to see tangible benefits for priority species and habitats.

**Response:**

Proposed change noted. Whilst we would encourage biodiversity net gains above the mandatory requirement, we anticipate that viability constraints may hinder our increasing of the minimum percentage above 10% due to the cumulative impact of other developer contributions within the district. These contributions are inclusive of measures which offer biodiversity benefits and mitigations to impacts of development within the Local Plan Area. We therefore consider our position reasonable in that the legislated minimum BNG requirements would be imposed in conjunction with other biodiversity measures and are likely to deliver tangible benefits in combination.

**Action:**

No change in response to representation.

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**4906****Object**

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**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Royal Society for the Protection of Birds (RSPB)

## Object

### Summary of representations:

Proposed changes: i) ensure consistency with NPPF and NPPG (amending E to refer to Protected and Priority Habitats and Species; removal of term 'where possible at 3 e)); ii) seek a more ambitious BNG target for major development sites; iii) consider how BNG will be addressed for phased development.

### Summary of representation changes to plan:

Proposed changes: i) ensure consistency with NPPF and NPPG (amending E to refer to Protected and Priority Habitats and Species; removal of term 'where possible at 3 e)); ii) seek a more ambitious BNG target for major development sites; iii) consider how BNG will be addressed for phased development.

### Response:

Proposed changes noted. i) We will consider minor modifications as proposed at E. and 3e)i. to ensure consistency with NPPF and NPPG. ii) Whilst we would encourage biodiversity net gains above the mandatory requirement, including for major sites, we anticipate that viability constraints may hinder our increasing of the minimum percentage above 10% due to the cumulative impact of other developer contributions within the district. These contributions are inclusive of measures which offer biodiversity benefits and mitigations to impacts of development within the Local Plan Area. We therefore consider our position reasonable in that the legislated minimum BNG requirements would be imposed in conjunction with other biodiversity measures.

iii) We will consider the need for a biodiversity plan for each phase of a phased development within proposed guidance for developers. We will consider including a reference to this guidance within the supporting text

### Action:

- i) See council suggested modifications CM068, CM077
- ii) No change in response to representation
- iii) See council suggested modification CM065

5043

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Sussex Wildlife Trust

## Object

### Summary of representations:

Objection. States policy unsound as not consistent with transition requirements. Proposes change to policy setting out extending timetable for small sites until April 2024.

### Summary of representation changes to plan:

Proposes change to policy setting out extending timetable for small sites until April 2024.

### Response:

Objection and proposed change noted. The anticipated timescale for adoption of the Proposed Local Plan is such that reference to the small sites extension period (until April 2024) is considered not to be necessary as it will have concluded prior to Plan's adoption.

### Action:

No change in response to representation.

5146

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain**Respondent:** Home Builders Federation

Support

**Summary of representations:**

Support for policy.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

N/A

5171

Support

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain**Respondent:** John Newman

Object

**Summary of representations:**

Objection. i) [Policy NE5 Point 1.] points c and d should be removed as are too prescriptive and duplicative of metric 3.1. ii) Policy should retain some flexibility.

**Summary of representation changes to plan:**

i) [Policy NE5 Point 1.] points c and d should be removed as are too prescriptive and duplicative of metric 3.1. ii) Policy should retain some flexibility.

**Response:**

Objection and proposed change noted. i) Points 1.c) and d) within Policy NE5 state the proposed on-site and off-site interventions within the Plan Area, as part of the mitigation hierarchy. While the biodiversity metric (both 3.1 and 4.0) considers the interventions in terms of spatial risk multiplier score, the policy specifies local parameters, including requirements to contribute towards strategically significant networks. These requirements enable CDC to target offsite BNG delivery to ensure the right habitats in the right places. As the criteria are not directly comparable they are not considered duplicative and the proposed change is not necessary.

ii) We will consider a minor amendment to Policy NE5 that enhances its flexibility by allowing for off-site provision outside of but neighbouring the Local Plan Area, recognising that BNG can contribute to wider nature recovery plans as well as local objectives. This will be caveated by the need to ensure land is deliverable in areas of strategic importance for biodiversity in accordance with future Local Nature Recovery Strategies.

**Action:**

i) No change in response to representation.  
ii) See council suggested modification CM073



5377

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain**Respondent:** Bellway Homes (Wessex) Ltd**Agent:** Chapman Lily Planning

Object

**Summary of representations:**

Objection. Should not be ability to mitigate harm to biodiversity or for developers to 'buy their way out of this situation'.

**Summary of representation changes to plan:**

N/A

**Response:**

Objection noted. The proposed policy requires development proposals to demonstrate a minimum of 10% biodiversity net gain, in addition to any statutory requirements for mitigations to address adverse impacts on biodiversity. The use of on and off-site mitigation and biodiversity credits in relation to biodiversity net gain is established by the soon to be statutory national process and hence these methods need to be maintained as options. The Biodiversity Metric calculations reflect that on-site mitigation is the preferred approach, however, and this is reiterated within Policy NE5.

**Action:**

No change in response to representation.

5440

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain**Respondent:** Mayday! Action Group

Object

**Summary of representations:**

Objection. Plan does not protect or enhance the natural environment in relation to the proposed strategic allocation with Policy A14 Land West of Tangmere (protection of veteran trees, removal of a pond). Proposed change to modify the plan to leave the access road from Saxon meadow to Church Lane out of the plan.

**Summary of representation changes to plan:**

Proposed change to modify the plan to leave the access road from Saxon meadow to Church Lane out of the plan.

**Response:**

Objection noted. Policy NE5 requires all development to ensure the conservation, protection, enhancement and restoration of biodiversity, avoiding any adverse impacts including on irreplaceable habitats such as veteran trees, according to the mitigation hierarchy. The change proposed does not relate to this policy (objections have also been recorded against Policy A14).

**Action:**

No change

5584

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain**Respondent:** Mr Oliver Gale

Object

**Summary of representations:**

Comment references limited availability of off-site units within Plan Area, and expectation to be able to source units in a neighbouring area or further afield before using statutory credit scheme

**Summary of representation changes to plan:**

N/A

**Response:**

Objection and comment noted. We will consider a minor amendment to Policy NE5 that enhances its flexibility by allowing for off-site provision outside but neighbouring the Local Plan Area, recognising that BNG can contribute to wider nature recovery plans as well as local objectives. This will be caveated by the need to ensure land is deliverable in areas of strategic significance in accordance with future Local Nature Recovery Strategies

**Action:**

See council suggested modification CM073

5606

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain**Respondent:** Thakeham Homes

Object

**Summary of representations:**

Objection and proposed change. i)Introductory paragraph insufficiently flexible to discharge the remaining criteria e.g. in instances where adverse impact cannot be avoided but can be reduced in accordance with the mitigation hierarchy. Wording therefore unjustified or likely to be effective. ii)Propose deletion of introductory paragraph (including A-H).

**Summary of representation changes to plan:**

ii)Propose deletion of introductory paragraph (including A-H).

**Response:**

Objection and proposed change noted. i)We will consider a minor amendment to Policy NE5's introductory sentence to ensure clarity in relation to adherence to the mitigation hierarchy and flexibility in terms of implementation. ii)It is considered that the inclusion of the introductory paragraph and points A-H is necessary to clarify the hierarchy of importance for habitats, sites and species considered within the policy and their deletion is therefore resisted.

**Action:**

i)See council suggested modification CM067

ii) No change in response to representation.

5643

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Countryside Properties

**Agent:** Turley

Object

**Summary of representations:**

■ Objection and proposed change to reflect extended timetable for small sites until April 24

**Summary of representation changes to plan:**

■ Proposed change to reflect extended timetable for small sites until April 24

**Response:**

■ Objection and proposed change noted. The anticipated timescale for adoption of the Proposed Local Plan is such that reference to the small sites extension period (until April 2024) is considered not to be necessary as it will have concluded prior to Plan's adoption. The proposed change is therefore resisted

**Action:**

■ No change in response to representation

5722

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Metis Homes

**Agent:** Nova Planning

## Object

### Summary of representations:

Supports the objectives but proposes changes to i) replace reference to “any adverse impact” with significant harm, and to ii) include a new provision for off site net gain outside of district as an alternative to national biodiversity credits.

[support in principle extracted – see 6235]

### Summary of representation changes to plan:

Proposes changes to i) replace reference to “any adverse impact” with significant harm, and to ii) include a new provision for off site net gain outside of district as an alternative to national biodiversity credits.

### Response:

Objection and proposed changes noted. i) We will consider a minor amendment to Policy NE5 to clarify our expectations in accordance with the mitigation hierarchy and to avoid suggestion of an absolute requirement regarding any adverse impact that is overly onerous and inflexible. The purchase of national biodiversity credits will be retained as a last resort option, and therefore this reference will be not be removed ii) We will consider a minor amendment to Policy NE5 that enhances its flexibility by allowing for off-site provision outside the Local Plan Area, recognising that BNG can contribute to wider nature recovery plans as well as local objectives. This will be caveated by the need to ensure land is deliverable in areas of strategic significance in accordance with future Local Nature Recovery Strategies

### Action:

See council suggested modifications CM067, Cm073

5764

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Suez (Sita UK)

## Support

### Summary of representations:

Support, including for: minimum 10% biodiversity net gain, recognising viability constraints within the district; hierarchy of on-site then off-site provision, where contributes to strategic networks; exclusion of designated sites and irreplaceable habitats from net gain metrics

### Summary of representation changes to plan:

N/A

### Response:

Support and comments noted

### Action:

No change

5798

Support

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Natural England

## Object

### Summary of representations:

Concerns of inflated developer net gain claims resulting from limited baseline biodiversity (including as a result of former use – e.g. intensive agriculture). Proposed change to set minimum standard of gain reflecting size and past development form.

### Summary of representation changes to plan:

N/A

### Response:

Support in principle noted.

Proposed change noted. It is recognised that the strategic significance of agricultural land in terms of its pre-development biodiversity baseline may be low. Proposed policy NE5 requires a minimum of 10% biodiversity net gain against the baseline, calculated using the national Biodiversity Metric. The Metric enables consideration of land parcels containing multiple habitats, such as hedgerows surrounding cropland, according to condition and scale, ensuring the relative pre- and post-intervention BNG is accurately measured; it is considered unnecessary to duplicate the Metric detail within the Local Plan policy.

### Action:

No change in response to representation.

6026

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

### Summary of representations:

Propose setting a greater than 10% BNG target. Suggest strengthening of wording to maximise opportunity to deliver an average net gain of 10% across the Local Plan Area: "1. Development proposals adhere to the NPPF mitigation hierarchy, and in addition, demonstrate that proposals provide a minimum of 10% net gain in biodiversity against a pre-development baseline. Where it is achievable, a 20%+ onsite net gain is encouraged".

### Summary of representation changes to plan:

N/A

### Response:

Proposed change noted. Whilst we would encourage biodiversity net gains above the mandatory requirement, we anticipate that viability constraints may hinder increasing of the minimum percentage above 10% due to the cumulative impact of other developer contributions within the district. These contributions are inclusive of measures which offer biodiversity benefits and mitigations to impacts of development within the Local Plan Area. We therefore consider our position reasonable in that the legislated minimum BNG requirements would be imposed in conjunction with other biodiversity measures.

### Action:

No change in response to representation.

6066

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain**Respondent:** The Woodland Trust

Support

**Summary of representations:**

Support in principle

**Summary of representation changes to plan:**

N/A

**Response:**

Support in principle noted

**Action:**

N/A

6094

Support

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain**Respondent:** Countryside Properties**Agent:** Turley

Object

**Summary of representations:**

Advise i) refer to SPD to provide details of BNG implementation including: biodiversity at risk locally and how BNG can help restore it; existing important biodiversity assets and their connectivity within the district; most and least favourable areas for BNG, underpinned by evidence; how BNG can link to strategic networks such as NRNs and SWCs. ii) Include hook to LNRS to futureproof the plan. Propose changes to supporting text and policy "Opportunities to conserve, protect, enhance and recover biodiversity and contribute to wildlife and habitats' connectivity will be undertaken, including the preservation, restoration and recreation of priorities habitats, ecological networks and the protection and recovery of priority species populations having regard to the LNRS to identify such opportunities.

**Summary of representation changes to plan:**

As per summary of representation.

**Response:**

Advice and proposed changes noted. i) We will consider a minor amendment to supporting text to include reference to the proposed production of guidance for developers in relation to BNG, reflecting proposed Plan Area-specific interim BNG implementation guidance, and anticipated country-wide guidance relating to LNRNs ii) We will consider a minor amendment to Policy NE5 to include reference to LNRSs to futureproof the Local Plan

**Action:**

See council suggested modifications CM065 and CM069

6110

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain**Respondent:** Natural England**Support****Summary of representations:**

Support for inclusion of list of sites requiring conservation, protection, enhancement and restoration of biodiversity.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

N/A

6172

Support

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain**Respondent:** Royal Society for the Protection of Birds (RSPB)**Support****Summary of representations:**

Support in principle.

**Summary of representation changes to plan:**

N/A

**Response:**

Support in principle noted

**Action:**

N/A

6176

Support

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain**Respondent:** Premier Marinas Limited**Agent:** CBRE Limited

## Support

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**Summary of representations:**

█ Inclusion of irreplaceable habitats, including ancient woodland and ancient or veteran trees, is welcome and appropriate.

**Summary of representation changes to plan:**

█ N/A

**Response:**

█ Support Noted.

**Action:**

█ N/A

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6177

Support

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**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Chichester Tree Wardens

## Support

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**Summary of representations:**

█ Support in principle [proposed changes extracted as objection – see 5043]

**Summary of representation changes to plan:**

█ N/A

**Response:**

█ Support in principle noted.

**Action:**

█ N/A

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6179

Support

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**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain

**Respondent:** Sussex Wildlife Trust

## Support

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**Summary of representations:**

█ Support in principle

**Summary of representation changes to plan:**

█ N/A

**Response:**

█ Support noted.

**Action:**

█ N/A



6180

Support

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain**Respondent:** Bellway Homes (Wessex) Ltd**Agent:** Chapman Lily Planning

Support

**Summary of representations:**

Support in principle

**Summary of representation changes to plan:**

N/A

**Response:**

Support in principle noted

**Action:**

No change

6235

Support

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain**Respondent:** Suez (Sita UK)

Object

**Summary of representations:**

Concerns regarding appropriateness of off-site mitigation and biodiversity credits, along with scope for compensation to adequately address detrimental impacts on biodiversity.

**Summary of representation changes to plan:**

N/A

**Response:**

Concerns noted. The use of off-site mitigation and biodiversity credits in relation to biodiversity net gain is established by the soon to be statutory national process and hence these methods need to be maintained as options. The Biodiversity Metric calculations reflect that on-site mitigation is the preferred approach, however, and this is reiterated within Policy NE5. Furthermore, Policy NE5 confirms the minimum of 10% BNG is required to be in addition to measures or obligations to mitigate or compensate for biodiversity impacts in accordance with the mitigation hierarchy.

**Action:**

No change in response to representation.

6301

Object

**Document Element:** Policy NE5 Biodiversity and Biodiversity Net Gain**Respondent:** Chidham and Hambrook Parish Council

## Background, 4.26

## Object

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### Summary of representations:

- i) No mitigation proposed in the plan to address adverse impact of sewage outflows on the Harbour. ii) Removal of Policy A11 from the Plan as inappropriate due to sewage outflow issue.

### Summary of representation changes to plan:

Policy A11 needs to be removed from the plan as it is not an appropriate development because of the sewage outflow situation

### Response:

Objection and proposed change noted. i) Policies NE16 and NE19 (referenced in NE6 and para. 4.27) and their supporting text specifically recognise impacts on water quality (including within Chichester Harbour) from sewage effluent from wastewater treatment works, with required mitigations for development. These references are considered to provide sufficient acknowledgement and mitigation of habitat impacts, as recognised within the HRA.ii) The change proposed (removal of Policy A11) does not relate to this policy (objections have also been recorded against Policy A11).

### Action:

No change in response to representation. [Correct para 4.27 "Policy NE18 NE19 (nutrient neutrality),"]

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**3841****Object**

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**Document Element:** Background, 4.26

**Respondent:** The Bosham Association

## Background, 4.27

## Object

### Summary of representations:

- i) No timetabled plan clearly defined to upgrade the sewerage network or increase capacity for wastewater treatment. ii) Removal of A11 and A12 from the Plan, reduce scale of housing proposed with A13.

### Summary of representation changes to plan:

- The scale of the development in the local plan needs to be reduced to 2699 houses.
- Policy A11 and A12 need to be removed from the plan.
- Policy A13 needs to be scaled down to 300 houses

### Response:

- Objection and proposed change noted. i) The matter of water management and water quality is addressed by Policy NE16 and its supporting text. Paragraph 4.27 recommends that Policy NE6 should be read in conjunction with Policy NE16 (amongst others) and it is therefore considered unnecessary to duplicate information from NE16 within NE6 and its supporting text (objections have also been recorded against NE16 and supporting text) ii) The changes proposed do not relate to this policy (objections have also been recorded against Policies A11, A12 and A13).

### Action:

- No change in response to representation

3843

Object

Document Element: Background, 4.27

Respondent: The Bosham Association

## Solent Coast SPAs, 4.28

## Object

### Summary of representations:

- Acknowledgement and mitigation of significant pressure on the harbours from sewage pollution from WWtW required

### Summary of representation changes to plan:

- NE6 does need not refer to sewage / NE16 as impact on humans not international sites of particular public concern.

### Response:

- Objection and proposed change noted. Paragraph 4.28 acknowledges nitrate pollution as one of two particular pressures on the harbours, with Policies NE16 and NE19 (referenced in para. 4.27) and their supporting text specifically recognising impacts on harbour water quality from sewage effluent from wastewater treatment works, with required mitigations for development. These references are considered to provide sufficient acknowledgement and mitigation of habitat impacts, as recognised within the HRA.

### Action:

- No change in response to representation. [Correct para 4.27 "Policy NE18 NE19 (nutrient neutrality),"]

3829

Object

Document Element: Solent Coast SPAs, 4.28

Respondent: Mrs Clare Gordon-Pullar

## Object

### Summary of representations:

- i) Supporting text for the Solent Coast SPAs should also refer to Solent Maritime SAC;
- ii) in addition to nitrate pollution and recreational disturbance, a third pressure of loss of saltmarsh habitat due to inappropriate coastal management (resulting in coastal squeeze) should be referenced;
- iii) in view of the significance of the issue, policy requirements relating to coastal squeeze should be included in Policy NE6 and NE12.

### Summary of representation changes to plan:

We would urgently advise that a third pressure to the harbours should be added which is inappropriate coastal management (resulting in significant impacts including coastal squeeze).

### Response:

Objection and proposed changes noted. i) We will consider a change to the supporting text to include reference to the Solent Maritime SAC to ensure it is comprehensive; ii) we will consider a change to the supporting text at paragraph 4.28 to highlight the impact of inappropriate coastal management on designated habitats; iii) we will consider a change to Policy NE6 to reference policy NE12 and development requirements to mitigate coastal squeeze. (proposed change also recorded against NE12 – see rep 6292)

### Action:

See council suggested modifications CM79, CM80, CM83

5800

Object

Document Element: Solent Coast SPAs, 4.28

Respondent: Natural England

## Solent Coast SPAs, 4.29

## Object

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**Summary of representations:**

- i) Use of 'essential' within wording of 4.29 implies demonstration of nutrient neutrality is a mandatory not optional requirement.
- ii) Proposed removal of Policy A11 on basis lack of provision for offsetting nitrates in conflict with para. 4.29.
- iii) other sites proposed which require nutrient neutrality should be removed from the Plan unless mitigation plan is in place

**Summary of representation changes to plan:**

Policy A11 needs to be removed from the local plan.

Other sites proposed which require nitrate offsetting should also be removed unless there is a plan in place for offsetting nitrates.

**Response:**

Objection and proposed change noted. Policy NE19 (with supporting text) requires all relevant developments within the Solent catchment to demonstrate nutrient neutrality. This is considered to be consistent with the wording of paragraph 4.29. ii) The change proposed (removal of Policy A11) does not relate to this policy (objections have also been recorded against Policy A11)

iii) The change proposed (removal of relevant site allocations without nutrient mitigation) does not relate to this policy (objections have also been recorded against Policy NE19 (rep 6256 refers).

**Action:**

No change in response to representation

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**3857****Object**

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**Document Element:** Solent Coast SPAs, 4.29

**Respondent:** The Bosham Association

## Arun Valley SPA and SAC, 4.31

## Object

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### Summary of representations:

Proposed changes to paragraph to ensure accuracy and consistency with other references to Southern Water's supply in the SNWRZ. Changes as follows:

"The Arun Valley SPA, SAC and Ramsar site lies within the Sussex North Water Resource Zone which is partly served by supplies from groundwater abstractions near Pulborough."

### Summary of representation changes to plan:

4.31 The Arun Valley SPA, SAC and Ramsar site lies within the Sussex North Water Resource Zone which is partly served by supplies from groundwater abstractions near Pulborough.

### Response:

Objection and proposed change noted. We will consider a minor modification to paragraph 4.31 to ensure accuracy and consistency

### Action:

See council suggested modification CM081

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4455

Object

**Document Element:** Arun Valley SPA and SAC, 4.31

**Respondent:** Southern Water

## The Mens, Ebernoe Common and Singleton & Cocking Tunnels SACs, 4.32

## Object

### Summary of representations:

Plan not sound as i) does not reference HRA findings in relation of foraging distances of barbastelle bats (up to 20km) ii) Policy A14 (Land West of Tangmere) within foraging range of barbastelle bats from Singleton Tunnels (12km buffer). Proposed change to add wording to 4.32 to refer.

### Summary of representation changes to plan:

o make this sound, add text to the local plan to highlight this important matter:

4.32 The Mens, Ebernoe Common and Singleton & Cocking Tunnels SACs are designated habitats for their Bechstein's and barbastelle bat populations. Applicants intending to submit proposals for development within the functionally linked conservation zones, as specified in the policy, should have regard to the Draft Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol (Natural England, 2018), or any subsequent equivalent document, and Policy NE6. It is noted that the masterplan relating to Tangmere is less than 12km from Singleton tunnel.

"Barbastelle bats are known to travel substantial distances from their roots to feeding sites. A study on barbastelle bats determined that home range distances show considerable inter-individual differences, with bats traveling between 1 and 20km to reach their foraging areas" (para 3.40, HAR), which means that the land to the west of Tangmere is within their foraging range.

### Response:

Objection and proposed change noted. i) The HRA references considerable inter-individual differences of up to 20km for barbastelle bat foraging distances, but also recognises the precautionary 12km 'wider conservation area' recommended by Natural England within the Sussex Bat Protocol. The requirements of Policy NE6 relating to this 12km buffer distance are therefore considered a proportionate response to the potential adverse impact on foraging areas for the protected species ii) Supporting text at paragraph 4.32 introduces bat-designated SACs and the Sussex Bat Protocol. The HRA notes that all strategic residential allocations in the south of the plan area are present within the 12km buffer defined by the protocol, but concludes that the Plan policies (specifically NE5 and NE6) enable habitat protection. It is therefore not considered necessary to highlight site-specific constraints within this introductory text (objections have also been recorded against Policy A14 – 6257 refers).

### Action:

No change in response to representation

4104

Object

**Document Element:** The Mens, Ebernoe Common and Singleton & Cocking Tunnels SACs, 4.32

**Respondent:** Mr Matthew Rees

## Support

### Summary of representations:

Supports and comments that will work with LPA to expand upon proposed wildlife corridors. Raises opportunity to provide additional corridor provision linking Tunnels SAC across Estate land

### Summary of representation changes to plan:

N/A

### Response:

Support and comment noted.

### Action:

N/A

4726

Support

**Document Element:** The Mens, Ebernoe Common and Singleton & Cocking Tunnels SACs, 4.32

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Policy NE6 Chichester's Internationally and Nationally Designated Habitats

## Support

### Summary of representations:

Support inclusion and comprehensiveness of policy. Comment incompatible with levels of development proposed in plan, particularly relation to the Chichester and Emsworth east-west corridor, along SSSI/SPA/SAC boundary. Proposed mitigations must be deliverable, funded and monitored effectively

### Summary of representation changes to plan:

N/A

### Response:

Support and comment noted

### Action:

N/A

4124

Support

**Document Element:** Policy NE6 Chichester's Internationally and Nationally Designated Habitats

**Respondent:** Chichester Harbour Trust



## Support

---

**Summary of representations:**

Support in full, particularly greater protection for bats

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted

**Action:**

N/A

---

4152

Support

---

**Document Element:** Policy NE6 Chichester's Internationally and Nationally Designated Habitats

**Respondent:** Chidham and Hambrook Parish Council

## Support

---

**Summary of representations:**

An important policy

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted

**Action:**

N/A

---

4408

Support

---

**Document Element:** Policy NE6 Chichester's Internationally and Nationally Designated Habitats

**Respondent:** Chichester Harbour Conservancy

## Support

---

**Summary of representations:**

Support for policy intent

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

N/A

4478

Support

**Document Element:** Policy NE6 Chichester's Internationally and Nationally Designated Habitats**Respondent:** Wisborough Green Parish Council

Support

**Summary of representations:**

Support for policy

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

N/A

4524

Support

**Document Element:** Policy NE6 Chichester's Internationally and Nationally Designated Habitats**Respondent:** Portsmouth Water Ltd

Object

**Summary of representations:**

Recognises practical difficulties in guaranteeing nutrient neutrality. Proposes 'appropriate mitigation' has regard for existing residents and the commercial viability of businesses and is proportionate to the scale of development proposed to ensure it doesn't render development unviable or overburdened. [Support in principle extracted as separate rep – see 6152]

**Summary of representation changes to plan:**

N/A

**Response:**

Objection and proposed change noted. Policy NE6 requires that the provision of appropriate mitigation must be in accordance with Policy NE19, and its wording is considered sufficient for this purpose. The proposed change has also been recorded against NE19 where nutrient neutrality is considered in more depth (rep 6258 refers).

**Action:**

No change in response to representation

4616

Object

**Document Element:** Policy NE6 Chichester's Internationally and Nationally Designated Habitats**Respondent:** Premier Marinas Limited**Agent:** CBRE Limited

## Support

---

**Summary of representations:**

Supports and encourages early developer engagement with EA to ensure associated environmental permits are feasible.

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted

**Action:**

N/A

---

4749

Support

---

**Document Element:** Policy NE6 Chichester's Internationally and Nationally Designated Habitats

**Respondent:** Environment Agency

## Support

---

**Summary of representations:**

Particularly welcomes and supports reference to SACs and SAC Protocol

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted.

**Action:**

N/A

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5134

Support

---

**Document Element:** Policy NE6 Chichester's Internationally and Nationally Designated Habitats

**Respondent:** South Downs National Park Authority

## Support

---

**Summary of representations:**

Supports

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

N/A

5172

Support

**Document Element:** Policy NE6 Chichester's Internationally and Nationally Designated Habitats

**Respondent:** John Newman

Support

**Summary of representations:**

Supports and comments that explicit reference to the designation and feature provides helpful clarification

**Summary of representation changes to plan:**

n/a

**Response:**

Support and comment noted

**Action:**

N/A

5380

Support

**Document Element:** Policy NE6 Chichester's Internationally and Nationally Designated Habitats

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

- i)Unclear how policy relates to nationally designated habitats (all sites specifically referenced are European or international designations).
- ii)References to Arun Valley Ramsar site have been missed.
- iii)References to Chichester and Langstone Harbours SPA should be consistent to ensure accuracy

### Summary of representation changes to plan:

We would suggest you consider amending the title to "Internationally Designated Habitats" only and that nationally designated sites are sufficiently covered under the relevant section of Policy NE5.

There are several instances including paragraph 4.27, the title of paragraph 4.31 and policy point a) where reference to the Arun Valley Ramsar site has been missed.

To avoid any confusion we would encourage reference to the Chichester and Langstone Harbours SPA as this is the correct, full name of the site (even though it is only the Chichester Harbour section that falls within the district)

### Response:

Objection and proposed changes noted. i) We will consider a change to the policy title and content to ensure its focus on internationally designated habitats only; ii) We will consider a change to the policy to include a reference to the Arun Valley Ramsar site at a); iii) we will consider changes to the policy and supporting text to ensure consistent references to Chichester and Langstone Harbours SPA are made

### Action:

See council suggested modifications CM082 and CM101

5801

Object

**Document Element:** Policy NE6 Chichester's Internationally and Nationally Designated Habitats

**Respondent:** Natural England

## Object

### Summary of representations:

Policy drafting should be strengthened regarding:

- i) Point d) Specification of greenfield sites – incorrect presumption that previously developed land cannot provide habitats;
- ii) Impact of atmospheric pollution on Ebernoe SAC as highlighted in HRA should be addressed and assessment specified as a requirement;
- iii) Clarity on why bat protocol is draft if signed up to – requirement to adhere or have regard to?

### Summary of representation changes to plan:

As per representation summary.

### Response:

Objection and proposed changes noted. i) The policy as drafted requires greenfield sites and sites that support or are in close proximity to relevant habitats to have due regard for bats. This is considered to ensure inclusion of developed sites, as appropriate. ii) Modelling within the HRA suggests no adverse effect on the integrity of Ebernoe SAC from atmospheric pollution will arise as a result of implementation of the Plan. Additional policies and development requirements (beyond those already proposed within NE1, NE21, T2, and T3) are therefore not considered proportionate. lii) The Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol has been agreed by Natural England and the South Downs National Park Authority. Adherence to the protocol is not mandatory, but it can be considered within planning decisions. Having regard to the protocol is therefore considered appropriate in this context.

### Action:

No change in response to representation

5834

Object

**Document Element:** Policy NE6 Chichester's Internationally and Nationally Designated Habitats

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Support

### Summary of representations:

Agree with premise of NE6 and recognise need to address water and nutrient neutrality issues

### Summary of representation changes to plan:

N/A

### Response:

Support in principle noted

### Action:

N/A

6152

Support

**Document Element:** Policy NE6 Chichester's Internationally and Nationally Designated Habitats**Respondent:** Premier Marinas Limited**Agent:** CBRE Limited**Object****Summary of representations:**

- Object: request NE6 be accompanied by inset map showing zones of influence.

**Summary of representation changes to plan:**

- Policy NE6 be accompanied by inset map showing zones of influence.

**Response:**

- The zones of influence are shown on the Policies Map.

**Action:**

- No changes as a result of this representation.

6259

Object

**Document Element:** Policy NE6 Chichester's Internationally and Nationally Designated Habitats**Respondent:** Bellway Homes (Wessex) Ltd**Agent:** Chapman Lily Planning**Background, 4.34****Object****Summary of representations:**

- Proposed inclusion of reference to SSSI condition review of Chichester Harbour in supporting text.

**Summary of representation changes to plan:**

- Proposed inclusion of reference to SSSI condition review of Chichester Harbour in supporting text.

**Response:**

- Objection and proposed change noted. We will consider a minor modification to 4.34 to reference the condition review, which is also listed in the Local Plan evidence.

**Action:**

- See council suggested modification CM084

4411

Object

**Document Element:** Background, 4.34**Respondent:** Chichester Harbour Conservancy

## Policy NE7 Development and Disturbance of Birds in Chichester and Langstone Harbours, Pagham Harbour, Solent and Dorset Coast Special Protection Areas and Medmerry Compensatory Habitat

### Support

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**Summary of representations:**

█ Support – no comment

**Summary of representation changes to plan:**

█ N/A

**Response:**

█ Support noted

**Action:**

█ N/A

4150

Support

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**Document Element:** Policy NE7 Development and Disturbance of Birds in Chichester and Langstone Harbours, Pagham Harbour, Solent and Dorset Coast Special Protection Areas and Medmerry Compensatory Habitat

**Respondent:** Chidham and Hambrook Parish Council



## Policy NE7 Development and Disturbance of Birds in Chichester and Langstone Harbours, Pagham Harbour, Solent and Dorset Coast Special Protection Areas and Medmerry Compensatory Habitat

### Object

#### Summary of representations:

Strengthen wording beyond 'have regard to' to meet the policy aims of the Chichester Harbour AONB Management Plan

#### Summary of representation changes to plan:

Strengthen wording beyond 'have regard to' to meet the policy aims of the Chichester Harbour AONB Management Plan

#### Response:

Objection and proposed change noted. We recognise that the Government response to the Glover Landscape Review considers a strengthening of AONB management plan duties, but in the absence of anticipated guidance on this matter, any heightened status is undefined, bringing uncertainty in relation to interpretation. The use of proposed wording 'have regard to the Chichester AONB Management Plan' is considered to be consistent with current national guidance relating to the designation and management of AONBs, and is therefore considered appropriate in this context.

#### Action:

No change in response to representation

4413

Object

**Document Element:** Policy NE7 Development and Disturbance of Birds in Chichester and Langstone Harbours, Pagham Harbour, Solent and Dorset Coast Special Protection Areas and Medmerry Compensatory Habitat

**Respondent:** Chichester Harbour Conservancy

### Support

#### Summary of representations:

Support

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted

#### Action:

N/A

4908

Support

**Document Element:** Policy NE7 Development and Disturbance of Birds in Chichester and Langstone Harbours, Pagham Harbour, Solent and Dorset Coast Special Protection Areas and Medmerry Compensatory Habitat

**Respondent:** Royal Society for the Protection of Birds (RSPB)

## Support

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**Summary of representations:**

Support.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

N/A

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5044

Support

**Document Element:** Policy NE7 Development and Disturbance of Birds in Chichester and Langstone Harbours, Pagham Harbour, Solent and Dorset Coast Special Protection Areas and Medmerry Compensatory Habitat

**Respondent:** Sussex Wildlife Trust

## Support

---

**Summary of representations:**

Support.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

N/A

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5173

Support

**Document Element:** Policy NE7 Development and Disturbance of Birds in Chichester and Langstone Harbours, Pagham Harbour, Solent and Dorset Coast Special Protection Areas and Medmerry Compensatory Habitat

**Respondent:** John Newman

## Support

---

**Summary of representations:**

Support.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

N/A

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5381

Support

**Document Element:** Policy NE7 Development and Disturbance of Birds in Chichester and Langstone Harbours, Pagham Harbour, Solent and Dorset Coast Special Protection Areas and Medmerry Compensatory Habitat

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Support

---

**Summary of representations:**

Support in principle [comment extracted as separate objection – see rep 6302]

**Summary of representation changes to plan:**

N/A

**Response:**

Support in principle noted.

**Action:**

N/A

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5449

Support

**Document Element:** Policy NE7 Development and Disturbance of Birds in Chichester and Langstone Harbours, Pagham Harbour, Solent and Dorset Coast Special Protection Areas and Medmerry Compensatory Habitat

**Respondent:** Mayday! Action Group

## Object

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**Summary of representations:**

Evolving guidance regarding nutrient neutrality means that policy NE7 may not be relevant for entirety of plan period.

**Summary of representation changes to plan:**

Proposed inclusion of reference to potential change to prevent policy becoming out of date and ineffective.

**Response:**

Objection and comment noted. Policy NE19 concerns nutrient neutrality to address adverse impacts on Chichester Harbour from nutrient discharges associated with development. NE7 separately addresses the disturbance of bird species within the designated SPAs (including Chichester and Langstone Harbours) from development. In view of this distinction, reference within NE7 to potential guidance changes concerning nutrient neutrality is considered unnecessary and potentially confusing.

**Action:**

No change in response to representation.

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**5698****Object**

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**Document Element:** Policy NE7 Development and Disturbance of Birds in Chichester and Langstone Harbours, Pagham Harbour, Solent and Dorset Coast Special Protection Areas and Medmerry Compensatory Habitat

**Respondent:** Church Commissioners for England

**Agent:** Lichfields

## Object

### Summary of representations:

Reiterating previously proposed changes considered necessary to improve clarity of plan:

i) Reference to the LNR Management Plan removed from clause a) as separate from joint scheme of mitigation and concerned with visitor experience not mitigation of visitor pressure. ii) expand policy in relation to functionally linked land, distinct from recreational disturbance impacts; iii) clarify impacts on functionally linked land could apply to all development (through amendment of para. 4.39); iv) remove sentence "net increases in residential development, which incorporates appropriate avoidance/mitigation measures, which would avoid any likelihood of a significant impact on effect on the SPA, will not require Appropriate Assessment" as appears contrary to required screening stage of AA. [support in principle extracted as separate rep – see 6303]

### Summary of representation changes to plan:

Reiterating previously proposed changes considered necessary to improve clarity of plan:

i) Reference to the LNR Management Plan removed from clause a) as separate from joint scheme of mitigation and concerned with visitor experience not mitigation of visitor pressure.  
ii) expand policy in relation to functionally linked land, distinct from recreational disturbance impacts;  
iii) clarify impacts on functionally linked land could apply to all development (through amendment of para. 4.39);  
iv) remove sentence "net increases in residential development, which incorporates appropriate avoidance/mitigation measures, which would avoid any likelihood of a significant impact on effect on the SPA, will not require Appropriate Assessment" as appears contrary to required screening stage of AA. [support in principle extracted as separate rep – see 6303]

### Response:

Objection and comments noted. i) We will consider a modification to policy NE7 (as it relates to Pagham and Medmerry) to remove reference to LNR Management Plan within point a) to avoid confusion with mitigations ii) We will consider minor modifications to policy NE7 to expand references to loss or degradation of functionally linked land to improve clarity, including in relation to the separate consideration of this impact pathway from recreational disturbance iii) We will consider a minor modification to paragraph 4.39 as follows: "All development (not just residential or tourism related) on or adjacent to these areas could potentially impact the SPAs, separate and in addition to the impact of recreational disturbance" to improve clarity. iv) We will consider a minor modification to Policy NE7 (as it relates to Pagham and Medmerry) to remove the sentence "Net increases in residential development, which incorporate appropriate avoidance/mitigation measures, which would avoid any likelihood of a significant effect on the SPA, will not require Appropriate Assessment" to avoid contradiction of AA screening process.

### Action:

See council suggested modifications CM085 and CM087.

5802

Object

**Document Element:** Policy NE7 Development and Disturbance of Birds in Chichester and Langstone Harbours, Pagham Harbour, Solent and Dorset Coast Special Protection Areas and Medmerry Compensatory Habitat

**Respondent:** Natural England

## Support

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**Summary of representations:**

Support in principle

**Summary of representation changes to plan:**

N/A

**Response:**

Support in principle noted.

**Action:**

N/A

### 6092

### Support

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**Document Element:** Policy NE7 Development and Disturbance of Birds in Chichester and Langstone Harbours, Pagham Harbour, Solent and Dorset Coast Special Protection Areas and Medmerry Compensatory Habitat

**Respondent:** Church Commissioners for England

**Agent:** Lichfields

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

N/A

### 6178

### Support

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**Document Element:** Policy NE7 Development and Disturbance of Birds in Chichester and Langstone Harbours, Pagham Harbour, Solent and Dorset Coast Special Protection Areas and Medmerry Compensatory Habitat

**Respondent:** Wates Developments and Seaward Properties

**Agent:** Barton Willmore now Stantec

## Object

### Summary of representations:

- i) Comment that attention to connectivity is vitally important to the AONB.
- ii) Challenges propriety and accountability of financial contribution to Bird Aware Solent Strategy as mitigation to loss of biodiversity.

### Summary of representation changes to plan:

N/A

### Response:

Objection and comment noted.

- i) We will consider modifications to Policy NE7 and its supporting text to recognise the impacts of loss or degradation of functionally linked habitats on bird species protected via statutory designated habitats including of Chichester and Langstone Harbours SPA.
- ii) The Bird Aware Solent strategy includes avoidance as well as mitigation measures. Financial contribution to the scheme therefore helps to avoid as well as mitigate adverse effects on the integrity of the sites from new residential development. It is not compensation for loss of habitat, which is only permitted under very stringent circumstances.

### Action:

- i) See council suggested modifications CM085 and CM087
- ii) No change in response to representation.

6302

Object

**Document Element:** Policy NE7 Development and Disturbance of Birds in Chichester and Langstone Harbours, Pagham Harbour, Solent and Dorset Coast Special Protection Areas and Medmerry Compensatory Habitat

**Respondent:** Mayday! Action Group

## Support

### Summary of representations:

Welcomes policy and improvements made since Reg 18, particularly inclusion of Solent and Dorset Coast SPA and the Medmerry Compensatory Habitat.

### Summary of representation changes to plan:

N/A

### Response:

Support in principle noted.

### Action:

N/A

6303

Support

**Document Element:** Policy NE7 Development and Disturbance of Birds in Chichester and Langstone Harbours, Pagham Harbour, Solent and Dorset Coast Special Protection Areas and Medmerry Compensatory Habitat

**Respondent:** Natural England

## Background, 4.41

## Object

### Summary of representations:

Object: Suggested change to penultimate sentence at 4.41. "A "valued" tree should include those determined using the criteria contained in British Standard 5837. Trees under 75mm in stem diameter and under 1.5m above ground level may be valued trees where they provide opportunities for succession planning for existing trees and/or for naturally regenerating woodland." Also sought at Reg 18 that plan demonstrates how it will deliver Government tree-planting targets. 4.42 should require Trees and Woodland Strategy to be prepared as SPD. Seek CDC recognises necessity for timely preparation of Strategy to avoid need for Wardens participation in this aspect of the hearing sessions. Further extensive amendments suggested to policy.

### Summary of representation changes to plan:

Suggest penultimate sentence amended to:

"A "valued" tree should include those determined using the criteria contained in British Standard 5837. Trees under 75mm in stem diameter and under 1.5m above ground level may be valued trees where they provide opportunities for succession planning for existing trees and/or for naturally regenerating woodland."

N.B. based on original wording which might mistakenly use "and" - the 75mm stem diameter measurement might be AT 1.5m above ground level

### Response:

Paragraph 035 of the PPG Natural Environment Guidance refers to the Forestry Commission and Natural England advice which is a material consideration in appropriate circumstances. BS5837 is referred to in this Guidance and the reference at 4.41 repeats the criteria contained within this Guidance. Tree planting project is detailed in Climate Emergency Detailed Action Plan 2021 and the DEFRA project which CDC have taken part in is also detailed on the Council's website. Supplementary Planning Documents will be considered after adoption of the Local Plan. Other than the amendments the Council has outlined in its Regulation 19 responses, it is considered that the Policy criterion reflects the intention of the NPPF and National Guidance.

### Action:

No change

4709

Object

**Document Element:** Background, 4.41

**Respondent:** Chichester Tree Wardens



## Background, 4.42

## Object

### Summary of representations:

Object: Suggested change to penultimate sentence at 4.41. "A "valued" tree should include those determined using the criteria contained in British Standard 5837. Trees under 75mm in stem diameter and under 1.5m above ground level may be valued trees where they provide opportunities for succession planning for existing trees and/or for naturally regenerating woodland." Also sought at Reg 18 that plan demonstrates how it will deliver Government tree-planting targets. 4.42 should require Trees and Woodland Strategy to be prepared as SPD. Seek CDC recognises necessity for timely preparation of Strategy to avoid need for Wardens participation in this aspect of the hearing sessions. Further extensive amendments suggested to policy.

### Summary of representation changes to plan:

As per rep summary

### Response:

Paragraph 035 of the PPG Natural Environment Guidance refers to the Forestry Commission and Natural England advice which is a material consideration in appropriate circumstances. BS5837 is referred to in this Guidance and the reference at 4.41 repeats the criteria contained within this Guidance. Tree planting project is detailed in Climate Emergency Detailed Action Plan 2021 and the DEFRA project which CDC have taken part in is also detailed on the Council's website. Supplementary Planning Documents will be considered after adoption of the Local Plan. Other than the amendments the Council has outlined in its Regulation 19 responses, it is considered that the Policy criterion reflects the intention of the NPPF and National Guidance.

### Action:

No change

## 4756

## Object

**Document Element:** Background, 4.42

**Respondent:** Chichester Tree Wardens

## Policy NE8 Trees, Hedgerows and Woodlands

Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

4153

Support

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**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands

**Respondent:** Chidham and Hambrook Parish Council

Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted

**Action:**

No change

4306

Support

---

**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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4479

Support

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**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands

**Respondent:** Wisborough Green Parish Council

## Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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4527

Support

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**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands

**Respondent:** Portsmouth Water Ltd

## Support

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**Summary of representations:**

Support.

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted

**Action:**

No change

4549

Support

**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands

**Respondent:** The Woodland Trust

Object

**Summary of representations:**

Clarify Point 6 – All major developments will be required to provide street tree planting – para 131 NPPF supported by footnote 50 states street tree planting should be sought unless in specific cases, there are clear justifiable compelling reasons why this would be inappropriate.

**Summary of representation changes to plan:**

As per rep summary.

**Response:**

Paragraph 131 of the NPPF does provide that planning policies and decisions should ensure that new streets are tree-lined unless as set out at footnote 50, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate. Criterion 6 will be expanded to reflect the NPPF and provide further clarity.

**Action:**

See Council's suggested Modification CM092.

4706

Object

**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates

## Object

### Summary of representations:

Object: Suggested change to penultimate sentence at 4.41. "A "valued" tree should include those determined using the criteria contained in British Standard 5837. Trees under 75mm in stem diameter and under 1.5m above ground level may be valued trees where they provide opportunities for succession planning for existing trees and/or for naturally regenerating woodland." Also sought at Reg 18 that plan demonstrates how it will deliver Government tree-planting targets. 4.42 should require Trees and Woodland Strategy to be prepared as SPD. Seek CDC recognises necessity for timely preparation of Strategy to avoid need for Wardens participation in this aspect of the hearing sessions. Further extensive amendments suggested to policy.

### Summary of representation changes to plan:

As per rep summary

### Response:

Paragraph 035 of the PPG Natural Environment Guidance refers to the Forestry Commission and Natural England advice which is a material consideration in appropriate circumstances. BS5837 is referred to in this Guidance and the reference at 4.41 repeats the criteria contained within this Guidance. Tree planting project is detailed in Climate Emergency Detailed Action Plan 2021 and the DEFRA project which CDC have taken part in is also detailed on the Council's website. Supplementary Planning Documents will be considered after adoption of the Local Plan. Other than the amendments the Council has outlined in its Regulation 19 responses, it is considered that the Policy criterion reflects the intention of the NPPF and National Guidance.

### Action:

No change

4839

Object

**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands

**Respondent:** Chichester Tree Wardens

## Object

### Summary of representations:

Claims woodland and hedgerows are not irreplaceable habitats and requests removal of reference.

### Summary of representation changes to plan:

As per rep summary.

### Response:

Criterion 2 will be amended to reflect the definition of irreplaceable habitats in the NPPF as referred to at paragraph 180(c).

### Action:

See Council's suggested Modification CM090.

4888

Object

**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands**Respondent:** Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd**Agent:** DWD Ltd

Support

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

4910

Support

**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands**Respondent:** Royal Society for the Protection of Birds (RSPB)

Object

**Summary of representations:**

Amend point 2 ".....resulting in the direct or indirect loss...." In line with Para 33 of PPG.

**Summary of representation changes to plan:**

Amend point 2 ".....resulting in the direct or indirect loss...." In line with Para 33 of PPG.

**Response:**

Suggested amendment agreed.

**Action:**

See Council's suggested Modification CM090.

5046

Object

**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands**Respondent:** Sussex Wildlife Trust

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

## 5174

## Support

**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands

**Respondent:** John Newman

## Object

### Summary of representations:

Definition of hedgerow unclear for criterion 2, should fall to criterion 3 – differentiation unclear; “All major proposals to provide tree planting...” add in “unless clear, justifiable and compelling reasons why inappropriate” at criterion 6. Change ‘maximise’ at point 4 to ‘harness’

### Summary of representation changes to plan:

Recommend amending draft Policy NE8 to reflect NPPF stating, all major development proposals will be required to provide street tree planting, unless, in specific cases there are clear, justifiable and compelling reasons why this would be inappropriate’. Concern expressed in relation to use of word ‘maximise’ in criteria 4, as taken to extreme, this might only ever support woodlands. Respectfully suggest this be replaced with ‘harness’.

### Response:

Criterion 2 will be amended to reflect the definition of irreplaceable habitats in the NPPF and reference to hedgerows will be removed. Criterion 6 will be expanded to reflect the NPPF and provide further clarity.

### Action:

See Council's suggested Modifications CM090 and CM092.

## 5383

## Object

**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

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### Summary of representations:

Not acceptable to remove established trees. Questions how Council will ensure hedgerows are not destroyed ahead of development. Queries why maintenance period is only 5 years.

### Summary of representation changes to plan:

No change

### Response:

The policy seeks to protect trees, hedgerows and woodland and thus, avoid their removal. The maintenance period of 5 years is a minimum period

### Action:

No change

5450

Object

---

**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands

**Respondent:** Mayday! Action Group

## Object

---

### Summary of representations:

Point 5 minimum 15m buffer too specific and presumptive. Policy assumes standard constraint, would unnecessarily limit development

### Summary of representation changes to plan:

No change

### Response:

Paragraph 035 of the PPG Natural Environment Guidance refers to the Forestry Commission and Natural England advice which is a material consideration in appropriate circumstances. Criterion 5 reflects the buffer zone recommendation

### Action:

No change

5723

Object

---

**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands

**Respondent:** Metis Homes

**Agent:** Nova Planning



## Object

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### Summary of representations:

Delete ref to "protected trees, groups of trees and woodland and hedgerows – does not accord with NPPF definition of irreplaceable habitats.

### Summary of representation changes to plan:

Delete ref to "protected trees, groups of trees and woodland and hedgerows – does not accord with NPPF definition of irreplaceable habitats.

### Response:

Criterion 2 will be amended to reflect the definition of irreplaceable habitats in the NPPF and reference to hedgerows will be removed.

### Action:

See Council's suggested Modification CM090.

---

5765

Object

---

**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands

**Respondent:** Suez (Sita UK)

## Support

---

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

---

5803

Support

---

**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands

**Respondent:** Natural England

## Object

---

### Summary of representations:

Amend wording to better deliver protection required in NPPF.

### Summary of representation changes to plan:

Add at point 5 "For larger developments, a precautionary buffer of up to 50m may be required unless the applicant can demonstrate that a smaller buffer would be sufficient."

### Response:

Paragraph 035 of the PPG Natural Environment Guidance refers to the Forestry Commission and Natural England advice which is a material consideration in appropriate circumstances. The buffer zone recommendation is as set out at criterion 5, however, the wording "Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone" in the Guidance recommendation will also be added to the policy.

### Action:

See Council's suggested Modification CM091.

---

6070

Object

---

**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands

**Respondent:** The Woodland Trust

## Support

---

### Summary of representations:

Support.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

---

6169

Support

---

**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

---

6248

Support

**Document Element:** Policy NE8 Trees, Hedgerows and Woodlands

**Respondent:** Sussex Wildlife Trust

### Policy NE9 Canals

## Object

---

**Summary of representations:**

Does not provide enough protection for canal which would be impacted by proposed relief road

**Summary of representation changes to plan:**

Chichester canal needs to have more protection so that development proposals can be refused if they are shown to impact on the canal

**Response:**

The policy makes provision for the preservation and enhancement of the Canals.

**Action:**

No change

---

3830

Object

**Document Element:** Policy NE9 Canals

**Respondent:** Mrs Clare Gordon-Pullar

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

4528

Support

**Document Element:** Policy NE9 Canals

**Respondent:** Portsmouth Water Ltd

## Object

### Summary of representations:

amend policy wording in accordance with para 35c NPPF: "Development proposals that make provision for through navigation or enhancement supports the further use and enhancement of the....." Add to end of first para "This includes improvements to existing houseboat population and further houseboat development on the canal."

### Summary of representation changes to plan:

Policy wording should be amended as follows to ensure the policy is more effective in accordance with paragraph 35(c) of the NPPF:

"Development proposals that make provision for through navigation or enhancement supports the further use and enhancement of the Chichester Ship Canal and/or the Wey and Arun Canal will be supported where they meet environmental, ecological, historical and transport considerations. This includes improvements to the existing houseboat population and further houseboat development on the canal.

Development proposals will be permitted where they preserve and enhance the remaining line and configuration of the Portsmouth and Arundel Canal and the features within it, with no overall adverse effect. Where no such line and configuration remains, proposals to reinterpret the alignment within new development proposals will be supported where they protect and enhance the culture, history and natural environment and consideration is given to local impacts

### Response:

The intent of this policy is limited to preserving and enhancing the Canals. A houseboat and caravan study has been commissioned, although this is more pertinent to the housing needs section of the plan

### Action:

No change

4618

Object

**Document Element:** Policy NE9 Canals**Respondent:** Premier Marinas Limited**Agent:** CBRE Limited

Support

**Summary of representations:**

Support

**Summary of representation changes to plan:**

We would suggest that the final sentence in the supporting text which refers to the potential need for development to undergo Appropriate Assessment be removed. It is currently incorrect as it implies it impacts on the canals themselves which would require assessment – certainly within the plan area the canals are not subject to any statutory nature conservation designation. Rather it is the case that development proposals which aim to re-instate lengths of the canal and/or associated features could have impacts on other designated nature conservation sites. We consider the policy wording itself along with other key policies such as NE5 sufficient to address this issue

**Response:**

Support and comments noted

**Action:**

See council suggested modification CM094

5804

Support

**Document Element:** Policy NE9 Canals**Respondent:** Natural England

Object

**Summary of representations:**

Final sentence in supporting text should be removed as incorrect – canals not subject to any statutory nature conservation designation.

**Summary of representation changes to plan:**

As per rep summary.

**Response:**

Proposed amendment will be incorporated as suggested.

**Action:**

See Council's suggested Modification CM094.

6111

Object

**Document Element:** Policy NE9 Canals**Respondent:** Natural England

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

6153

Support

**Document Element:** Policy NE9 Canals

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

## Background, 4.48

## Object

### Summary of representations:

Plan must include policies that add an additional layer of protection to important areas at risk of coalescence, confirming that open countryside and land outside settlement boundaries (particularly that identified as playing an additional function) does not carry with it a presumption in favour of any development; special characteristics and role which the Goodwood Estate exhibits should be reflected in the local plan; concerned A16 and A17 policies will be viewed in isolation from other parts of Goodwood Estate.

### Summary of representation changes to plan:

The plan must include policies that add an additional layer of protection to important areas, confirming that open countryside and land outside settlement boundaries (particularly that identified as playing an additional function) does not carry with it a presumption in favour of any development; the new local plan being applied as a whole.

### Response:

As set out in Policy S2, the presumption in favour of sustainable development is only within the settlement boundaries. NE3 provides protection from coalescence. As pointed out at paragraph 1.12, the plan should be read as a 'whole' and policies will not be applied in isolation

### Action:

No change

4307

Object

**Document Element:** Background, 4.48

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support and comments noted

### Action:

No change

## 4481

## Support

**Document Element:** Background, 4.48

**Respondent:** Wisborough Green Parish Council

## Background, 4.49

## Object

### Summary of representations:

Chichester City's settlement boundary is incorrect. Based on methodology in settlement boundary background paper, settlement boundary should be re-drawn to include approved playing pitches and residential development at Land north of Madgwick Lane – see Appendix 3 in Rep

### Summary of representation changes to plan:

To rectify this soundness issue and ensure that the methodology in the Council's Background Paper is applied properly, logically and consistently, the approved playing pitches and the approved residential development at Land north of Madgwick Lane should be included within Chichester city's settlement boundary through a Main Modification to the Plan

### Response:

The Settlement Boundaries Review was carried out in 2018 to support the Regulation 18 stage of the Local Plan Review with representations received at that consultation informing the Regulation 19 version. Representations at this stage must be confined to whether the policy meets the soundness test. A further Settlement Boundaries Review will be undertaken following adoption of the Local Plan.

### Action:

No change

## 4720

## Object

**Document Element:** Background, 4.49

**Respondent:** CEG and the Landowners (D C Heaver and Eurequity IC Limited)

**Agent:** CEG and the Landowners (D C Heaver and Eurequity IC Limited)

**Background, 4.50****Object****Summary of representations:**

- Replace “inappropriate development” with term of legal and/or recognised status; change ‘characteristics’ to ‘qualities’.
- Avoid bundling Chi Harbour and Pagham Harbour together – separate entities.

**Summary of representation changes to plan:**

- As per rep summary.

**Response:**

- “Inappropriate development” and “characteristics” are terms used within the NPPF. However, to emphasise the Harbours as separate entities, wording has been changed.

**Action:**

- See Council's suggested Modification CM095.

**4444****Object****Document Element:** Background, 4.50**Respondent:** Chichester Harbour Conservancy**Support****Summary of representations:**

- Support

**Summary of representation changes to plan:**

- N/A

**Response:**

- Support and comments noted

**Action:**

- No change

**4482****Support****Document Element:** Background, 4.50**Respondent:** Wisborough Green Parish Council



## Background, 4.51

## Object

### Summary of representations:

- Replace “inappropriate development” with term of legal and/or recognised status; change ‘characteristics’ to ‘qualities’.
- Avoid bundling Chi Harbour and Pagham Harbour together – separate entities.

### Summary of representation changes to plan:

- As per rep summary.

### Response:

- “Inappropriate development” and “characteristics” are terms used within the NPPF. However, to emphasise the Harbours as separate entities, wording has been changed.

### Action:

- See Council's suggested Modification CM095.

4447

Object

Document Element: Background, 4.51

Respondent: Chichester Harbour Conservancy

## Support

### Summary of representations:

- Support

### Summary of representation changes to plan:

- N/A

### Response:

- Support and comments noted

### Action:

- No change

4484

Support

Document Element: Background, 4.51

Respondent: Wisborough Green Parish Council

## Background, 4.52

## Object

### Summary of representations:

Remove Policy A11 and A12 – do not support rural economy or allow local communities to thrive; assess impact of traffic along A259 between Fishbourne and Southbourne; SDNPA have raised concerns about connectivity between SDNP and AONB

### Summary of representation changes to plan:

Policy A11 needs to be removed from the plan.

Policy A12 should be removed from the plan for the same reasons.

An assessment on the impact of traffic along the stretch of the A259 between Fishbourne and Southbourne should be carried out

### Response:

The spatial strategy seeks to locate the majority of development in locations which have access to a range of services and facilities, informed by the settlement hierarchy evidence. This has also been influenced by site availability, suitability, environmental and other constraints.

Assessment of traffic impacts from planned strategic development forms part of the transport evidence base. NE2 Landscape Policy and NE13 Chichester Harbour AONB provide specific protection in relation to the AONB and the SDNP

### Action:

No change

## 3854

## Object

**Document Element:** Background, 4.52

**Respondent:** The Bosham Association

## Object

### Summary of representations:

4.52/4.56 inconsistent with NPPF para 85 revise “essential” to “important” in 4.52 and remove ‘essential’ from 4.56 (too onerous). Requirement 1 in policy not appropriate in all cases – if proposed site in location outside settlement boundary is already well connected to local amenities, should be no requirement to improve/create opportunities etc.

### Summary of representation changes to plan:

As per rep summary.

### Response:

Paragraphs 4.52 and 4.56 are carried forward from the Regulation 18 Preferred Approach stage with representations received at that consultation informing the Regulation 19 version. Representations at this stage must be confined to whether the policy meets the soundness test. Criterion 1 is amended slightly to be in line with paragraph 85 which states: “development.... exploits any opportunities to make a location more sustainable...”.

### Action:

See Council's suggested Modification CM097.

4029

Object

**Document Element:** Background, 4.52**Respondent:** Mrs Victoria Douglas

Object

**Summary of representations:**

Plan must include policies that add an additional layer of protection to important areas at risk of coalescence, confirming that open countryside and land outside settlement boundaries (particularly that identified as playing an additional function) does not carry with it a presumption in favour of any development; special characteristics and role which the Goodwood Estate exhibits should be reflected in the local plan; concerned A16 and A17 policies will be viewed in isolation from other parts of Goodwood Estate.

**Summary of representation changes to plan:**

As set out in the accompanying letter, we ask that the particular needs and character of the Goodwood Estate, particularly the husbandry over centuries which has created the landscape which the plan seeks to protect, are recognised, ideally as a specific policy, through the local plan and its need to evolve for the wider public good of economic growth and environmental protection, is maintained and enhanced. Areas subject to policies A16 and A17 should not be viewed in isolation from other parts of the Estate

**Response:**

As set out in Policy S2, the presumption in favour of sustainable development is only within the settlement boundaries. NE3 provides protection from coalescence. As pointed out at paragraph 1.12, the plan should be read as a 'whole' and policies will not be applied in isolation

**Action:**

No change

4308

Object

**Document Element:** Background, 4.52**Respondent:** The Goodwood Estates Company Limited**Agent:** HMPC Ltd

Support

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comments noted

**Action:**

No change

4486

Support

---

**Document Element:** Background, 4.52

**Respondent:** Wisborough Green Parish Council

## Background, 4.53

Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comments noted

**Action:**

No change

4487

Support

---

**Document Element:** Background, 4.53

**Respondent:** Wisborough Green Parish Council

Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comments noted

**Action:**

No change

4488

Support

---

**Document Element:** Background, 4.53

**Respondent:** Wisborough Green Parish Council

## Background, 4.55

## Object

### Summary of representations:

Remove Policy A11 and A12 – do not support rural economy or allow local communities to thrive; assess impact of traffic along A259 between Fishbourne and Southbourne; SDNPA have raised concerns about connectivity between SDNP and AONB

### Summary of representation changes to plan:

Policy A11 should be removed from the local plan

### Response:

The spatial strategy seeks to locate the majority of development in locations which have access to a range of services and facilities, informed by the settlement hierarchy evidence. This has also been influenced by site availability, suitability, environmental and other constraints.

Assessment of traffic impacts from planned strategic development forms part of the transport evidence base. NE2 Landscape Policy and NE13 Chichester Harbour AONB provide specific protection in relation to the AONB and the SDNP

### Action:

No change

**3855****Object**

Document Element: Background, 4.55

Respondent: The Bosham Association

## Background, 4.56

## Object

### Summary of representations:

4.52/4.56 inconsistent with NPPF para 85 revise “essential” to “important” in 4.52 and remove ‘essential’ from 4.56 (too onerous). Requirement 1 in policy not appropriate in all cases – if proposed site in location outside settlement boundary is already well connected to local amenities, should be no requirement to improve/create opportunities etc.

### Summary of representation changes to plan:

As per rep summary.

### Response:

Paragraphs 4.52 and 4.56 are carried forward from the Regulation 18 Preferred Approach stage with representations received at that consultation informing the Regulation 19 version. Representations at this stage must be confined to whether the policy meets the soundness test. Criterion 1 is amended slightly to be in line with paragraph 85 which states: “development.... exploits any opportunities to make a location more sustainable...”.

### Action:

See Council's suggested Modification CM097.

**4031****Object**

Document Element: Background, 4.56

Respondent: Mrs Victoria Douglas

## Policy NE10 Development in the Countryside

### Object

#### Summary of representations:

4.52/4.56 inconsistent with NPPF para 85 revise "essential" to "important" in 4.52 and remove 'essential' from 4.56 (too onerous). Requirement 1 in policy not appropriate in all cases – if proposed site in location outside settlement boundary is already well connected to local amenities, should be no requirement to improve/create opportunities etc.

#### Summary of representation changes to plan:

As per rep summary.

#### Response:

Paragraphs 4.52 and 4.56 are carried forward from the Regulation 18 Preferred Approach stage with representations received at that consultation informing the Regulation 19 version. Representations at this stage must be confined to whether the policy meets the soundness test. Criterion 1 is amended slightly to be in line with paragraph 85 which states: "development.... exploits any opportunities to make a location more sustainable...".

#### Action:

See Council's suggested modification CM097.

4039

Object

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Mrs Victoria Douglas

### Object

#### Summary of representations:

Allocations are contrary to policy.

#### Summary of representation changes to plan:

Remove these proposed allocations and identify more suitable locations

#### Response:

The spatial strategy seeks to locate the majority of development in locations which have access to a range of services and facilities, informed by the settlement hierarchy evidence. This has also been influenced by site availability and suitability, environmental and other constraints

#### Action:

No change

4050

Object

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Bosham Parish Council

## Object

---

### Summary of representations:

Allocations contrary to policy.

### Summary of representation changes to plan:

Reduce the allocated housing in both parishes

### Response:

The spatial strategy seeks to locate the majority of development in locations which have access to a range of services and facilities, informed by the settlement hierarchy evidence. This has also been influenced by site availability and suitability, environmental and other constraints

### Action:

No change

---

4159

Object

---

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Chidham and Hambrook Parish Council

## Support

---

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

---

4272

Support

---

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Chichester Harbour Trust



## Object

---

**Summary of representations:**

Conserve and enhance too strict; clarify complimentary to or compatible with; criterion 4 too restrictive.

**Summary of representation changes to plan:**

Rewrite policy:

Test to conserve and enhance is too strict for 'ordinary' countryside

Clarify what 'complimentary to or compatible with' means

Criteria 4 overly restrictive

**Response:**

Criteria 3, 4 and 5 to which this representation relates are all carried forward from the Regulation 18 Preferred Approach stage with Criterion 4 and 5 forming the countryside policy in the current adopted Local Plan. Compliance with the criteria will continue to be determined on a case by case basis at the planning application stage

**Action:**

No change

---

**4351****Object**

---

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Mr Stephen Jupp

## Object

---

**Summary of representations:**

Policy should include requirement that development needs a countryside location and meets an essential, small scale and local need, which cannot be met elsewhere.

**Summary of representation changes to plan:**

As per rep summary.

**Response:**

At paragraph 85 and paragraph 78 of the NPPF there is an emphasis on meeting local need in rural areas. On that basis, the reference to meeting essential small scale and local need that appears in the adopted local plan and Reg 18 Local Plan is carried forward.

**Action:**

See Council's suggested Modification CM096.

---

**4405****Object**

---

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Plaistow and Ifold Parish Council

## Support

---

**Summary of representations:**

Support.

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comments noted

**Action:**

No change

---

4489

Support

---

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Wisborough Green Parish Council

## Object

---

**Summary of representations:**

add to criterion 4: 'or developed site for employment uses within the B Use Class, an existing employment site'. To be compliant with para 35a of NPPF

**Summary of representation changes to plan:**

Addition of 'or developed site for employment uses within the B Use Class, an existing employment site' to clause 4

**Response:**

Policy E2 deals with existing employment sites

**Action:**

No change

---

4620

Object

---

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

## Object

---

**Summary of representations:**

Policy inconsistent with policy E4. Suggest plan states development associated with horticulture will be assessed against E4.

**Summary of representation changes to plan:**

It is therefore suggested that the Local Plan states that development associated with horticulture coming forward in the Runcton HDA, or within the setting of the Runcton HDA, should be assessed against the Policy E4 of the Local Plan as opposed to Policy NE10

**Response:**

As pointed out at paragraph 1.12, the plan should be read as a 'whole' and policies will not be applied in isolation

**Action:**

No change

---

**4988****Object**

---

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Object

---

**Summary of representations:**

Drayton Waterside Site is better aligned with countryside policy than A20 Bognor Rd allocation.

**Summary of representation changes to plan:**

See accompanying letter/statement by Vail Williams

**Response:**

Consideration of employment sites to meet the employment land requirement formed part of the Sustainability Appraisal.

**Action:**

No change

---

**5014****Object**

---

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Drayton Investments Limited

**Agent:** Drayton Investments Limited

## Object

---

**Summary of representations:**

█ Include further bullet point to recognise that development in countryside must avoid impacts to the natural environment.

**Summary of representation changes to plan:**

█ As per rep summary.

**Response:**

█ It is proposed that criterion 3 is amended to include reference to biodiversity and nature recovery networks.

**Action:**

█ See Council's suggested Modification CM098.

---

5047

Object

---

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Sussex Wildlife Trust

## Support

---

**Summary of representations:**

█ Support

**Summary of representation changes to plan:**

█ N/A

**Response:**

█ Support noted

**Action:**

█ No change

---

5175

Support

---

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** John Newman

## Object

---

### Summary of representations:

Concerned re; criterion that allows proposals for sites located close to an established settlement and will lead to coalescence

### Summary of representation changes to plan:

No change

### Response:

Policy NE3 is designed to prevent coalescence. As pointed out at paragraph 1.12, the plan should be read as a 'whole' and policies will not be applied in isolation

### Action:

No change

---

5451

Object

---

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Mayday! Action Group

## Support

---

### Summary of representations:

although should acknowledge requirements of Policy H7.

### Summary of representation changes to plan:

N/A

### Response:

As pointed out at paragraph 1.12, the plan should be read as a 'whole' and policies will not be applied in isolation

### Action:

No change

---

5619

Support

---

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Thakeham Homes

## Object

### Summary of representations:

Inconsistent with para 152 of NPPF which encourages the reuse of existing resources including the conversion of existing buildings, there is no pre-requisite to adopt a sequential approach or give preference to other uses. Criterion B should be removed

### Summary of representation changes to plan:

Under paragraph NPPF paragraph 152, there is no prerequisite to adopt a sequential approach, or to give preference to other uses. As such, criteria B should be omitted from Policy NE10. Reference to criteria B should also be removed from criteria C

### Response:

Criterion B is carried forward from the Regulation 18 local plan and derives from Policy 46 in the current adopted local plan. The criterion aims to reflect the requirements of section 6 of the NPPF paragraph 84 (supporting a prosperous rural economy) as well as paragraph 80 which seeks to avoid isolated homes in the countryside

### Action:

No change

5699

Object

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Church Commissioners for England

**Agent:** Lichfields

## Object

### Summary of representations:

Previously advised add "and linking to green infrastructure" to criterion 1. Criterion 3 – add requirement that proposals should demonstrate they will not adversely impact Nature Recovery Networks (NPPF para 179). Include impacts to biodiversity – inappropriate development in countryside can have significant impacts (NPPF paras 174/179).

### Summary of representation changes to plan:

As per rep summary.

### Response:

Amendments suggested are agreed and will be incorporated into the policy.

### Action:

See Council's suggested Modifications CM097 and CM098.

5805

Object

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Natural England

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

6112

Support

---

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Natural England

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

6140

Support

---

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Plaistow and Ifold Parish Council

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

6154

Support

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

Object

**Summary of representations:**

Sentence from existing plan needs to be retained: "within the countryside, outside settlement boundaries, development will be granted where it requires a countryside location and meets the essential, small scale and local need which cannot be met within or immediately adjacent to existing settlements."

**Summary of representation changes to plan:**

As per rep summary.

**Response:**

At paragraph 85 and paragraph 78 of the NPPF there is an emphasis on meeting local need in rural areas. On that basis, the reference to meeting essential small scale and local need that appears in the adopted local plan and Reg 18 Local Plan is carried forward.

**Action:**

See Council's suggested Modification CM096.

6211

Object

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** Wisborough Green Parish Council



## Object

---

**Summary of representations:**

Plan must include policies that add an additional layer of protection to important areas at risk of coalescence, confirming that open countryside and land outside settlement boundaries (particularly that identified as playing an additional function) does not carry with it a presumption in favour of any development; special characteristics and role which the Goodwood Estate exhibits should be reflected in the local plan; concerned A16 and A17 policies will be viewed in isolation from other parts of Goodwood Estate.

**Summary of representation changes to plan:**

The plan must make appropriate and robust provision for housing need within the material constraints imposed on the District, with those constraints being supported by clear policy. This should include a need to protect areas of important, functional countryside, where there is a risk of coalescence or gradual coalescence over time, or where development would erode the provision of open green or blue space to the detriment of the community

**Response:**

As set out in Policy S2, the presumption in favour of sustainable development is only within the settlement boundaries. NE3 provides protection from coalescence. As pointed out at paragraph 1.12, the plan should be read as a 'whole' and policies will not be applied in isolation

**Action:**

No change

---

**6286****Object**

---

**Document Element:** Policy NE10 Development in the Countryside

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Background, 4.63

## Object

### Summary of representations:

- Technical correction to description of role of CHC and suggest adding ref to Coastal Partners

### Summary of representation changes to plan:

- " who manage Chichester Harbour for nature conservation and landscape for landscape, the occupation of leisure and recreation, and the conservation of nature".

- Add ref to Coastal Partners

### Response:

- Change accepted

### Action:

- See council suggested modifications CM099 and CM 100

4498

Object

Document Element: Background, 4.63

Respondent: Chichester Harbour Conservancy

## Background, 4.65

## Object

### Summary of representations:

- Insert "the" before "designation".

### Summary of representation changes to plan:

- Insert "the" before "designation".

### Response:

- Additional word not considered necessary

### Action:

- No change in response to representation.

4501

Object

Document Element: Background, 4.65

Respondent: Chichester Harbour Conservancy

## Background, 4.68

## Object

### Summary of representations:

Give additional detail about Shoreline Management Plans

### Summary of representation changes to plan:

The South Downs Shoreline Management Plan and the North Solent Shoreline Management Plan identify the most sustainable approach to managing the flood and coastal erosion risks to the coastline in the short-term (0 to 20 years), medium term (20 to 50 years), long term (50 to 100 years). To facilitate the implementation of the SMP strategic policies and projects, the local plan with its coastal partners will provide an SPD on Coastal Change. This SPD will give detailed policies for all stakeholders as to how their property/land can be protected or adapted for climate change in the short, medium or long term. Where hold the line is the only option, (due to site specific issues), the Regional Habitat Compensation programme referenced in 4.69 can provide adequate compensation.

### Response:

Change not considered necessary for soundness but some additional wording has been agreed with Natural England for clarity.

### Action:

See council suggested modification CM106

4995

Object

Document Element: Background, 4.68

Respondent: Mr John Blamire

## Background, 4.69

## Object

### Summary of representations:

Correct " Regional Habitat Compensatory Programme " to " Habitat Compensation and Restoration Programme ( HCRP)

### Summary of representation changes to plan:

Correct " Regional Habitat Compensatory Programme " to " Habitat Compensation and Restoration Programme ( HCRP)

### Response:

Amend to reflect change in name, here and in Policy NE11

### Action:

See council suggested modification CM107

4752

Object

Document Element: Background, 4.69

Respondent: Environment Agency

## Background, 4.70

# Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None proposed

**Response:**

Support noted

**Action:**

No change in response to representation

## 5000

# Support

---

**Document Element:** Background, 4.70

**Respondent:** Mr John Blamire

## Policy NE11 The Coast

# Mixed

---

**Summary of representations:**

Support but - queries the distances used in the policy.

**Summary of representation changes to plan:**

None proposed.

**Response:**

Support noted. This policy does not refer to any distances. Refer to responses on Policy NE12.

**Action:**

No change in response to representation

## 4157

# Object

---

**Document Element:** Policy NE11 The Coast

**Respondent:** Chidham and Hambrook Parish Council

## Support

---

### Summary of representations:

Support

### Summary of representation changes to plan:

None proposed

### Response:

Support noted

### Action:

No change in response to representation

---

## 4274

## Support

**Document Element:** Policy NE11 The Coast

**Respondent:** Chichester Harbour Trust

---

## 4504

## Support

**Document Element:** Policy NE11 The Coast

**Respondent:** Chichester Harbour Conservancy

## Object

---

### Summary of representations:

Policy wording should allow non marine related employment uses

### Summary of representation changes to plan:

Expand final bullet: " appropriate leisure and recreational uses, including water-based activities, and marine and non-marine related employment uses which meet local needs, complement existing employment, tourism and leisure uses and or provide a public benefit, including those which require direct access to water; where these uses avoid adverse environmental impacts"

### Response:

The intention is for employment close to the coast to be focussed on employment needing a coastal location.

### Action:

No change in response to representation

---

## 4623

## Object

**Document Element:** Policy NE11 The Coast

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

## Object

---

### Summary of representations:

Minor amendment to change "Regional Habitat Compensatory Programme" to "Habitat Compensation and Restoration Programme.

### Summary of representation changes to plan:

Change "Regional Habitat Compensatory Programme" to "Habitat Compensation and Restoration Programme.

### Response:

Agree

### Action:

See council proposed modification CM112

---

4751

Object

---

**Document Element:** Policy NE11 The Coast

**Respondent:** Environment Agency

## Support

---

### Summary of representations:

Support

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation

---

5048

Support

---

**Document Element:** Policy NE11 The Coast

**Respondent:** Sussex Wildlife Trust

---

5176

Support

---

**Document Element:** Policy NE11 The Coast

**Respondent:** John Newman

## Object

### Summary of representations:

Policy does not sufficiently address the impact of building close to the harbour.

### Summary of representation changes to plan:

None suggested

### Response:

In addition to the work to protect and enhance the areas around the coast and harbours as set out in NE11, NE 12 provides development management criteria for development around the coast, including the harbour. Policy NE 13 sets out additional criteria for development within the Chichester Harbour AONB. Policies NE16 and 17 protect water quality and NE6 protects designated sites.

### Action:

No change in response to representation

## 5441

## Object

**Document Element:** Policy NE11 The Coast

**Respondent:** Mayday! Action Group

## Mixed

### Summary of representations:

Support but suggest additional wording to supporting text and policy

### Summary of representation changes to plan:

1. Seek additional wording relating to coastal processes,
2. Add Chichester Harbour Conservancy
3. Add reference to targets in the national Environmental Improvement Plan

### Response:

1. Agreed – further revised wording agreed in discussion with NE.
- 
2. agreed.
3. Insert additional text here and in supporting text – further additions were suggested in discussion with Natural England.

### Action:

See council suggested modifications CM102 and CM103.

## 5806

## Object

**Document Element:** Policy NE11 The Coast

**Respondent:** Natural England

## Object

---

### Summary of representations:

Biodiversity will be wiped out

### Summary of representation changes to plan:

None proposed

### Response:

The policy sets out how coastal areas will be protected and enhanced. Policy NE5 requires the conservation, protection and restoration of biodiversity and a minimum of 10% biodiversity net gain.

### Action:

No change in response to representation.

---

5890

Object

---

**Document Element:** Policy NE11 The Coast

**Respondent:** Save our South Coast Alliance

## Mixed

---

### Summary of representations:

Support but - queries the distances used in the policy.

### Summary of representation changes to plan:

None proposed.

### Response:

Support noted. This policy does not refer to any distances. Refer to responses on Policy NE12.

### Action:

No change in response to representation

---

6087

Support

---

**Document Element:** Policy NE11 The Coast

**Respondent:** Chidham and Hambrook Parish Council



## Mixed

### Summary of representations:

Support but suggest additional wording to supporting text and policy

### Summary of representation changes to plan:

1. Seek additional wording relating to coastal processes,
2. Add Chichester Harbour Conservancy
3. Add reference to targets in the national Environmental Improvement Plan

### Response:

1. Agreed – further revised wording agreed in discussion with NE.
- 
2. agreed.
3. Insert additional text here and in supporting text – further additions were suggested in discussion with Natural England.

### Action:

See council suggested modifications CM102 and CM103.

## 6113

## Support

Document Element: Policy NE11 The Coast

Respondent: Natural England

### Background, 4.74

## Object

### Summary of representations:

Clarification needed for the 16 metre setback.

### Summary of representation changes to plan:

Wording clarification In para 4.74 after “ the landward side of” replace “ the” with “any sea”. Start next sentence with A rather than “ This” and insert “ emergency works” after “maintenance”.

### Response:

Clarification welcomed

### Action:

See council suggested modification CM114

## 4759

## Object

Document Element: Background, 4.74

Respondent: Environment Agency

## Background, 4.75

## Object

### Summary of representations:

25m setback is not sufficient

### Summary of representation changes to plan:

Increase distance (CHC suggest 50m)

### Response:

Additional text is proposed to para 4.76  
to clarify that the National Coastal Risk Management work of the Environment agency is also a consideration.

### Action:

See council suggested modifications CM116 and CM117

---

**4550****Object**

**Document Element:** Background, 4.75

**Respondent:** Chichester Harbour Conservancy

---

**5117****Object**

**Document Element:** Background, 4.75

**Respondent:** Lynn Reel

## Background, 4.77

## Object

### Summary of representations:

Approach to marine enterprises is too restrictive

### Summary of representation changes to plan:

Need to retain marine enterprise whilst being flexible

### Response:

The paragraph recognises the need for marine businesses to evolve – unclear what specific change is sought.

### Action:

No change in response to representation

---

**4040****Object**

**Document Element:** Background, 4.77

**Respondent:** Mrs Victoria Douglas

## Background, 4.79

## Support

---

### Summary of representations:

Support BUT suggest additions

### Summary of representation changes to plan:

Refer to Shoreline Defence Guidelines being prepared by CHaPRoN and consider adopting as SPD

### Response:

As the guidelines are still being drafted it is not considered necessary to refer to them here

### Action:

No change in response to representation.

4551

Support

---

Document Element: Background, 4.79

Respondent: Chichester Harbour Conservancy

## Policy NE12 Development around the Coast

## Object

---

### Summary of representations:

Objects to marketing requirement – not necessary in all cases.

### Summary of representation changes to plan:

Remove the following sentence "A marketing report as set out in Appendix C will be needed to show that the site is no longer needed for its current use."

### Response:

Agree as the preceding sentence refers to the use being appropriate and necessary

### Action:

See council suggested modification CM122

4038

Object

---

Document Element: Policy NE12 Development around the Coast

Respondent: Mrs Victoria Douglas

## Object

### Summary of representations:

Setback distance is inadequate given sea level rise/ erosion.

### Summary of representation changes to plan:

N/A

### Response:

The setback distances have been reviewed in discussion with Natural England and revisions proposed to the policy.

### Action:

See council suggested modification CM120

4156

Object

**Document Element:** Policy NE12 Development around the Coast

**Respondent:** Chidham and Hambrook Parish Council

## Support

### Summary of representations:

Want additional reference to challenging issues around sea defences and to need to MMO and NE consent for works adjacent to the SSSI

### Summary of representation changes to plan:

Want additional reference to challenging issues around sea defences and to need for MMO and NE consent for works adjacent to the SSSI

### Response:

Paragraph 4.72 before NE11 sets out where the Marine Plan produced by the Marine Management Organisation must be used. Flood defences are covered in NE11 .

### Action:

No change in response to representation.

4277

Support

**Document Element:** Policy NE12 Development around the Coast

**Respondent:** Chichester Harbour Trust

## Object

---

**Summary of representations:**

Policy is too vague. Need to define the areas it applies to

**Summary of representation changes to plan:**

Show area covered on the policies map

**Response:**

The policy covers any development along the open coast or around the harbours.

**Action:**

No change in response to representation.

---

4353

Object

---

**Document Element:** Policy NE12 Development around the Coast

**Respondent:** Mr Stephen Jupp

## Object

---

**Summary of representations:**

25m setback is too restrictive

**Summary of representation changes to plan:**

Setback should be determined on a case by case basis.

**Response:**

Comment noted. The setback does not apply to uses with a functional need to be closer to the water, subject to vulnerability assessment.

**Action:**

No change in response to representation.

---

4625

Object

---

**Document Element:** Policy NE12 Development around the Coast

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

## Object

### Summary of representations:

1. Consider using Highest Astronomical Tide rather than Mean High Water
2. Paragraph about replacement buildings is unclear – a replacement setback would be a new building so should be setback by 25m
3. Additional bullet to encourage future relocation within the property boundary if impacted by coastal erosion.

### Summary of representation changes to plan:

1. Consider using Highest Astronomical Tide rather than Mean High Water
2. Paragraph about replacement buildings is unclear – a replacement setback would be a new building so should be setback by 25m
3. Additional bullet to encourage future relocation within the property boundary if impacted by coastal erosion. “ The development considers coastal erosion impacts over its lifetime and where possible and relevant, is constructed in such a way that future relocation within the property boundary is possible to mitigate future impacts.

### Response:

1. Agree
2. Wording has been revised to apply the same to new and replacement building. .
3. Additional reference is made to coastal erosion to ensure buildings are set sufficiently far back.

### Action:

1. See councils proposed modification CM118

4757

Object

**Document Element:** Policy NE12 Development around the Coast

**Respondent:** Environment Agency

## Object

### Summary of representations:

1. Marine environment off Selsey should be protected

### Summary of representation changes to plan:

1. Marine environment off Selsey should be protected

### Response:

1. The area off Selsey was nationally designated as the Selsey Bill and the Hounds Marine Conservation Zone in May 2019. This designation is referred to in Policy NE14.

### Action:

1. No change in response to representation.

**5008****Object****Document Element:** Policy NE12 Development around the Coast**Respondent:** Mr Justin Atkinson**Object****Summary of representations:**

- Setback distance is inadequate given sea level rise/ erosion.

**Summary of representation changes to plan:**

- N/A

**Response:**

- The setback distances have been reviewed in discussion with Natural England and revisions proposed to the policy.

**Action:**

- See council suggested modification CM120

**5049****Object****Document Element:** Policy NE12 Development around the Coast**Respondent:** Sussex Wildlife Trust**Support****Summary of representations:**

- Support

**Summary of representation changes to plan:**

- None

**Response:**

- Support noted.

**Action:**

- None

**5177****Support****Document Element:** Policy NE12 Development around the Coast**Respondent:** John Newman

## Policy NE12 Development around the Coast

### Object

---

#### Summary of representations:

Flood risk assessments used to inform the plan are out of date and plan needs to reflect Natural England approach to Hold the Line/ vs Managed retreat

#### Summary of representation changes to plan:

None

#### Response:

Flood risk assessments have been reviewed as new data becomes available and consider the undefended as well as the defended position.

Natural England have been involved in iterations of this policy.

#### Action:

No change in response to representation.

5434

Object

---

**Document Element:** Policy NE12 Development around the Coast

**Respondent:** Mayday! Action Group

### Object

---

#### Summary of representations:

Support the setback of " at least 25m".

Additional wording suggested for supporting text.

Caravans and camping sites may need to move if they become at risk.



**Summary of representation changes to plan:**

Supporting text should refer to National Coastal erosion Risk Management work of the Environment Agency which maps and measures projected coastal erosion. "Development should be set back in line with expected property lifetime and estimated erosion rates."

Clarify that new caravans or camping sites will not result in new sea defences but expected to move or be removed if they become at risk from coastal change/flooding (either NE12 or NE9)

At 2 add: ( requiring a coastal location) after " recreational opportunities"

At 6 add: " whilst also ensuring that any small scale loss of mudflat within the designated sites is compensated for."

Additional requirements:

" Undeveloped areas on low lying land around Chichester Harbour are prioritised for opportunities that actively restore coastal habitats or works with natural processes to address climate impacts and loss of biodiversity"

" The development can demonstrate consideration of and adaptation to future climate scenarios and their potential impacts, including, but not limited to) shading, surface water flooding, wind blown sand, wave driven shingle."

Expand policy paragraph to read " ... replacement buildings should be set further back in line with NCERM erosion prediction and coastal flooding and should not hinder coastal processes with regard to designated sites if applicable".

Add to policy requirement b: "harm nature conservation ( particularly in relation to loss of mudflat), landscape or heritage interests."

**Response:**

Revised wording has been discussed and agreed with Natural England.

**Action:**

See council suggested modifications CM110, CM111, CM113, CM115, CM116, CM117, CM118, CM120 and CM121

**5818****Object**

**Document Element:** Policy NE12 Development around the Coast

**Respondent:** Natural England

**Object****Summary of representations:**

25m setback is insufficient

**Summary of representation changes to plan:**

None suggested

**Response:**

Revised wording in relation to setbacks has been agreed with Natural England, to take account of National Coastal Erosion Risk Mapping.

**Action:**

See council suggested modification CM120

5889

Object

**Document Element:** Policy NE12 Development around the Coast

**Respondent:** Save our South Coast Alliance

Support

**Summary of representations:**

Support in principle

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change in response to representation.

6086

Support

**Document Element:** Policy NE12 Development around the Coast

**Respondent:** Chidham and Hambrook Parish Council

Support

**Summary of representations:**

Support in principle

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change in response to representation.

6155

Support

**Document Element:** Policy NE12 Development around the Coast

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

## Support

---

**Summary of representations:**

Support in principle

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change in response to representation.

---

6249

Support

---

**Document Element:** Policy NE12 Development around the Coast

**Respondent:** Sussex Wildlife Trust

## Object

---

**Summary of representations:**

Coastal management and coastal squeeze should be covered in the policy

**Summary of representation changes to plan:**

Coastal management and coastal squeeze should be covered in the policy

**Response:**

Additional wording has been discussed and agreed with Natural England.

**Action:**

See council suggested modification CM118

---

6292

Object

---

**Document Element:** Policy NE12 Development around the Coast

**Respondent:** Natural England

## Background, 4.80

## Object

### Summary of representations:

Change “ inappropriate development” to “urbanisation”

### Summary of representation changes to plan:

Change “ inappropriate development” to “urbanisation”

### Response:

Agreed

### Action:

Replace “ inappropriate development” with “ urbanisation”.

Note that this change was omitted from the Council's suggested modifications list at submission in error. It will be added to an updated version as CAM395

4553

Object

Document Element: Background, 4.80

Respondent: Chichester Harbour Conservancy

## Background, 4.81

## Object

### Summary of representations:

Change “ produced” to “published” and update references – 19 Planning Principles. Note expiry date of current management plan and review of shorelines guidance.

### Summary of representation changes to plan:

Change “ produced” to “published” and update references – 19 Planning Principles,

### Response:

Agreed

### Action:

See council suggested modification CM123

4555

Object

Document Element: Background, 4.81

Respondent: Chichester Harbour Conservancy

## Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

### Support

---

**Summary of representations:**

Support

BUT setting of AONB and exceptional circumstances need to be clarified

**Summary of representation changes to plan:**

None

**Response:**

Support and comment noted

**Action:**

No change in response to representation

4007

Support

---

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** Mrs Jane Towers

### Object

---

**Summary of representations:**

Proposed allocations in East West corridor don't comply with this policy

**Summary of representation changes to plan:**

N/A

**Response:**

Comment noted

**Action:**

No change in response to representation

4051

Object

---

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** Bosham Parish Council

## Support

---

**Summary of representations:**

Support

BUT setting of AONB and exceptional circumstances need to be clarified

**Summary of representation changes to plan:**

None

**Response:**

Support and comment noted

**Action:**

No change in response to representation

---

4147

Support

---

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** Chidham and Hambrook Parish Council

## Support

---

**Summary of representations:**

Support

BUT strategic policies (A11,12,13) seem to conflict with this.

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation

---

4279

Support

---

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** Chichester Harbour Trust

## Object

### Summary of representations:

Uncertain where point 3 applies without mapping.

Point 6 – queries the 25m setback and whether “ futher back” refers to further than 25m or existing building.

### Summary of representation changes to plan:

Remove 3 or add a map.

Reword 6 to include “ where possible” and clarify setback for replacement buildings.

### Response:

Do not consider a map is needed for point 3.

Propose removing the setback from this policy as it is already covered by Policy NE12 – no need to repeat.

### Action:

See council suggested modification CM124

## 4354

## Object

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** Mr Stephen Jupp

## Support

### Summary of representations:

Note importance of AONB and harbour

### Summary of representation changes to plan:

None

### Response:

Comment noted

### Action:

No change in response to representation

## 4355

## Support

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** Southbourne Parish Council

## Object

---

**Summary of representations:**

■ Promoting site at Main Road, Hermitage

**Summary of representation changes to plan:**

■ Change method of reviewing individual sites – don't discount anything in AONB automatically

**Response:**

■ This policy does not apply any automatic discounting of sites but sets out criteria against which any proposals can be considered.

**Action:**

■ No change in response to representation

---

4546

Object

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** Obsidian Strategic

**Agent:** Andrew Black Consulting

## Object

---

**Summary of representations:**

■ 25m should be 50m

**Summary of representation changes to plan:**

■ 25m should be 50m

**Response:**

■ Criterion 6 has been removed from this policy as the setback is covered in NE12 (where amendments are proposed).

**Action:**

■ See council suggested modification CM124

---

4556

Object

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** Chichester Harbour Conservancy



## Object

---

### Summary of representations:

- Remove 25m setback requirement

### Summary of representation changes to plan:

- Remove 25m setback requirement – this should be determined site by site

### Response:

- Criterion 6 has been removed from this policy as the setback is covered in NE12 (where amendments are proposed).

### Action:

- See council suggested modification CM124

---

4627

Object

---

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

## Support

---

### Summary of representations:

- Support/ Support in principle

### Summary of representation changes to plan:

- None

### Response:

- Support noted

### Action:

- No change in response to representation

---

5050

Support

---

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** Sussex Wildlife Trust

---

5132

Support

---

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** South Downs National Park Authority

## Object

---

### Summary of representations:

Would like more emphasis on resolving waste water issues

### Summary of representation changes to plan:

Would like more emphasis on resolving waste water issues

### Response:

As noted in the rep, this is addressed by Policy NE16

### Action:

No change in response to representation

---

5178

Object

---

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** John Newman

## Object

---

### Summary of representations:

Oppose development in E-W corridor.

### Summary of representation changes to plan:

"may" is not clear enough. Need a standard framework to assess alternatives

### Response:

Comment relates to para 4.83. No change is considered necessary as the requirement will be applied where necessary.

### Action:

No change in response to representation.

---

5444

Object

---

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** Mayday! Action Group

## Support

---

### Summary of representations:

Support/ Support in principle

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation

5820

Support

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** Natural England

6083

Support

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** Chichester Harbour Conservancy

6085

Support

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** Chidham and Hambrook Parish Council

6104

Support

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** Fishbourne Meadows Residents' Association

6156

Support

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

6242

Support

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** John Newman

## Object

---

### Summary of representations:

Should be an equivalent policy for the SDNP

### Summary of representation changes to plan:

Should be an equivalent policy for the SDNP

### Response:

NE13 covers development within the Chichester Harbour AONB which is in the plan area.

NE2 refers to the SDNP

### Action:

No change in response to representation.

## 6261

## Object

---

**Document Element:** Policy NE13 Chichester Harbour Area of Outstanding Natural Beauty

**Respondent:** South Downs National Park Authority

## Background, 4.84

## Support

---

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

## 3769

## Support

---

**Document Element:** Background, 4.84

**Respondent:** Mr Joseph O'Sullivan

## Policy NE14 Integrated Coastal Zone Management for the Manhood Peninsula

### Object

---

**Summary of representations:**

Identify routes needed, safeguard and require funding at point 6.

**Summary of representation changes to plan:**

As per rep summary

**Response:**

Transport infrastructure is also covered within the transport policies T1 to T3 whilst funding is covered within the Infrastructure Business Plan (IBP) and Infrastructure Delivery Plan (IDP) as referred to in policy I1 Infrastructure Provision. As pointed out at paragraph 1.12, the plan should be read as a 'whole' and policies will not be applied in isolation

**Action:**

No change

---

4015

Object

---

**Document Element:** Policy NE14 Integrated Coastal Zone Management for the Manhood Peninsula

**Respondent:** Chichester and District Cycle Forum

### Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

---

4833

Support

---

**Document Element:** Policy NE14 Integrated Coastal Zone Management for the Manhood Peninsula

**Respondent:** Environment Agency

## Object

### Summary of representations:

Resilience and Adaptation – ICZM 2021 and beyond not included in evidence base. Policy should include allocation of area of coastal change management based on evidence of updated SFRA/references to climate change adaptation. SA dismisses linked pathways and impacts of relocating current settlement areas – should have tested Selsey strategic allocation as reasonable alternative. Relocation of communities in vulnerable areas should be acknowledged; address vulnerability of B2145 in respect of climate adaptation. See re-drafted policy focussing on climate change adaptation on MP.

### Summary of representation changes to plan:

Revised NE14 proposed - see attached written representation doc for full wording. Proposed revisions include climate change adaptation and mitigation including designating an area of coastal change management and supporting development that is capable of long term defence by recognising managed retreat

### Response:

The 'Resilience and Adaptation' document is for parishes, communities and environmental groups, it was not used to inform the preparation of the policy. The policy requires consideration of the Shoreline Management Plans which do not at this stage require the identification of a Coastal Change Management Area. The SA highlights the policies' importance for climate change adaptation/resilience as well as for seeking improved infrastructure at criterion 6. This policy does not comment upon strategic allocations. The policy acknowledges at criterion 3, potential for relocation of current settlement areas. The B2145 is referred to in the SFRA and SA and the need to adapt to the impacts of climate change is acknowledged at paragraph 4.85 of the policy pre-text.

### Action:

No change

5358

Object

**Document Element:** Policy NE14 Integrated Coastal Zone Management for the Manhood Peninsula

**Respondent:** Landlink Estates Ltd

**Agent:** Jackson Planning Ltd

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

5821

Support

**Document Element:** Policy NE14 Integrated Coastal Zone Management for the Manhood Peninsula

**Respondent:** Natural England

## Object

### Summary of representations:

4.84 has incorrect reference – should read “Chichester and Langstone Harbours SPA/Ramsar site”. Expand 4 in policy to “All development proposals should seek to enhance the distinctive character of the Manhood Peninsula, having particular regard to the ecology (including the potential to contribute to any nature recovery networks), landscape and heritage of the area.

### Summary of representation changes to plan:

As per rep summary.

### Response:

The correct reference: “Chichester and Langstone Harbours SPA/Ramsar site” will be incorporated into policy. The potential contribution that proposals may make to nature recovery networks will also be included at criterion 4.

### Action:

See Council's suggested Modifications CM126 and CM128.

6123

Object

**Document Element:** Policy NE14 Integrated Coastal Zone Management for the Manhood Peninsula

**Respondent:** Natural England

## Background, 4.90

## Object

### Summary of representations:

Paragraph 4.90 should also reference the South East River Basin Management Plan

### Summary of representation changes to plan:

Paragraph 4.90 should also reference the South East River Basin Management Plan.

### Response:

Reference to the Management Plan is made in both this policy and NE11, and therefore it is considered that this issue has already been addressed and it is not considered necessary to also make additional reference to this in the supporting text.

### Action:

No change

4843

Object

**Document Element:** Background, 4.90

**Respondent:** Environment Agency

## Object

### Summary of representations:

Recommends mentioning and explaining coastal squeeze here, and cross reference the SSSI Condition Review for Chichester Harbour

### Summary of representation changes to plan:

I would mention and explain coastal squeeze here, and cross reference the SSSI Condition Review for Chichester Harbour

### Response:

The Council agree that coastal squeeze is an important issue, but given that this is already addressed in policy NE11 there is considered to be no merit in making additional reference to it in the supporting text of NE15

### Action:

No change

4931

Object

Document Element: Background, 4.90

Respondent: Chichester Harbour Conservancy

## Background, 4.91

## Support

### Summary of representations:

It does seem that given the strength of the constraints identified in this section, it seems clear that such high levels of development on the coastal plain are by default unsustainable. The levels of management, control and monitoring to enable such development seems unachievable, given that the systems in place currently are not fit for purpose

### Summary of representation changes to plan:

N/A

### Response:

The flooding constraints facing the plan area are significant, particularly with respect to the Manhood Peninsula. However, they do not necessarily mean it is appropriate to restrict the housing requirement on that basis alone, particularly if there are sufficient sites available which will pass the sequential test. Moreover, this issue also needs to be considered in relation to other constraints, and balanced against the level of need

### Action:

No change

4281

Support

Document Element: Background, 4.91

Respondent: Chichester Harbour Trust



## Object

---

**Summary of representations:**

The plan fails take into account sufficiently the issues with inadequate drainage and water overflow, which will be exacerbated by future increases in extreme rainfall events. The properties of Saxon Meadow rely on soakaway for excess water. The issue extends beyond Saxon Meadow and into Church Lane and the fields where the Council proposes to put an allotment

**Summary of representation changes to plan:**

Before any proposed building by Chichester Council is started, it is vital that the assessed risk of flooding, together with the existing high water levels are thoroughly investigated so that 'effective adaption planning' as advocated by the RMetS is effectively implemented

**Response:**

The Council's Strategic Flood Risk Assessment does address the impacts of climate change associated with flood risk and includes consideration of how predicted increases in rainfall will affect future flood risk. The representation appears more focused on the Tangmere development site and hence is more relevant to policy A14

**Action:**

No change

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**4525****Object**

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**Document Element:** Background, 4.91

**Respondent:** Mr John Newsom

**Background, 4.92**

## Object

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**Summary of representations:**

The plan fails to provide sufficient resources to map and understand the existing challenge affecting surface water run-off for dwellings at Saxon Meadow and its surroundings

**Summary of representation changes to plan:**

Amend the plan as follows:

4.92 Any development in the plan area must therefore have regard to flood and erosion risk, now and in the future, by way of location and specific measures, such as additional flood alleviation, which will protect people, properties and vulnerable habitats from flooding. Recent changes to national guidance highlight the importance of considering flood risk from all sources, and this is particularly significant for the plan area as large parts of it are at risk from groundwater flooding, which needs to be recognised in development decisions alongside the well-established risks in relation to tidal, fluvial and surface water flooding. Appropriate mapping of all sources of flood risks is still evolving, and is likely to develop further over the plan period. In light of the absence of accurate mapping, the council will always require applicants to directly approach local residents and land users to gain a better understanding of surface water issues at the preapplication stage so that issues can be identified and resolved satisfactorily, and the council will ensure that all required investment to safeguard existing residents is provided on a timely basis before new development proceeds and funded by developers and/or relevant infrastructure providers

**Response:**

The Council's Strategic Flood Risk Assessment does address the relevant sources at a strategic level, and considers the impacts of climate change. However, this level of detail is beyond the scope of that process and will need to be covered in the site-specific flood risk assessment and requirements/recommendations subsequently controlled by condition. Ultimately, the representation appears more focused on the Tangmere development site and hence is more relevant to policy A14

**Action:**

No change

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**4123****Object**

---

**Document Element:** Background, 4.92

**Respondent:** Mr Matthew Rees

## Object

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**Summary of representations:**

Saxon meadow relies on a soakaway for dispersal of rainwater. In future years climate change will lead to increased rainfall. It is felt this has not been evaluated by the authority. The future, therefore, could mean Saxon Meadow being effectively 'cut off' by rainwater and possibly suffer flooding to properties

**Summary of representation changes to plan:**

As per 2015 report Master Plan A14 insist infrastructure upgraded before any dwellings erected. To be funded by Council or developers. Especially relevant for Saxon Meadow as our pumping station would not cope with new houses. Soakaways cannot be relied on

**Response:**

The Council's Strategic Flood Risk Assessment does address the relevant sources at a strategic level, and considers the impacts of climate change. However, this level of detail is beyond the scope of that process and will need to be covered in the site-specific flood risk assessment and requirements/recommendations subsequently controlled by condition. Ultimately, the representation appears more focused on the Tangmere development site and hence is more relevant to policy A14

**Action:**

No change

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**4441****Object**

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**Document Element:** Background, 4.92

**Respondent:** Mrs A Cobby

**Background, 4.94**

## Object

### Summary of representations:

In spite of the commitment to produce SuDS the plan also says development will be directed towards areas of lowest flood risk. Sadly this plan has failed to identify existing areas of annual flooding in Church Lane, and the adjacent field. There is also a lack of recognition in the plan to maintain the historic pond adjacent to St Andrew's Church and the mature trees leading up to Saxon Meadow housing. These according to the plan will interfere with the proposed cycle path. There is also no recognition of the Tangmere Conservation status attached to this corridor.

### Summary of representation changes to plan:

Reassurances that any final plan takes into account the exiting Tangmere Conservation area planning rules regarding ability to change / destroy mature trees, put in additional hard landscaping and change use of the designated area. In addition, ensure that proper plans are in place for the maintenance of this land which has up to now been undertaken by the Saxon Meadow Tangmere Ltd residents.

Acknowledgement that further biodiversity field study is undertaken to establish the extent and location of newts from the flowing streams during the fields.

As a resident I have discovered at least one.

Prevent the streams in the fields being culverted thus denying wildlife habitat for a variety of species.

### Response:

The representation makes reference to SuDS and sequential approach to development (in relation to flood risk), both of which are addressed appropriately in the policy. The representation raises a number of issues which are beyond the scope of this policy, such as the historic point and Conservation Area. Ultimately, the representation appears more focused on a number of wider issues associated with the Tangmere development site and hence is more relevant to policy A14

### Action:

No change

4387

Object

Document Element: Background, 4.94

Respondent: Mr John Wolfenden

## Support

### Summary of representations:

WGPC supports this statement

### Summary of representation changes to plan:

N/A

### Response:

Comment noted

### Action:

No change

**4493****Support****Document Element:** Background, 4.94**Respondent:** Wisborough Green Parish Council**Background, 4.95****Support****Summary of representations:**

■ WGPC supports this statement

**Summary of representation changes to plan:**

■ N/A

**Response:**

■ Comment noted

**Action:**

■ No change

**4494****Support****Document Element:** Background, 4.95**Respondent:** Wisborough Green Parish Council**Background, 4.96****Object****Summary of representations:**

■ Consider the distances from fluvial waters and tidal waters (8m and 16m) to be insufficient

**Summary of representation changes to plan:**

■ Increase the distances

**Response:**

■ These distances are derived from the legislation. The Council does not have a justification for seeking to impose greater distances, nor what those distances would entail

**Action:**

■ No change

**4146****Object****Document Element:** Background, 4.96**Respondent:** Chidham and Hambrook Parish Council

## Support

---

**Summary of representations:**

WGPC supports this statement

**Summary of representation changes to plan:**

N/A

**Response:**

Comment noted

**Action:**

No change

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4594

Support

**Document Element:** Background, 4.96

**Respondent:** Wisborough Green Parish Council

## Object

---

**Summary of representations:**

Have concerns in relation to Policy NE16 (Water Management and Water Quality) and the potential overreliance on necessary improvements to the wastewater treatment works (WwTW) to support residential development

**Summary of representation changes to plan:**

A contingency should be made as a fallback position should these WwTW improvements not be delivered in time

**Response:**

The comment is noted, but appears to be focused on policy NE16 and hence it is considered that there is no justification for making an amendment to this particular paragraph on the basis of this point

**Action:**

No change

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4769

Object

**Document Element:** Background, 4.96

**Respondent:** Wates Developments and Seaward Properties

**Agent:** Barton Willmore now Stantec

## Object

### Summary of representations:

The EA proposes various technical amendments to the policy. The EA recommend increasing the buffer stated within the policy in order to provide 'additional benefits for biodiversity'. The EA recommend an amendment to the criteria set out under point 4, which would ensure that the highest of the levels specified is what is actually used in the development. The EA recommend the inclusion of an additional clause f) within the policy in order to address situations where there will be a loss of flood storage.

### Summary of representation changes to plan:

As per rep summary.

### Response:

In terms of the request to provide for additional buffer for biodiversity, it is not considered that this is justified, particularly in relation to this policy, which is primarily targeted towards flood risk rather than biodiversity. However, for completeness, the council will add the wording "including culverts"(as requested).

The Council is happy to include the replacement wording proposed by the EA in relation to point 4.

With respect to the requested change to point f), the Council notes that this is taken from the Planning Practice Guidance, and hence it seems most pertinent to only incorporate the key point rather than the whole of the guidance.

### Action:

See Council's suggested Modifications CM131, CM134 and CM135.

4841

Object

Document Element: Background, 4.96

Respondent: Environment Agency

## Policy NE15 Flood Risk and Water Management

Support

### Summary of representations:

I agree with Policies NE11, NE12, NE13 (where I would like to see more emphasis on resolving the problems of effluent), NE15, NE16 (where you do now tackle the issue of wastewater), NE19, and NE20

### Summary of representation changes to plan:

N/A

### Response:

Comment noted

### Action:

No change

5179

Support

Document Element: Policy NE15 Flood Risk and Water Management

Respondent: John Newman

## Object

### Summary of representations:

Consider that the SFRA and its findings are not well-understood by parishes, councillors or local residents. Nevertheless, consider that it is clear that the risk of significant flooding has increased. CDC have recognised that the Manhood Peninsula has specific challenges including flood risk hence the zero requirement for housing in the WMP. Manhope think the submission is probably just sound enough and hope that this approach filters through to decisions for applications yet to be determined. Changes requested to the Plan in order to place significant further restrictions on development in relation to flood risk and waste-water infrastructure

### Summary of representation changes to plan:

No new developments of five or more dwellings shall be approved by the LPA until the following reports, work and maps have been completed and due consultation has taken place with residents & parishes, (in line with the latest government approach to restoring local democracy).

- a. Environment Agency flood maps based on the Interim SFRA (December 2022) have been completed.
- b. Sewage infrastructure work as yet unknown in Southern Waters upcoming Asset Management Period to be in place before any development of 5 or more dwellings are approved.
- c. Full and proper engagement with NHS as to practical limits on health demands as a result of new housing developments especially on the Manhood Peninsula

### Response:

The comments are noted, and it is welcomed that Manhope, though reluctantly, consider the plan to be sound. It should be highlighted that the Council consulted with parish councils and local interest groups as part of the process of preparing the interim SFRA and this has been published as part of the Regulation 19 submission. The Council has also subsequently completed a final version of the SFRA. The additional restrictions proposed are not considered reasonable.

### Action:

No change

**5258****Object**

**Document Element:** Policy NE15 Flood Risk and Water Management

**Respondent:** Manhope



## Object

### Summary of representations:

SWT would support an increased set back from fluvial water course of 10 meters to support opportunities for biodiversity. Further increases to the setback for tidal water course of 25 meters, would be encouraged to bring it in line with the aspirations of Policy NE 12 (Development Around the Coast).

### Summary of representation changes to plan:

SWT would support an increased set back from fluvial water course of 10 meters to support opportunities for biodiversity. Further increases to the setback for tidal water course of 25 meters, would be encouraged to bring it in line with the aspirations of Policy NE 12 Development around the coast

### Response:

In terms of the request to provide an additional buffer for biodiversity, it is not considered that this is justified, particularly in relation to this policy, which is primarily targeted towards flood risk rather than biodiversity. The issue of the separation distances has been covered in other representations. The specified distance is driven by national legislation. The Council does not have a justification for extending that distance or what it should be extended to, so such a change is not considered to be a sound approach

### Action:

No change

5273

Object

**Document Element:** Policy NE15 Flood Risk and Water Management

**Respondent:** Sussex Wildlife Trust

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Requesting reference to SRN/NH made.] Request that reference is made to the SRN or National Highways within the flood risk policies. Development must not lead to any surface water flooding on the SRN carriageway. These points apply to the site operation and construction phases. National Highways should be contacted to discuss these points in detail as part of, or in advance of a planning application submission

### Summary of representation changes to plan:

We request that reference is made to the SRN or National Highways within the Flood Risk policies.

Development must not lead to any surface water flooding on the SRN carriageway. These points apply to the site operation and construction phases. National Highways should be contacted to discuss these points in detail as part of, or in advance of a planning application submission

### Response:

While the Council fully acknowledges the importance of preventing flooding of the strategic road network, it is considered that this amendment is not necessary in order to render the plan sound. The policy already includes a catch-all style clause concerning not increasing flood risk elsewhere which addresses the sort of issue envisaged in the comment

### Action:

No change

**5284****Object****Document Element:** Policy NE15 Flood Risk and Water Management**Respondent:** National Highways**Object****Summary of representations:**

The lack of inclusion in a key background supporting document -Strategic Flood Risk Assessment (SFRA) -of the Planning Practice Guidance on Flood Risk and Coastal Change that has important bearing on issues particularly for the southern plan area and specifically mentions the importance of the phasing of development to infrastructure provision is a concern especially when it was published in August 2022. These omissions again have an impact on the Plan's overall 'Soundness

**Summary of representation changes to plan:**

No change

**Response:**

This representation is not considered to be entirely clear. In terms of the SFRA, that was published as an interim version as part of the Regulation 19 consultation. That version was not able to incorporate all of the amendments necessary as a result of the new PPG guidance published in August 2022, but the Council has subsequently updated it in order to respond to that new guidance and this has resulted in only very minimal changes being necessary. Consequently, the Council considers that the plan is underpinned by an SFRA which adheres to national policy and guidance, and that the Local Plan is an appropriate response to the constraints it identifies

**Action:**

No change

**5347****Object****Document Element:** Policy NE15 Flood Risk and Water Management**Respondent:** Mr Paul Bedford

## Object

### Summary of representations:

Consider policy provisions pragmatic and broadly consistent with national guidance. Fifth paragraph - no objection in principle but prescribed distances (8m and 16m) should be regarded as a guide. Welcome clear steer on drainage / build requirements (nos.1-4), support intent for sustainable drainage systems to be designed into landscape of all major development and for use of construction materials with low permeability up to at least same height as finished floor levels. Commend Council for commissioning Level 2 SFRA.

However, consider the second sentence seems a little misguided. Would suggest that the 'where relevant' should come before sequential test too, as it doesn't apply to all forms of development.

### Summary of representation changes to plan:

As per rep summary.

### Response:

Reference to 8m and 16m relates back to legislative requirements, and hence will need to be applied in accordance with that legislation.

The Council can see the point made about 'where relevant' in terms of the application of the sequential approach, and would have no objection to making such an amendment.

### Action:

See Council's suggested Modification CM130.

5385

Object

**Document Element:** Policy NE15 Flood Risk and Water Management

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

In principle a sound approach but flood risks assessments used in forming the Plan are out of date (last completed in 2018) and any decision to allocate sites is contrary to Environment Agency policy. Additionally, since March 2021 Natural England established a position in relationship to 'Hold the Line' vs. 'Managed Retreat' in environmentally sensitive areas, of which the Chichester Harbour AONB is a significant example. CDC have failed to set out an appropriate policy within the proposed Local Plan that addresses this requirement.

### Summary of representation changes to plan:

No change

### Response:

Response makes reference to flood risk assessments being out of date as they date back to 2018. However, an updated SFRA was published as part of the Reg. 19 consultation. In addition, the allocations have followed the approach set out in national policy, as they are informed by a sequential and exception test, and an SFRA level 2.

Decisions concerning 'Hold to the Line' vis-à-vis 'Managed Retreat' will need to be informed by future updates to the shoreline management plans. The plan responds appropriately to the position as it currently stands

### Action:

No change

**5433****Object****Document Element:** Policy NE15 Flood Risk and Water Management**Respondent:** Mayday! Action Group**Object****Summary of representations:**

Unrealistic to set finished floor levels (FFL's) to an offset from 'average site level'. This would be highly problematic for any site on a considerable gradient and restrict master planning and placemaking, due to earthworks required (and wouldn't even help prevent flood risk). It is recommended wording looks to protect exceedance flow routes ensuring property FFL's are 300mm above exceedance flood level. Additionally, 'vulnerable' development is not clearly defined – is this specific to dwellings in Flood Zones 2 or 3? Should be clarified.

**Summary of representation changes to plan:**

As per rep summary.

**Response:**

This is essentially the same point made by the Environment Agency and the Council agrees that the policy should be amended accordingly.

In terms of the reference to needing to be more specific in relation to what is defined as vulnerable development, this is not considered to be strictly necessary, as this relates back to national policy, and presumably all forms of vulnerable development encompassed by national policy should be protected from the impacts of flood risk.

**Action:**

See Council's suggested Modification CM134.

**5607****Object****Document Element:** Policy NE15 Flood Risk and Water Management**Respondent:** Thakeham Homes

## Object

### Summary of representations:

The wording 'exceed the normal design standards' in first criterion of policy is somewhat ambiguous, and as a consequence is unlikely to be 'effective' in its application. Requirement in criterion 2 that, 'There is no increase in either the volume or rate of surface water run-off leaving the site' is also unlikely to be justified on all sites, particularly where ground conditions do not permit infiltration.

### Summary of representation changes to plan:

As per rep summary.

### Response:

The Council agree that some clarification regarding what is meant by 'normal design standard' would be helpful and an amendment to that effect is proposed. In essence the wording wasn't intended to refer to a particular set of design standards, rather a particular severity of flood risk event. The Council also agrees with the point made in relation to criterion 2 and has proposed an amendment to address that and ensure that the policy can be implemented in an effective manner.

### Action:

See Council's suggested Modifications CM132 and CM133.

5644

Object

**Document Element:** Policy NE15 Flood Risk and Water Management

**Respondent:** Countryside Properties

**Agent:** Turley

## Object

### Summary of representations:

Policy NE15 should be amended to make it clear that the Sequential Test need not be applied to strategic allocations as the test will already have been carried out by the LPA via the SFRA.

### Summary of representation changes to plan:

Policy NE15 should be amended to make it clear that the Sequential Test need not be applied to strategic allocations as the test will already have been carried out by the LPA via the SFRA

### Response:

While the Council agree that the point made is essentially correct, it is considered that this change is not necessary in order to render the plan sound as this issue is already covered in national guidance as per the relevant paragraph in the Planning Practice Guidance - 027 Reference ID: 7-027-20220825. In any case, the amendment proposed to representation number 5385 regarding 'where relevant' indirectly addresses this point.

### Action:

No changes

**5758****Object****Document Element:** Policy NE15 Flood Risk and Water Management**Respondent:** Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd**Agent:** DWD Ltd**Support****Summary of representations:**

Natural England welcome the recognition of the flood defence challenges, in particular we welcome the recognition of developments ability to influence flood risk elsewhere and the cumulative impacts of flood risk. We strongly support the policy requirements relating to SuDs (particularly long-term management arrangements), coastal squeeze and the consideration of natural flood management

**Summary of representation changes to plan:**

N/A

**Response:**

Comment noted

**Action:**

No change

**5822****Support****Document Element:** Policy NE15 Flood Risk and Water Management**Respondent:** Natural England

**Water Supply and the efficient use of water:, 4.98****Object****Summary of representations:**

Water is in too short supply for the number of houses.

**Summary of representation changes to plan:**

Reduce the housing number.

**Response:**

Policy NE16 requires sufficient water supply prior to occupation.

The suggested change is not a change to this paragraph. The suggested change has also been recorded against policy H1 and responded to there.

**Action:**

No change in response to representation.

**4189****Object**

**Document Element:** Water Supply and the efficient use of water:, 4.98

**Respondent:** Chidham and Hambrook Parish Council

**Support****Summary of representations:**

Water is in too short supply for the number of houses.

**Summary of representation changes to plan:**

Reduce the housing number.

**Response:**

Policy NE16 requires sufficient water supply prior to occupation.

The suggested change is not a change to this paragraph. The suggested change has also been recorded against policy H1 and responded to there.

**Action:**

No change in response to representation.

**4496****Support**

**Document Element:** Water Supply and the efficient use of water:, 4.98

**Respondent:** Wisborough Green Parish Council

## Water Supply and the efficient use of water:, 4.100

### Object

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**Summary of representations:**

Notes that the estate has its own water supply and is looking to remain water neutral.

**Summary of representation changes to plan:**

Want plan to support such an initiative with supportive policies for infrastructure.

**Response:**

This approach is welcomed – unclear what change to the plan is required for this.

**Action:**

No change in response to representation.

## 4309

### Object

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**Document Element:** Water Supply and the efficient use of water:, 4.100

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

### Object

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**Summary of representations:**

Minor clarification edits.

**Summary of representation changes to plan:**

Insert "(WRZ)" after "Zone" in the second line.

Change the second "Zone" to "WRZ"

**Response:**

Amend for clarity/consistency.

**Action:**

See council suggested modification CM137

## 4454

### Object

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**Document Element:** Water Supply and the efficient use of water:, 4.100

**Respondent:** Southern Water



## Support

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### Summary of representations:

Support but have concerns about water supply and the untested nature of the water neutrality strategy. Concerned about level of development in the Sussex North WRZ.

### Summary of representation changes to plan:

None

### Response:

Comment noted

### Action:

No change in response to representation.

---

4497

Support

**Document Element:** Water Supply and the efficient use of water:, 4.100

**Respondent:** Wisborough Green Parish Council

## Object

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### Summary of representations:

Support but have concerns about water supply and the untested nature of the water neutrality strategy. Concerned about level of development in the Sussex North WRZ.

### Summary of representation changes to plan:

None

### Response:

comment noted.

### Action:

No change in response to representation.

---

6212

Object

**Document Element:** Water Supply and the efficient use of water:, 4.100

**Respondent:** Wisborough Green Parish Council

## Treating wastewater;, 4.101

Mixed

### Summary of representations:

Support but raises concerns about Southern Water and capacity calculations

### Summary of representation changes to plan:

None

### Response:

Comment noted

### Action:

No change in response to representation

4606

Support

Document Element: Treating wastewater;, 4.101

Respondent: Wisborough Green Parish Council

6229

Object

Document Element: Treating wastewater;, 4.101

Respondent: Wisborough Green Parish Council

## Treating wastewater;, 4.102

Object

### Summary of representations:

Concern about CSOs and treatment capacity

### Summary of representation changes to plan:

Moratorium on housebuilding until Southern Water have a clear plan to deal with CSOs.

### Response:

Policy NE16 requires that development is phased to align with delivery of new or improved wastewater infrastructure where this is needed.

### Action:

No change in response to representation.

3836

Object

Document Element: Treating wastewater;, 4.102

Respondent: The Bosham Association

## Support

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**Summary of representations:**

Support but lack confidence that upgrades will happen

**Summary of representation changes to plan:**

None proposed

**Response:**

Comment noted

**Action:**

No change in response to representation.

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4499

Support

**Document Element:** Treating wastewater;, 4.102

**Respondent:** Wisborough Green Parish Council

## Object

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**Summary of representations:**

Support but lack confidence that upgrades will happen

**Summary of representation changes to plan:**

None proposed

**Response:**

Comment noted

**Action:**

No change in response to representation.

---

6213

Object

**Document Element:** Treating wastewater;, 4.102

**Respondent:** Wisborough Green Parish Council

## Treating wastewater;, 4.103

# Mixed

### Summary of representations:

Query how the DWMP was used to inform the plan when it hadn't been published.

### Summary of representation changes to plan:

Revise wording

### Response:

Agree this is unclear – we worked with Southern Water as the DWMP was being prepared and consulted upon but the DWMP was not yet published in final form before the Reg 19 consultation. Suggest wording is amended.

### Action:

See council suggested modification CM138

### 3837

### Object

**Document Element:** Treating wastewater;, 4.103

**Respondent:** The Bosham Association

### 4008

### Object

**Document Element:** Treating wastewater;, 4.103

**Respondent:** Mrs Jane Towers

### 4217

### Object

**Document Element:** Treating wastewater;, 4.103

**Respondent:** Chidham and Hambrook Parish Council

### 4500

### Support

**Document Element:** Treating wastewater;, 4.103

**Respondent:** Wisborough Green Parish Council

### 6214

### Object

**Document Element:** Treating wastewater;, 4.103

**Respondent:** Wisborough Green Parish Council

**Treating wastewater;, 4.105****Object****Summary of representations:**

RECEIVED LATE: In relation to Portsmouth Water and Southern Water targets to reduce water consumption to 100 litres per person per day (lppd) by 2040, it is noted that the target is not the level which could be required for water neutrality.

**Summary of representation changes to plan:**

N/A

**Response:**

Comment noted – these targets are set by the respective water companies and do not override any plan requirements.

**Action:**

No change in response to representation.

**6501****Object**

**Document Element:** Treating wastewater;, 4.105

**Respondent:** CPRE Sussex

**Agent:** CPRE Sussex

**Treating wastewater;, 4.107****Object****Summary of representations:**

No certainty of a solution for Thornham so additional restrictions should be imposed as for Apuldram

**Summary of representation changes to plan:**

Refer to additional restrictions for Thornham

**Response:**

This para refers to the Position Statement for Thornham which sets out when restrictions will be needed.

**Action:**

No change in response to representation

**4188****Object**

**Document Element:** Treating wastewater;, 4.107

**Respondent:** Chidham and Hambrook Parish Council

## Policy NE16 Water Management and Water Quality

### Support

#### Summary of representations:

Support.

#### Summary of representation changes to plan:

None.

#### Response:

Support noted.

#### Action:

No change in response to representation

### 3780

### Support

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Mr Edward Bowring

### Object

#### Summary of representations:

Insufficient provision to treat waste water. Amount of extra sewage should be assessed.

#### Summary of representation changes to plan:

No more development should be permitted until sewage infrastructure has been upgraded

#### Response:

The policy as drafted requires that development is phased to align with delivery of wastewater treatment infrastructure where this is needed, and that water quality is protected.

#### Action:

No change in response to representation

### 3783

### Object

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Mrs Donna-Maria Thomas

### 3831

### Object

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Mrs Clare Gordon-Pullar

## Object

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### Summary of representations:

Object – impact of additional housing on Chichester Harbour

### Summary of representation changes to plan:

Remove policy A11 and reduce the number of houses

### Response:

The suggested change is not a change to this policy. The suggested change has also been recorded against policy A11 and responded to there.

### Action:

No change in response to representation

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3838

Object

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** The Bosham Association

## Object

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### Summary of representations:

Objects to development at Wisborough Green due to sewage issues.

Agrees with requirement to phase development.

### Summary of representation changes to plan:

No change to NE16 proposed. Objection relates to housing at Wisborough Green

### Response:

The suggested change is not a change to this policy. The suggested change has also been recorded against policy H3 and responded to there.

### Action:

No change in response to representation

---

3879

Object

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Mr simon urry

## Object

### Summary of representations:

No more development should be permitted until sewage infrastructure has been upgraded

### Summary of representation changes to plan:

No more development until waste water and road upgrades are carried out. Reduce the housing numbers. Remove A12

### Response:

The policy as drafted requires that development is phased to align with delivery of wastewater treatment infrastructure where this is needed, and that water quality is protected. The other suggested changes are not changes to this policy.

The suggested changes have also been recorded against policy A12 and responded to there.

### Action:

No change in response to representation

## 3934

## Object

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Mrs Donna-Maria Thomas

## Mixed

### Summary of representations:

Supports but suggests additional wording

### Summary of representation changes to plan:

Additional wording proposed " the uncertainty of these constraints, the reduced efficiency of SUDS in such low lying areas and the current concerns about Chichester Harbour make it unlikely that there would be much further sustainable development"

### Response:

Proposals will be assessed against the criteria to determine acceptability – the additional wording is unnecessary for a development management policy.

### Action:

No change in response to representation

## 3940

## Object

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Fishbourne Parish Council



## Object

### Summary of representations:

No more development should be permitted until sewage infrastructure has been upgraded

### Summary of representation changes to plan:

No more development until waste water and road upgrades are carried out. Reduce the housing numbers. Remove A11

### Response:

The policy as drafted requires that development is phased to align with delivery of wastewater treatment infrastructure where this is needed, and that water quality is protected. The other suggested changes are not changes to this policy.

The suggested changes have also been recorded against Policy A11 and responded to there.

### Action:

No change in response to representation

## 3944

## Object

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Mr Roger Weymouth

## Object

### Summary of representations:

1. Reduce water use target to 100lppd
2. Separate waste water and water quality policies
3. No certainty improvements to Thornham WWTW can be delivered.

### Summary of representation changes to plan:

- Reduce water use to 100lppd.
- Set out the requirements for Thornham in policy.

### Response:

1. 110lppd is the tightest target required by Building Regulations – the 2015 Deregulation Act means LPAs cannot set additional standards. The need for water neutrality justifies a tighter target than this as an exception for the Sussex North Water Resource zone but we do not have sufficient evidence to require 110 in the rest of the Plan Area at present although the policy is worded to encourage developers to go beyond this.

The requirements for Thornham currently refer to the Position Statement because the situation is less fixed than that for Apuldram = the issues are different and so the nature of the response may need to change over time. -

### Action:

No change in response to representation

## 4009

## Object

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Mrs Jane Towers

## Object

### Summary of representations:

1. Policy will not provide safe water supplies – providing water will harm water quality
2. How will lower water use be encouraged?
3. No evidence of upgrades to wastewater treatment infrastructure

### Summary of representation changes to plan:

Set out the upgrades to water supply/ wastewater treatment infrastructure

### Response:

1. The first part of the policy sets out that development would only be allowed where safe water can be provided without such harm.
2. The policy encourages applicants to build to facilitate a lower water use.
3. Southern Water are the statutory undertaker with responsibility for identifying and delivering upgrades to meet the needs of new development. This is done through their business planning process, including the DWMP.

### Action:

No change in response to representation

**4054****Object**

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Bosham Parish Council

## Object

### Summary of representations:

Objects to development in Southbourne based on uncertainty of a deliverable solution to treat waste water at Thornham WWTW

### Summary of representation changes to plan:

Add after drainage impact assessment “must demonstrate to the satisfaction of the local planning authority.

### Response:

The drainage assessment is required in order to assess compliance, so the additional wording is unnecessary.

### Action:

No change in response to representations.

**4070****Object**

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Southbourne Parish Council

## Object

### Summary of representations:

- Apuldram WWTW is inadequate.
- Southern Gateway drains to Apuldram.
- Environmental constraints and lack of sewage provision..

### Summary of representation changes to plan:

- No further development until the necessary infrastructure improvements are delivered.

### Response:

The policy as drafted requires that development is phased to align with delivery of wastewater treatment infrastructure where this is needed, and that water quality is protected.

In relation to Apuldram, this policy requires development at Southern Gateway to demonstrate no net increase in flows to Apuldram

### Action:

- No change in response to representations

4072

Object

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Donnington Parish Council

## Object

### Summary of representations:

- No more development should be permitted until sewage infrastructure has been upgraded.
- Southern Water should be a statutory consultee on large planning applications

### Summary of representation changes to plan:

- Separate water supply and waste water into separate policies.

### Response:

The policy as drafted requires that development is phased to align with delivery of wastewater treatment infrastructure where this is needed, and that water quality is protected.

Southern Water are routinely consulted on large/relevant applications but it is not within our remit to determine who is a statutory consultee.

Sections of this policy (such as water efficiency) relate to both water supply and wastewater so it is not considered necessary to separate the policies.

### Action:

- No change in response to representations

4162

Object

**Document Element:** Policy NE16 Water Management and Water Quality**Respondent:** Chidham and Hambrook Parish Council

Object

**Summary of representations:**

- Wastewater system is inadequate and will be exacerbated by additional development

**Summary of representation changes to plan:**

- Reduce housing numbers

**Response:**

The suggested change is not a change to this paragraph The suggested change has also been recorded against policy H1 and responded to there

**Action:**

- No change in response to this representation.

4284

Object

**Document Element:** Policy NE16 Water Management and Water Quality**Respondent:** Chichester Harbour Trust

Object

**Summary of representations:**

- Support but suggest wording clarifications

**Summary of representation changes to plan:**

Under Water Supply insert additional wording " outside the Sussex North Water Resource Zone" so the text reads: "Development proposals outside the Sussex North Water Resource Zone will be permitted that demonstrate"; Under Water Efficiency correct "Southern Water's Supply Zone North" to " Southern Water's Water Resource Zone Sussex North".

**Response:**

- The first change is not considered necessary. The second modification is made for accuracy.

**Action:**

- See council suggested modification CM141

4458

Object

**Document Element:** Policy NE16 Water Management and Water Quality**Respondent:** Southern Water

## Support

### Summary of representations:

Supports the policy but is concerned that homeowners can subsequently change/ remove installed water reduction fittings.

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation.

## 4502

## Support

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

1. What evidence would be required of a water supply?
2. Disappointed that the target is 110lppd rather than 100.

### Summary of representation changes to plan:

N/A

### Response:

1. That there are no supply issues, such as that identified for the Sussex Water Resource Zone North, that are not addressed.
2. 110lppd is the tightest target required by Building Regulations – the 2015 Deregulation Act means LPAs cannot set additional standards. The need for water neutrality justifies a tighter target than this as an exception for the Sussex North Water Resource zone but we have not currently seen sufficient evidence to require 110 in the rest of the Plan Area at present although the policy is worded to encourage developers to go beyond this. Email from Portsmouth Water dated 26th June 2023 confirmed this is not a soundness objection.  
Information about Portsmouth Water's incentive to achieve water consumption below 100lppd will be added to supporting text

### Action:

See council suggested modification CM139

## 4508

## Object

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Portsmouth Water Ltd

## Mixed

### Summary of representations:

Support but refers to comments on policy H3

### Summary of representation changes to plan:

None

### Response:

Support noted – comments related to H3 are recorded against that policy.

### Action:

No change in response to representation.

## 4605

## Support

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

Object to Thornham Position Statement requirement for capacity to be taken up on a first come first served basis

### Summary of representation changes to plan:

Priority should be given to strategic planned schemes

### Response:

The Thornham Position Statement was prepared to manage speculative development coming in ahead of the local plan. Southern Water can't plan ahead for speculative development as they don't know where/when it will be. However, Southern Water do know this for strategic allocations and can plan any upgrades accordingly.

### Action:

No change in response to the representation

## 4770

## Object

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Wates Developments and Seaward Properties

**Agent:** Barton Willmore now Stantec

## Object

### Summary of representations:

Apuldram position statement means no strategic sites in the catchment can happen until SW makes necessary improvements.

2. A fallback position should be set out for Thornham recognising impact on housing trajectory if improvements are not made.

### Summary of representation changes to plan:

There should be an allowance for schemes to demonstrate through their own WW mitigation strategy and drainage impact assessment that they can operate within the capacity of existing wastewater treatment infrastructure

### Response:

The Apuldram Position Statement requires no net increase in flows to the works – this could be achieved by connection to an alternative works with capacity or through demonstrating no net increase in flows an alternative way such as through water neutrality.

The proposed change is not necessary as applicants can already do this to demonstrate compliance with the requirements

2. The housing trajectory takes account of the need for upgrades at Thornham during the lifetime of the plan..

### Action:

No change in response to representation.

**4772****Object**

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Barton Willmore now Stantec

## Object

### Summary of representations:

1.Support 110 litres pppd

2. Suggest a wording change relating to sewer connection

### Summary of representation changes to plan:

N/A

### Response:

1. Support noted

2. Wording change can be made as a minor mod (this is currently set out in the Surface water SPD mentioned in the bullet above)

### Action:

See council suggested modification CM142

**4845****Object**

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Environment Agency

## Object

---

### Summary of representations:

Object to requirement to demonstrate no adverse impact as it may not be possible

### Summary of representation changes to plan:

Reword to "minimise harm"

### Response:

Do not agree with this change which would weaken protection.

### Action:

No change in response to representations

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4887

Object

---

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd

**Agent:** DWD Ltd

## Support

---

### Summary of representations:

Support but asks whether we intend to define major and minor development in the policy

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

Major and minor development have standard meanings in planning. Major development is defined in the Town and County Planning (Development Management Procedure ) (England) Order 2015. Anything smaller is minor development.

### Action:

No change in response to representation

---

4933

Support

---

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Chichester Harbour Conservancy



## Object

### Summary of representations:

Asks if the policy sufficiently addresses commercial and horticultural water use.

### Summary of representation changes to plan:

Amend d) to "development is phased to align with the delivery and operation of new and improved wastewater infrastructure where this is required.

### Response:

The first part of the policy, relating to water supply and the 3rd part about water quality and wastewater applies to all forms of development. Criteria a) under the second part of the policy requires non residential uses to achieve 3 credits in BREEAM which is in line with the requirements agreed for the Sussex Resource Zone North. No specific change is suggested to address this point so the change sought is unclear.

The suggested wording change to insert "and operation" into the policy is agreed and can be made as a minor mod.

### Action:

See council suggested modification CM142

5051

Object

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Sussex Wildlife Trust

## Support

### Summary of representations:

Support.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

5180

Support

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** John Newman

## Object

### Summary of representations:

1. Raises concerns about the low lying location of Sidlesham WWTW
2. Concerns about Southern Water using tankering when heavy rain is forecast
3. Asks for a moratorium on development

### Summary of representation changes to plan:

- Want an additional policy to assemble a consortium of stakeholders to survey the condition of Pagham Harbour.

### Response:

1. This has been raised with Southern Water and lies within their remit.
2. Southern Water are looking at what needs to be done at Sidlesham. The Local Plan does not allocate any sites in that catchment,
3. This policy requires development to be phased to align with delivery of any sewerage infrastructure needed.
4. Natural England are already undertaking a condition review of Pagham Harbour – a Local Plan policy is not needed for this to happen.

### Action:

- No change in response to representation

5259

Object

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Manhope

Support

### Summary of representations:

- Support.

### Summary of representation changes to plan:

- N/A

### Response:

- Support Noted.

### Action:

- No change in response to representation

5262

Support

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Horsham District Council

## Object

### Summary of representations:

Concerned about compliance with as yet unpublished position statements and unclear how allocations are reconciled with the need to achieve no net increase in flows.

Consider policy can be made sound with modifications.

### Summary of representation changes to plan:

No specific wording change proposed

### Response:

The Position Statement for Apuldram was published in 2018 and that for Thornham in 2021.

Allocated sites need to achieve no net increase in flow where relevant.

### Action:

No change in response to representation

**5390****Object**

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

Insufficient provision to treat waste water. Amount of extra sewage should be assessed.

### Summary of representation changes to plan:

No more development should be permitted until sewage infrastructure has been upgraded

### Response:

The policy as drafted requires that development is phased to align with delivery of wastewater treatment infrastructure where this is needed, and that water quality is protected.

### Action:

No change in response to representation

**5436****Object**

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Mayday! Action Group

## Object

---

### Summary of representations:

- 1.Object to shifting responsibility to ensure sufficient potable water from Southern Water to developers
2. Object to requirements for Apuldram and Thornham - Water industry Act gives developers a right to connect whether or not this overloads the system – responsibility of all downstream treatment and discharge is that of Southern Water.

### Summary of representation changes to plan:

Not specified

### Response:

We recognise SW's role and responsibilities but cannot grant permissions that would contravene HRA requirements

### Action:

No change in response to representation.

5608

Object

---

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Thakeham Homes

## Object

---

### Summary of representations:

Object to requirement to demonstrate no adverse impact as it may not be possible

### Summary of representation changes to plan:

Reword to "minimise harm"

### Response:

Do not agree with this change which would weaken protection.

### Action:

No change in response to representations

5767

Object

---

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Suez (Sita UK)

## Object

---

### Summary of representations:

Support most sections of the policy but suggest wording changes around the 110lppd figure:

### Summary of representation changes to plan:

Suggest clarifying that 110lppd is a maximum and giving greater encouragement to achieving lower usage by signposting Waterwise UK Water Efficiency Strategy in policy or in supporting text

### Response:

The policy already describes 110lppd as a maximum and encourages lower water use.

The Water Efficiency Strategy will be added to supporting text

### Action:

See council suggested modification CM136

---

## 5824

## Object

---

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Natural England

## Object

---

### Summary of representations:

Policy is not effective or justified because it relies on Policy NE17 regarding water neutrality in Sussex N WRZ . Rep cross refers to HRA reps ( which consider NE17 unenforceable) and NE6

### Summary of representation changes to plan:

Not specified

### Response:

Unclear what change is sought to policy NE16. The approach to water neutrality has been developed with a range of stakeholders including Natural England.

### Action:

No change as a result of representation.

---

## 5835

## Object

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**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Object

---

### Summary of representations:

Objection. Southern Water is in an impossible position, unable to manage current wastewater but with a statutory duty to take wastewater from new development. Tankers should only be used in emergencies. Water is being taken from Ems

### Summary of representation changes to plan:

Not specified

### Response:

This appears to be an observation on the functioning of the water industry more than the Local Plan – unclear what change is sought to the policy

### Action:

No change as a result of representation.

5874

Object

---

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Alan and Susan Green

## Object

---

### Summary of representations:

Asks if improvements to wastewater infrastructure and ensuring no adverse impacts are achievable.

### Summary of representation changes to plan:

Not specified

### Response:

This policy is written to require this.

### Action:

No change as a result of representation.

5879

Object

---

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Fishbourne Meadows Residents' Association

## Support

---

**Summary of representations:**

Support, particularly c and d

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change as a result of representation.

---

### 6012

### Support

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**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Southern Water

## Mixed

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**Summary of representations:**

Supports but suggests additional wording

**Summary of representation changes to plan:**

Additional wording proposed " the uncertainty of these constraints, the reduced efficiency of SUDS in such low lying areas and the current concerns about Chichester Harbour make it unlikely that there would be much further sustainable development"

**Response:**

Proposals will be assessed against the criteria to determine acceptability – the additional wording is unnecessary for a development management policy.

**Action:**

No change in response to representation

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### 6106

### Support

---

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Fishbourne Parish Council

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None

**Response:**

Support noted.

**Action:**

No change in response to representation

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6124

Support

---

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Natural England

Mixed

---

**Summary of representations:**

Support but refers to comments on policy H3

**Summary of representation changes to plan:**

None

**Response:**

Support noted – comments related to H3 are recorded against that policy.

**Action:**

No change in response to representation.

---

6228

Object

---

**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** Wisborough Green Parish Council



## Object

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**Summary of representations:**

RECEIVED LATE: There are two reports due to be published - the West Sussex Coast and Gt Brighton Board and Southern Water overall plan for drainage and waste water. The timing of the LP is thus unable to take these two influential inputs into account and may have implications for the 'Soundness' of the plan as it moves forward.

No mention is included of Sidlesham WSTW which is operating at and beyond capacity resulting in new housing on the Manhood Peninsula dealing with waste water in gardens, in houses etc.

**Summary of representation changes to plan:**

N/A

**Response:**

We worked with Southern Water as the Drainage and Wastewater Management Plan (DWMP) was being prepared and consulted upon but the DWMP was not yet published in final form before the Reg 19 consultation. Suggest wording is amended for clarity.

The situation in relation to Sidlesham WWTW is acknowledged and is for Southern Water to address. The Local Plan does not propose any housing allocations in the Sidlesham catchment.

**Action:**

See council suggested modification CM138.

---

**6504****Object**

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**Document Element:** Policy NE16 Water Management and Water Quality

**Respondent:** CPRE Sussex

**Agent:** CPRE Sussex

## Background, 4.108

## Object

### Summary of representations:

Suitably sets out that development in the WRZ is supplied from Pulborough abstraction.

Could improve clarity by stating that aquifer is specifically being impacted by the Pulborough abstractions (see proposed changes)

### Summary of representation changes to plan:

'...by the Pulborough ground water abstraction site, abstracting from the Folkestone beds of the lower greensand/Wealden greensand semiconfined aquifer. As well as....'

### Response:

Agree

### Action:

See council suggested modification CM143

5826

Object

Document Element: Background, 4.108

Respondent: Natural England

## Background, 4.109

## Object

### Summary of representations:

Suitable sets out requirement to achieve WN for these developments.

Could add wording to clarify that achieving WN is one of the most readily available methods to rule out an adverse effect on integrity (see proposed changes).

### Summary of representation changes to plan:

'...on the sites. The most feasible method to achieve this is to require that development must be water neutral....'

### Response:

Agree

### Action:

See council suggested modification CM143

5827

Object

Document Element: Background, 4.109

Respondent: Natural England

**Background, 4.110****Support****Summary of representations:**

Support with qualification.

WGPC is unaware of provisions that prevent homeowners subsequently changing installed fittings and water saving devices and questions how this will be monitored.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change to plan

**4503****Support**

**Document Element:** Background, 4.110

**Respondent:** Wisborough Green Parish Council

**Object****Summary of representations:**

As the final strategy is not out yet we advise that this paragraph should include some discussion as to why achieving 85lppd is critical. i.e. achieving this high level of efficiency will enable the strategy to provide offsetting more effectively thereby reducing costs OR make a direct refence to discussion in PART C strategy.

Should add wording to make apparent within this local plan why these tighter measures are required before offsetting should be considered, given that the final plan is not yet published (see proposed changes).

**Summary of representation changes to plan:**

'...water use category; Achieving these higher levels of efficiency will enable the strategy to provide necessary offsetting more effectively, thereby reducing offsetting costs and ensuring viability for development within the WRZ. This may.....'

**Response:**

Agree

**Action:**

See council suggested modification CM143

**5830****Object**

**Document Element:** Background, 4.110

**Respondent:** Natural England

## Background, 4.111

## Support

### Summary of representations:

Support with qualification.

The Water Neutrality Study is an unproven model, to draw conclusions as to its efficacy is questionable at best. It is likely that there will be significant additional demand for water above existing levels and that offsetting this additional demand against existing supplies will prove harder, if not impossible, against existing supplies.

If the IOS fails to work, a distinct possibility, any new development in the northern area will have a negative affect on existing homeowners.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

4512

Support

Document Element: Background, 4.111

Respondent: Wisborough Green Parish Council

## Object

### Summary of representations:

Support with qualification.

The Water Neutrality Study is an unproven model, to draw conclusions as to its efficacy is questionable at best. It is likely that there will be significant additional demand for water above existing levels and that offsetting this additional demand against existing supplies will prove harder, if not impossible, against existing supplies.

If the IOS fails to work, a distinct possibility, any new development in the northern area will have a negative affect on existing

### Summary of representation changes to plan:

N/A

### Response:

Work on SNOWS (Sussex North Offsetting Water Scheme) remains on-going and further details will emerge as this work progresses.

### Action:

No change to plan

**6217****Object****Document Element:** Background, 4.111**Respondent:** Wisborough Green Parish Council**Background, 4.112****Support****Summary of representations:**

Support with qualification.

WGPC is concerned that the Local Plan relies upon an HRA and Environmental Assessment undertaken in 2019, at that time the allocations to the northern parishes were much reduced.

When the Planning Inspector asked CDC 'for no stone to be left unturned' in seeking additional housing sites, was he/she made aware of the water neutrality implications in the north eastern area. The water situation has deteriorated since the 2019 study, not least as result of development completed and occupied.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change to plan

**4505****Support****Document Element:** Background, 4.112**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

Support – with qualification

WGPC is concerned that the Local Plan relies upon an HRA and Environmental Assessment undertaken in 2019, at that time the allocations to the northern parishes were much reduced.

When the Planning Inspector asked CDC 'for no stone to be left unturned' in seeking additional housing sites, was he/she made aware of the water neutrality implications in the north eastern area. The water situation has deteriorated since the 2019 study, not least as result of development completed and occupied.

### Summary of representation changes to plan:

N/A

### Response:

The SA and HRA work has continued to evolve with the local plan and the assessments have been updated for each stage of the local plan production. The Planning Inspectorate is aware of the water neutrality issue and the joint work that is being undertaken by the affected authorities.

### Action:

No change to plan

## 6215

## Object

**Document Element:** Background, 4.112

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

RECEIVED LATE: Paragraphs 4.112 and 4.113 are contradictory.

### Summary of representation changes to plan:

N/A

### Response:

Paragraph 4.112 sets out that the Water Neutrality Strategy provides overall evidence that Local Plan development will not negatively impact on the Arun Valley sites; paragraph 4.113 sets out the details of how applicants will need to demonstrate their scheme is water neutral in its own right.

### Action:

No change to Plan.

## 6505

## Object

**Document Element:** Background, 4.112

**Respondent:** CPRE Sussex

**Agent:** CPRE Sussex

## Background, 4.113

Support

---

**Summary of representations:**

■ WGPC supports this statement.

**Summary of representation changes to plan:**

■ N/A

**Response:**

■ Support noted

**Action:**

■ No change to plan

4514

Support

---

**Document Element:** Background, 4.113

**Respondent:** Wisborough Green Parish Council

## Policy NE17 Water Neutrality

Support

---

**Summary of representations:**

■ Support

**Summary of representation changes to plan:**

■ N/A

**Response:**

■ Support noted

**Action:**

■ No change to plan.

4154

Support

---

**Document Element:** Policy NE17 Water Neutrality

**Respondent:** Chidham and Hambrook Parish Council

## Support

---

### Summary of representations:

Support with qualification.

The WNS is an unproven model, to draw conclusions as to its efficacy is questionable, at best. It is likely there will be significant additional demand for water above existing levels and offsetting this additional demand against existing supplies will prove harder., if not impossible, against existing supplies.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

---

## 4509

## Support

---

**Document Element:** Policy NE17 Water Neutrality

**Respondent:** Wisborough Green Parish Council

## Support

---

### Summary of representations:

Portsmouth Water support this policy.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

---

## 4531

## Support

---

**Document Element:** Policy NE17 Water Neutrality

**Respondent:** Portsmouth Water Ltd



## Object

### Summary of representations:

Premier support the thrust of this policy and the need to protect water neutrality through water efficient design in accordance with BREEAM or an equivalent standard. That said, the policy should allow flexibility for the type of non-domestic buildings.

### Summary of representation changes to plan:

The policy should allow flexibility for type of non-domestic buildings

### Response:

Comments noted

### Action:

No change to plan

4629

Object

**Document Element:** Policy NE17 Water Neutrality

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

## Support

### Summary of representations:

CBC strongly supports the approach taken in the Chichester Local Plan Policy NE17: Water Neutrality. This approach was discussed and agreed jointly across the Sussex North local authorities and has been advised and supported by the technical evidence.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

4793

Support

**Document Element:** Policy NE17 Water Neutrality

**Respondent:** Crawley Borough Council

## Support

---

### Summary of representations:

We are supportive of the policy requiring a maximum water consumption standard of 85 litres per person per day for development within the Sussex North Water Resource Zone.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

---

## 4846

## Support

---

**Document Element:** Policy NE17 Water Neutrality

**Respondent:** Environment Agency

## Support

---

### Summary of representations:

The RSPB supports Policy NE17 and the implementation of the Water Neutrality Strategy and the associated mitigation requirements for water neutrality. The RSPB is supportive of the requirements to secure water efficient design in new development, which promotes water use reductions before looking towards the need to mitigate water use through offsetting schemes.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

---

## 4911

## Support

---

**Document Element:** Policy NE17 Water Neutrality

**Respondent:** Royal Society for the Protection of Birds (RSPB)

## Object

### Summary of representations:

With the offsetting schemes or alternative water supplies, will a guarantee for the lifetime of the development be required as part of the water neutrality statement? We do not feel the policy or the supporting text makes that requirement clear. SWT does recognise that the offsetting scheme is still emerging and that the supporting literature around this topic is considerable.

### Summary of representation changes to plan:

N/A

### Response:

Work on SNOWS (Sussex North Offsetting Water Scheme) remains on-going and further details will emerge as this work progresses. Natural England has worked jointly with the affected authorities to identify an appropriate mitigation strategy.

### Action:

No change to plan

5052

Object

**Document Element:** Policy NE17 Water Neutrality

**Respondent:** Sussex Wildlife Trust

## Support

### Summary of representations:

The policy for water neutrality is noted and the South Downs National Park Authority welcomes the continued joint work with CDC and the other affected Local Planning Authorities.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

5135

Support

**Document Element:** Policy NE17 Water Neutrality

**Respondent:** South Downs National Park Authority

## Support

### Summary of representations:

Water neutrality is a significant issue affecting both our districts. Horsham District Council supports this policy which is derived from the joint work undertaken by Chichester District Council, Horsham District Council and Crawley brough Council. We look forward to continued working with CDC on the development of the implementation scheme, in order to deliver the JBA Water Neutrality Assessment study. This will ensure all new development is in conformity with the Habitat Regulations and can demonstrate water neutrality.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

5263

Support

**Document Element:** Policy NE17 Water Neutrality

**Respondent:** Horsham District Council

## Object

### Summary of representations:

Bellway note the contents of draft Policy NE17. Given that this draft policy wouldn't impact upon the deliverability of the Police Field site, no further comments are proffered.

Policy does not impact on Police Field site (Southern Gateway), no further comments.

### Summary of representation changes to plan:

For the avoidance of doubt, it is respectfully suggested that the title of the draft Policy be amended to 'Water Neutrality within the Sussex North Water Resource Zone'.

### Response:

Comments noted. However, it is not considered necessary to amend the title as it is clear what area is relevant in the policy.

### Action:

No change to plan

5392

Object

**Document Element:** Policy NE17 Water Neutrality

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

Suggest revisions to policy

### Summary of representation changes to plan:

Recommend Part 1a and 1b should be under heading 'Water Efficient Design'. Part 1a should also confirm whether this includes external water use or not. Point 3 of the policy should outline what is expected from an offsetting scheme.

### Response:

Comments noted

### Action:

See council suggested modification CM144

## 5610

## Object

**Document Element:** Policy NE17 Water Neutrality

**Respondent:** Thakeham Homes

## Object

### Summary of representations:

Policy sets out onerous restriction on water use per person per household per day. Potentially achievable, however, it is restrictive and not attractive to future residents. Accordingly, its introduction without flexibility, may limit desirability of future properties. Policy should therefore allow house builder flexibility to allow high water usage, set against greater off-site water saving measures. Knock on effect could be an increase in housing values for existing stock not subject to restrictive water use. Also consider there to be a need for a strategic mitigation to be provided alongside the Plan. At present there is no evidence of this being prepared.

### Summary of representation changes to plan:

Policy should be more flexible.

### Response:

Comments noted

A joint LPA offsetting mitigation scheme is being developed (SNOWS) to sit alongside local plans of affected authorities.

### Action:

See council suggested modification CM144

## 5757

## Object

**Document Element:** Policy NE17 Water Neutrality

**Respondent:** Barratt David Wilson Homes

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

Policy requirement 4, while useful to include, should include wording to make clear that where alternative water supply is being proposed as a method to avoid AEOI. The statement will also need to demonstrate that deliverability of this water supply is certain for the lifetime of the development.

Adding this wording will make apparent to developers seeking alternative supply as an AEOI avoidance measure, what will be required of them by the Habitats Regulations in the line with the People Over Wind ruling. This will have the benefit of ensuring this policy requirement does not unintentionally encourage a proliferation of developers seeking inappropriate water supply solutions while also giving your authority more confidence to reject such inappropriate proposals at an early stage, which should save your authority and developers time and resources.

### Summary of representation changes to plan:

We would suggest the following:

4. Where an alternative water supply is to be provided, the statement will need to demonstrate that no water is utilised from sources that supply the Sussex North WRZ. The wider acceptability of and certainty of delivery for alternative water supplies will be considered on a case-by-case basis.

### Response:

Agree

### Action:

See council suggested modification CM144

5831

Object

**Document Element:** Policy NE17 Water Neutrality

**Respondent:** Natural England

## Object

### Summary of representations:

Object to policy on grounds of uncertainty over enforcement of water efficiency; monitoring from LPA's perspective impossible; LPA can't be certain measure imposed will be effective; no provisions made for circumstances in which offsetting scheme not available; offsetting within WRZ will surely exacerbate issues: Water Neutrality Statement requires full understanding of how water will be managed from consent; considerable doubt about how applications can be managed in manner suggested by Plan; see detailed representations provided in attachment.

### Summary of representation changes to plan:

N/A

### Response:

Work is continuing on the joint LPA approach and strategy to address water neutrality.

Work on SNOWS (Sussex North Offsetting Scheme) remains on-going and further details will emerge as this work progresses.

### Action:

No change to plan

5836

Object

**Document Element:** Policy NE17 Water Neutrality**Respondent:** Kirdford Parish Council**Agent:** Troy Planning + Design**Support****Summary of representations:**

Overall we are satisfied that the policy requirements are sufficient to rule out an AEOI on this plan on the Arun Valley designated sites resultant from increased abstraction at Pulborough.

Policy requirement 1 is robust and clearly defines general requirements to rule out AEOI.

Requirements 2 and 3 are robust and suitably set out that a strategic offsetting strategy is being developed which should make achieving requirements 1 significantly easier for the allocation of this plan.

Policy requirement 5 is robust and clearly defines the 3 key aspects of a WN statement which are required as a minimum to demonstrate that AEOI on the Arun Valley sites resulting from additional abstraction can be ruled out.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change to plan

6125

Support

**Document Element:** Policy NE17 Water Neutrality**Respondent:** Natural England**Support****Summary of representations:**

Support in principle.

Premier welcome the Council's decision for new developments to bring forward their own offsetting schemes and taking a pragmatic approach to offsetting.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change to plan

6157

Support

**Document Element:** Policy NE17 Water Neutrality**Respondent:** Premier Marinas Limited**Agent:** CBRE Limited

Object

**Summary of representations:**

Support with qualification.

The WNS is an unproven model, to draw conclusions as to its efficacy is questionable, at best. It is likely there will be significant additional demand for water above existing levels and offsetting this additional demand against existing supplies will prove harder., if not impossible, against existing supplies.

If the OIS fails to work, a distinct possibility, any new development in the northern area will have a negative effect on existing homeowners.

WGPC is unaware of provisions that prevent homeowners subsequently changing installed fittings or any definitive plans for rainwater capture and use within individual homes.

**Summary of representation changes to plan:**

N/A

**Response:**

More detail of progress with the water neutrality strategy is set out in the Topic Paper.

Work on SNOWS (Sussex North Offsetting Scheme) remains on-going and further details will emerge as this work progresses.

The Planning Inspectorate is aware of the water neutrality issue and the joint work that is being undertaken by the affected authorities.

**Action:**

No change

6216

Object

**Document Element:** Policy NE17 Water Neutrality**Respondent:** Wisborough Green Parish Council



## Support

### Summary of representations:

SWT is supportive of policy measure coming forward to address impacts on designated sites from abstraction. This is the first time SWT has seen a policy of this kind come forward in a Local Plan, so we have not an opportunity to comment through the Regulation 18 process. As such, our comments related to this policy may not be considered strictly within the realms of soundness.

### Summary of representation changes to plan:

N/A

### Response:

Comments noted.

### Action:

No change to plan.

6250

Support

**Document Element:** Policy NE17 Water Neutrality

**Respondent:** Sussex Wildlife Trust

## Policy NE18 Source Protection Zones

Support

### Summary of representations:

Any problems more likely to be agricultural

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation

4148

Support

**Document Element:** Policy NE18 Source Protection Zones

**Respondent:** Chidham and Hambrook Parish Council

## Support

---

**Summary of representations:**

Support.

**Summary of representation changes to plan:**

None.

**Response:**

Support noted

**Action:**

No change in response to representation

---

**4537****Support**

**Document Element:** Policy NE18 Source Protection Zones

**Respondent:** Portsmouth Water Ltd

---

**4847****Support**

**Document Element:** Policy NE18 Source Protection Zones

**Respondent:** Environment Agency

---

## Support

**Summary of representations:**

Note policy

**Summary of representation changes to plan:**

None

**Response:**

Comment noted.

**Action:**

No change in response to representation

---

**5514****Support**

**Document Element:** Policy NE18 Source Protection Zones

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Background, 4.121

## Object

### Summary of representations:

No nutrient mitigation in place for A11

### Summary of representation changes to plan:

Remove A11

### Response:

A nutrient mitigation plan will need to be agreed in line with requirements. This is usually done through the planning application process as the mitigation available will evolve over the plan period.

The change sought is not a change to this policy.

### Action:

No change in response to representation.

3856

Object

Document Element: Background, 4.121

Respondent: The Bosham Association

## Policy NE19 Nutrient Neutrality

## Object

### Summary of representations:

No agreed nutrient mitigation scheme

### Summary of representation changes to plan:

N/A

### Response:

A nutrient mitigation plan will need to be agreed in line with requirements for any relevant development. This is usually done through the planning application process as the mitigation available will evolve over the plan period.

### Action:

No change in response to representation

4067

Object

Document Element: Policy NE19 Nutrient Neutrality

Respondent: Bosham Parish Council

## Object

---

### Summary of representations:

Where are strategies to minimise the use of pesticides and fertilisers?

### Summary of representation changes to plan:

N/A

### Response:

The use of pesticides by farmers does not require planning permission so does not fall within the remit of the Local Plan or the planning system. However these issues are addressed by measures outside of the planning system such as the Nitrate Vulnerable Zone classification which applies across much of the area, and Catchment Sensitive Farming programme as well as local initiatives such as CHAPRON, and by Protected Sites Strategies as set out in the Environment Act.

### Action:

No change in response to representation.

---

## 4161

## Object

---

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** Chidham and Hambrook Parish Council

## Support

---

### Summary of representations:

Support.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

---

## 4287

## Support

---

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** Chichester Harbour Trust

## Object

### Summary of representations:

Premier suggest the policy is amended to make explicit reference for mitigation to be agreed on a site-by-site basis and to be proportionate and reasonable to the scale of proposed development to ensure it is effective in accordance with paragraph 35(c) of the NPPF.

### Summary of representation changes to plan:

Add " to be agreed on a site by site basis and to be proportionate and reasonable to the scale of proposed development"

### Response:

Additional wording is unnecessary – mitigation is generally agreed on a site by site basis through the planning application process and needs to be sufficient to make the development nutrient neutral to comply with HRA requirements.

### Action:

No change in response to representation

4630

Object

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

## Object

### Summary of representations:

Object.

### Summary of representation changes to plan:

Want additional information on nutrient neutrality, current state of play for mitigation schemes and evidence of collaborative working with catchment operators

### Response:

The HRA sets out the current state of play and more information will be published in a background paper. There is also information on the Council website

CDC have been working with other authorities across the affected area through the PFSH Water Quality Group since 2019, including joint funding 3 staff working on this issue.

### Action:

No change in response to representation

4914

Object

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** Royal Society for the Protection of Birds (RSPB)

## Object

---

### Summary of representations:

Clarify that agreed mitigation measures must be in the context of Chichester Harbour

### Summary of representation changes to plan:

Clarify that agreed mitigation measures must be in the context of Chichester Harbour

### Response:

To be considered nutrient neutral the mitigation has to be in the same catchment.

### Action:

No change in response to representation

---

4937

Object

---

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** Chichester Harbour Conservancy

## Object

---

### Summary of representations:

Support but suggest it would be useful to set out what information is required with a planning application, as per the Water neutrality Policy

### Summary of representation changes to plan:

N/A

### Response:

Information requirements will be set out in the Local List which can be more readily updated if requirements change.

### Action:

No change in response to representation

---

5053

Object

---

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** Sussex Wildlife Trust

## Support

---

**Summary of representations:**

Support.

**Summary of representation changes to plan:**

None.

**Response:**

Support noted.

**Action:**

No change in response to representation.

---

5181

Support

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** John Newman

## Object

---

**Summary of representations:**

Pagham Harbour needs to be given the same protection

**Summary of representation changes to plan:**

None

**Response:**

Pagham Harbour is offered protection under Policy NE16 which requires no adverse effect .

**Action:**

No change in response to representation.

---

5349

Object

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** Mr Paul Bedford

## Object

---

### Summary of representations:

Policy duplicates content of NE6 – scope to consolidate

### Summary of representation changes to plan:

Policy should be expanded to promote and encourage suitable schemes

### Response:

A nutrient mitigation plan will need to be agreed in line with requirements for any relevant development. This is usually done through the planning application process as the mitigation available will evolve over the plan period. The policy is not intended to identify particular schemes.

### Action:

No change in response to representation.

---

5393

Object

---

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

---

### Summary of representations:

Increasing housing impacts harbour.

### Summary of representation changes to plan:

Fix the infrastructure before building more houses

### Response:

No change to this policy is suggested. Other policies cover infrastructure requirements for new development.

### Action:

No change in response to representation

---

5452

Object

---

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** Mayday! Action Group



## Object

---

### Summary of representations:

Support but suggest additional wording

### Summary of representation changes to plan:

1. Make clear what information developers will need to provide.

2. Highlight in supporting text that other types of development might have a non sewerage related water quality implications

Additional documents to reference in supporting text.

### Response:

1. Information requirements will be set out in the local list. 2. The impact of other uses on water quality is covered by Policy NE16 – although changes in agricultural practice are outwith the planning system.

Additional guidance will be added to the Nutrient Neutrality page on our website.

### Action:

See council suggested modifications CM145 and CM146

---

5841

Object

---

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** Natural England

## Support

---

### Summary of representations:

Support but suggest additional wording

### Summary of representation changes to plan:

N/A

### Response:

Support noted – suggested wording changes now covered in rep 5841

### Action:

No change in response to representation.

---

6126

Support

---

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** Natural England

## Support

---

**Summary of representations:**

Support in principle

**Summary of representation changes to plan:**

None in response to representation

**Response:**

Support noted

**Action:**

See reps 4630 and 6258 for suggested changes

---

6158

Support

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

## Support

---

**Summary of representations:**

Support nutrient neutrality alongside other catchment measures

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change in response to representation

---

6173

Support

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** Royal Society for the Protection of Birds (RSPB)

## Support

---

### Summary of representations:

Support in principle

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change in response to representation

---

## 6251

## Support

---

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** Sussex Wildlife Trust

## Object

---

### Summary of representations:

"Essential" in 4.29 suggested nutrient neutrality is mandatory not optional

### Summary of representation changes to plan:

Remove proposed allocations that require nutrient neutrality until a mitigation plan is in place

### Response:

At the present time nutrient neutrality is mandatory in relevant areas as set out in policy NE19.

A nutrient mitigation plan will need to be agreed in line with requirements. This is usually done through the planning application process as the mitigation available will evolve over the plan period.

The change sought is not a change to this policy.

### Action:

No change in response to representation.

---

## 6256

## Object

---

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** The Bosham Association

## Object

### Summary of representations:

Practical difficulties in securing nutrient neutrality ( duplicate of rep 4616)

### Summary of representation changes to plan:

Proposes 'appropriate mitigation' [as per policy NE6] has regard for existing residents and the commercial viability of businesses, and is proportionate to the scale of development proposed to ensure it doesn't render development unviable or overburden.

### Response:

Additional wording is unnecessary – mitigation is generally agreed on a site by site basis through the planning application process and needs to be sufficient to make the development nutrient neutral to comply with HRA requirements.

### Action:

No change in response to representation

6258

Object

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

## Object

### Summary of representations:

RECEIVED LATE: Nutrient neutrality exclusion of large area of the Peninsula from the protection zone is illogical as same conditions exhibited in Chichester Harbour exist at Pagham.

Nutrient budget calculator March, 2022 version gives an "n" factor for discharges from WWTW - no direct mention of its use at Chichester harbour and as data on Pagham Harbour has yet to be made public, the role of Sidlesham WWTW has not been referred to. The "N" factor would probably be more restrictive on outflows from WWTW than the total discharge permits and shows a lack of coordinated approach between the Environment Agency and Natural England.

### Summary of representation changes to plan:

N/A

### Response:

The area affected by the requirement for nutrient neutrality is defined by Natural England. The notice of designation of sensitive catchment areas published by government on 25 January 2024 confirmed Chichester and Langstone Harbours as part of the wider Solent nutrient sensitive catchment.

If the catchment is extended to include Pagham Harbour in future then the same requirement would apply. Policy NE16 also ensures that effects on water quality are considered in all parts of the plan area.

### Action:

No change in response to representation.

6503

Object

---

**Document Element:** Policy NE19 Nutrient Neutrality

**Respondent:** CPRE Sussex

**Agent:** CPRE Sussex

**Pollution, 4.123****Object****Summary of representations:**

No acknowledgement of the role of transport in mitigating climate change or its effects; sustainable movement and access to address anthropogenic impacts. Additional transport evidence required to demonstrate opportunities for sustainable transport have been identified as required by NPPF 104/105

**Summary of representation changes to plan:**

The allocations require substantial additional transport related work and evidence to demonstrate that the opportunities for sustainable transport have been identified and taken up as required by NPPF paragraphs 104-105

**Response:**

The role of transport in mitigating climate change together with sustainable transport modes and access is referred to in the suite of transport policies at Chapter 8. Opportunities for sustainable travel modes are considered in the Chichester Transport Study

**Action:**

No change

**5534****Object**

**Document Element:** Pollution, 4.123

**Respondent:** Stagecoach South

**Policy NE20 Pollution****Object****Summary of representations:**

Need study to show impact of proposed level of housing on air quality and road traffic pollution

**Summary of representation changes to plan:**

Study to show the impact this level of housing will have on air quality and pollution caused by the increase in traffic

**Response:**

Pollution effects from planned development are considered as part of the Sustainability Appraisal and through the Air Quality Assessment – Annex D of 2023 Transport Study.

**Action:**

No change

**4010****Object**

**Document Element:** Policy NE20 Pollution

**Respondent:** Mrs Jane Towers

## Object

---

### Summary of representations:

Need reduction in housing and district wide approach to achieving appropriate mitigation measures.

### Summary of representation changes to plan:

Both a reduction in housing numbers to reduce the pollution and a district wide strategic approach to achieving appropriate mitigation measures, to ensure soundness of the plan

### Response:

The various pollution policies point to the relevant guidance, standards and/or action plan. Appropriate mitigation measures will be determined at planning application stage and considered on a case-by-case basis

### Action:

No change

---

4068

Object

---

**Document Element:** Policy NE20 Pollution

**Respondent:** Bosham Parish Council

## Object

---

### Summary of representations:

Development should be refused. Should be no mitigation for increased pollution from increase of homes, planning should be refused

### Summary of representation changes to plan:

Impacts should not be mitigated for.  
Planning should be refused if there is an adverse pollution impact

### Response:

Pollution effects from planned development are considered as part of the Sustainability Appraisal. Any new proposals for development will need to meet the criteria in Policy NE22 Air Quality

### Action:

No change

---

4144

Object

---

**Document Element:** Policy NE20 Pollution

**Respondent:** Chidham and Hambrook Parish Council

## Object

---

### Summary of representations:

Include "A Construction Environmental Management Plan (CEMP) is recommended for developments that are located within Source Protection Zones (SPZ) and next to rivers".

### Summary of representation changes to plan:

As per rep summary.

### Response:

CEMPs are usually required in Planning Conditions. However, a new paragraph will be incorporated into the policy explicitly referring to pollution prevention measures being taken during construction activities. This criterion will be applicable to all development proposals and will therefore include development within SPZs/next to rivers although Policy NE18 Source Protection Zones already has criteria also relevant to this issue.

### Action:

See Council's suggested modification CM147.

---

4511

Object

---

**Document Element:** Policy NE20 Pollution

**Respondent:** Portsmouth Water Ltd

## Support

---

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

---

4516

Support

---

**Document Element:** Policy NE20 Pollution

**Respondent:** Wisborough Green Parish Council



## Support

---

**Summary of representations:**

Support.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

---

**4534**
**Support**

**Document Element:** Policy NE20 Pollution

**Respondent:** Portsmouth Water Ltd

## Object

---

**Summary of representations:**

Add: "During construction activities, pollution prevention measures should be taken on site including appropriate storage of hazardous substances, suitable management of surface water to prevent pollutants reaching watercourses and equipment provided for containing spills if necessary."

**Summary of representation changes to plan:**

As per rep summary.

**Response:**

Suggested inclusion of text referencing construction activities is agreed.

**Action:**

See Council's suggested Modification CM147.

---

**4850**
**Object**

**Document Element:** Policy NE20 Pollution

**Respondent:** Environment Agency

## Support

---

**Summary of representations:**

Support.

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted

**Action:**

No change

---

5054

Support

**Document Element:** Policy NE20 Pollution

**Respondent:** Sussex Wildlife Trust

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

---

5182

Support

**Document Element:** Policy NE20 Pollution

**Respondent:** John Newman

## Object

---

### Summary of representations:

Unnecessary to include reference to other policies that exist in their own right

### Summary of representation changes to plan:

No change

### Response:

Many policies within the plan cross-reference other relevant policies. NE20 Pollution is an over-arching policy for all the other pollution policies contained within the plan

### Action:

No change

---

5394

Object

---

**Document Element:** Policy NE20 Pollution

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

---

### Summary of representations:

Question acceptable levels, how impacts will be assessed and measured and who is accountable

### Summary of representation changes to plan:

No change

### Response:

Each specific pollution policy details criteria which must be met to avoid/mitigate pollution and details the relevant standards and guidance that apply

### Action:

No change

---

5453

Object

---

**Document Element:** Policy NE20 Pollution

**Respondent:** Mayday! Action Group

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted

**Action:**

No change

---

5842

Support

**Document Element:** Policy NE20 Pollution

**Respondent:** Natural England

### Background, 4.128

## Object

---

**Summary of representations:**

Support although DSDS's are not designations so change correct wording to: "The plan area includes three 'Dark Sky Discovery Sites', all defined within.....".

**Summary of representation changes to plan:**

As per rep summary.

**Response:**

Agreed, amended wording required.

**Action:**

See Council's suggested Modifications CM148 and CM149.

---

4940

Object

**Document Element:** Background, 4.128

**Respondent:** Chichester Harbour Conservancy

## Policy NE21 Lighting

Support

---

**Summary of representations:**

Support, although disappointing no mention of light pollution in urban areas.

**Summary of representation changes to plan:**

As per rep summary

**Response:**

Support and comment noted

**Action:**

No change.

4011

Support

---

**Document Element:** Policy NE21 Lighting

**Respondent:** Mrs Jane Towers

Support

---

**Summary of representations:**

Although include 'Switch off Lights' suggestion made to CDC at recent meeting; include measures to reduce light pollution in urban areas

**Summary of representation changes to plan:**

As per rep summary

**Response:**

Support and comment noted. The policy applies to relevant proposals within any part of the plan area.

**Action:**

No change

4155

Support

---

**Document Element:** Policy NE21 Lighting

**Respondent:** Chidham and Hambrook Parish Council

## Object

### Summary of representations:

Need to include positive statement having goal to minimise light pollution; specify requirement for detailed lighting scheme to be prepared in line with relevant BS and latest national design guidance including using specific energy-efficient forms of lighting; point 4 to include use of cowls and careful directional lighting.

### Summary of representation changes to plan:

As per rep summary

### Response:

Minimising light pollution is implicit in paragraph 4.127 which sets out that the design of lighting schemes should be carefully considered to prevent light spillage and glare. Planning Practice Guidance on Light Pollution makes reference to efficient lamp and luminaire selection as well as other measures for reducing the impact of lighting – national guidance is referred to at criterion 1 of the policy.

### Action:

No changes

## 4363

## Object

**Document Element:** Policy NE21 Lighting

**Respondent:** Southbourne Parish Council

## 4364

## Object

**Document Element:** Policy NE21 Lighting

**Respondent:** Southbourne Parish Council

## 4365

## Object

**Document Element:** Policy NE21 Lighting

**Respondent:** Southbourne Parish Council

## Support

### Summary of representations:

Support.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

4518

Support

**Document Element:** Policy NE21 Lighting**Respondent:** Wisborough Green Parish Council

## Object

**Summary of representations:**

█ should include statement providing safety and security for pedestrians, cyclists, vehicles during hours of darkness

**Summary of representation changes to plan:**

█ No change

**Response:**

█ The transport policies make provision for the safety of motorists, pedestrians and cyclists to be incorporated into the design of development and in particular, Policy T3 criterion 1 provides for well-lit and connected cycle and walking routes

**Action:**

█ No change

4638

Object

**Document Element:** Policy NE21 Lighting**Respondent:** Mr Allen McDonald

## Object

**Summary of representations:**

█ Support, although DSDS's are not designations so change correct wording to: "The plan area includes three 'Dark Sky Discovery Sites', all defined within...".

**Summary of representation changes to plan:**

█ As per rep summary.

**Response:**

█ Agreed, amended wording required.

**Action:**

█ See Council's suggested Modifications CM148 and CM149.

4943

Object

**Document Element:** Policy NE21 Lighting**Respondent:** Chichester Harbour Conservancy

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

---

**5055**

**Support**

**Document Element:** Policy NE21 Lighting

**Respondent:** Sussex Wildlife Trust

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

---

**5183**

**Support**

**Document Element:** Policy NE21 Lighting

**Respondent:** John Newman

## Object

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**Summary of representations:**

Consider such matters capable of being addressed by a Condition

**Summary of representation changes to plan:**

No change

**Response:**

Comment noted

**Action:**

No change



5395

Object

**Document Element:** Policy NE21 Lighting

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

Support

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

5454

Support

**Document Element:** Policy NE21 Lighting

**Respondent:** Mayday! Action Group

Support

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

5843

Support

**Document Element:** Policy NE21 Lighting

**Respondent:** Natural England

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No change

---

6051

Support

**Document Element:** Policy NE21 Lighting

**Respondent:** Mr Allen McDonald

## Object

---

**Summary of representations:**

Seek universal requirement that rooflights and lanterns have dusk to dawn automatic blinds to prevent egress of light at night

**Summary of representation changes to plan:**

Being in the setting of the SDNP, WGPC request that it is a universal requirement that all Velux rooflights and lanterns to have dusk to dawn automatic blinds to prevent the egress of light at night.

**Response:**

Measures for reducing the impact of lighting are set out in the Planning Practice Guidance on Light Pollution which is referred to at criterion 1 of the policy

**Action:**

No change

---

6218

Object

**Document Element:** Policy NE21 Lighting

**Respondent:** Wisborough Green Parish Council

## Policy NE22 Air Quality

## Object

---

**Summary of representations:**

Development not located/ designed to minimise traffic generation – housing allocation should be reduced and located closer to city

**Summary of representation changes to plan:**

Housing allocation to be reduced and located more to the city

**Response:**

Comment noted

**Action:**

No change

---

**4012****Object**

---

**Document Element:** Policy NE22 Air Quality

**Respondent:** Mrs Jane Towers

## Object

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**Summary of representations:**

Include ULEZ, car pooling. Housing number will increase traffic, impact air quality so reduce housing number

**Summary of representation changes to plan:**

Reduce the housing numbers from 10,350

**Response:**

Impacts from planned development were considered as part of the Sustainability Appraisal. The suite of transport policies include a number of measures to mitigate/reduce car travel.

**Action:**

No change

---

**4143****Object**

---

**Document Element:** Policy NE22 Air Quality

**Respondent:** Chidham and Hambrook Parish Council

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

---

4851

Support

**Document Element:** Policy NE22 Air Quality

**Respondent:** Environment Agency

## Support

---

**Summary of representations:**

Support.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

---

5184

Support

**Document Element:** Policy NE22 Air Quality

**Respondent:** John Newman

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

5396

Support

**Document Element:** Policy NE22 Air Quality**Respondent:** Bellway Homes (Wessex) Ltd**Agent:** Chapman Lily Planning

## Object

**Summary of representations:**

HELAA has not considered air quality impacts. Concern that increase in traffic created by new dwellings will impact air quality

**Summary of representation changes to plan:**

No change

**Response:**

Impacts from planned development were considered as part of the Sustainability Appraisal and through the Air Quality Assessment – Annex D of the Transport Study 2023. The suite of transport policies include a number of measures to mitigate/reduce car travel and the Air Quality Policy NE22 requires an air quality assessment where proposals are likely to impact upon air quality.

**Action:**

No change

5455

Object

**Document Element:** Policy NE22 Air Quality**Respondent:** Mayday! Action Group

## Object

**Summary of representations:**

Criterion 1 should read: "Development is located and designed to minimise traffic generation and congestion through access to by maximising the relevance and attractiveness of sustainable transport modes, including maximising provision of specific demonstrably effective measures to make pedestrian and cycle and public transport routes and networks more direct, more safe, faster and more reliable.

**Summary of representation changes to plan:**

As per rep summary.

**Response:**

Comment noted. A change to criterion 1 is proposed to make specific reference to access to public transport as is also referred to in the transport policies.

**Action:**

See Council's suggested Modification CM150.

**5533****Object****Document Element:** Policy NE22 Air Quality**Respondent:** Stagecoach South**Support****Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

**5844****Support****Document Element:** Policy NE22 Air Quality**Respondent:** Natural England**Background, 4.134****Object****Summary of representations:**

Policy should acknowledge impact of new development on existing uses with reference to 'agent of change' principle (NPPF para 186); Set out minimum evidence required; leisure uses should be added to 4.134.

**Summary of representation changes to plan:**

Leisure uses can generate noise and disturbance and should be added to the list of potential sources.

**Response:**

The policy requires mitigation measures to be provided where there are likely to be noise impacts; and the policy pre-text refers to minimum considerations contained in the relevant guidance; "leisure" will be added to paragraph 4.134.

**Action:**

See Council's suggested Modification CM153.

**4729****Object****Document Element:** Background, 4.134**Respondent:** The Goodwood Estates Company Limited**Agent:** HMPC Ltd

## Policy NE23 Noise

# Support

### Summary of representations:

although should be expanded to include noise assessment caused by additional traffic on road networks and measures implemented to measure this

### Summary of representation changes to plan:

N/A

### Response:

Paragraph 4.134 refers to a noise impact assessment being required for residential and other noise sensitive development proposals located in close proximity to noise sources, including transport. Any existing development affected by road noise from traffic would already have mitigation measures in place

### Action:

No change

## 4145

# Support

**Document Element:** Policy NE23 Noise

**Respondent:** Chidham and Hambrook Parish Council

# Object

### Summary of representations:

Policy should acknowledge impact of new development on existing uses with reference to 'agent of change' principle (NPPF para 186); Set out minimum evidence required; leisure uses should be added to 4.134.

### Summary of representation changes to plan:

The plan should set out clearly the minimum evidence required to demonstrate the lack of noise disturbance and a resultant high-quality of living environment for individual sites.

Policy should acknowledge the impact of new development on existing uses, with reference to the 'agent of change' principle (NPPF paragraph 186) being a policy requirement.

### Response:

The policy requires mitigation measures to be provided where there are likely to be noise impacts; and the policy pre-text refers to minimum considerations contained in the relevant guidance; "leisure" will be added to paragraph 4.134.

### Action:

See Council's suggested Modification CM153.

## 4310

# Object

**Document Element:** Policy NE23 Noise

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

### Summary of representations:

Support although complains re; noise from Goodwood, claims CDC too indulgent towards Goodwood

### Summary of representation changes to plan:

N/A

### Response:

Support and comment noted

### Action:

No change

5185

Support

**Document Element:** Policy NE23 Noise

**Respondent:** John Newman

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Considerations in line with NH policy.] For sites positioned close to SRN, expect masterplans to minimise exposure to strategic traffic. Structures to be erected on the development land with maintenance able to take place without encroachment onto highway land

### Summary of representation changes to plan:

No change

### Response:

Paragraph 4.134 recognises that noise sensitive development proposals may be located in close proximity to transport and references noise impact assessments and good acoustic design informed by relevant guidance. Such matters will be determined on a case-by-case basis at planning application stage

### Action:

No change

5285

Object

**Document Element:** Policy NE23 Noise

**Respondent:** National Highways



## Object

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**Summary of representations:**

■ matter capable of being addressed by means of condition

**Summary of representation changes to plan:**

■ No change

**Response:**

■ Comment noted

**Action:**

■ No change

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5397

Object

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**Document Element:** Policy NE23 Noise

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Support

---

**Summary of representations:**

■ Support

**Summary of representation changes to plan:**

■ N/A

**Response:**

■ Support noted

**Action:**

■ No change

---

5456

Support

---

**Document Element:** Policy NE23 Noise

**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

Ambiguous wording in criteria 1 and 2. Wording that aligns better with NPPG0004 Change 1 to "...seeking to ensure noise exposure likely to give rise to significant adverse effects on health and quality of life is avoided..". Rework 2 to be more specific to noise sensitive uses and users criterion is aimed towards.

### Summary of representation changes to plan:

Suggest wording that aligns better to NPPG4:

'...by seeking to ensure noise exposure likely to give rise to significant adverse effects on health and quality of life is avoided....'

We would suggest criterion 2 be reworded to be more specific to the noise sensitive uses and users this criterion is aimed toward.

### Response:

In line with paragraph 185 a) of the NPPF, amendment has been made to criterion 1 to reflect the NPPF paragraph 185a, the Noise PPG and Noise Planning Statement wording regarding impacts on health and quality of life. Uses and users are not defined in criterion 2 to avoid the criterion being exclusionary.

### Action:

See Council's suggested Modification CM154.

5652

Object

**Document Element:** Policy NE23 Noise

**Respondent:** Countryside Properties

**Agent:** Turley

Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

5845

Support

**Document Element:** Policy NE23 Noise

**Respondent:** Natural England

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

---

6287

Support

**Document Element:** Policy NE23 Noise

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

### Policy NE24 Contaminated Land

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No Change

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4519

Support

**Document Element:** Policy NE24 Contaminated Land

**Respondent:** Wisborough Green Parish Council

## Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

---

4536

Support

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**Document Element:** Policy NE24 Contaminated Land

**Respondent:** Portsmouth Water Ltd

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

---

4852

Support

---

**Document Element:** Policy NE24 Contaminated Land

**Respondent:** Environment Agency

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

5186

Support

**Document Element:** Policy NE24 Contaminated Land

**Respondent:** John Newman

**Object**

**Summary of representations:**

■ Consider matter capable of being addressed by Condition

**Summary of representation changes to plan:**

■ No change

**Response:**

■ Comment noted

**Action:**

■ No changes to be made

5398

**Object**

**Document Element:** Policy NE24 Contaminated Land

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Policy NE24 Contaminated Land

### Object

#### Summary of representations:

Re-use of land affected by contamination should be actively promoted. HELAA has capacity on brownfield sites for 4500 homes

#### Summary of representation changes to plan:

As per rep summary

#### Response:

The Plan supports dwellings within Chichester City Centre coming forward on brownfield sites. Brownfield sites could also come forward in other areas with a parish number if there are suitable sites available. The plan supports the re-use of previously developed land particularly in its countryside and tourism policies as well as through its strategic allocation at Southern Gateway.

#### Action:

No changes to be made

5457

Object

Document Element: Policy NE24 Contaminated Land

Respondent: Mayday! Action Group

## Background, 5.1

### Support

#### Summary of representations:

Support: No comment.

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted.

#### Action:

No change in response to representation.

3889

Support

Document Element: Background, 5.1

Respondent: Mr Roger Wakeham

## Object

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**Summary of representations:**

Object: No account taken of holiday lets which displace homes

**Summary of representation changes to plan:**

Place limit on/ account for holiday lets.

**Response:**

The objectively assessed housing need figure of 638 dwellings referenced in para 5.1 is based on a standard methodology and does not include any loss of housing stock to holiday lets.

**Action:**

No change in response to representation

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4335

Object

**Document Element:** Background, 5.1

**Respondent:** Mr Peter Jannece

## Support

---

**Summary of representations:**

Support: Selsey Town Council acknowledges that Selsey's housing allocation has been reduced to zero.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No change in response to representation.

---

4402

Support

**Document Element:** Background, 5.1

**Respondent:** Mr Robin Davison

## Background, 5.2

## Support

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**Summary of representations:**

Support: The Council should not have to meet the unmet housing need from the South Downs National Park

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No change in response to representation.

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**3832****Support**

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**Document Element:** Background, 5.2

**Respondent:** Mrs Clare Gordon-Pullar

## Object

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**Summary of representations:**

Object: A27 capacity is not a permanent constraint and should be enlarged and capacity increased to accommodate more housing in the south of the district rather than north.

**Summary of representation changes to plan:**

Include reference to housing projections in the south of the district if A27 was enlarged.

**Response:**

The restriction of housing numbers in the south of the district is due to the inability to fully fund the mitigation required on the A27 to provide for the growth at 638dpa.

**Action:**

No change in response to representation.

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**3848****Object**

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**Document Element:** Background, 5.2

**Respondent:** Mrs Deborah Speirs



## Object

### Summary of representations:

Object: Local Plan must make provision to meet, as a minimum, the housing needs of the district in full to support economic growth, promote sustainable patterns of travel, reduce housing unaffordability and meet the housing needs of all sectors of the community, particularly first time buyers, the elderly and those who are unable to secure a home on the open market.

### Summary of representation changes to plan:

To assist in providing the necessary additional level of growth in the district, there is a need to recognise the suitability of additional sites on the edge of Chichester City, through the allocation of additional housing sites such as land at Lawrence Farm in Fishbourne Parish.

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers.

Promotion of alternative site noted.

### Action:

No change in response to representation.

## 4086

## Object

**Document Element:** Background, 5.2

**Respondent:** Berkeley Strategic Group

## Object

### Summary of representations:

Object: Land at Lawrence Farm (previously included in AL6) is available for development, in a sustainable location and not covered by climate change flood risk. Site should be included and would help facilitate improvements to Fishbourne Roundabout and deliver additional housing in Fishbourne Parish.

### Summary of representation changes to plan:

Allocate Land at Lawrence Farm for housing

### Response:

Promotion of site noted.

### Action:

No change in response to representation.

## 4094

## Object

**Document Element:** Background, 5.2

**Respondent:** Berkeley Strategic Group

## Object

### Summary of representations:

Object: Standard methodology should not apply – exceptional circumstances, number too high. Only a reduction of 100 houses per year. Will have detrimental impact on local residents and environment

### Summary of representation changes to plan:

Reduce the housing number from 10,350 and plead exceptional circumstances for Chichester District and its residents.

### Response:

The Council is not meeting the standard methodology figure (see Housing Need Background Paper for further detail) The Local Plan housing requirement of 535 (south of the plan area) is a constrained annual requirement figure, based on the constraint of the A27. Other constraints are taken into account when developing the spatial strategy to meet the requirement and through the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). This issue is also covered in more detail in the Housing Need, Housing Distribution and Transport Background Papers.

### Action:

No change in response to representation.

4187

Object

**Document Element:** Background, 5.2

**Respondent:** Chidham and Hambrook Parish Council

## Object

### Summary of representations:

Object: local plan must make provision to meet, as a minimum, the housing needs of the district in full to support economic growth, promote sustainable patterns of travel, reduce housing unaffordability and meet the housing needs of all sectors of the community, particularly first time buyers, the elderly and those who are unable to secure a home on the open market.

### Summary of representation changes to plan:

To assist in providing the necessary additional level of growth in the district, there is a need to recognise the suitability of additional sites on the edge of Chichester City, through the allocation of additional housing sites such as land at Raughmere Farm in Lavant Parish.

### Response:

The justification for not meeting housing needs in full is set out in the Housing Need and Transport Background Papers. Promotion of site noted.

### Action:

No change in response to representation.

4253

Object

**Document Element:** Background, 5.2

**Respondent:** Mr David Lock and Ms Melanie Jenkins

**Agent:** Mr Jonathan Lambert

## Object

### Summary of representations:

Gladman have serious concerns that the Council are not planning to meet its housing needs in full.

The Council maintain that the 535dpa is based on detailed discussions with National Highways and the County Council as to what can be delivered within existing highway capacity. Whilst Gladman understands the concerns with regard to the need to improve local transport infrastructure, we note that the Council's latest Transport Study (published in January 2023) undertook a sensitivity analysis as to whether the core scenario that supports the 535dpa position in the Draft Local Plan could accommodate a higher level of growth. The conclusion in paragraphs 5.6.5 and 11.2.3 of the Transport Study 'concludes that in the main, the 700 dpa (southern plan area) demands can generally be accommodated by the mitigation proposed for the 535 dpa core test.'

### Summary of representation changes to plan:

n/A

### Response:

The Local Plan housing requirement of 535dpa (south of the plan area) is a constrained annual requirement figure, based on the constraint of the A27.

The justification for not meeting housing needs in full is set out in the Housing Need and Transport Background Papers.

### Action:

No change in response to representation.

4897

Object

**Document Element:** Background, 5.2

**Respondent:** Gladman Developments Ltd

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seek to understand Council's approach.] Object: How will impacts on A27, funding and delivery of mitigation be dealt with if neighbouring authorities unable to meet Chichester's unmet needs?

### Summary of representation changes to plan:

N/A

### Response:

Comment noted. The Transport Infrastructure Management Group (TIMG) will consider the funding and delivery of mitigation.

### Action:

No change in response to representation.

5286

Object

**Document Element:** Background, 5.2

**Respondent:** National Highways

## Object

### Summary of representations:

#### Object:

- i) Target of 535 is too high due to constraints including Chichester Harbour AONB, South Downs National Park, importance of rural/semi-rural land for wildlife corridors.
- ii) Excessive housebuilding will damage the environment and quality of life for existing residents in East-West corridor.

### Summary of representation changes to plan:

N/A

### Response:

- i) The Local Plan housing requirement of 535dpa (south of the plan area) is a constrained annual requirement figure, based on the constraint of the A27.

Other constraints are taken into account when developing the spatial strategy to meet the requirement and through the Sustainability Appraisal and Habitats Regulations Assessment (HRA). This issue is also covered in more detail in the Housing Need, Housing Distribution and Transport Background Papers.

The locations of the supply of housing (through allocations and parish numbers) have been informed by a Landscape Capacity Study (2018) which provided a high-level assessment of landscape capacity. The Strategic Wildlife Corridors recognise the importance of avoiding habitat fragmentation.

- ii) The impact of housebuilding on the environment and quality of life for existing residents will be taken into account when planning applications are considered, using the numerous policies in the Local Plan which protect the environment and amenity of existing residents.

### Action:

No change in response to representation.

5458

Object

**Document Element:** Background, 5.2

**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

Object: No explanation of reduction in housing or the decrease in the southern plan area and increase in the north compared to Preferred Approach.

### Summary of representation changes to plan:

N/A

### Response:

The reduction from 638 to 575dpa is due to the constraint that the A27 places on the amount of development that can be accommodated in the south of the district.

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers.

The increase in the north compared the Preferred Approach is due to the need to explore all possible means of meeting the 638dpa figure, which included looking again at the potential for development in the north east of the plan area. For further detail on the justification for the housing figure in the north east of the plan area, please see the Housing Distribution Background Paper.

### Action:

No change in response to representation.

5837

Object

Document Element: Background, 5.2

Respondent: Kirdford Parish Council

Agent: Troy Planning + Design

## Background, 5.3

## Object

### Summary of representations:

Object: Lack of information and reference to transport study in Duty to Cooperate Statement of Compliance and how it was accounted for in DtC discussions with adjoining authorities – difficult to conclude if legal duty met.

### Summary of representation changes to plan:

N/A

### Response:

The Duty to Cooperate Statement of Compliance has been updated to reflect the latest position and continuing work on agreeing Statements of Common Ground with relevant authorities.

### Action:

No change in response to representation.

5642

Object

Document Element: Background, 5.3

Respondent: Countryside Properties

Agent: Turley

## Policy H1 Meeting Housing Needs

### Object

#### Summary of representations:

How has 10,350 been arrived at given constraints (AONB, Grade 1 Agricultural Land, wildlife corridors) and lack of Government imposed target.

#### Summary of representation changes to plan:

Make Southern Water a statutory commenter/stakeholder/approver to ALL planning applications

#### Response:

The Local Plan housing requirement of 535 (south of the plan area) is a constrained annual requirement figure, based on the constraint of the A27. Other constraints are taken into account when developing the spatial strategy to meet the requirement and through the Sustainability Appraisal.

The locations of the supply of housing (through allocations and parish numbers) have been informed by a Landscape Capacity Study (2018) which provided a high-level assessment of landscape capacity. The Strategic Wildlife Corridors recognise the importance of avoiding habitat fragmentation

#### Action:

No change in response to representation

3775

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** E Brown

### Object

#### Summary of representations:

- i) Special qualities of the environment not being protected by building on greenfield land when brownfield land available.
- ii) No solutions for existing sewage outflow problems. Further homes will exacerbate impact of sewage outflows on Chichester Harbour AONB and SSSI.

#### Summary of representation changes to plan:

Building houses on greenfield sites and outside settlement areas (Policy A11) should not be permitted.

Fewer homes until plan in place to stop sewage outflows

#### Response:

i) Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

ii) Policy NE16 requires that development is phased to align with delivery of wastewater treatment infrastructure where this is needed, and that water quality is protected.

#### Action:

No change in response to representation

**3781****Object****Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Mrs Donna-Maria Thomas**Object****Summary of representations:**

- More than 900 houses on the Manhood Peninsula.
- Not a cycle route along the A286.
- Nothing to stop flooding – no more housing without flood works.

**Summary of representation changes to plan:**

- Include a cycle route for commuters between Wittering and Chichester.
- New flood works to keep the sea out and rainwater away needs to be included

**Response:**

The Local Plan makes provision for a limited amount of new housing development on the Manhood Peninsula. This approach takes account of the large amount of development that has received planning permission and updated technical evidence, including the Strategic Flood Risk Assessment (SFRA) which considers flood risk. This is considered in more detail in the Housing Distribution Background Paper and Sustainability Appraisal.

The council is seeking funding to address the issues with the current flood defences in Selsey, however, that will be extremely costly, and there is no guarantee that funding will be provided. Ultimately, national planning policy seeks to steer development away from locations where it will be dependent on flood defences, and the Local Plan has followed that approach.

The Infrastructure Delivery Plan (IDP) sets out the infrastructure required to support the Local Plan.

**Action:**

- No change in response to representation

**3806****Object****Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Mr Philip Nevil

## Object

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**Summary of representations:**

Provision of fresh water?? Wastewater and sewage?? Environmental impact? Highways congestion? What part of West Sussex in 30 years won't be under water? Medical health and care capability? You have heard this all before. Enough is enough!

**Summary of representation changes to plan:**

No dwellings can be consented until all the critical infrastructure imperatives are in place or are guaranteed to be implemented in an aligned manner

**Response:**

The council has considered the wide range of constraints impacting upon the plan area when considering the housing number and distribution of housing and site allocations. This is set out in more detail in the Housing Need, Housing Distribution and Transport Background Papers and Sustainability Appraisal.

The Infrastructure Delivery Plan (IDP) sets out the infrastructure required to support the Local Plan.

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable

**Action:**

No change in response to representation

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**3823****Object**

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**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Mr Keith Meadmore



# Object

**Summary of representations:**

Housing figure should be reduced by 76.5% to equate to land available outside SDNP and AONB.  
 Housing will have adverse effect on quality of water bodies including Chichester Harbour.  
 Neighbourhood Plans ignored.  
 Insufficient wastewater treatment capacity. New homes will lead to lack of compliance with water quality and wastewater part of the policy.  
 Insufficient capacity within the strategic road network to accommodate the additional traffic from proposed housing.  
 Transport Assessment published after Local Plan, confirms network at capacity. Nothing achieved to address junction capacity since 2014 Transport Assessment

**Summary of representation changes to plan:**

Change housing requirement to 2,699 houses.  
 Use Neighbourhood Plans to decide which developments will be used.  
 Remove Policy A11 and A12  
 A13 should be limited to 300 houses.  
 Moratorium on development until wastewater treatment and A27 mitigation guaranteed

**Response:**

The Local Plan housing requirement of 535 (south of the plan area) is a constrained annual requirement figure, based on the constraint of the A27. Other constraints are taken into account when developing the spatial strategy to meet the requirement and through the Sustainability Appraisal. This issue is also covered in more detail in the Housing Need, Housing Distribution and Transport Background Papers.

Where the Local Plan makes a parish housing requirement it will be for a Neighbourhood Plan to identify potential development sites.

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

The proposed modifications to Policy T1 Transport Infrastructure set out the council's approach to securing transport mitigation to support the planned growth.

**Action:**

No change in response to representation

**3839****Object****Document Element:** Policy H1 Meeting Housing Needs**Respondent:** The Bosham Association

## Object

### Summary of representations:

Whilst we acknowledge the constraints of the A27 to the Southern Plan Area, these constraints are not as limiting in the North of the Plan Area, to justify a housing supply of 40 dwellings per annum (679 total).

I

### Summary of representation changes to plan:

A higher number of dwellings should be allocated to the North of the Plan Area, by increasing the settlement boundary of sustainable settlements such as Loxwood and Kirdford, in order to help the District achieve the objectively assessed housing need of the district.

### Response:

As set out in the Sustainability Appraisal (SA) and Housing Distribution Background Paper a range of scenarios were considered in the north plan area, including a higher growth figure for Loxwood, but not considered appropriate.

### Action:

No change in response to representation

## 3913

## Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Loxwood (Mellow) Ltd

**Agent:** Ms Megan Smith

## Object

### Summary of representations:

- i) Should be meeting objectively assessed need figure.
- ii) Higher number of dwellings should be allocated to the north of the plan area, such as at Loxwood and Kirdford

### Summary of representation changes to plan:

Loxwood should have a figure of 300 dwellings

### Response:

- i) The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.
- ii) As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north plan area, including a higher growth figure for Loxwood and Kirdford, but not considered appropriate.

### Action:

No change in response to representation

## 3924

## Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Ms Megan Smith

## Object

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**Summary of representations:**

Object: against housing number proposed on grounds of nitrate neutrality; wastewater pollution and treatment; road congestion; lack of guaranteed upgrades to road network; air pollution; unsustainability; lack of infrastructure; biodiversity implications; loss of greenfield/agricultural land; coalescence.

**Summary of representation changes to plan:**

Moratorium on house building until wastewater and A27 road infrastructure upgrades are guaranteed and carried out.  
Reduce overall housing numbers to reflect the 23.5% of land available (resulting in 2699 dwellings).  
Remove policy A11 and A12

**Response:**

The Local Plan housing requirement of 535dpa (south of the plan area) is a constrained annual requirement figure, based on the constraint of the A27. Other constraints have been taken into account when developing the spatial strategy to meet the requirement and through the Sustainability Appraisal and Habitats Regulations Assessment.

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

The Local Plan includes numerous policies to protect the landscape, environment and the amenity of current and future residents.

**Action:**

No change in response to representation.

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**3932****Object**

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**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Mrs Donna-Maria Thomas

## Object

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**Summary of representations:**

- to housing number. Ten thousand dwellings into approximately 20% of the available land space.
- Lack of infrastructure to support new development.
- Loss of agricultural and greenfield land.

**Summary of representation changes to plan:**

- Moratorium on development until wastewater treatment and A27 mitigation guaranteed.
- Remove Policy A11
- Fewer houses

**Response:**

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be desirable to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

**Action:**

- No change in response to representation

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**3945****Object**

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**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Mr Roger Weymouth

## Object

### Summary of representations:

Unsound as does not PHASE the release of the uncommitted housing sites. Despite 62% of the overall allocation already being built or committed, equating to 10 years land supply, the remaining 3300 are not constrained. Sites could be granted Permission without the necessary infrastructure being in place.

### Summary of representation changes to plan:

Uncommitted sites should only be released conditional on infrastructure being in place commensurate with development

### Response:

The council needs to achieve a 5 year supply of housing upon adoption, and to maintain the required level of supply across the plan period, particularly in the first 10 years. The housing provided within the Local Plan will achieve this, as set out in the housing trajectory which forms part of the Local Plan. This is explained in more detail in the Housing Supply Background Paper.

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable

### Action:

No change in response to representation

3999

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Chichester and District Cycle Forum

Support

### Summary of representations:

Additional housing in Nutbourne would support veterinary practice

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

4033

Support

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Mr Roderick Kynoch

## Object

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### Summary of representations:

High number of windfall sites, where will they be provided? Will they be provided outside settlement boundaries?

### Summary of representation changes to plan:

N/A

### Response:

Windfall site allowances are based on past delivery rates and will be within settlement policy boundaries unless they can meet the requirements of the plan in relation to dwellings in the countryside

### Action:

No change in response to representation

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## 4075

## Object

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**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** 50.8 Architecture + Interiors

## Object

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### Summary of representations:

Object:

Local plan should, as a minimum, provide for the full identified housing need of 11,484 dwellings over the plan period. Fails to provide for the full housing need and Duty-to-Cooperate discussions have failed to resolve the shortfall. Unmet housing need of 1,134 dwellings not addressed.

### Summary of representation changes to plan:

Additional sites on edge of Chichester should be allocated, including Lawrence Farm.

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers . The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance. Promotion of additional site noted.

### Action:

No change in response to representation.

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## 4087

## Object

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**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Berkeley Strategic Group

## Object

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### Summary of representations:

Housing number should be lower

### Summary of representation changes to plan:

Reduce the housing number

### Response:

The Local Plan housing requirement of 535 (south of the plan area) is a constrained annual requirement figure, based on the constraint of the A27. Other constraints are taken into account when developing the spatial strategy to meet the requirement and through the Sustainability Appraisal. This issue is also covered in more detail in the Housing Need, Housing Distribution and Transport Background Papers.

### Action:

No change in response to representation

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## 4117

## Object

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**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Mrs Jane Towers

## Object

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### Summary of representations:

: Housing number should be lower

### Summary of representation changes to plan:

Reduce the housing number

### Response:

The Local Plan housing requirement of 535 (south of the plan area) is a constrained annual requirement figure, based on the constraint of the A27. Other constraints are taken into account when developing the spatial strategy to meet the requirement and through the Sustainability Appraisal. This issue is also covered in more detail in the Housing Need, Housing Distribution and Transport Background Papers.

### Action:

No change in response to representation

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## 4129

## Object

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**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Mrs Jane Towers

## Object

### Summary of representations:

Transport Assessment model does not include developments such as Chichester Free School adjacent to A27 Whyke roundabout.

Over capacity issues still remain at other roundabouts. Plan does not effectively mitigate the impact of additional growth and is adding further demand.

### Summary of representation changes to plan:

Housing number should be further challenged on this basis

### Response:

The proposed modifications to Policy T1 Transport Infrastructure set out the council's approach to securing transport mitigation to support the planned growth.

### Action:

No change in response to representation

4134

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Donnington Parish Council

## Object

### Summary of representations:

Object: If recommendations within policies are adhered to 10,300 is not viable or deliverable.

Recommendations will be superseded by 'exceptional circumstances' and policies overridden.

87% of housing in the East/West corridor – will impact on Chichester Harbour AONB, already in decline.

### Summary of representation changes to plan:

Reduce the housing numbers.

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

Development of the strategic allocations will be subject to the requirements of the Local Plan natural environment policies, particularly Policy NE2 (Natural Landscape), NE5 (Biodiversity) and NE13 (Chichester Harbour AONB) and the site specific requirements set out in the strategic allocation policies.

### Action:

No change in response to representation.

4186

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Chidham and Hambrook Parish Council



## Object

### Summary of representations:

Object: Over capacity at the Fishbourne roundabout not been addressed. No guarantee that funding will be available within plan period. No funding for necessary improvements to address congestion (current and future).  
No control over public transport service improvements. Charge of £7,728 per unit yet to be confirmed as legally compliant.

### Summary of representation changes to plan:

Reduce housing numbers.

### Response:

The issues in relation to the Fishbourne roundabout are considered in detail in the Transport Study, and also addressed in the Transport Background Paper.

The proposed modifications to Policy T1 Transport Infrastructure set out the council's approach to securing transport mitigation to support the planned growth.

### Action:

No change in response to representation.

## 4239

## Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Bosham Parish Council

## Object

### Summary of representations:

Object: No evidence of a district wide strategic approach to achieving mitigation measures.

### Summary of representation changes to plan:

Reduce housing numbers to reduce pollution.  
District wide strategic approach to achieving appropriate mitigation measures.

### Response:

Impacts from planned development were considered as part of the Sustainability Appraisal and through the Air Quality Assessment – Annex D of the Transport Study. The suite of transport policies include a number of measures to mitigate/reduce car travel and the Air Quality Policy NE22 requires an air quality assessment where proposals are likely to impact upon air quality.

### Action:

No change in response to representation.

## 4244

## Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Bosham Parish Council

## Object

### Summary of representations:

Object: Air quality will be reduced by the increased volume of traffic on the A27 before any upgrades can be implemented.

2,000 new homes along the A259 corridor - increase in traffic will impact air quality. Cannot be mitigated - will deter walking or cycling. Decrease cars using our roads - without frequent bus and train services at affordable levels of cost, this will not happen.

### Summary of representation changes to plan:

Reduce the housing numbers from 10,350

### Response:

Impacts from planned development were considered as part of the Sustainability Appraisal and through the Air Quality Assessment – Annex D of the Transport Study. The suite of transport policies include a number of measures to mitigate/reduce car travel and the Air Quality Policy NE22 requires an air quality assessment where proposals are likely to impact upon air quality.

### Action:

No change in response to representation.

## 4254

## Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Chidham and Hambrook Parish Council

## Object

### Summary of representations:

Object:

i) Should meet identified housing need of 11,484 dwellings. DtC discussions have not resolved shortfall. Unmet need not addressed.

### Summary of representation changes to plan:

Additional sites on edge of Chichester should be allocated, such as Land at Raughmere Farm in Lavant Parish.

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance. Promotion of additional site noted.

### Action:

No change in response to representation.

## 4258

## Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Mr David Lock and Ms Melanie Jenkins

**Agent:** Mr Jonathan Lambert

## Support

### Summary of representations:

Support: Housing strategy supported as it is responsive to constraints.

Estate will continue to oppose developments that harm ability to contribute to local economy and ensure living conditions of prospective house occupiers not harmed.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

## 4311

## Support

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

### Summary of representations:

Object: Include firm commitment to early review to include high-growth options to address existing infrastructure constraints and unmet need.

### Summary of representation changes to plan:

Promote site at Broadbridge

Commit to early review, exploring higher growth options.

### Response:

Modifications are proposed to Chapter 8 to clarify the 'monitor and manage' process (following an update to the Transport Study) and an additional policy (M1 Review of Local Plan) is proposed to trigger a potential early review of the plan.

Promotion of alternative site noted.

### Action:

See council suggested modification CM379

## 4329

## Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Heaver Homes

**Agent:** Quod

## Object

### Summary of representations:

Object: Lack of flexible buffer especially as overall housing requirement is expressed as a minimum in Policy H1

### Summary of representation changes to plan:

North of plan area should make a more significant contribution towards housing supply.

### Response:

The latest projected supply position is set out in the Housing Supply Background Paper, which currently shows a total supply of 10,752, a buffer that amounts to approximately 4% which strikes a balance between ensuring a robust supply position while recognising the constrained housing requirement.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north plan area and the final scenarios are the most appropriate for each settlement when taking into account the full range of factors needing to be considered.

### Action:

No change in response to representation.

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**4350****Object**

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Welbeck Strategic Land IV LLP (Welbeck Land)

**Agent:** Miss Jess Bain

## Object

### Summary of representations:

Object: No sound basis for lower figure, arisen from political pressure and not supported by evidence.

### Summary of representation changes to plan:

Meet local housing figure should be met plus SDNPA 40 dpa.

Increase provision in the east-west corridor as good sustainable transport.

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

### Action:

No change in response to representation.

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**4356****Object**

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Mr Stephen Jupp

## Object

### Summary of representations:

Object: No assessment of need for people who need to live in caravan or houseboat.

### Summary of representation changes to plan:

Needs to address needs of all groups.

### Response:

A Caravan and Houseboats Study was conducted in 2023. This recognises that this form of accommodation does have a limited role to play within the local housing market, particularly for certain groups. The Council is happy to address this issue via appropriate amendments to the plan should this be considered necessary by the Inspector.

### Action:

No change in response to representation.

## 4373

## Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Mr Stephen Jupp

## Object

### Summary of representations:

Object: Extent of undersupply of housing against established need not justified. Concerns over delivery of housing from strategic allocations within trajectory timescales.

### Summary of representation changes to plan:

See attached.

### Response:

It is acknowledged that a detailed justification was not provided alongside the Regulation 19 consultation. This has now been set out in the Housing Need and Transport Background Papers .

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper.

### Action:

No change in response to representation.

## 4552

## Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Tanglewood Residences Limited

**Agent:** Andrew Black Consulting

## Object

### Summary of representations:

Object: as it includes parish housing allocations – see response to Policy H3.

### Summary of representation changes to plan:

N/A

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper (May 2024) was that Wisborough Green has the capacity to accommodate 75 dwellings. Therefore, the figure of 75 is considered an appropriate figure to help meet the overall housing numbers.

### Action:

No change in response to representation.

4557

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

Object: Housing numbers too high for the capacity of the District – will cause harm to protected sites, landscapes and communities.

### Summary of representation changes to plan:

Significantly reduce housing allocation for the District.  
Less reliance on greenfield sites.

### Response:

The Local Plan housing requirement of 535dpa (south of the plan area) is a constrained annual requirement figure, based on the constraint of the A27. Other constraints have been taken into account when developing the spatial strategy to meet the requirement and through the Sustainability Appraisal and Habitats Regulations Assessment. This is addressed in more detail in the Housing Need Background Paper.

The impact of housebuilding on the environment and quality of life for existing residents will be taken into account when planning applications are considered, using the numerous policies in the Local Plan which protect the environment and amenity of existing residents.

### Action:

No change in response to representation.

4583

Object

**Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Chichester Harbour Trust

Object

**Summary of representations:**

Object: Policy should set out housing figure from standard method.

**Summary of representation changes to plan:**

N/A

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

**Action:**

No change in response to representation.

4631

Object

**Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Premier Marinas Limited**Agent:** CBRE Limited

Support

**Summary of representations:**

Support: Merrow Wood accept lower housing requirement. But implications are 1,100 less dwellings – greater pressure on sites and locations identified.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No change in response to representation

4681

Support

**Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Merrow Wood**Agent:** Intelligent Land

## Object

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**Summary of representations:**

Object: Suppression of housing requirement not justified. See attached.

**Summary of representation changes to plan:**

The introductory text and the first line within the table under Policy H1 to identify a minimum housing requirement of 12,492 dwellings

Additional site allocations identified

Site selection process should focus new allocations at sustainable locations in accordance with spatial strategy (Policy SP1).

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

Promotion of alternative sites noted.

The housing distribution and allocations have sought to focus on the most sustainable locations. This is set out in the Sustainability Appraisal and Housing Distribution Background Paper.

**Action:**

No change in response to representation.

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**4714****Object**

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**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** CEG and the Landowners (D C Heaver and Eurequity IC Limited)

**Agent:** CEG and the Landowners (D C Heaver and Eurequity IC Limited)



## Object

### Summary of representations:

Object: OAHN should be met in full, particularly given high house prices – otherwise will heighten affordability and over-occupation.

Should meet unmet needs from SDNP.

Growth should be included on Manhood Peninsula at 600 dwellings.

### Summary of representation changes to plan:

Overall number should be 763 dpa.

Include 600 dwellings on the Manhood Peninsula (as Preferred Approach)

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

The Local Plan makes provision for a limited amount of new housing development on the Manhood Peninsula. This approach takes account of the large amount of development that has received planning permission and updated technical evidence, including the SFRA which considers flood risk. This is considered in more detail in the Housing Distribution Background Paper and Sustainability Appraisal.

Promotion of alternative site noted.

### Action:

No change in response to representation.

4716

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Welbeck Strategic Land IV LLP

**Agent:** Mrs Sarah Hufford

## Object

### Summary of representations:

Object: Plan fails to take into account full potential of all new strategic locations in the District, such as Boxgrove.

Evidence supports potential for strategic level of growth at Boxgrove.

### Summary of representation changes to plan:

Strategic growth at Boxgrove should be 200 not 50 dwellings

### Response:

The Housing Distribution Background Paper explains the development of the proposed distribution of housing and the split between strategic and non-strategic provision. The SA report (January 2023, Section 7), sets out the council's reasoning for the preferred growth strategy having considered reasonable alternatives, including consideration of Boxgrove.

### Action:

No change in response to representation.

4734

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Rydon Homes Limited

**Agent:** DMH Stallard LLP

Object

**Summary of representations:**

**Object:**

Reason for constraint on level of growth (A27 capacity) contrary to provision in Policy I1 and Infrastructure Delivery Plan to ensure infrastructure and funding available to support development.

No unmet needs accommodated.

Insufficient evidence on lack of capacity on A27 and relocating more growth to the north.

**Summary of representation changes to plan:**

Should meet full housing need of District and plan for increased supply.

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

**Action:**

No change in response to representation.

4753

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Seaward Strategic Land Ltd and Owners of Land on Durbans Road, Wisborough Green

**Agent:** Luken Beck MDP Ltd

## Policy H1 Meeting Housing Needs

### Object

#### Summary of representations:

Object: Land east of Southbourne has been justified, is available, suitable and deliverable, has been masterplanned and should be allocated rather than leading to delays through the Site Allocation DPD or Neighbourhood Plan.

#### Summary of representation changes to plan:

Land east of Southbourne should be allocated for mixed use development.

#### Response:

The Neighbourhood Plan Review 2019-2037 (NP2) that proposed an allocation to the east of Southbourne for 1,250 dwellings was withdrawn by the Parish Council in April 2022. As the Examiner considered that the Neighbourhood Plan had not met the Basic Conditions, he did not go on to consider the merits of the proposed allocation.

The Southbourne Background Paper (May 2024) sets out the justification for the approach taken in the Local Plan of identifying a Broad Location for Development.

#### Action:

No change in response to representation.

4775

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Wates Developments and Seaward Properties

**Agent:** Barton Willmore now Stantec

### Object

#### Summary of representations:

Object: Reason for constraint on level of growth (A27 capacity) contrary to provision in Policy I1 and Infrastructure Delivery Plan to ensure infrastructure and funding available to support development.

No unmet needs accommodated. Insufficient evidence on lack of capacity on A27.

#### Summary of representation changes to plan:

Should meet full housing need of District and plan for increased supply.

#### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

#### Action:

No change in response to representation.

4776

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Seaward Strategic Land Ltd and Owners of Land on Cooks Lane, Southbourne

**Agent:** Luken Beck MDP Ltd

## Object

### Summary of representations:

Object: Reason for constraint on level of growth (A27 capacity) contrary to provision in Policy I1 and Infrastructure Delivery Plan to ensure infrastructure and funding available to support development.

No unmet needs accommodated. Insufficient evidence on lack of capacity on A27.

### Summary of representation changes to plan:

Should meet full housing need of District and plan for increased supply.

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

### Action:

No change in response to representation

4781

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Seaward Strategic Land Ltd and Owners of Land on Penny Lane, Hermitage

**Agent:** Luken Beck MDP Ltd

## Object

### Summary of representations:

Object: Additional supply flexibility of 15% above housing requirement should be identified.

Disagree with number of homes allocated to Manhood Peninsula.

Will exacerbate shortfall of affordable homes and affordability issues.

### Summary of representation changes to plan:

Additional supply flexibility of 15% above housing requirement should be identified.

### Response:

The latest projected supply position is set out in the Housing Supply Background Paper, which currently shows a total supply of 10,752.

The Local Plan makes provision for a limited amount of new housing development on the Manhood Peninsula. This approach takes account of the large amount of development that has received planning permission and updated technical evidence, including the SFRA which considers flood risk. This is considered in more detail in the Housing Distribution Background Paper and Sustainability Appraisal.

### Action:

No change in response to representation.

4869

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Gladman Developments Ltd

## Object

### Summary of representations:

Object: Failure to consider how housing growth can sustain and expand public transport provision.

Housing can support existing shops and services in a settlement which can be accessed without the need to use the A27.

Insufficient homes will result in in-commuting which will worsen A27.

### Summary of representation changes to plan:

Address housing need.

Housing figures should be assigned to settlements which need growth to sustain existing services and which have public transport options.

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

### Action:

No change in response to representation.

4877

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Mr Graham Pick

**Agent:** Batcheller Monkhouse

## Object

### Summary of representations:

Object: Should meet full need plus buffer to accommodate unmet needs from SDNP plus 5% flexibility buffer.

A further 2,500 homes should be identified.

Chidham and Hambrook Parishes should be revisited to meet shortfall.

### Summary of representation changes to plan:

See attached.

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

The latest projected supply position is set out in the Housing Supply Background Paper (May 2024), which currently shows a total supply of 10,752, a buffer that amounts to approximately 4% which strikes a balance between ensuring a robust supply position while recognising the constrained housing requirement.

### Action:

No change in response to representation.

4903

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Gleeson Land

## Object

### Summary of representations:

Object: Policy not positively prepared or justified. Level of unmet need beyond 2026 is unresolved.

### Summary of representation changes to plan:

Policy should account for cross boundary infrastructure mitigation contributions and secure phased development needs allied to infrastructure to address unmet need (including via West Sussex and Greater Brighton Strategic Planning Board i.e. Local Strategic Statement - LSS3 update)

### Response:

Discussions are ongoing with Arun District Council to agree a Statement of Common Ground.

### Action:

No change in response to representation.

4928

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Arun District Council

## Object

### Summary of representations:

- Object: i) Council should be meeting at least full need of 638dpa plus unmet need from the South Downs National Park and provide a 5% buffer (total of 712dpa).
- ii) Local Plan Transport Study has significant matters not considered by the Council.
- iii) Site promoted at Land West of Clay Lane, Fishbourne.

### Summary of representation changes to plan:

- Increase housing figure to 712dpa.
- Increase the Policy H1 East-West Corridor sub-area housing provision figure to 11,174 dwellings
- Update the Policy H1 components of housing supply figures, in particular the 'Category b Known commitments' following a critical review of the deliverability of the respective supply sites.
- Re-consider locations previously identified in the Preferred Approaches consultation as sustainable / suitable locations for growth, such as Fishbourne.

### Response:

- i) The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (July 2024). The justification and evidence to support the housing trajectory is set out in the Housing Supply Background Paper (July 2024). The latest projected supply position is set out in the Housing Supply Background Paper (July 2024), which currently shows a total supply of 10,752, a buffer that amounts to approximately 4% which strikes a balance between ensuring a robust supply position while recognising the constrained housing requirement.
- ii) The Transport Study has been updated in response to Regulation 19 representations and all matters considered in full.
- iii) Promotion of site noted.

### Action:

No change in response to representation.

4934

Object

**Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Gleeson Strategic Land

Object

**Summary of representations:**

Object: Additional 220 homes to Loxwood not sustainable.  
 No public transport or village shop. Insufficient sewage system.  
 Will become a small town.

**Summary of representation changes to plan:**

Additional homes should be in or close to urban areas with sustainable transport options and sewage capacity.  
 If additional houses are required the total should be massively reduced.  
 Number should include 50 houses off Pond Copse Lane.

**Response:**

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper. The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed.

**Action:**

No change in response to representation.

4936

Object

**Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Mr Daniel Kuszel

## Object

### Summary of representations:

Object: To many houses already built on Manhood Peninsula and Selsey.  
 Impacts on facilities, roads, wildlife, noise and light pollution.  
 All but essential development should be stopped.

### Summary of representation changes to plan:

N/A

### Response:

The Local Plan makes provision for a limited amount of new housing development on the Manhood Peninsula. This approach takes account of the large amount of development that has received planning permission and updated technical evidence, including the SFRA which considers flood risk. This is considered in more detail in the Housing Distribution Background Paper and Sustainability Appraisal.

### Action:

No change in response to representation.

5007

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Mr Justin Atkinson

## Object

### Summary of representations:

Object: Insufficient justification for not meeting full need or considering unmet need from adjoining authorities.  
 Transport Study supports A27 has capacity to accommodate higher growth and should not be considered a constraint.

### Summary of representation changes to plan:

Site suggested for allocation or through allocations of additional numbers to Fishbourne Parish for NP allocation

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers.  
 Promotion of alternative site noted.

### Action:

No change in response to representation.

5010

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Landacre (Chichester) Limited

**Agent:** Henry Adams LLP



## Object

### Summary of representations:

- Object: i) Insufficient justification for not meeting need or evidence on how need will be met elsewhere under duty to cooperate.
- ii) Housing supply calculations are unclear, specifically in relation to Plaistow and Ifold.
- iii) Query whether existing allocation in Site Allocation DPD at Little Springfield Farm has been doubled counted and whether number should be 35 dwellings.

### Summary of representation changes to plan:

Parish number for Plaistow and Ifold should be 35 as a minimum

### Response:

- i) The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers July 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.
- ii) The Site Allocation DPD allocation for 10 dwellings at Land North of Little Springfield Farm in Ifold is included in the Local Plan housing trajectory under 'sites allocated in the Local Plan 2014 – 2029'. The non-strategic parish housing requirement of 25 dwellings is in addition to the 10 dwelling allocation.
- iii) The allocation in the Local Plan 2021 - 2039 does not need to be increased to 35 as the 10 dwelling allocation at Little Springfield Farm is 'saved' – as set out in Appendix H 'List of saved and deleted Local Plan 2014 – 2029 and Site Allocation DPD 2014 – 2029 policies'.

### Action:

No change in response to representation.

## 5020

## Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Domusea

**Agent:** Smith Simmons Partners

## Object

### Summary of representations:

Object: Insufficient justification for not meeting need or evidence on how need will be met elsewhere under duty to cooperate.

### Summary of representation changes to plan:

N/A

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers . The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

### Action:

No change in response to representation.

5028

Object

**Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Hanbury Properties**Agent:** Smith Simmons Partners

Object

**Summary of representations:**

Object: Insufficient justification for not meeting need or evidence on how need will be met elsewhere under duty to cooperate.

**Summary of representation changes to plan:**

N/A

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

**Action:**

No change in response to representation.

5033

Object

**Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Northgate Properties Ltd**Agent:** Smith Simmons Partners

Object

**Summary of representations:**

Object: higher growth could be accommodated. Does not address unmet needs.  
Allocation in Loxwood should be based on higher growth scenario.

**Summary of representation changes to plan:**

Accommodate higher growth including unmet needs.  
Increase allocation to Loxwood.

**Response:**

i) The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance. As set out in the SA and Housing Distribution Background Paper (May 2024) a range of scenarios were considered in the north plan area, including a higher growth figure for Loxwood, but not considered appropriate.

**Action:**

No change in response to representation.

**5040****Object****Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Crownhall Estates Limited & Martin Grant Homes**Agent:** Henry Adams LLP**Object****Summary of representations:**

Object: Insufficient justification for not meeting full need or considering unmet need from adjoining authorities.

Transport Study supports A27 has capacity to accommodate higher growth and should not be considered a constraint.

Support: Approach to Boxgrove and allocation of minimum of 50 homes through NP/ Site Allocations DPD.

**Summary of representation changes to plan:**

Should be meet need and considering unmet needs from adjoining authorities.

Site promoted.

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

Promotion of site noted.

Support for Boxgrove parish number noted.

**Action:**

No change in response to representation.

**5081****Object****Document Element:** Policy H1 Meeting Housing Needs**Respondent:** The Brooks Family**Agent:** Henry Adams LLP

## Object

### Summary of representations:

- Object: i) Insufficient justification for not meeting need or evidence on how need will be met elsewhere under duty to cooperate.
- ii) Housing supply calculations are unclear, specifically in relation to strategic allocations of 300 dwellings to Chidham and Hambrook in A12 and 220 dwellings to Loxwood in A15. Will commitments count against new proposed allocation? Further clarification required to confirm that allocation numbers are fixed.

### Summary of representation changes to plan:

Clarification to confirm that the allocations are fixed, and no further adjustments will be made to the figures.

### Response:

- i) The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.
- ii) The housing trajectory in Appendix E of the Local Plan includes a '\*' alongside sites with permission which will count towards the allocated housing number for a parish. The justification and evidence to support the housing latest trajectory is set out in the Housing Supply Background Paper (July 2024).
- Permissions which are on 'made' Neighbourhood Plan allocations or were permitted prior to the base date do not come off the allocation.

### Action:

No change in response to representation.

5106

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Seaward Properties Ltd

**Agent:** Smith Simmons Partners

## Object

### Summary of representations:

Object: Undersupply of housing compared to standard method. Should include unmet need from SDNP. Unable to demonstrate 5 year supply. Unmet need should be made up within early part of plan period.

### Summary of representation changes to plan:

N/A

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

The justification and evidence to support the latest housing trajectory, including meeting the requirement for a 5 year housing supply on adoption, is set out in the Housing Supply Background Paper (May 2024).

### Action:

No change in response to representation.

5111

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Levanter Developments Limited

**Support**

**Summary of representations:**

Support: Note housing target of 10,350 and supply figure. Note that CDC Plan area now unable to accommodate any unmet need from the South Downs National Park part of Chichester District. SDNPA commissioned evidence study to assess housing need.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No change in response to representation.

5137

**Support**

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** South Downs National Park Authority

## Object

### Summary of representations:

Object: i) Policy unsound – not justified or consistent with national policy. Should be meeting minimum of 638dpa. Transport Study Sensitivity analysis demonstrates that 700 dpa could be accommodated in southern plan area by the mitigation proposed.

No clear evidence to justify why A27 improvements cannot support further 68 homes each year.

ii) Site assessment methodology in HELAA incorrect and contrary to para 176 of the NPPF in dismissing sites within the AONB – should be subject to further assessment. AONB should not be absolute constraint – sites within AONB should be in the stage 2 assessment.

iii) Unclear if requirement to provide at least 10% of homes on sites of under 1 ha will be met.

### Summary of representation changes to plan:

N/A

### Response:

i) The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers.

ii) The PPG states that ‘plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations. For example, assessments should reflect the policies in footnote 7 of the NPPF, which sets out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area’. The policies referred to include AONB.

iii) The evidence setting out how the 10% of homes on sites of under 1ha likely to be met is set out in the Housing Supply Background Paper.

### Action:

No change in response to representation.

5147

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Home Builders Federation

## Object

### Summary of representations:

Object:

Insufficient justification for not meeting full need or considering unmet need from adjoining authorities.

Transport Study supports A27 has capacity to accommodate higher growth and should not be considered a constraint.

### Summary of representation changes to plan:

Increase housing number per annum. Site promoted for allocation. Land east of Foxbridge Drive and South of B2145 Hunston

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

Promotion of site noted.

### Action:

No change in response to representation.

5157

Object

**Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Spiby Partners Ltd**Agent:** Henry Adams LLP

Object

**Summary of representations:**

Object to reduced overall supply of housing which will result in lower infrastructure contributions. Increasing problems with affordability and aging population. Small and medium scale sites can be delivered in short term whilst larger sites await upgrading works.

**Summary of representation changes to plan:**

Transport Study should be reviewed with intention of meeting assessed housing need in full.

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers.

**Action:**

No change in response to representation.

5236

Object

**Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Hallam Land Management Limited**Agent:** LRM Planning

Object

**Summary of representations:**

Object: Insufficient justification for not meeting full need or considering unmet need from adjoining authorities. Transport Study supports A27 has capacity to accommodate higher growth and should not be considered a constraint. Increased housing requirement could assist funding highways improvements.

**Summary of representation changes to plan:**

Reconsider housing figures, consider proposed site to accommodate additional housing number

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance. Promotion of site noted

**Action:**

No change in response to representation.

5242

Object

**Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Chichester Grain Ltd**Agent:** Henry Adams LLP

Object

**Summary of representations:**

Object: Support in principle but not justified as it stands. Acknowledge meeting full housing requirement would be challenging. HDC not in a position to accommodate any of Chichester's unmet housing need due to water neutrality and need to prioritise meeting needs from within the Northern West Sussex HMA.

SOCG with National Highways should transparently demonstrate why the constraints on the A27 will not allow higher growth in the E/W corridor.

**Summary of representation changes to plan:**

N/A

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers.

Position of HDC in relation to not being able to accommodate unmet need noted. A Statement of Common Ground is being progressed.

**Action:**

No change in response to representation.

5264

Object

**Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Horsham District Council

Object

**Summary of representations:**

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seeking evidence.] Object: Locating 84% of housing provision within the east-west corridor reiterates additional pressure on already congested road.

Insufficient evidence of locations away from the A27.

**Summary of representation changes to plan:**

N/A

**Response:**

The Housing Distribution Background Paper sets out the justification for the spatial distribution of housing growth, including how the potential for additional growth in the north of the plan area was considered.

**Action:**

No change in response to representation.



5287

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** National Highways

Object

**Summary of representations:**

- i) Amount of unplanned development on Manhood Peninsula through appeals is in unsustainable locations
- ii) do the numbers allowed on appeal exceed what would have been planned totals?

**Summary of representation changes to plan:**

N/A

**Response:**

- i) Appeal decisions are a judgement made by a Planning Inspector based on the individual circumstances of each case. On adoption, the Local Plan will help to steer future development towards more sustainable locations.
- ii) The appeals do not exceed the 'planned total' that was in the preferred approach

**Action:**

No change in response to representation

5344

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Mr Paul Bedford

## Object

### Summary of representations:

Object: Policy not included housing allocations to deal with climate adaptation and managed coastal retreat. Must identify an area of coastal change management to properly plan for climate adaptation and identify a quantum of development required to meet the managed coastal retreat. housing lost to coastal retreat must be replaced. Must identify broad spatial and land use requirements for this component of housing supply. Interaction of supply of replacement housing as a result of climate adaptation and more traditional housing need as well as timeframe for replacement housing, should be considered as part of supply side calculations.

### Summary of representation changes to plan:

Housing requirement for replacement housing lost to coastal retreat must be calculated and added to overall housing requirement for the plan period.

### Response:

The 'Resilience and Adaptation' document is for parishes, communities and environmental groups, it was not used to inform the preparation of the policy. The policy requires consideration of the Shoreline Management Plans which do not at this stage require the identification of a Coastal Change Management Area. The SA highlights the policies' importance for climate change adaptation/resilience as well as for seeking improved infrastructure at criterion 6. This policy does not comment upon strategic allocations. The policy acknowledges at criterion 3, potential for relocation of current settlement areas. The B2145 is referred to in the SFRA and SA and the need to adapt to the impacts of climate change is acknowledged at paragraph 4.85 of the policy pre-text.

### Action:

No change in response to representation.

5359

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Landlink Estates Ltd

**Agent:** Jackson Planning Ltd

## Object

### Summary of representations:

Object: Unsound not to include any strategic locations/ allocations on the Manhood Peninsula, given Selsey's position in the settlement hierarchy. Too much reliance on consented sites on the Peninsula and Selsey in particular, prevents access to new houses for all settlements.

### Summary of representation changes to plan:

N/A

### Response:

The Settlement Hierarchy is an important piece of evidence informing the housing distribution, however, there are other factors to consider, and as the Plan has evolved the decision has been taken to focus development on more sustainable and less constrained parts of the plan area. This issue is covered in more detail in the Housing Distribution Background Paper and Sustainability Appraisal.

### Action:

No change in response to representation.

**5370****Object****Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Deerhyde Limited**Agent:** Vail Williams LLP**Object****Summary of representations:****Object:**

i) Plan area is capable of accommodating greater housing quantum to facilitate development and help villages flourish and meet Local Plan objectives. Transport Study supports A27 has capacity to accommodate higher growth and should not be considered a constraint.

ii) Insufficient justification for not meeting full need or considering unmet need from adjoining authorities.

**Summary of representation changes to plan:**

Accommodate higher housing figure.

**Response:**

i) & ii) The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

**Action:**

No change in response to representation.

**5382****Object****Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Reside Developments Ltd**Agent:** Henry Adams LLP**Object****Summary of representations:**

**Object:** Housing needs will not be met. Student population growth and affordable housing needs and unmet needs of sub-region should be taken into account.

**Summary of representation changes to plan:**

Requirement should be reconsidered and increased. Including needs of particular groups and complete DtC process to consider how to provide for unmet needs of sub-region.

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

**Action:**

No change in response to representation.

5387

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Elivia Homes

**Agent:** Genesis Town Planning Ltd

Support

**Summary of representations:**

■ But concerns that no supply buffer

**Summary of representation changes to plan:**

■ Policy H1 express provision as 'at least' should carry through into the title of the right-hand column

**Response:**

■ Support noted

**Action:**

■ No change in response to representation

5399

Support

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

Should meet objectively assessed needs. Should ensure appropriate growth to enable existing settlements to be sustained

### Summary of representation changes to plan:

Meet objectively assessed needs.

Accommodate more within sustainable settlements in north of the plan area.

Land at Champions Farm, Wisborough Green suggested

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023), was that Wisborough Green has the capacity to accommodate 75 dwellings. Therefore, the figure of 75 is considered an appropriate figure to help meet the overall housing numbers.

Promotion of site noted.

### Action:

No change in response to representation

5407

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Landowner at Champions Farm, Wisborough Green

**Agent:** Southern Planning Practice

## Object

### Summary of representations:

Housing needs will not be met. Student population growth and affordable housing needs and unmet needs of sub-region should be taken into account.

### Summary of representation changes to plan:

Plan should be positively worded and plan for necessary infrastructure.

Requirement should be reconsidered and increased. Including needs of particular groups and complete DtC process to consider how to provide for unmet needs of sub-region

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance

The Plan is as positive as it reasonably can be in terms of tackling the need for affordable housing

### Action:

No change in response to representation

**5411****Object**

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Jennifer Asser

**Agent:** Genesis Town Planning Ltd

## Object

### Summary of representations:

Should meet objectively assessed needs, unmet needs from SDNP/ coastal sub-region.

No buffer included and no account taken for non-implementation of strategic and allocated sites

### Summary of representation changes to plan:

Meet OAN and unmet needs from SDNP/ coastal sub-region.

10% buffer be applied to be accounted for within the Draft Plan

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

The latest projected supply position is set out in the Housing Supply Background Paper (May 2024), which currently shows a total supply of 10,752, a buffer that amounts to approximately 4% which strikes a balance between ensuring a robust supply position while recognising the constrained housing requirement

### Action:

No change in response to representation

**5422****Object**

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Mr AJ Renouf, Mr DA Renouf, & Mrs SJ Renouf

**Agent:** Rodway Planning Consultancy Ltd

## Object

### Summary of representations:

#### Object:

- i) Target of 535 is too high due to constraints including Chichester Harbour AONB, South Downs National Park, importance of rural/semi-rural land for wildlife corridors.
- ii) Excessive housebuilding will damage the environment and quality of life for existing residents in East-West corridor. Will result in urbanisation.

### Summary of representation changes to plan:

Use of phrase 'exceptional circumstances' is too open-ended and could lead to policies being overridden.

### Response:

) The Local Plan housing requirement of 535dpa (south of the plan area) is a constrained annual requirement figure, based on the constraint of the A27. Other constraints are taken into account when developing the spatial strategy to meet the requirement and through the Sustainability Appraisal and Habitats Regulations Assessment. This issue is also covered in more detail in the Housing Need, Housing Distribution and Transport Background Papers.

The locations of the supply of housing (through allocations and parish numbers) have been informed by a Landscape Capacity Study (2018) which provided a high-level assessment of landscape capacity. The Strategic Wildlife Corridors recognise the importance of avoiding habitat fragmentation.

ii) The impact of housebuilding on the environment and quality of life for existing residents will be taken into account when planning applications are considered, using the numerous policies in the Local Plan which protect the environment and amenity of existing residents.

### Action:

No change in response to representation.

5442

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Mayday! Action Group

## Object

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**Summary of representations:****Object:**

- i) Concerned that affordability and housing availability issues will be exacerbated.
- ii) Conclusion on not meeting housing needs does not follow from Transport Study conclusions which have tested 700 dpa with same mitigation package.
- iii) Local Strategic Statement 3 should be mechanism to address DtC but it has not been applied to production of plan.

**Summary of representation changes to plan:**

N/A

**Response:**

- i) The Plan is as positive as it reasonably can be in terms of tackling the need for affordable housing.
- ii) The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers.
- iii) The Local Strategic Statement 3 has not reached a stage where it can be used to influence the production of the Plan

**Action:**

No change in response to representation

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**5535****Object**

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**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Stagecoach South



## Object

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**Summary of representations:**

Increase dwellings allocated to service villages, particularly northern plan area. To meet district housing need, unmet need from SDNP and counteract A27 infrastructure constraints

**Summary of representation changes to plan:**

Further consideration needs to be given to the allocation of sites within the Local Plan before it can progress to examination

Land East of St Peter's Church, Wisborough Green promoted as omission site

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north plan area and the final scenarios are the most appropriate for each settlement when taking into account the full range of factors needing to be considered.

Higher options for the north of the plan area have already been considered and deemed inappropriate through the SA process.

Promotion of site noted

**Action:**

No change in response to representation

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**5553****Object**

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**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Millwood Designer Homes

**Agent:** Savills

## Object

### Summary of representations:

To housing in north of District on grounds of environmental restraints; water neutrality and sewage issues, lack of infrastructure: public transport, schools and GP surgeries; access; congestion; poor road infrastructure.

### Summary of representation changes to plan:

N/A

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north plan area and the final scenarios are the most appropriate for each settlement when taking into account the full range of factors needing to be considered.

### Action:

No change in response to representation

5602

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Wendy Lockwood

## Object

### Summary of representations:

No justification for reduction from OAN, more could be allocated in the north.

### Summary of representation changes to plan:

N/A

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Higher options for the north of the plan area have already been considered and deemed inappropriate through the SA process.

As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north plan area and the final scenarios are the most appropriate for each settlement when assessed against the SA topic areas.

### Action:

No change in response to representation.

**5611****Object****Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Thakeham Homes**Object****Summary of representations:**

Housing needs will not be met. Student population growth and affordable housing needs and unmet needs of sub-region should be taken into account.

**Summary of representation changes to plan:**

Requirement should be reconsidered and increased. Including needs of particular groups and complete DtC process to consider how to provide for unmet needs of sub-region.

Site for 300 dwellings should be allocated

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

The Plan is as positive as it reasonably can be in terms of tackling the need for affordable housing

Promotion of alternative site noted

**Action:**

No change in response to representation

**5645****Object****Document Element:** Policy H1 Meeting Housing Needs**Respondent:** DG Phillips (Bosham) Ltd and Phillips Build Ltd**Agent:** Genesis Town Planning Ltd**Object****Summary of representations:**

SA should have tested growth scenarios above 638dpa in line with Transport Study

**Summary of representation changes to plan:**

Revisit and test higher growth scenarios through SA

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance

**Action:**

No change in response to representation

**5654****Object****Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Countryside Properties**Agent:** Turley**Object****Summary of representations:**

Insufficient justification for not meeting full need or considering unmet need from adjoining authorities.  
 Transport Study supports A27 has capacity to accommodate higher growth and should not be considered a constraint

**Summary of representation changes to plan:**

535 should be a minimum and further land considered to be allocated

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance

**Action:**

No change in response to representation

**5657****Object****Document Element:** Policy H1 Meeting Housing Needs**Respondent:** The Pick Family**Agent:** Henry Adams LLP**Object****Summary of representations:**

Insufficient justification for not meeting full need or considering unmet need from adjoining authorities.  
 Transport Study supports A27 has capacity to accommodate higher growth and should not be considered a constraint

**Summary of representation changes to plan:**

535 should be a minimum and further land considered to be allocated.  
 Site submission - Land to the West of Stoney Meadow, North Mundham. 225 dwellings

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.  
 Promotion of alternative site noted

**Action:**

No change in response to representation

5662

Object

**Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Mr & Mrs Bell**Agent:** Henry Adams LLP

Support

**Summary of representations:**

Should the Planning Inspector find that the Council requires additional land to meet the housing need using the standard method, CCE's land at Southbourne, Oving, Drayton Land and Hunston are suitable, available and developable for housing. In addition, CCE's rural development sites could also contribute to meeting the housing need.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

5700

Support

**Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Church Commissioners for England**Agent:** Lichfields

Object

**Summary of representations:**

Transport Study shows that an additional 2,970 could be delivered in the Southern plan area. This should be considered in context of affordable housing need, unmet needs from SDNP. Additional numbers in north unnecessary given additional capacity in the A27 and lack of facilities and amenities

**Summary of representation changes to plan:**

N/A

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance

**Action:**

No change in response to representation

**5724****Object****Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Metis Homes**Agent:** Nova Planning**Object****Summary of representations:**

- Do not accept that A27 capacity matters present a ceiling in terms of housing delivery; -
- Do not accept that the Plan and associated SA demonstrates reasonable alternatives being considered;
- Plan therefore not positively prepared nor approach to housing figures justified;
- Plan does not appear to meet the exceptional circumstances allowed for within NPPF to justify alternative approach;
- Plan as proposed is therefore inconsistent with NPPF when read as a whole.

**Summary of representation changes to plan:**

N/A

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

As set out in Section 4 of the SA, the selection of reasonable alternatives for appraisal through the SA is the responsibility of CDC as the plan maker. The SA also makes clear that the number of reasonable alternatives appraised should be manageable – not all conceivable alternatives need be appraised.

The Housing Distribution and Transport Background Papers together with Section 5 of the SA set out the factors that have influenced the spatial strategy and selection of reasonable alternatives.

**Action:**

No change in response to representation

**5727****Object****Document Element:** Policy H1 Meeting Housing Needs**Respondent:** Dandara Southern Limited**Agent:** Henry Adams LLP

## Object

### Summary of representations:

Insufficient justification for not meeting full need or considering unmet need from adjoining authorities.  
 Transport Study supports A27 has capacity to accommodate higher growth and should not be considered a constraint

### Summary of representation changes to plan:

535 should be a minimum and further land considered to be allocated.  
 Site submission – Land at Stubcroft Farm, East Wittering promoted

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.  
 Promotion of alternative site noted.

### Action:

No change in response to representation

## 5752

## Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Barratt David Wilson Homes

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

A27 is not an exceptional circumstance as it can be mitigated. Strategic objective includes mitigation impacts on the A27.  
 Over reliance on larger and strategic sites with issues around lack of delivery

### Summary of representation changes to plan:

N/A

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.  
 The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

### Action:

No change in response to representation

## 5770

## Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Landowner - Land At Farmfield Nurseries

**Agent:** Mission Town Planning Ltd

## Object

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**Summary of representations:**

Housing needs will not be met – no exceptional circumstances for alternative approach, capacity constraints on A27 should not limit growth. Other needs and unmet needs of sub-region should be taken into account

**Summary of representation changes to plan:**

Requirement should be reconsidered and increased – meet full need unless able to demonstrate adverse effects of additional traffic flows on A27 outweigh benefits. Including needs of particular groups and complete DtC process to consider how to provide for unmet needs of sub-region.

Retitle H1 to recognise will not meet need or amend to meet housing need.

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

The Plan is as positive as it reasonably can be in terms of tackling the need for affordable housing and needs of other groups

**Action:**

No change in response to representation

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**5779****Object**

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**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Beechcroft Developments Limited

**Agent:** Genesis Town Planning Ltd



## Object

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**Summary of representations:**

Spatial distribution not justified. No explanation of reduction in housing or the decrease in the southern plan area and increase in the north.

Failure to explain Water Neutrality issues in the north and overstated constraints in south by relying on unclear argument about A27

**Summary of representation changes to plan:**

N/A

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance

As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north plan area and the final scenarios are the most appropriate for each settlement when taking into account the full range of factors needing to be considered.

**Action:**

No change in response to representation

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**5838****Object**

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**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Policy H1 Meeting Housing Needs

### Object

#### Summary of representations:

Object: Housing figure should be higher as it does not reflect the standard method, does not allow for unmet need in other authorities, or reflect the needs of particular groups.

Unconvinced by the transport evidence supporting a lower figure.

Plan should set out how the required upgrades to infrastructure will be delivered.

#### Summary of representation changes to plan:

Requirement should be reconsidered and increased – meet full need unless able to demonstrate adverse effects of additional traffic flows on A27 outweigh benefits. Including needs of particular groups and complete DtC process to consider how to provide for unmet needs of sub-region

#### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

The proposed modifications to Policy T1 Transport Infrastructure set out the council's approach to securing transport mitigation to support the planned growth.

#### Action:

No change in response to representation

5872

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Southcott Homes Limited

**Agent:** Genesis Town Planning Ltd

### Object

#### Summary of representations:

: Impact on A259 from Southbourne to Fishbourne – already negative impact from noise and congestion

#### Summary of representation changes to plan:

N/A

#### Response:

The Chichester Transport Study (2024) considers the impact on the local road network from the development in the plan.

There are no junctions between Fishbourne and Southbourne on the A259 that require mitigation due to planned growth

#### Action:

No change in response to representation

5881

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Fishbourne Meadows Residents' Association

## Object

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### Summary of representations:

Housing numbers should meet need and support provided to enable infrastructure to be provided.

### Summary of representation changes to plan:

Revise housing number to reflect local housing need

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance

### Action:

No change in response to representation

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5956

Object

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**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** The Bramley Family

**Agent:** PowerHaus Consultancy

## Object

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### Summary of representations:

Under supply of housing not justified

### Summary of representation changes to plan:

N/A

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance

### Action:

No change in response to representation

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5967

Object

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**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Obsidian Strategic

**Agent:** Andrew Black Consulting

## Object

### Summary of representations:

- No exceptional circumstances to justify the under supply of housing against local need.
- Evidence to support additional sites including Crouchlands Farm.
- Unsound = not positively prepared or justified when accounting for reasonable alternatives

### Summary of representation changes to plan:

- See attached written representation

### Response:

- The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.
- Promotion of site noted.
- The consideration of reasonable alternatives is set out within the Sustainability Appraisal, which was submitted alongside and underpins the Local Plan.

### Action:

- No change in response to representation

5979

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Artemis Land and Agriculture Limited

**Agent:** DLBP

## Object

### Summary of representations:

- The housing requirement (10,350) for the plan period 2021-2039 must reflect Objectively Assessed Need to avoid the risk of failing to be seen as positively prepared. The evidence base on which the justification for a reduction in housing delivery is flawed and not credible. The plan fails the tests of soundness to this regard and Policy H1 should be amended in line with a reassessment of highway constraints

### Summary of representation changes to plan:

- Policy H1 should be amended in line with a reassessment of highway constraints

### Response:

- The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance

### Action:

- No change in response to representation

6074

Object

**Document Element:** Policy H1 Meeting Housing Needs

**Respondent:** Wates Developments and Seaward Properties

**Agent:** Barton Willmore now Stantec

## Strategic Locations/Allocations, 5.6

### Support

#### Summary of representations:

For methodology of allocating housing sites to meet the housing and economic development needs of Chichester District, based primarily on their suitability, availability and achievability.

Support the carry forward of existing local plan strategic site allocations. The delivery of these sites provides a critical component of the housing supply in the early years of the plan period and should be regarded as being a priority.

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted

#### Action:

N/A

### 4090

### Support

**Document Element:** Strategic Locations/Allocations, 5.6

**Respondent:** Berkeley Strategic Group

### Support

#### Summary of representations:

For methodology of allocating housing sites to meet the housing and economic development needs of Chichester District, based primarily on their suitability, availability and achievability.

Support the carry forward of existing local plan strategic site allocations. The delivery of these sites provides a critical component of the housing supply in the early years of the plan period and should be regarded as being a priority.

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted

#### Action:

N/A

### 4263

### Support

**Document Element:** Strategic Locations/Allocations, 5.6

**Respondent:** Mr David Lock and Ms Melanie Jenkins

**Agent:** Mr Jonathan Lambert

**Policy H2 Strategic Locations/ Allocations 2021 - 2039****Object****Summary of representations:**

No capacity at the Bosham WTW for new housing. Upgrade should be first.

**Summary of representation changes to plan:**

Allocated housing for Bosham should be 0

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

**Action:**

No change in response to representation

**3791****Object**

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Mr Andrew Gould

**Object****Summary of representations:**

No or inadequate facilities in Loxwood (No bus No shop, Inadequate sewers Flooding issues, Water neutrality, School full, Doctors full)

**Summary of representation changes to plan:**

Fewer houses for Loxwood. They need to go nearer to Urbanisation such as Chichester

**Response:**

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

**Action:**

No change in response to representation

**3805****Object****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Mrs Joanna Wright**Object****Summary of representations:**

220 houses in Loxwood when there is still no water neutrality really does not make sense.  
 Will end life in rural villages.  
 Loxwood is a village and not a town!  
 No village shop

**Summary of representation changes to plan:**

Reduce number of houses drastically

**Response:**

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The Council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

**Action:**

No change in response to representation

**3819****Object****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Ms Louise Williamson

## Object

### Summary of representations:

- Building 84% (8717 houses) of the allocated housing along the east-west corridor is not justifiable.
- Insufficient road and no sewage capacity with no guaranteed upgrades.
- Previous Fishbourne Roundabout measures not delivered

### Summary of representation changes to plan:

- Remove Policy A11, Policy A12
- Policy A13 should be limited to 300 houses.
- Cut overall numbers to 2,699 and allocate based on provision identified in neighbourhood plans.

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

Development of the strategic allocations will be subject to the requirements of the Local Plan natural environment policies, particularly Policy NE2 (Natural Landscape), NE5 (Biodiversity) and NE13 (Chichester Harbour AONB) and the site specific requirements set out in the strategic allocation policies.

The proposed modifications to Policy T1 Transport Infrastructure set out the council's approach to securing transport mitigation to support the planned growth.

### Action:

- No change in response to representation

**3840****Object**

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** The Bosham Association

## Object

### Summary of representations:

- Reason and evidence for Loxwood strategic site unavailable

### Summary of representation changes to plan:

- Remove Loxwood as a strategic location

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper (May 2024) was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers

### Action:

- No change in response to representation



**3849****Object****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Mrs Deborah Speirs**Object****Summary of representations:**

220 at Loxwood not sufficient to meet need and should be increased provision in north of the plan area.  
 Delivery should be through allocation in the Local Plan not through the NP

**Summary of representation changes to plan:**

Allocation to Loxwood should be 300 dwellings.  
 Remove reliance on delivery of housing through NPs

**Response:**

As set out in the Sustainability Appraisal and Housing Distribution Background Paper a range of scenarios were considered in the north plan area, including a higher growth figure for Loxwood, but not considered appropriate.

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period. The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

**Action:**

No change in response to representation

**3914****Object****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Loxwood (Mellow) Ltd**Agent:** Ms Megan Smith

# Object

## Summary of representations:

to 220 new houses to be built in Loxwood.

Does not take into account the number of houses that have already been given planning permission (will be more than 220)

Too many houses on green fields.

Will totally overwhelm the village

Very limited bus service and no amenities.

What about the Crouchlands development? No mention of the 600 houses and new primary school which is only a short distance from Loxwood.

No account taken for sewage and water usage issues

## Summary of representation changes to plan:

Brownfield sites should be found.

Development should be on outskirts of larger settlements not small villages and to south of A27.

## Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper (May 2024) was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers. This process did take into account environmental issues such as wastewater.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's updated facilities research in the Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

In terms of the reference to the proposed housing on the Crouchlands site, this is neither a consented scheme nor a prospective allocation, and therefore does not factor into the proposed housing distribution or supply calculations. The considerations with respect to this site are addressed within the Sustainability Appraisal.

Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

## Action:

No change in response to representation

3920

Object

Document Element: Policy H2 Strategic Locations/ Allocations 2021 - 2039

Respondent: Mrs Charlotte Smith

## Object

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**Summary of representations:**

Neighbourhood Plan approved and review has stalled – should be respected.  
No shop, school full, limited bus – not a service village

**Summary of representation changes to plan:**

Remove 220 houses from Loxwood

**Response:**

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

**Action:**

No change in response to representation

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**3921****Object**

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**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Dana Dean

## Object

### Summary of representations:

220 homes at Loxwood will not meet OAN and should be increased to 300 dwellings. Reliance should not be placed on NP to allocate sites

### Summary of representation changes to plan:

Increase Loxwood figure to 300  
Allocate sites to meet Loxwood figure

### Response:

As set out in the Sustainability Appraisal and Housing Distribution Background Paper a range of scenarios were considered in the north plan area, including a higher growth figure for Loxwood, but not considered appropriate.

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper.

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period.

The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

### Action:

No change in response to representation

3925

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Loxwood (Mellow) Ltd

**Agent:** Ms Megan Smith

## Support

### Summary of representations:

Support: Thames Water are the statutory sewerage undertaker for a small part of the northern area of the District around Haslemere and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012

None of the strategic sites are located within the Thames Water region. If any sites were to be located within the Thames Water region, a consideration to the potential impact on water and wastewater infrastructure should be included when promoting a development and provision for upgrades should be made, where required.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

**3953****Support****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Thames Water Utilities Ltd**Object****Summary of representations:**

Object: Transport and wastewater infrastructure should be committed prior to release of housing sites.

**Summary of representation changes to plan:**

See attached alternative Policy A11 wording

**Response:**

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

The proposed modifications to Policy T1 Transport Infrastructure set out the council's approach to securing transport mitigation to support the planned growth.

**Action:**

No change in response to representation.

**4000****Object****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Chichester and District Cycle Forum

## Object

### Summary of representations:

Object: Insufficient infrastructure in Loxwood (school full, no sewage capacity, water supply/ neutrality issues, no gas, no shop, no public transport, roads unsuitable)

### Summary of representation changes to plan:

Build housing near major roads

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed.

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be desirable to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

### Action:

No change in response to representation.

## 4017

## Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Mr David Amey

## Object

### Summary of representations:

Object: Loxwood - Lack of infrastructure, ie schools and medical facilities. Virtually no public transport – car reliance, detriment to environment. Doctors at capacity. Dunsfold will make it worse.

### Summary of representation changes to plan:

Use brownfield sites.

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper (May 2024) was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The Council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The Council's updated facilities research in the Background Paper (updated 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed.

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood. The updated Transport Assessment (2024) has reviewed the transport evidence produced for the Waverley Local Plan and concludes that the small number of additional trips from the proposed development in the north is unlikely to cause capacity issues on the A281 Guildford/Horsham Road or the A2133 Loxwood Road Junction, Alford.

### Action:

No change in response to representation.

4019

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Mrs Penelope Gaze

# Object

**Summary of representations:**

Object: Lack of consultation on revised housing numbers in north of district.  
 A281 is also constraint (more than A27).  
 220 houses (plus 91 already allocated) to Loxwood is not sustainable.  
 SA justification weak.  
 No viable bus, sewerage capacity, school shops.

**Summary of representation changes to plan:**

Remove Policy A15.  
 Allocation should be 125 homes.

**Response:**

There is considerable flexibility open to LPAs in how the initial stages of local plan production are carried out and there is no requirement to have a further Regulation 18 consultation or carry out additional consultation outside of the statutory requirements.

The updated Transport Assessment (2024) has reviewed the transport evidence produced for the Waverley Local Plan and concludes that the small number of additional trips from the proposed development in the north is unlikely to cause capacity issues on the A281 Guildford/Horsham Road or the A2133 Loxwood Road Junction, Alford.

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed.

**Action:**

No change in response to representation.

**4080****Object**

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Mr Tim Swann



## Object

### Summary of representations:

Object: Policy H2 suggests a further 1,125 homes could be delivered through the allocation of three new sites around Chichester City.

Inclusive of the three proposed site allocations, the total proposed level of housing around Chichester City stands at 4,080 dwellings. Greater capacity for development surrounding Chichester City, which can contribute towards the current shortfall, such as land at Lawrence Farm.

### Summary of representation changes to plan:

A greater level of housing needs to be included around Chichester City, given the additional capacity.

### Response:

The Housing Distribution Background Paper sets out the justification for the site allocations and strategic parish numbers set out in Policy H2.

Promotion of alternative site noted.

### Action:

No change in response to representation.

4092

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Berkeley Strategic Group

## Object

### Summary of representations:

Object: Reduce the housing allocated to Chidham and Hambrook as they should not be service villages.

### Summary of representation changes to plan:

Reduce the allocation for Chidham and Hambrook

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

The council's Settlement Hierarchy Update Background Paper concludes that Chidham and Hambrook has the range of services and facilities to be classified as a service village and is a sustainable location for development over the plan period.

### Action:

No change in response to representation.

4120

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Mrs Jane Towers

## Object

### Summary of representations:

Object: Allocations in the East/West corridor are outside the existing settlement boundary and in the countryside contrary to this policy.

### Summary of representation changes to plan:

Remove these proposed allocations and identify more suitable locations.

### Response:

The methodology for determining the settlement boundaries is set out in the Settlement Review Background Paper (May 2024)

Settlement boundaries should be expanded to include new development adjacent to the existing settlement boundary. This includes sites that have been developed following allocation in the adopted Local Plan, and the allocations in the related Site Allocation DPD.

### Action:

No change in response to representation.

4137

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Bosham Parish Council

## Object

### Summary of representations:

Object: The housing numbers are too high. 2000 houses planned from Fishbourne to Southbourne along one transport route.

Not sustainable and will result in coalescence, suburbanisation, traffic congestion, decrease in air quality, substantial impacts on landscape, the AONB and the environment.

### Summary of representation changes to plan:

Reduce the housing allocation number.

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

Development of the strategic allocations will be subject to the requirements of the Local Plan natural environment policies, particularly Policy NE2 (Natural Landscape), NE5 (Biodiversity) and NE13 (Chichester Harbour AONB) and the site specific requirements set out in the strategic allocation policies.

### Action:

No change in response to representation.

**4185****Object****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Chidham and Hambrook Parish Council**Object****Summary of representations:**

Object: Insufficient level of development around Chichester City.

Evidence provided that there is a greater number of suitable sites than is being proposed.

**Summary of representation changes to plan:**

Evidence provided that there is a greater number of suitable sites than is being proposed.

Land to the South of Chichester known as Lawrence Farm (HELAA reference HFB0027) promoted.

**Response:**

The Housing Distribution Background Paper (May 2024) sets out the justification for the site allocations and strategic parish numbers set out in Policy H2.

Promotion of site noted.

**Action:**

No change in response to representation.

**4257****Object****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Berkeley Strategic Group**Object****Summary of representations:**

Object: Policy H2 of the local plan suggests a further 1,125 homes could be delivered through the allocation of three new sites around Chichester City. Given the length of the plan period, and the strategic importance of Chichester City, as outlined above, Berkeley consider a there is greater capacity for development surrounding Chichester City, which can contribute towards meeting the identified housing supply shortfall, such as land at Raughmere Farm.

**Summary of representation changes to plan:**

Site promoted - land at Raughmere Farm.

**Response:**

The Housing Distribution Background Paper (May 2024) sets out the justification for the site allocations and strategic parish numbers set out in Policy H2.

**Action:**

No change in response to representation.

**4264****Object****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Mr David Lock and Ms Melanie Jenkins**Agent:** Mr Jonathan Lambert**Object****Summary of representations:**

Object: Loxwood remote from employment, poor public transport, too far to cycle to services and employment. Will increase pressure infrastructure, particularly sewage.

**Summary of representation changes to plan:**

Remove Loxwood allocation to better location.

**Response:**

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper (May 2024) was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The Council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The Council's updated facilities research in the Background Paper (updated 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

**Action:**

No change in response to representation.

**4323****Object****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Mr Richard Moseley

## Object

### Summary of representations:

Object: lack of procedural soundness due to time and changes since Regulation 18 Plan.

### Summary of representation changes to plan:

Plan for a range of new housing that meets the needs of local people, that does not overburden any one place, including taking into account changing requirements at different stages of life, affordable housing and specialist accommodation; helping young people and families to stay in the area;

Plan to provide local infrastructure to support new development before approving such, and seek opportunities to address existing infrastructure problems, such as those relating to the A27 and wastewater treatment

### Response:

There is considerable flexibility open to LPAs in how the initial stages of local plan production are carried out and there is no requirement to have a further Regulation 18 consultation.

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

The proposed modifications to Policy T1 Transport Infrastructure set out the council's approach to securing transport mitigation to support the planned growth.

### Action:

No change in response to representation.

4327

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Westhampnett Parish Council

# Object

**Summary of representations:**

The plan for Loxwood is unsustainable given the local lack of employment, public transport and waste water disposal. There will be a total reliance on car journeys for work, leisure and living needs. For these reasons the increase of 220 houses is fundamentally flawed and unsustainable. This local plan demonstrates a lack of understanding of the environment in the far north of the district and needs revisiting for Loxwood and surrounding villages.

**Summary of representation changes to plan:**

There needs to be reduction in the number of houses required in Loxwood back to the numbers stated in the neighbourhood plan which is currently held up in CDC

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

**Action:**

No change in response to this representation.

**4330****Object**

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Mr Roger Newman

## Object

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**Summary of representations:**

Object: Increase provision as per objection to H1 but reduce in Loxwood as per previous comments [rep number 4344]

**Summary of representation changes to plan:**

Increase Hambrook and Nutbourne to 500 as previously suggested in the consultation documents which were sent to the Parishes

**Response:**

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's updated Settlement Hierarchy Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

**Action:**

No change in response to representation.

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**4358****Object**

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**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Mr Stephen Jupp

## Object

### Summary of representations:

Object: Too many homes to Loxwood, already overloaded. No facilities to support people.

### Summary of representation changes to plan:

Revisit policy to delete Loxwood allocation.

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

### Action:

No change in response to representation

4521

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Miss Karin Jones

## Support

### Summary of representations:

support this policy

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

4544

Support

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Portsmouth Water Ltd



## Object

### Summary of representations:

Object: A single large site allocation for Loxwood contrary to the needs, characteristics, available information, local insights / positive approaches to local growth embracing Localism and self-build homes.

### Summary of representation changes to plan:

Replace the single large site allocation for Loxwood with a dispersed approach comprising small / medium sized sites with a focus on self build housing provision.

### Response:

Where the Local Plan makes a parish housing requirement, as is the case at Loxwood, it will be for a Neighbourhood Plan to identify potential development sites. This also includes the provision of appropriate specialist housing such as custom and self-build units.

### Action:

No change in response to representation.

4562

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Mr William MacGeagh

## Object

### Summary of representations:

Object: to the proposed housing allocations, in particular the allocations which principally affect Chichester Harbour AONB: A11 Land at Highgrove Farm, Bosham A13 Southbourne Broad Location for Development A12 Nutbourne and Hambrook (Chidham and Hambrook Parish)

### Summary of representation changes to plan:

The housing allocation for the east-west corridor should be reduced, with particular reference to: A11 Land at Highgrove Farm, Bosham A13 Southbourne Broad Location for Development A12 Nutbourne and Hambrook (Chidham and Hambrook Parish)

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

Development of the strategic allocations will be subject to the requirements of the Local Plan natural environment policies, particularly Policy NE2 (Natural Landscape), NE5 (Biodiversity) and NE13 (Chichester Harbour AONB) and the site specific requirements set out in the strategic allocation policies.

### Action:

No change in response to representation.

4596

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Chichester Harbour Trust

Object

**Summary of representations:**

Object: Far too many homes in unsuitable locations such as Loxwood.  
 Not enough infrastructure to support the volume of housing proposed.  
 No allowance for the already disproportionate development in the area.

**Summary of representation changes to plan:**

Housing to be built in urban areas and not on green belt/green fields

**Response:**

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed.

**Action:**

No change in response to representation.

4632

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Mr Stuart Gordon

## Object

### Summary of representations:

Object: Lack of infrastructure in Loxwood (limited bus service, employment – car dependence, 1 school, GP practice at capacity, lack of sewage capacity). Environment ignored – impact on wildlife corridors, habitats and degradation of bridleways and footways.

### Summary of representation changes to plan:

N/A

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed.

### Action:

No change in response to representation.

4640

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Mrs Jan Carter

## Object

### Summary of representations:

Object: Loxwood not a service village. The Post Office & village shop closed, one bus a day on four days a week.  
 The nearest railway is 6 miles away - no bus connection.  
 Local roads incapable of taking increased traffic.  
 Sewage and water system inadequate.  
 Internet insufficient.  
 Harm to rural life and village character.

### Summary of representation changes to plan:

No further homes in Loxwood. Look at allocating small numbers in other villages

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed.

### Action:

No change in response to representation.

## 4655

## Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Mrs Elizabeth Lancaster

## Object

### Summary of representations:

Object: Loxwood - insufficient infrastructure for drainage, sewage, transport, retail, roads, schools, doctors etc.  
Southern Water is already spilling sewage into the river Lox. Area cannot support more housing.

### Summary of representation changes to plan:

Reduce number of houses at Loxwood.  
Don't provide houses for Surrey and London.

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed.

### Action:

No change in response to representation.

4664

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Mr Roger Marshman

## Object

### Summary of representations:

Object: Loxwood - very limited transport links, no shops/PO, employment opportunities requiring increased travel by car - extra pressure upon B road; 1 primary school at capacity, full Medical Practice.

No capacity for disposal of sewage and waste water for new housing.

Ignores legislation re preservation and development of environment for nature, wildlife and benefit to community and visitors.

### Summary of representation changes to plan:

Return to Neighbourhood Plan proposals.

Recognise wildlife benefits of the area.

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the council that there are no infrastructure constraints to the scale of development proposed.

In relation to wastewater infrastructure the current position is set out in the Statement of Common Ground with Southern Water.

### Action:

No change in response to representation.

## 4665

## Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Mr David Carter

## Object

### Summary of representations:

Object: to 220 more houses in Loxwood. Incapacity of drainage system. Currently dealing with a serious raw sewage situation which flowed and covered our garden. Please check with Southern Water who tell us that sewers and drainage not fit for more housing

### Summary of representation changes to plan:

Cancel the plan completely

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed.

In relation to wastewater infrastructure the current position is set out in the Statement of Common Ground with Southern Water and the Environment Agency.

### Action:

No change in response to representation.

4703

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Bruce Frost

## Object

### Summary of representations:

Object: Land to the West of Church Road should be allocated (developable HELAA site). Corroborated by the approval of the Southern Parcel.

### Summary of representation changes to plan:

Allocation should be made within Policy H2 for 150 – 160 dwellings at Land West of Church Road (Northern Parcel)

### Response:

Promotion of site noted.

### Action:

No change in response to representation.

4721

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Welbeck Strategic Land IV LLP**Agent:** Mrs Sarah Hufford

Object

**Summary of representations:**

allocation of dwellings for Loxwood Ward disproportionate in scale to the other larger areas mentioned. ie: 220 dwellings for Loxwood and 270 for Chichester City.

The infrastructure in Loxwood ward unable to cope (public transport, schools places, doctors surgeries etc...)

Further development in area is unsustainable.

Other applications too for large scale housing developments at Crouchlands Farm with 600 dwellings.

**Summary of representation changes to plan:**

Reduce the allocated numbers of proposed dwellings to this rural, isolated area

**Response:**

The Chichester City figure referred to only relates to the neighbourhood planning number for Chichester. Significantly more development is already being built out around Chichester on the basis of allocations in the adopted Local Plan, with large additional allocations around Chichester proposed in the new Local Plan.

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed.

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

In terms of the reference to the proposed housing on the Crouchlands site, this is neither a consented scheme nor a prospective allocation, and therefore does not factor into the proposed housing distribution or supply calculations. The considerations with respect to this site addressed within the Sustainability Appraisal.

**Action:**

No change in response to representation



**4738****Object****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Mr Stuart Lockwood**Object****Summary of representations:**

Object: Currently the Plan proposes 10,354 total new homes over the Plan period (575.2 homes p.a). However, using the Standard methodology, the actual housing needed in the District is 11,484 homes. The 11,484 figure is calculated using data from the ICENI Chichester Housing and Economic Development Needs Assessment (HEDNA) Report from April, 2022. Indeed, using this data, CDC is currently 1,131 homes short of it's need over the 18-year period.

Evidence base supports case for strategic level of growth at Boxgrove of 610 potential plots.

**Summary of representation changes to plan:**

H2 should include strategic allocation for Boxgrove Parish

**Response:**

The Housing Distribution Background Paper (May 2024) explains the development of the proposed distribution of housing and the split between strategic and non-strategic provision. The SA report (January 2023, Section 7, sets out the Council's reasoning for the preferred growth strategy having considered reasonable alternatives, including consideration of Boxgrove.

**Action:**

No change in response to representation.

**4741****Object****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Rydon Homes Limited**Agent:** DMH Stallard LLP

## Object

### Summary of representations:

Object: to the exclusion of Boxgrove Parish from Policy H2 as it has potential to accommodate strategic locations for residential development. Boxgrove is a service village.

### Summary of representation changes to plan:

Capacity of Boxgrove should be reflected in re-assessed policy

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

The Housing Distribution Background Paper explains the development of the proposed distribution of housing and the split between strategic and non-strategic provision. The SA report (January 2023, Section 7, sets out the Council's reasoning for the preferred growth strategy having considered reasonable alternatives, including consideration of Boxgrove.

As set out in the SA and Housing Distribution Background Paper the numbers set for Boxgrove are the most appropriate when taking into account the full range of factors needing to be considered. above.

### Action:

No change in response to representation

4797

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Rydon Homes Limited

**Agent:** DMH Stallard LLP

## Support

### Summary of representations:

Support: inclusion of West of Chichester (A6) as a Strategic Allocation under policy H2.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

4799

Support

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

## Support

### Summary of representations:

Support: We note that a significant proportion of the housing numbers proposed through the Local Plan will be delivered by Neighbourhood Plans. We have highlighted key criteria for individual locations that we would wish to see considered by those Plans when allocating sites.

Where possible we would wish to see these included within the Local Plan policy but as you will be aware we have produced a checklist for Neighbourhood Plan groups in your district which will guide the identification of sites and other key issues and opportunities to be addressed in the future.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

## 4853

## Support

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Environment Agency

## Object

### Summary of representations:

Object: to the increased allocation at Highgrove Farm and the evidence submitted that has arrived at this allocation.

The French Gardens (TFG) site which has been incorrectly coloured red on the HELAA and incorrectly assessed on the Sustainability Assessment.

Errors result in unsoundness including - 1.TFG is lower grade soil. 2. TFG was preferred in Village consultation. 3. TFG no impact on East-West coalescence, SDNP and AONB. 4. TFG would result in reinvestment into dilapidated rural business. 5. TFG mitigation available onsite etc.

### Summary of representation changes to plan:

Allocate 25 – 30 homes on HELAA site HBO0003

### Response:

The Housing Distribution Background Paper sets out the justification for the site allocations and strategic parish numbers set out in Policy H2.

Promotion of site noted.

### Action:

No change in response to representation.

## 4882

## Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Willowfield Farm

## Object

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### Summary of representations:

Object: housing figure apportioned to Chidham and Hambrook parish, should be increased to at least 500 dwellings

### Summary of representation changes to plan:

Figure for Chidham and Hambrook should be increased to at least 500 dwellings

### Response:

The Housing Distribution Background Paper (May 2024) sets out the justification for the site allocations and strategic parish numbers set out in Policy H2.

### Action:

No change in response to representation

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4904

Object

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**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Gleeson Land

## Policy H2 Strategic Locations/ Allocations 2021 - 2039

### Object

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**Summary of representations:**

Object: to Policies A11, A12 and A13 - reasons set-out under specific policies.

**Summary of representation changes to plan:**

Remove Policy A11. Amend Policies A12 and A13.

**Response:**

The Housing Distribution Background Paper (May 2024) sets out the justification for the site allocations and strategic parish numbers set out in Policy H2.

**Action:**

No change in response to representation.

4944

Object

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**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Chichester Harbour Conservancy

### Object

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**Summary of representations:**

Settlement Hierarchy Background Paper needs updating to provide justification for revised distribution and quantum of development

**Summary of representation changes to plan:**

N/A

**Response:**

The Settlement Hierarchy Background Paper (May 2024) has been updated and an additional Background Paper setting out the justification for the housing distribution has been prepared

**Action:**

No change in response to representation

5029

Object

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**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Hanbury Properties

**Agent:** Smith Simmons Partners

## Object

**Summary of representations:**

Settlement Hierarchy Background Paper needs updating to provide justification for revised distribution and quantum of development

**Summary of representation changes to plan:**

N/A

**Response:**

The Settlement Hierarchy Background Paper (May 2024) has been updated and an additional Background Paper setting out the justification for the housing distribution has been prepared

**Action:**

No change in response to representation

**5034****Object**

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Northgate Properties Ltd

**Agent:** Smith Simmons Partners

## Object

**Summary of representations:**

Settlement Hierarchy Background Paper needs updating to provide justification for revised distribution and quantum of development.

Options for north should have been more thoroughly tested.

**Summary of representation changes to plan:**

N/A

**Response:**

The Settlement Hierarchy Background Paper (May 2024) has been updated and an additional Background Paper setting out the justification for the housing distribution has been prepared.

The options for the north have been tested thoroughly – as set out in the Sustainability Appraisal and Housing Distribution Background Paper.

**Action:**

No change in response to representation

**5107****Object**

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Seaward Properties Ltd

**Agent:** Smith Simmons Partners

## Object

### Summary of representations:

Object: Delivery of Land West of Chichester and Tangmere SDL unachievable delivery timescales – lack of evidence to justify trajectory. New sites A11, A8, A10, A4 and A5 also unjustified trajectory.

### Summary of representation changes to plan:

N/A

### Response:

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

### Action:

No change in response to representation.

## 5118

## Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Levanter Developments Limited

## Object

### Summary of representations:

Object: Suggested amendments to policy to help to ensure that development coming forward in this sensitive area (A259 between Emsworth and Chichester) positively addresses the South Downs National Park and its setting.

Southbourne (1,050 homes), Wisborough Green (75 homes), (Kirdford (50 homes) and Boxgrove (50 homes) - concern about figures and challenge neighbourhood planning groups may have as many potential sites likely to be in the setting of the South Downs National Park.

Attempts to meet these target figures will need to address the requirements of NPPF paragraph 176 on setting.

### Summary of representation changes to plan:

Wording amendment relates to other policies

### Response:

Comments noted. Amendments to other policies set out under relevant representations.

### Action:

No change in response to representation

## 5138

## Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** South Downs National Park Authority

## Object

### Summary of representations:

Object: Strategic locations/allocations set out in Policy H2 do not reflect flexible approach ('at least'). See Paragraph 119 of NPPF.

Policy A13 does not allow for masterplanning approach to further assess actual capacity and best use of land.

Flexibility should be embedded into wording of Policy H2 to ensure intention of Policy S2 is achieved; housing target of at least 10,350 dwellings is met; and land identified for development is most effectively used.

### Summary of representation changes to plan:

Policy H2 includes the wording "at least" before the quantum of development for any strategic location or allocation. For example, Policy A13 would instead state "at least"

### Response:

Para 10.1 of the Plan makes it clear that the strategic site allocation policies include an anticipated number of dwellings to come forward on each site and that any variation to this through the development management process would need to be justified with up to date evidence, for example, through a Transport Assessment.

A modification is proposed to Policy A13 and other relevant strategic allocation policies to include 'approximately' to reflect this flexibility. The council is also in the process of progressing the Southbourne Allocation DPD, which includes capacity work and high level masterplanning by specialist consultants.

### Action:

No change in response to this representation but see changes proposed to strategic allocation policies.

5237

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Hallam Land Management Limited

**Agent:** LRM Planning

## Support

### Summary of representations:

Support: Given the challenges that face Neighbourhood Planning groups in the preparation and delivery of Neighbourhood Plans, (which can potentially delay the delivery of these allocations), we support the identification of strategic sites in the Local Plan, programmed for delivery earlier in the plan period.

Welcomes continued dialogue with the relevant stakeholders, to ensure development at strategic locations such as Loxwood are delivered in a timely manner and adhere to sustainable development principles

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.



**5265****Support****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Horsham District Council

## Object

**Summary of representations:**

National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Comment regarding impacts.] Object: The proposed developments are dispersed along the A27 corridor from Hermitage to the west of the city through to Tangmere in the east. We note that this has the potential to put pressures and traffic impacts on multiple A27 junctions rather than just one or two locations.

**Summary of representation changes to plan:**

N/A

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

The proposed modifications to Policy T1 Transport Infrastructure set out the council's approach to securing transport mitigation to support the planned growth.

**Action:**

No change in response to representation.

**5288****Object****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** National Highways

## Object

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### Summary of representations:

Object: failed to be properly assessed in line with The Environmental Assessment of Plans and Programmes Regulations 2004 - Regulation 12;  
Unjustified removal of strategic housing site at Selsey - removing site from plan condemns population of Selsey relying on B2145 to effective abandonment;  
Reasonable alternatives not tested in SA.  
Supporting evidence for Selsey site attached.

### Summary of representation changes to plan:

Reinstate Strategic site at Selsey with testing in the SA.  
The allocation would need to deal with flood resilience for access and egress to the B2145 in a proportionate way, working with the relevant agencies.  
Benefits of providing part of flood resilience to the wider community of Selsey needs to be recognised as part of the planning policy balance.

### Response:

The Housing Distribution Background Paper sets out the justification for the site allocations and strategic parish numbers set out in Policy H2.  
The Local Plan makes provision for a limited amount of new housing development on the Manhood Peninsula. This approach takes account of the large amount of development that has received planning permission and updated technical evidence, including the SFRA which considers flood risk. The consideration of reasonable alternatives is set out within the Sustainability Appraisal, which was submitted alongside and underpins the Local Plan

### Action:

No change in response to representation.

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**5360****Object**

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**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Landlink Estates Ltd

**Agent:** Jackson Planning Ltd

## Object

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**Summary of representations:**

Object: There are no strategic locations/allocations on the Manhood Peninsula under Policy H2 which is considered unsound, particularly given the position that Selsey holds in the settlement hierarchy

**Summary of representation changes to plan:**

Allocation of site on the Manhood Peninsula - sites at land north of Golf Links Lane and land west of Old Farm Road promoted.

**Response:**

The Settlement Hierarchy Background Paper (May 2024) has been updated and an additional Housing Distribution Background Paper setting out the justification for the housing distribution has been prepared.

The Local Plan makes provision for a limited amount of new housing development on the Manhood Peninsula. This approach takes account of the large amount of development that has received planning permission and updated technical evidence, including the SFRA which considers flood risk. This is considered in more detail in the Housing Distribution Background Paper and Sustainability Appraisal.

Promotion of sites noted.

**Action:**

No change in response to representation.

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**5372****Object**

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**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Deerhyde Limited

**Agent:** Vail Williams LLP

## Support

### Summary of representations:

Support: inclusion of the Southern Gateway as an allocation for 180 dwellings, but anticipated numbers should be prefixed by at least or approximately.

Consideration should be given to the timing of any intervention, should the Neighbourhood Plans not progress in a timely manner.

Subject to these modifications, Bellway contend that policy H2 has been positively prepared, is fully justified and effective

### Summary of representation changes to plan:

Anticipated numbers should be prefixed by at least or approximately.

### Response:

Support noted.

Para 10.1 of the Plan makes it clear that the strategic site allocation policies include an anticipated number of dwellings to come forward on each site and that any variation to this through the development management process would need to be justified with up to date evidence, for example, through a Transport Assessment. A modification is proposed to Policy A13 and other relevant strategic allocation policies to include 'approximately' to reflect this flexibility.

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period. The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

### Action:

No change in response to this representation but see changes proposed to strategic allocation policies.

## 5400

## Support

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

Object: Site submitted - Land at Herons Farm, Kirdford. Up to 200 dwellings, including self build.

### Summary of representation changes to plan:

Site promoted should be allocated – Land at Herons Farm, Kirdford.

### Response:

Where the Local Plan makes a parish housing requirement, which includes Kirdford, it will be for a Neighbourhood Plan to identify potential development sites.

Promotion of site noted.

### Action:

No change in response to representation

**5404****Object****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Reside Developments Ltd**Agent:** Henry Adams LLP**Object****Summary of representations:**

Object: Inadequate number of dwellings allocated (see comments on H1).

**Summary of representation changes to plan:**

Increase figure for H2 (and/or H3)

Land at Monks Hill (HELAA - HWE0014) should be allocated

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024).

Promotion of site noted.

**Action:**

No change in response to representation.

**5413****Object****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Jennifer Asser**Agent:** Genesis Town Planning Ltd**Object****Summary of representations:**

Object: level of development set out in the draft plan is insufficient and deliverability of some of the strategic sites relied on is questioned. Sites submitted. Lansdowne Nursery Oving, 48 dwellings. Sherwood Nursery Oving 15 dwellings.

**Summary of representation changes to plan:**

Allocate Lansdowne Nursery Oving, 48 dwellings. Sherwood Nursery Oving 15 dwellings

**Response:**

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024).

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

Promotion of site noted.

**Action:**

No change in response to representation.

**5426****Object****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Mr AJ Renouf, Mr DA Renouf, & Mrs SJ Renouf**Agent:** Rodway Planning Consultancy Ltd**Object****Summary of representations:**

Object: to Loxwood figure on open space and infrastructure grounds.

**Summary of representation changes to plan:**

N/A

**Response:**

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's updated Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

**Action:**

No change in response to representation.

**5428****Object****Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Mrs Joyce King

## Object

### Summary of representations:

Object: to Loxwood figure on infrastructure grounds. (Water supply, waste water and sewerage, public transport, medical centre, open views, employment)

### Summary of representation changes to plan:

N/A

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed. In relation to wastewater infrastructure the current position is set out in the Statement of Common Ground with Southern Water.

### Action:

No change in response to representation.

5429

Object

Document Element: Policy H2 Strategic Locations/ Allocations 2021 - 2039

Respondent: Mr John King

## Object

### Summary of representations:

Object: Too much housing on greenfield sites, HELAA identifies brownfield sites for over 4,000 dwellings

### Summary of representation changes to plan:

Brownfield sites should be developed ahead of greenfield sites.

### Response:

Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

### Action:

No change in response to representation.

5438

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Mayday! Action Group

Support

**Summary of representations:**

Support: Strategic locations offer clear opportunities to make use of sustainable transport modes.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No change in response to representation.

5536

Support

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Stagecoach South

Object

**Summary of representations:**

Object: not consulted on revised housing numbers in North of the district.

A281 is a bigger constraint than A27 which will also have Dunsfold adding pressure.

Allocation of 220 houses plus a further 91 houses on already allocated sites not sustainable in rural Loxwood.

Huge percentage increase will destroy village.

**Summary of representation changes to plan:**

Remove Policy A15.

Amend Policies H2 and H3 to allocation of 125 houses.



**Response:**

There is considerable flexibility open to LPAs in how the initial stages of local plan production are carried out and there is no requirement to have a further Regulation 18 consultation.

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood. The updated Transport Assessment (2024) has reviewed the transport evidence produced for the Waverley Local Plan and concludes that the small number of additional trips from the proposed development in the north is unlikely to cause capacity issues on the A281 Guildford/Horsham Road or the A2133 Loxwood Road Junction, Alford.

**Action:**

No change in response to representation.

**5561****Object**

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Tim Swann

## Object

### Summary of representations:

Object: Concern where Neighbourhood Plans are delayed, knock-on delay in provision of housing - allocate sites to ensure delivery as these are strategic allocations.

### Summary of representation changes to plan:

Allocate sites instead of leaving to Neighbourhood Plans.

### Response:

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period.

The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

### Action:

No change in response to representation.

5613

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Thakeham Homes

## Object

### Summary of representations:

Promotes an alternative site to meet/deliver higher housing numbers.

### Summary of representation changes to plan:

Included proposed alternative site

### Response:

The Housing Distribution Background Paper (May 2024) sets out the justification for the site allocations and strategic parish numbers set out in Policy H2.

Promotion of site noted.

### Action:

No change in response to representation.

5647

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** DG Phillips (Bosham) Ltd and Phillips Build Ltd

**Agent:** Genesis Town Planning Ltd

## Object

### Summary of representations:

Object: Lack of funding for infrastructure or phasing.

### Summary of representation changes to plan:

Amend Policy H2 Strategic Locations/Allocations 2021- 2039 so A2, 4, 5, 8, 10, 11 and 13 are only released one year after work commences on the A27 improvements at the Fishbourne and Bognor roundabouts, and, where appropriate, waste water treatment works.

### Response:

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

In relation to wastewater infrastructure the current position is set out in the Statement of Common Ground with Southern Water.

### Action:

No change in response to representation.

5651

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Manhood Peninsular Action Group

## Support

### Summary of representations:

Support: shows that Tangmere is a location that can be seen to grow.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

5690

Support

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** The Birkett Family

**Agent:** Henry Adams LLP

## Support

### Summary of representations:

Support: Draft Policy H2 confirms that the Tangmere Strategic Development Location is carried forward from the 2015 Local Plan and this is supported by CCE.

Strong support is also given for the Broad Location of Development in Southbourne (Policy A13) for up to 1,050 dwellings.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

## 5701

## Support

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Church Commissioners for England

**Agent:** Lichfields

## Object

### Summary of representations:

Object: Object to Land at Maudlin Farm, Westhampnett' – as not part of Regulation 18 stage.

SA stated Southbourne development unlikely to be deliverable in first 5 years. Planning Ref. SB/22/01283/FULEIA for 'Land at Harris Scrapyard & Oaks Farm', (discrete land parcel of proposed BLD) would provide delivery of at least 50 dwellings in period to 2026 and 103 dwellings by 2027. Southern Water have confirmed suitable foul drainage can be accommodated for the development.

SA incorrect as proposed development can provide early housing delivery as part of BLD.

If this is the reason for introducing an allocation at Maudlin Farm, and altering spatial strategy, at this late stage in the plan-making process, then Spatial Strategy is flawed.

### Summary of representation changes to plan:

Remove Land at Maudlin Farm.

### Response:

There is considerable flexibility open to LPAs in how the initial stages of local plan production are carried out and there is no requirement to have a further Regulation 18 consultation.

The Housing Distribution Background Paper (May 2024) sets out the justification for the site allocations and strategic parish numbers set out in Policy H2.

It is noted that the alternative site promoted has since granted planning permission at appeal.

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

### Action:

No change in response to representation

5728

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Metis Homes

**Agent:** Nova Planning

Object

**Summary of representations:**

Object: to Hunston no longer having housing allocation.

Site submission - Land At Farmfield Nurseries, Selsey Road 200 dwellings.

**Summary of representation changes to plan:**

Allocate 200 dwellings to Hunston.

**Response:**

The Housing Distribution Background Paper sets out the justification for the site allocations and strategic parish numbers set out in Policy H2.

The Local Plan makes provision for a limited amount of new housing development on the Manhood Peninsula. This approach takes account of the large amount of development that has received planning permission and updated technical evidence, including the SFRA which considers flood risk. This is considered in more detail in the Housing Distribution Background Paper and Sustainability Appraisal.

Promotion of site noted.

**Action:**

No change in response to representation

5771

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Landowner - Land At Farmfield Nurseries

**Agent:** Mission Town Planning Ltd

## Object

### Summary of representations:

Object: Increased dwelling requirement can be accommodated without significantly altering spatial strategy. Accommodate additional development at less constrained Service Villages in northern parts of Manhood Peninsula. Hunston is relatively unconstrained - good accessibility to road network. Additional development at Hunston would be consistent with Policy T1. Hunston a sustainable location for new development capable of delivering at least 200 homes during Plan period. Site promoted at Land at Hunston Village Dairy

### Summary of representation changes to plan:

Make a strategic scale allocation for Hunston - Site promoted at Land at Hunston Village Dairy.

### Response:

The Housing Distribution Background Paper sets out the justification for the site allocations and strategic parish numbers set out in Policy H2.

The Local Plan makes provision for a limited amount of new housing development on the Manhood Peninsula. This approach takes account of the large amount of development that has received planning permission and updated technical evidence, including the SFRA which considers flood risk. This is considered in more detail in the Housing Distribution Background Paper and Sustainability Appraisal.

Promotion of site noted.

### Action:

No change in response to representation.

5777

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Beechcroft Developments Limited

**Agent:** Genesis Town Planning Ltd

## Object

### Summary of representations:

Object: concerns over the delivery of housing from the strategic allocations within the unjustified timescales as set out within the trajectory including:

The achievability of carried forward allocations for Land West of Chichester (A6) and Tangmere SDL (A14);

The effectiveness of the identification of the Southbourne Broad Location for Development (A13), the adequacy of justification for its trajectory, and lack of detail concerning delivery.

### Summary of representation changes to plan:

Land South of Main Road, Hermitage promoted

### Response:

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper

Promotion of site noted.

### Action:

No change in response to representation.

5968

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Obsidian Strategic**Agent:** Andrew Black Consulting

Object

**Summary of representations:**

Object: concerns over the delivery of housing from the strategic allocations within the unjustified timescales as set out within the trajectory contained in the plan.

Housing trajectory for sites carried forward - Land West of Chichester (A6) and the Tangmere SDL (A14), are unachievable.

Anticipated delivery from new strategic sites highly ambitious and lacks justification.

**Summary of representation changes to plan:**

Site promoted – Land at Tanglewood Nurseries, Wisborough Green

**Response:**

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

Where the Local Plan makes a parish housing requirement, such as Wisborough Green, it will be for a Neighbourhood Plan to identify potential development sites.

**Action:**

No change in response to representation.

5974

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039**Respondent:** Tanglewood Residences Limited**Agent:** Andrew Black Consulting

Support

**Summary of representations:**

Support: strategic locations are broadly located in areas where the Council held Housing Register indicates the highest level of housing need.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No change in response to representation.

6013

Support

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Chichester District Council Housing Team - Local Housing Authority

Object

**Summary of representations:**

Promotes an alternative site to meet/deliver higher housing numbers.

**Summary of representation changes to plan:**

Included proposed alternative site

**Response:**

The Housing Distribution Background Paper (May 2024) sets out the justification for the site allocations and strategic parish numbers set out in Policy H2.

Promotion of site noted.

**Action:**

No change in response to representation.

6022

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Barratt David Wilson Homes

**Agent:** Henry Adams LLP

6065

Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** The Sadler Family

**Agent:** Henry Adams LLP



## Object

### Summary of representations:

We strongly support an amendment to be made to Policy H2 to allow for the provision of circa (or a minimum of) 1,250 dwellings at Southbourne

### Summary of representation changes to plan:

We strongly support an amendment to be made to Policy H2 to allow for the provision of circa (or a minimum of) 1,250 dwellings at Southbourne

### Response:

The Southbourne Background Paper (2024) sets out the justification for the approach taken in the Local Plan of identifying a Broad Location for Development, and the Housing Distribution Background Paper (2024) explains the reduction from 1,250 dwellings to the number in Policies H2 and A13 of 1,050.

### Action:

No change in response to this representation.

## 6072

## Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Wates Developments and Seaward Properties

**Agent:** Barton Willmore now Stantec

## Object

### Summary of representations:

The quantum of development at Southbourne (A13) should be 1,250 to reflect the conclusions of the sustainability appraisal, the capacity within the land east of Southbourne and the importance in bringing forward all infrastructure improvements to the village and wider area.

### Summary of representation changes to plan:

The quantum of development at Southbourne (A13) should be 1,250 to reflect the conclusions of the sustainability appraisal, the capacity within the land east of Southbourne and the importance in bringing forward all infrastructure improvements to the village and wider area.

### Response:

The Southbourne Background Paper (2024) sets out the justification for the approach taken in the Local Plan of identifying a Broad Location for Development, and the Housing Distribution Background Paper (2024) explains the reduction from 1,250 dwellings to the number in Policies H2 and A13 of 1,050.

### Action:

No change in response to representation.

## 6075

## Object

**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Wates Developments and Seaward Properties

**Agent:** Barton Willmore now Stantec

## Object

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**Summary of representations:**

There is 'over development' as stated in the sustainability assessment (p90) which makes the Local Plan not legally compliant. Tangmere Parish Council has the figure of [unclear] houses in the village of Tangmere as a whole at 1156. The sheer number of proposed houses (increased to 1300) is disproportionate and excessive - it will increase the number of houses in one area by over double. This is an overdevelopment and not in keeping or sympathetic with an area which has conservation status.

**Summary of representation changes to plan:**

Reduce the number of houses so that the density is lowered and is not concentrated in one area to 'dwarf' existing houses at Saxon Meadow, a conservation area next to the Saxon church of St Andrew's.

**Response:**

Comment noted. The Local Plan is required to plan for meeting housing needs, or a housing figure that has been derived through evidence which supports the local plan preparation. In this regard, suitable site allocations must be made, and this development site has been assessed as being suitable for accommodating 1,300 dwellings, as evidenced through the masterplanning process. There is no evidence to suggest that the housing number for this site should be reduced.

**Action:**

No change in response to representation.

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**6162****Object**

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**Document Element:** Policy H2 Strategic Locations/ Allocations 2021 - 2039

**Respondent:** Richard Hedgecock

## Non-strategic Parish Housing Requirements, 5.7

### Object

#### Summary of representations:

Object: Growth at Wisborough green does not comply with aim "it is intended that such new housing should generally be directed primarily towards the larger, more sustainable settlements."

#### Summary of representation changes to plan:

Utilise urban development

#### Response:

The Settlement Hierarchy Background Paper (May 2024) has been updated and an additional Housing Distribution Background Paper (May 2024) setting out the justification for the housing distribution has been prepared. Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper (May 2024) was that Wisborough Green has the capacity to accommodate 75 dwellings. Therefore, the figure of 75 is considered an appropriate figure to help meet the overall housing numbers.

#### Action:

No change in response to representation.

3880

Object

**Document Element:** Non-strategic Parish Housing Requirements, 5.7

**Respondent:** Mr simon urry

### Support

#### Summary of representations:

Support: this statement. NP review has been started and has been through Regulation 14 based upon the earlier allocation of 40.

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted.

#### Action:

No change in response to representation.

4523

Support

**Document Element:** Non-strategic Parish Housing Requirements, 5.7

**Respondent:** Wisborough Green Parish Council

## Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

### Object

#### Summary of representations:

Support: House prices in East Wittering increasing due to investment properties and holiday lets. Needs to be a mechanism to only allow residential occupation by local residents.

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted.

#### Action:

No change in response to representation.

3797

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mr Andrew Barton

### Object

#### Summary of representations:

Object: to the additional 75 houses in Wisborough Green. Insufficient infrastructure (lack of public transport, sewage, roads, medical facilities, schools, water). Would be on greenfield not brownfield sites. Need for homes in south not northern area

#### Summary of representation changes to plan:

Allocation of houses to be fairly distributed.

Out of a list of 27 villages, only 7 have been allocated for extra development and Wisborough green has been allocated the highest number.

#### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper (May 2024) was that Wisborough Green has the capacity to accommodate 75 dwellings. Therefore, the figure of 75 is considered an appropriate figure to help meet the overall housing numbers.

Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

#### Action:

No change in response to representation.

**3851****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** Mr Michael Rankin**Object****Summary of representations:**

Object: Approach to housing allocation through Neighbourhood Plans is ineffective and unjustified. Loxwood settlement boundary in NP does not reflect current extent of village or level of housing required.

**Summary of representation changes to plan:**

Local Plan should allocate sites.

**Response:**

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period.

The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

**Action:**

No change in response to representation.

**3915****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** Loxwood (Mellow) Ltd**Agent:** Ms Megan Smith**Object****Summary of representations:**

Site submission Land South West of Willets Way, Loxwood.

**Summary of representation changes to plan:**

Wants settlement boundary at Loxwood extended to include their site .

**Response:**

The Housing Distribution Background Paper (May 2024) sets out the justification for the site allocations and strategic parish numbers set out in Policy H2 (which includes Loxwood - so Loxwood does not have a number in H3).

Promotion of site noted.

Any settlement boundary changes will be considered through a neighbourhood plan

**Action:**

No change in response to representation.

**3923****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** Loxwood (Mellow) Ltd**Agent:** Ms Megan Smith**Object****Summary of representations:****Object:**

Too much reliance on NP allocations. Promoting site at Land South of Willetts Way, Loxwood.

**Summary of representation changes to plan:**

Local Plan should allocate sites at a District Level, and not delegate to Neighbourhood Plans.

Promoting site at Land South of Willetts Way, Loxwood.

**Response:**

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period. The Site Allocations DPD provides a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

Promotion of site noted.

**Action:**

No change in response to representation.

**3926****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** Loxwood (Mellow) Ltd**Agent:** Ms Megan Smith

## Object

### Summary of representations:

Object: Wisborough Green -extra 75-houses not small-scale. Infrastructure inadequate and new residents will be car dependant. Will spoil character of the village.

### Summary of representation changes to plan:

Neighbourhood Plan to decide what is best for small villages

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper (May 2024) was that Wisborough Green has the capacity to accommodate 75 dwellings. Therefore, the figure of 75 is considered an appropriate figure to help meet the overall housing numbers.

Where the Local Plan makes a parish requirement it will be for a Neighbourhood Plan to identify potential development sites.

### Action:

No change in response to representation.

3929

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mr John Gough

## Object

### Summary of representations:

Object: deliverability of numbers should be checked with relevant parish council

### Summary of representation changes to plan:

After 'If draft neighbourhood plans making provision for at least the minimum housing numbers of the relevant area have not made demonstrable progress the Council' add 'after checking deliverability with the parish council concerned'.

### Response:

As set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper (May 2024) the numbers for each parish are based on ensuring that there are sufficient sites, based on the HELAA, within the parish to meet the number given.

### Action:

No change in response to representation.

3937

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Fishbourne Parish Council

## Object

### Summary of representations:

Object: Wisborough Green sewage system regularly fails under current load. Will not comply with Policy NE16 Water Management and Water Quality, in particular paras a, b and d of that policy: adverse impact from additional sewage spilling into adjacent water bodies and groundwater, surface and ground water quality.  
Significant wastewater infrastructure improvement required to cope with current load.  
Additional housing development must align with the infrastructure development.

### Summary of representation changes to plan:

Remove development in Wisborough Green.

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper (May 2024) was that Wisborough Green has the capacity to accommodate 75 dwellings. Therefore, the figure of 75 is considered an appropriate figure to help meet the overall housing numbers.

In relation to wastewater infrastructure the current position is set out in the Statement of Common Ground with Southern Water.

### Action:

No change in response to representation.

3973

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mr simon urry

Support

### Summary of representations:

Support: withdrawal of the strategic housing allocation for Hunston and the rest of the Manhood Peninsula

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

3974

Support

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Hunston Parish Council



## Object

### Summary of representations:

Object: East Wittering has been allocated zero but we do have a need, at least for affordable and social housing. See the number of local people waiting on the Chichester Housing waiting list.

### Summary of representation changes to plan:

Allocate at least the estimated number of social and affordable housing on the Chichester Housing waiting list over this period to East Wittering.

### Response:

The Local Plan makes provision for a limited amount of new housing development on the Manhood Peninsula. This approach takes account of the large amount of development that has received planning permission and updated technical evidence, including the SFRA which considers flood risk. This is considered in more detail in the Housing Distribution Background Paper and Sustainability Appraisal.

The Housing Distribution Background Paper sets out the justification for the spatial strategy and distribution of housing across the plan area. It would not be appropriate for all parishes to have planned growth, although this does not prevent suitable rural exception sites coming forward for affordable housing in accordance with Policy H7.

### Action:

No change in response to representation.

## 4003

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mr Joseph O'Sullivan

## Object

### Summary of representations:

Support: RELUCTANTLY the allocation of 75 houses at Wisborough Green. But no infrastructure (doctors, dentist, sports centre, supermarket, petrol station), car reliance, school over capacity, no mobile signal, small shop, sewage and electricity supply under pressure

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

## 4013

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mrs Valerie Mourilyan

## Object

### Summary of representations:

Object: does not provide an adequate allocation of housing to Fishbourne Parish.

### Summary of representation changes to plan:

Provide a greater level of housing to Fishbourne Parish.

### Response:

The Housing Distribution Background Paper (May 2024) sets out the justification for the site allocations and strategic parish numbers set out in Policy H3.

Promotion of site noted.

### Action:

No change in response to representation.

## 4088

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Berkeley Strategic Group

## Object

### Summary of representations:

Object: randomly distributing houses to villages. For low-carbon lifestyle, dwellings need to be built near employment and public transport. Villages have neither.

### Summary of representation changes to plan:

Put all the dwellings in cities, where they are needed; or, within walking distance of a train station or an area served by a regular (i.e. every 30 minutes) bus service running throughout the day.

### Response:

The Housing Distribution Background Paper (May 2024) sets out the justification for the site allocations and strategic parish numbers set out in Policy H3.

### Action:

No change in response to representation.

## 4164

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mr david burgin

## Object

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### Summary of representations:

Object: does not provide an adequate allocation of housing to Lavant Parish.

### Summary of representation changes to plan:

Provide greater level of housing needs to Lavant parish

### Response:

The Housing Distribution Background Paper (May 2024) sets out the justification for the site allocations and strategic parish numbers set out in Policy H3.

Promotion of site noted.

### Action:

No change in response to representation.

4266

Object

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**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mr David Lock and Ms Melanie Jenkins

**Agent:** Mr Jonathan Lambert

## Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

### Object

#### Summary of representations:

- Object: Number of houses to Kirdford exceeds what is reasonable in relation to village size and status.
- Does not reflect environmental constraints/ lack of infrastructure.
- Will impact on identity of village.

#### Summary of representation changes to plan:

- Reduction in the number of houses projected for Plaistow, Ifold and Kirdford.

#### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north plan area and the final scenarios are the most appropriate for each settlement when taking into account the full range of factors needing to be considered.

#### Action:

- No change in response to representation

4292

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mr Michael Jackson

### Object

#### Summary of representations:

- Object: Plan should support limited development at villages e.g. Lavant

#### Summary of representation changes to plan:

- Clarify that a zero figure in Policy H3 does not mean all development opportunities, including windfalls, must be resisted.
- The zero figure is offered as a strategic guide to housing locations but is not an indication that all forms of housing will be inappropriate

#### Response:

- The Plan allows for small windfall sites within settlement boundary and for rural exception sites.

#### Action:

- No change in response to representation.

4312

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

### Summary of representations:

Support: allocation of 50 new homes in Kirdford.

Clear alternative delivery mechanism be set out within the Plan to deal with uncertainty over NPs.

### Summary of representation changes to plan:

Clear alternative delivery mechanism be set out within the Plan to deal with uncertainty over NPs.

### Response:

Support noted..

### Action:

No change in response to representation.

## 4352

## Support

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Welbeck Strategic Land IV LLP (Welbeck Land)

**Agent:** Miss Jess Bain

## Object

### Summary of representations:

Object: Increase provision in certain villages where the sensitivity assessment has shown the capability of accommodating growth and not set out figures based on political pressures from Parish Councils.

### Summary of representation changes to plan:

Increase Fishbourne and Nutbourne to at least 100; Increase Birdham to 50; Change Selsey, East and West Wittering from 0 to 50 each

### Response:

The Housing Distribution Background Paper (May 2024) sets out the justification for the site allocations and strategic parish numbers set out in Policy H3.

### Action:

No change in response to representation.

## 4360

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mr Stephen Jupp

## Object

### Summary of representations:

Object: The Boxgrove Neighbourhood Plan team contest the allocation of 50 dwellings as not being achievable for reasons of:

- Lack of consultation
- % of parish land in the SDNP
- Sites assessments
- Fair treatment of parishes
- Policy NE10 building in the countryside
- School capacity
- Conflict with heritage assets P9 P10 P11
- Grading of agricultural land for development NE2

### Summary of representation changes to plan:

Reduction in the housing allocation to a number that we believe is achievable on what land is available.

### Response:

The Housing Distribution Background Paper (May 2024) explains the development of the proposed distribution of housing and the split between strategic and non-strategic provision. The SA report (January 2023, Section 7, sets out the Council's reasoning for the preferred growth strategy having considered reasonable alternatives, including consideration of Boxgrove.

### Action:

No change in response to representation.

## 4517

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mr David Leah

## Object

### Summary of representations:

Object: allocation of 75 homes to Wisborough Green inconsistent with the approach to housing distribution set out in other policies.

Strong case for the reasons why development in the southern part of the district is constrained, but error in considering that the northern part of the district can accommodate additional development above that suggested during the Regulation 18 consultation.

A sustainability-based approach does not support the proposed allocation and it should revert to that proposed at Regulation 18 stage.

### Summary of representation changes to plan:

N/A

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper (May 2024) was that Wisborough Green has the capacity to accommodate 75 dwellings. Therefore, the figure of 75 is considered an appropriate figure to help meet the overall housing numbers.

### Action:

No change in response to representation

## 4554

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

to 220 new dwellings in Loxwood (loss of wildlife habitat, limited public transport, inadequate parking at Billingshurst Station, issues with water and sewerage capacity, impact on character of village, traffic increase, loss of footpaths/ rights of way)

### Summary of representation changes to plan:

Keep to existing building line to west of main road through village of Loxwood. Therefore no development on fields - HL X00 16.

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed.

### Action:

No change in response to representation.

4560

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Revd John Bundock



## Object

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**Summary of representations:**

Quota for north only based on unresolved issues with A27, development better located in south. Amount for north should factor in infrastructure, ecology, utilities, public transport, car reliance, school places, medical facilities and sewage capacity.

Will cause irreversible harm to biodiversity and character of the area.

Increase disproportionate to existing size of the villages.

**Summary of representation changes to plan:**

Reduce allocation of housing to the north need to levels allocated in 2020

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north plan area and the final scenarios are the most appropriate for each settlement when taking into account the full range of factors to be considered.

**Action:**

No change in response to representation

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**4654****Object**

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**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mrs Elizabeth Sullivan

## Object

### Summary of representations:

No evaluation of infrastructure resources in the north east to back up housing targets. Duty to Cooperate not considered impact of growth at Billingshurst and Dunsfold.

Amount of dwellings in NE will impact on character of villages.

Underlying assumptions and analysis limited and unsound.

### Summary of representation changes to plan:

NE villages to set their own levels of development through the NP process, from a target range set from the Lower growth values and the value in the March 2023 proposal. For example, Wisborough Green would have range 40 - 75 allocation, not the fixed and arbitrary 75

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

As set out in the Sustainability Appraisal and Housing Distribution Background Paper a range of scenarios were considered in the north plan area and the final scenarios are the most appropriate for each settlement when taking into account the full range of factors needing to be considered.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood. The updated Transport Assessment (2024) has reviewed the transport evidence produced for the Waverley Local Plan and concludes that the small number of additional trips from the proposed development in the north is unlikely to cause capacity issues on the A281 Guildford/Horsham Road or the A2133 Loxwood Road Junction, Alford.

### Action:

No change in response to representation

4667

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mr Andrew Jackson

## Object

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**Summary of representations:**

Would like the site previously identified for a school at Graylingwell to be allocated for housing as a school is no longer needed.

**Summary of representation changes to plan:**

Would like the site previously identified for a school at Graylingwell to be allocated for housing as a school is no longer needed.

**Response:**

The council recognises WSCC view that a school is no longer needed at Graylingwell and notes that the s106 safeguarding land for a school use , which was associated with wider permissions for the Graylingwell area, expired several years ago.

In Policy H2 Chichester City has been allocated a figure of 270 homes to be delivered through preparation of a neighbourhood plan. Delivery of additional housing on this site can be considered as part of that process or through a planning application - it does not need to be identified in Policy H3.

**Action:**

No change in response to representation.

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**4678****Object**

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**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Linden/Downland/Graylingwell LLP c/o Countryside Partnerships Southern

**Agent:** Andrew Burgess Planning Ltd

## Object

### Summary of representations:

Accept Manhood situation. Issues in Boxgrove with over capacity of A27, flooding and drainage, school capacity and lack of facilities.

Sites in 2021 HELAA not considered suitable yet are now considered to be acceptable.

### Summary of representation changes to plan:

NP should be able to determine suitable number for the Parish

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

The Housing Distribution Background Paper explains the development of the proposed distribution of housing and the split between strategic and non-strategic provision. The SA report (January 2023, Section 7, sets out the Council's reasoning for the preferred growth strategy having considered reasonable alternatives, including consideration of Boxgrove.

As set out in the SA and Housing Distribution Background Paper the numbers set for Boxgrove are the most appropriate when taking into account the full range of factors needing to be considered.

Where the Local Plan makes a parish housing requirement it will be for a Neighbourhood Plan to identify potential development sites.

### Action:

No change in response to representation

**4695****Object**

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mrs Maureen Chaffe

## Object

### Summary of representations:

25 additional homes for Plaistow and Ifold is excessive no local need for so much housing.

Existing infrastructure cannot support that number of houses: rural lanes and roads are already strained and not being maintained, the water supply cannot sustain that number of houses, this will be a threat to the quiet, rural nature of the villages, in particular Plaistow.

### Summary of representation changes to plan:

Reduce the number of additional houses in Plaistow and Ifold to 10.

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north plan area and the final scenarios are the most appropriate for each settlement when taking into account the full range of factors needing to be considered.

### Action:

No change in response to representation

4699

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mr Phillip Luff

## Object

### Summary of representations:

'small-scale' should be defined, noting that 6 dwellings is the minimum for allocation but no guidance is given about when a site stops being 'small-scale' and becomes 'strategic' and to be included under Policy H2.

West Wittering Parish is not apportioned development.

Land West of Church Road (Northern Parcel) should be allocated for strategic development. Accordingly, the West Wittering Parish should be noted with a '\*'

### Summary of representation changes to plan:

Allocate Land West of Church Road (Northern Parcel) for strategic developments - West Wittering Parish should be noted with a '\*'

### Response:

Policy H2 sets out the 'strategic locations/ allocations' which start at 180.

The Housing Distribution Background Paper (May 2024) sets out the justification for the spatial strategy and distribution of housing across the plan area. It would not be appropriate for all parishes to have planned growth, although this does not prevent suitable exception sites coming forward for affordable housing in accordance with Policy H7.

Promotion of alternative site noted

### Action:

No change in response to representation

**4722****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** Welbeck Strategic Land IV LLP**Agent:** Mrs Sarah Hufford**Object****Summary of representations:**

Boxgrove has the potential to accommodate a strategic level of housing growth, rather than the conclusion that it has limited capacity due to constraints.

**Summary of representation changes to plan:**

Strategic growth at Boxgrove should be 200 not 50 dwellings

**Response:**

The Housing Distribution Background Paper (May 2024) explains the development of the proposed distribution of housing and the split between strategic and non-strategic provision. The SA report (January 2023, Section 7, sets out the Council's reasoning for the preferred growth strategy having considered reasonable alternatives, including consideration of Boxgrove

**Action:**

No change in response to representation

**4737****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** Rydon Homes Limited**Agent:** DMH Stallard LLP

## Object

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**Summary of representations:**

limited housing provision for Wisborough Green of 75 dwellings, against the 220 dwellings proposed for Loxwood not reflective of the constraints and sustainability credentials of these settlements. Approach needs to be justified

**Summary of representation changes to plan:**

Land on Durbans Road, Wisborough Green promoted for c.50 dwellings

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north plan area and the final scenarios are the most appropriate for each settlement when taking into account the full range of factors needing to be considered.

Promotion of site noted.

**Action:**

No change in response to representation

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**4755****Object**

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**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Seaward Strategic Land Ltd and Owners of Land on Durbans Road, Wisborough Green

**Agent:** Luken Beck MDP Ltd

## Object

### Summary of representations:

Too much reliance on Neighbourhood Planning process. Opportunities for development from small scale allocations and/or windfall should be allowed

### Summary of representation changes to plan:

Allocate small-scale housing sites and/or reconsider the redrawing of development boundaries surrounding non-strategic settlements to provide greater opportunities for windfall development.

Land to the rear of Felside, Chalk Road, Ifold promoted

### Response:

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period.

The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

Promotion of site noted

### Action:

No change in response to representation

4763

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mr Robin Neville

**Agent:** Simply Planning Limited

## Object

### Summary of representations:

Boxgrove has the potential to accommodate a strategic level of housing growth, rather than the conclusion that it has limited capacity due to constraints.

### Summary of representation changes to plan:

Plan for a higher quantum of growth than the maximum of 75 under Policy H3

### Response:

The Housing Distribution Background Paper (May 2024) explains the development of the proposed distribution of housing and the split between strategic and non-strategic provision. The SA report (January 2023, Section 7, sets out the Council's reasoning for the preferred growth strategy having considered reasonable alternatives, including consideration of Boxgrove

### Action:

No change in response to representation



4807

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Rydon Homes Limited

**Agent:** DMH Stallard LLP

Object

**Summary of representations:**

to no new housing allocations in Birdham which is a Tier 3 Service Village. Has gone from 125 in Preferred Approach to 0.

**Summary of representation changes to plan:**

Further housing growth in Birdham

**Response:**

The Local Plan makes provision for a limited amount of new housing development on the Manhood Peninsula. This approach takes account of the large amount of development that has received planning permission and updated technical evidence, including the SFRA which considers flood risk. This is considered in more detail in the Housing Distribution Background Paper and Sustainability Appraisal.

**Action:**

No change in response to representation

4872

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Gladman Developments Ltd

Object

**Summary of representations:**

Lack of consultation with residents or resident input on location of housing in Bosham

**Summary of representation changes to plan:**

Consult with Bosham residents on allocation of 300 homes

**Response:**

There is considerable flexibility open to LPAs in how the initial stages of local plan production are carried out and there is no requirement to have a further Regulation 18 consultation

**Action:**

No change in response to representation

4895

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Willowfield Farm

## Object

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### Summary of representations:

Housing figure needed for Birdham to help meet affordable housing need for 69 dwellings between 2020 – 2035. Lack of local housing will lead to increased commuting. Locating housing with good public transport connections and where cycling to work is a realistic option, commuting traffic can be reduced

### Summary of representation changes to plan:

Assign a housing figure to Birdham to reflect the housing need

### Response:

The Local Plan makes provision for a limited amount of new housing development on the Manhood Peninsula. This approach takes account of the large amount of development that has received planning permission and updated technical evidence, including the SFRA which considers flood risk. This is considered in more detail in the Housing Distribution Background Paper and Sustainability Appraisal.

### Action:

No change in response to representation

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## 4912

## Object

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**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mr Graham Pick

**Agent:** Batcheller Monkhouse

## Object

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### Summary of representations:

Object: promoting an omission site to the Draft Chichester Local Plan.

### Summary of representation changes to plan:

Promoting an omission site to the Draft Chichester Local Plan – Land off Main Road Birdham.

### Response:

Promotion of site noted.

### Action:

No change in response to representation.

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## 4941

## Object

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**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Gladman Developments Ltd

## Object

### Summary of representations:

Object: Query figure for 25 dwellings at Plaistow and Ifold.

### Summary of representation changes to plan:

Clarify role and impact of existing unimplemented commitments in the housing land supply on the proposed non-strategic allocations.

### Response:

The non-strategic parish housing requirement of 25 dwellings is in addition to the 10 dwelling allocation. The allocation in the Local Plan 2021 - 2039 does not need to be increased to 35 as the 10 dwelling allocation at Little Springfield Farm is 'saved' – as set out in Appendix H 'List of saved and deleted Local Plan 2014 – 2029 and Site Allocation DPD 2014 – 2029 policies'.

### Action:

No change in response to representation.

## 5021

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Domusea

**Agent:** Smith Simmons Partners

## Object

### Summary of representations:

Object: Allocation of 35 – 70 dwellings should be directed to Sidlesham.

### Summary of representation changes to plan:

Allocate around 35-70 dwellings.  
HELAA site HSI0004, Greenwood Nursery Highleigh Road Sidlesham promoted.

### Response:

The Housing Distribution Background Paper (May 2024) sets out the justification for the site allocations and strategic parish numbers set out in Policy H3.  
Promotion of site noted.

### Action:

No change in response to representation.

## 5024

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Greenwood Group Ltd

**Agent:** Smith Simmons Partners

## Support

### Summary of representations:

Selected areas for growth and housing figures are deliverable over the Plan period.

But - plan area could accommodate a greater level of growth.

Support the approach to Boxgrove and the allocation of a minimum of 50 houses with a suitable site to be identified through the Neighbourhood Plan or Site Allocations DPD.

Site promoted

### Summary of representation changes to plan:

Site proposed in relation to Boxgrove Allocation

### Response:

Support noted.

Promotion of site noted

### Action:

No change

## 5082

## Support

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** The Brooks Family

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

Object: to 50 dwellings - over 50% of land in parish lies within SDNP; HELAA sites within countryside; lack of capacity at local school and A27; views would be compromised by development; heritage assets affected; use of agricultural land.

### Summary of representation changes to plan:

N/A

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

As set out in the SA and Housing Distribution Background Paper the numbers set for Boxgrove are the most appropriate when taking into account the full range of factors needing to be considered.

### Action:

No change in response to representation.

## 5124

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Boxgrove Parish Council

## Object

### Summary of representations:

Object: Should also allocate sites in Wisborough Green within the Scenario 2 (in SA) as stand-alone applications with an allowance that applications could come forward on these sites in the event that the Neighbourhood Plans do not progress within a set timetable (2 years is suggested as a reasonable time frame).

### Summary of representation changes to plan:

Add additional wording to state that individual planning applications can come forward on sustainable sites outside of existing settlement boundaries in parishes should delivery not come forward within the first five years of the plan period. Priority should be given to sites identified within draft versions of Neighbourhood Plans.

### Response:

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period.

The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

Promotion of site noted.

### Action:

No change in response to representation.

## 5125

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Levanter Developments Limited

## Object

### Summary of representations:

Object: Suggested amendments to policy (NE2) to help to ensure that development coming forward in this sensitive area (A259 between Emsworth and Chichester) positively addresses the South Downs National Park and its setting.

Southbourne (1,050 homes), Wisborough Green (75 homes), (Kirdford (50 homes) and Boxgrove (50 homes) - concern about figures and challenge neighbourhood planning groups may have as many potential sites likely to be in the setting of the South Downs National Park.

Attempts to meet these target figures will need to address the requirements of NPPF paragraph 176 on setting.

### Summary of representation changes to plan:

No change to this policy

### Response:

See response to comments on Policy NE2

### Action:

No change in response to representation.

**5139****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** South Downs National Park Authority**Object****Summary of representations:**

Object: does not include sites in Parishes to meet the Council's OAN where there are acceptable sites capable of accommodating housing to meet those needs;

Evidence of suitable sites has been provided in HELAA assessment; a reasonable alternative would have been to look at parishes considering allocations in Neighbourhood Development Plans (Hunston) and where planning application were well advanced (North Mundham); reasonable alternative site Charmans Field, Runcton should have been tested in SA.

**Summary of representation changes to plan:**

Add additional capacity at North Mundham and Hunston villages:

Hunston – Figure 100

North Mundham Figure 100

**Response:**

The Housing Distribution Background Paper sets out the justification for the non- strategic parish numbers set out in Policy H3.

The Local Plan makes provision for a limited amount of new housing development on the Manhood Peninsula. This approach takes account of the large amount of development that has received planning permission and updated technical evidence, including the SFRA which considers flood risk. This is considered in more detail in the Housing Distribution Background Paper and Sustainability Appraisal.

The consideration of reasonable alternatives is set out within the Sustainability Appraisal, which was submitted alongside and underpins the Local Plan

Promotion of site noted.

**Action:**

No change in response to representation.

**5361****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** Landlink Estates Ltd**Agent:** Jackson Planning Ltd

## Object

### Summary of representations:

Object: Selsey should be allocated housing.  
Overreliance on consented sites.

### Summary of representation changes to plan:

N/A

### Response:

The Housing Distribution Background Paper (May 2024) sets out the justification for the site allocations and strategic parish numbers set out in Policy H3.

The Local Plan makes provision for a limited amount of new housing development on the Manhood Peninsula. This approach takes account of the large amount of development that has received planning permission and updated technical evidence, including the SFRA which considers flood risk. This is considered in more detail in the Housing Distribution Background Paper and Sustainability Appraisal.

### Action:

No change in response to representation.

5373

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Deerhyde Limited

**Agent:** Vail Williams LLP

## Object

### Summary of representations:

Object: Need for smaller allocations within Manhood Peninsula, particularly Selsey to maintain vitality and viability and provide new homes for future residents.

### Summary of representation changes to plan:

Allocate smaller sites on Manhood and Selsey.

### Response:

The Housing Distribution Background Paper (May 2024) sets out the justification for the site allocations and strategic parish numbers set out in Policy H3.

The Local Plan makes provision for a limited amount of new housing development on the Manhood Peninsula. This approach takes account of the large amount of development that has received planning permission and updated technical evidence, including the SFRA which considers flood risk. This is considered in more detail in the Housing Distribution Background Paper and Sustainability Appraisal.

Promotion of site noted.

### Action:

No change in response to representation.

**5379****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** Deerhyde Limited**Agent:** Vail Williams LLP**Object****Summary of representations:**

Object: Need for smaller allocations within Manhood Peninsula, particularly Selsey to maintain vitality and viability and provide new homes for future residents.

Object: Wording not precise and does not provide for clear timescales for delivery of NP or Site Allocations DPD.

**Summary of representation changes to plan:**

Higher housing number in Kirdford. Site promoted.

Clear timescales for Neighbourhood Plans and Site Allocation DPD.

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north plan area and the final scenarios are the most appropriate for each settlement when taking into account the full range of factors needing to be considered.

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper.

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period.

The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

**Action:**

No change in response to representation.

**5384****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** Reside Developments Ltd**Agent:** Henry Adams LLP



## Object

### Summary of representations:

Object: Over reliant on the Neighbourhood Plan process, should make provision for the identified housing requirement without the need to rely on Neighbourhood Plans bringing forward sites.

### Summary of representation changes to plan:

Allocate land at Champions Farm for development within the Local Plan.

### Response:

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period. The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

Promotion of site noted.

### Action:

No change in response to representation.

## 5408

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Landowner at Champions Farm, Wisborough Green

**Agent:** Southern Planning Practice

## Object

### Summary of representations:

Object: Site submitted - Fourways, Fishbourne. 9 dwellings.

### Summary of representation changes to plan:

Allocate Fourways, Fishbourne for 9 dwellings.

### Response:

Promotion of site noted.

### Action:

No change in response to representation.

## 5410

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mr and Miss . Butterfield and Waldron

**Agent:** Rodway Planning Consultancy Ltd

## Object

### Summary of representations:

Object: As a result of inadequacies of Policy H1 in meeting need, Policy H3 not sound.

### Summary of representation changes to plan:

Housing figure in Policy H3 for Westbourne should be increased above the currently proposed figure of 30 dwellings.

### Response:

The Housing Distribution Background Paper sets out the justification for the non- strategic parish numbers set out in Policy H3.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper. This has also been influenced by site availability and suitability, environmental and other constraints.

### Action:

No change in response to representation.

## 5415

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Jennifer Asser

**Agent:** Genesis Town Planning Ltd

## Support

### Summary of representations:

Support: note the contents of draft Policy H3. Given that this draft Policy wouldn't impact upon the deliverability of the Police Fields site, no further comments are proffered.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

## 5515

## Support

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Support

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### Summary of representations:

Support: Public transport availability in this area (north-east), provided by the County Council through services it procures, is minimal. Might justify significant measures to secure a boost in the frequency of bus services between Guildford and Billingshurst, passing through these settlements.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

5537

Support

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**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Stagecoach South

# Object

**Summary of representations:**

Object: Wisborough Green's number should be 125 and allocation of HELAA Site at Land East of St Peter's Church for up to 80 dwellings.

Policy should support speculative applications if Neighbourhood Plan does not propose development.

**Summary of representation changes to plan:**

Increase Wisborough Green's housing requirement to 'at least' 125 additional homes.

Increase allocation of new dwellings in Wisborough Green to provide suitable housing buffer and compensate for miscalculation of future housing delivery in emerging WGNP.

Allocate Land East of St Peter's Church (HWG0011) for up to 80 dwellings to ensure that sufficient housing is delivered within earlier part of Plan period.

Remove any ambiguity concerning meaning of 'demonstrable progress' and allocate development sites in Local Plan to ensure their timely delivery.

Include support of speculative applications if a Neighbourhood Plan is not proposing suitable quantities of development.

**Response:**

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper (May 2024) was that Wisborough Green has the capacity to accommodate 75 dwellings. Therefore, the figure of 75 is considered an appropriate figure to help meet the overall housing numbers.

Promotion of alternative site noted.

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period. The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

**Action:**

No change in response to representation.

**5555****Object**

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Millwood Designer Homes

**Agent:** Savills

## Object

### Summary of representations:

Object: Lack of consultation on revised housing numbers in north of district.

A281 is also constraint (more than A27).

220 houses (plus 91 already allocated) to Loxwood is not sustainable.

### Summary of representation changes to plan:

Remove Policy A15.

Amend Policies H2 and H3 to allocation of 125 houses.

### Response:

There is considerable flexibility open to LPAs in how the initial stages of local plan production are carried out and there is no requirement to have a further Regulation 18 consultation.

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood and that the traffic impacts were acceptable. The updated Transport Assessment (2024) has reviewed the transport evidence produced for the Waverley Local Plan and concludes that the small number of additional trips from the proposed development in the north is unlikely to cause capacity issues on the A281 Guildford/Horsham Road or the A2133 Loxwood Road Junction, Alford.

### Action:

No change in response to representation.

5562

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Tim Swann

## Object

### Summary of representations:

Object: Should be some growth within all Parishes, even at a low level.

### Summary of representation changes to plan:

N/A

### Response:

The Housing Distribution Background Paper (May 2024) sets out the justification for the spatial strategy and distribution of housing across the plan area. It would not be appropriate for all parishes to have planned growth, although this does not prevent suitable rural exception sites coming forward for affordable housing in accordance with Policy H7.

### Action:

No change in response to representation.

## 5615

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Thakeham Homes

## Support

### Summary of representations:

Support: approach to 30 additional houses in Westbourne either through a Neighbourhood Plan or subsequent Development Plan Document.

Support the proposed housing numbers of 30, with these being increased should supporting evidence be provided.

Potential for additional housing on their land, allocated within the Neighbourhood Plan.

Any potential shortfall of housing in the Parish could be meet by development on their land.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

## 5638

## Support

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Landowners at Chantry Farm

**Agent:** Henry Adams LLP

## Support

### Summary of representations:

Support: proposed housing numbers in Policy H3 for Wisborough Green and that the proposed figure of 75 should be seen as a minimum figure

### Summary of representation changes to plan:

Promoting Land to the West of Wisborough Green

### Response:

Support noted.  
Promotion of site noted.

### Action:

No change in response to representation.

## 5641

## Support

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** The Stickland Family

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

Object: does not allocate any additional housing to Tangmere Parish other than the Strategic Development Location.  
Land to the East of Tangmere can provide additional housing in Tangmere

### Summary of representation changes to plan:

Allocate site promoted - Land to the East of Tangmere

### Response:

The Housing Distribution Background Paper sets out the justification for the non- strategic parish numbers set out in Policy H3.  
The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper. This has also been influenced by site availability and suitability, environmental and other constraints.  
Promotion of site noted.

### Action:

No change in response to representation.

## 5691

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** The Birkett Family

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

Object: Selected areas for growth and figures are deliverable, but plan area could accommodate a greater level of growth.

Relies on the delivery of Neighbourhood Plan / Small Site Allocations DPD.

Wording of H3 is not precise and does [not] provide any clear timetable for delivery within the Plan period

### Summary of representation changes to plan:

Clear timescales for Neighbourhood Plans and Site Allocation DPD.

### Response:

The Housing Distribution Background Paper (May 2024) sets out the justification for the site allocations and strategic parish numbers set out in Policy H3.

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period.

The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

### Action:

No change in response to representation.

5729

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Dandara Southern Limited

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

Object: Settlement hierarchy out of date, scores Westbourne higher than Loxwood and does not take account of cycling distance from Westbourne to Southbourne and Emsworth stations. Westbourne should have more than 30 dwellings.

### Summary of representation changes to plan:

N/A

### Response:

Both Westbourne and Loxwood are classified as service villages in the settlement hierarchy. The latest evidence is set out in the updated Settlement Hierarchy Background Paper (May 2024). Accessibility to a railway station by cycle is not a specific criteria used to determine service village status.

### Action:

No change in response to representation.



**5740****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** Metis Homes**Agent:** Nova Planning**Object****Summary of representations:**

Object: Increased dwelling requirement can be accommodated without significantly altering spatial strategy. Accommodate additional development at less constrained Service Villages in northern parts of Manhood Peninsula. Hunston is relatively unconstrained - good accessibility to road network. Additional development at Hunston would be consistent with Policy T1. Hunston a sustainable location for new development capable of delivering at least 200 homes during Plan period. Site promoted at Land at Hunston Village Dairy

**Summary of representation changes to plan:**

Set a housing figure of at least 200 homes for Hunston in Policy H3 which could be delivered as part of Neighbourhood Plan process.

**Response:**

The Local Plan makes provision for a limited amount of new housing development on the Manhood Peninsula. This approach takes account of the large amount of development that has received planning permission and updated technical evidence, including the SFRA which considers flood risk. This is considered in more detail in the Housing Distribution Background Paper and Sustainability Appraisal.

Promotion of site noted.

**Action:**

No change in response to representation.

**5778****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** Beechcroft Developments Limited**Agent:** Genesis Town Planning Ltd

## Object

### Summary of representations:

Object: Define small-scale housing; clarify that making 'provision' is not the same as making 'allocations' ie; some housing can be expected from windfall sites; paragraph 5.10 not reflected in policy.

### Summary of representation changes to plan:

Define small-scale housing; clarify that making 'provision' is not the same as making 'allocations' ie; some housing can be expected from windfall sites; paragraph 5.10 not reflected in policy.

### Response:

Not defining small scale as it provides flexibility for parishes to meet the requirement in the best way according to their local evidence and circumstances.

Any size sites can be allocated but these would still be in addition to any windfall sites (that are under 5 dwellings) that may come forward (to avoid double counting).

### Action:

No change in response to representation.

5839

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Object

### Summary of representations:

Object: As a result of inadequacies of Policy H1 in meeting need, Policy H3 not sound.

### Summary of representation changes to plan:

Housing figure in Policy H3 for Westbourne should be increased above the currently proposed figure of 30 dwellings.

Allocate land at The Shires, Long Copse Lane, Westbourne for up to 7 dwellings.

### Response:

The Housing Distribution Background Paper sets out the justification for the non- strategic parish numbers set out in Policy H3.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper. This has also been influenced by site availability and suitability, environmental and other constraints.

Promotion of site noted.

### Action:

No change in response to representation.

5871

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Southcott Homes Limited

**Agent:** Genesis Town Planning Ltd

## Object

### Summary of representations:

Object: to increase in housing number for Wisborough Green - village character would be ruined; threats to wildlife/natural environment; lack of infrastructure; lack of affordable housing; congestion; use of greenfield rather than brownfield sites; second home owners should be penalised.

### Summary of representation changes to plan:

Reduce housing for Wisborough Green

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper (May 2024) was that Wisborough Green has the capacity to accommodate 75 dwellings. Therefore, the figure of 75 is considered an appropriate figure to help meet the overall housing numbers.

Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

### Action:

No change in response to representation.

5882

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Annette Olney

## Object

### Summary of representations:

Object: number of dwellings identified for Fishbourne should be amended.  
Site at Clay Lane promoted.

### Summary of representation changes to plan:

Number of dwellings allocated to Fishbourne under Policy H3 should be amended from 30 dwellings to 250 as identified in draft Policy AL9 of the Regulation 18 Local Plan.

### Response:

The Housing Distribution Background Paper (May 2024) sets out the justification for the non- strategic parish numbers set out in Policy H3.

Promotion of site noted

### Action:

No change in response to representation

**5957****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** The Bramley Family**Agent:** PowerHaus Consultancy**Object****Summary of representations:**

Object: Highly dependent on the delivery of housing from Neighbourhood Plan areas.

**Summary of representation changes to plan:**

Add additional wording to state that individual planning applications can come forward on sustainable sites outside of existing settlement boundaries in parishes should delivery not come forward within the first five years of the plan period. Priority should be given to sites identified within draft versions of Neighbourhood Plans.

**Response:**

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period.

The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

**Action:**

No change in response to representation.

**5969****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** Obsidian Strategic**Agent:** Andrew Black Consulting

## Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

### Object

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#### Summary of representations:

Object: Highly dependent on the delivery of housing from Neighbourhood Plan areas.

#### Summary of representation changes to plan:

Add additional wording to state that individual planning applications can come forward on sustainable sites outside of existing settlement boundaries in parishes should delivery not come forward within the first 2 years of the plan period. Priority should be given to sites identified within draft versions of Neighbourhood Plans, inclusive of the proposed Tanglewood Nursery site at Wisborough Green.

#### Response:

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period.

The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

#### Action:

No change in response to representation.

5975

Object

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**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Tanglewood Residences Limited

**Agent:** Andrew Black Consulting

## Object

### Summary of representations:

Object: evidence demonstrates additional housing could be delivered in the North of the Plan Area, particularly in the parish of Plaistow and Ifold at Crouchlands Farm.

Overly reliant on the delivery of additional homes in the North of the Plan Area on sites allocated in neighbourhood plans - no evidence to demonstrate that any sites are likely to be allocated, nor even that neighbourhood plans will be prepared by each of the parishes in the plan period

### Summary of representation changes to plan:

Crouchlands Farm should be allocated for housing

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north plan area and the final scenarios are the most appropriate for each settlement when taking into account the full range of factors needing to be considered.

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper.

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period.

The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

Promotion of alternative site noted.

### Action:

No change in response to representation.

5977

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Artemis Land and Agriculture Limited

**Agent:** DLBP

## Support

### Summary of representations:

Support: allocation for new development of 30 dwellings in Westbourne - in general terms this seems like a reasonable level of new growth that can be accommodated.

Quantity of 30 as a maximum target due to constraints.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

## 5981

## Support

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Westbourne Parish Council

## Object

### Summary of representations:

RECEIVED LATE

Object: to Kirdford figure.

Should be less permissions granted in small villages. 70 houses proposed on Townfield Meadows inappropriate and inconsistent with Neighbourhood Plan. Village would grow disproportionately.

### Summary of representation changes to plan:

N/A

### Response:

The Housing Distribution Background Paper sets out the justification for the non- strategic parish numbers set out in Policy H3.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper. This has also been influenced by site availability and suitability, environmental and other constraints.

As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north plan area and the final scenarios are the most appropriate for each settlement when taking into account the full range of factors needing to be considered.

### Action:

No change in response to representation.

## 5985

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Peter Thompson

## Object

### Summary of representations:

RECEIVED LATE

Object: to Loxwood, Kirdford and Plaistow figures. Impact on character of local area, insufficient public transport, surgery under pressure at Loxwood.

Environmental impacts significant. Has infrastructure been considered. Will reduce quality of life.

### Summary of representation changes to plan:

N/A

### Response:

The Housing Distribution Background Paper sets out the justification for the non- strategic parish numbers set out in Policy H3.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper. This has also been influenced by site availability and suitability, environmental and other constraints. As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north plan area and the final scenarios are the most appropriate for each settlement when taking into account the full range of factors needing to be considered.

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal (2023) and the Housing Distribution Background Paper (May 2024) was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

### Action:

No change in response to representation.

5995

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Dr and Mrs P Longthorne



## Object

### Summary of representations:

RECEIVED LATE

Object: [comments understood to relate to A15 Loxwood and other proposed development in the North of the Plan area] on grounds of: - ecological impact; - traffic / limited transport links - limited existing supporting infrastructure - water supply and neutrality issue

### Summary of representation changes to plan:

N/A

### Response:

The Housing Distribution Background Paper sets out the justification for the non- strategic parish numbers set out in Policy H3.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper. This has also been influenced by site availability and suitability, environmental and other constraints. The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.. This has also been influenced by site availability and suitability, environmental and other constraints.

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north plan area and the final scenarios are the most appropriate for each settlement when taking into account the full range of factors needing to be considered.

### Action:

No change in response to representation.

5997

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Aaron Beadle

## Object

### Summary of representations:

The conclusion in paragraph 5.6.5 and 11.2.3 of the Transport Study appears to be that 700 dpa could be accommodated (in the southern plan area) by the mitigation proposed for the 535 dpa, with some additional (as yet undesigned and not costed), mitigation works beyond those highlighted for the Bognor and Fishbourne roundabouts.

It is therefore our view that the figure of 535 should be seen as an absolute minimum and other land should be considered to be allocated.

### Summary of representation changes to plan:

Allocate additional land. Site submission - Land to the West of Stoney Meadow, North Mundham. 225 dwellings.

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance.

The proposed modifications to Policy T1 Transport Infrastructure set out the council's approach to securing transport mitigation to support the planned growth.

Promotion of site noted

### Action:

No change in response to representation.

## 6048

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mr & Mrs Bell

**Agent:** Henry Adams LLP

## Support

### Summary of representations:

Support in principle

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

## 6054

## Support

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mr Andrew Barton

## Object

### Summary of representations:

It is therefore our view that the [housing] figure of 535 should be seen as an absolute minimum and other land should be considered to be allocated.

### Summary of representation changes to plan:

[Consideration of omission site - 15 acres farmland to the west of Birdham]

### Response:

The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers (May 2024). The latest Duty to Cooperate evidence is set out in the updated Statement of Compliance. Promotion of site noted.

### Action:

No change in response to representation.

## 6064

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** The Pick Family

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

The Plan sets out that this new housing will be delivered through the Neighbourhood Plan process however at the current time there is uncertainty as to if or when the Kirdford Neighbourhood Plan will be formally reviewed.

### Summary of representation changes to plan:

On this basis, we consider it important that a clear alternative delivery mechanism be set out within the Plan to ensure certainty to allow for the Plan to be considered effective.

### Response:

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period. The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

### Action:

No change in response to representation.

## 6077

## Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Welbeck Strategic Land IV LLP (Welbeck Land)

**Agent:** Miss Jess Bain

## Object

### Summary of representations:

Concern is that the Plan relies on the delivery of Neighbourhood Plan and/or Small Site Allocations DPD. In terms of delivery, Policy H3: Non-Strategic Housing Policy Requirements 2021-2039, states the following:

If draft neighbourhood plans making provision for at least the minimum housing numbers of the relevant area have not made demonstrable progress the council will allocate sites for development within a development plan document in order to meet the requirements of this Local Plan.

The above does not provide any clear timetable for commencement of a DPD and thus is not considered to be an effective approach to housing delivery.

### Summary of representation changes to plan:

Consideration of omission site - Land at Chichester Grain Stores, Hambrook, Southbourne

### Response:

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period. The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

Promotion of alternative site noted.

### Action:

No change in response to representation.

**6079****Object**

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Chichester Grain Ltd

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

Consideration of CCE's landholding at Southbourne, Oving, and Hunston Parishes.

### Summary of representation changes to plan:

Consideration of CCE's landholdings at Southbourne, Oving and Hunston parishes.

### Response:

Promotion of sites noted.

### Action:

No change in response to representation.

**6093****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** Church Commissioners for England**Agent:** Lichfields**Support****Summary of representations:**

■ Support in principle

**Summary of representation changes to plan:**

■ N/A

**Response:**

■ Support noted.

**Action:**

■ No change in response to representation.

**6105****Support****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** Fishbourne Parish Council**Object****Summary of representations:**

■ Site promoted. Land West of Clay Lane, Fishbourne.

**Summary of representation changes to plan:**

■ N/A

**Response:**

■ Promotion of site noted.

**Action:**

■ No change in response to representation.

**6114****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** Gleeson Strategic Land

## Object

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**Summary of representations:**

Site submission, Headfoldswood Farm, Loxwood. 325 dwellings.

**Summary of representation changes to plan:**

N/A

**Response:**

Promotion of site noted.

**Action:**

No change in response to representation.

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6134

Object

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**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Crownhall Estates Limited & Martin Grant Homes

**Agent:** Henry Adams LLP

## Object

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**Summary of representations:**

Site submission. Land at Flat Farm, Hambrook. 40 dwellings.

**Summary of representation changes to plan:**

N/A

**Response:**

Promotion of site noted.

**Action:**

No change in response to representation.

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6135

Object

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**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Dandara Southern Limited

**Agent:** Henry Adams LLP

## Object

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**Summary of representations:**

The plan relies on the delivery of Neighbourhood Plans and/or Small Sites Allocations DPD.

This is not precise and does not provide any clear timetable for delivery within the Plan period.

**Summary of representation changes to plan:**

The Local Plan needs to give a clear timescale for completion of the DPD.

Consideration of proposed site (Land at New Bridge Farm, Clay Lane, Chichester) within the Local Plan or at least through an allocation of numbers to the Parish, who in turn would select sites through a neighbourhood Plan allocation.

**Response:**

The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period.

The council would use a further DPD as a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

Promotion of alternative site noted.

**Action:**

No change in response to representation.

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**6137****Object**

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**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Landacre (Chichester) Limited

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

[RECEIVED LATE]

Objection to further development within Loxwood on grounds of lack of supporting infrastructure, including shops and services, sustainable transport, and sewage facilities.

### Summary of representation changes to plan:

N/A

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed. Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

### Action:

No change in response to representation.

6138

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Pauline Hammett



## Object

### Summary of representations:

[RECEIVED LATE]

Objection to further development within Loxwood on grounds of lack of supporting infrastructure, including shops and services, sustainable transport, and sewage facilities.

### Summary of representation changes to plan:

N/A

### Response:

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

The outcome of this work, as set out in the Sustainability Appraisal and the Housing Distribution Background Paper was that Loxwood has the capacity to accommodate 220 dwellings. Therefore, the figure of 220 is considered an appropriate figure to help meet the overall housing numbers.

The council's approach to the classification of settlements in the hierarchy is based on the availability of community facilities, key public services, retail and leisure opportunities as set out in the Settlement Hierarchy Background Paper (2018). The council's Settlement Hierarchy Update Background Paper (May 2024) concludes that Loxwood has the range of services and facilities to be classified as a service village.

Both NHS Sussex and the education authority, WSCC, have advised the Council that there are no infrastructure constraints to the scale of development proposed.

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

### Action:

No change in response to representation.

6139

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Peter Tait

## Object

### Summary of representations:

Nuances of proposed 'small scale' development within the North of the Plan Area are to be appreciated:

All housing numbers advocated are large-scale for the current size of the settlements in this area and will increase their population sizes, without providing any services / facilities to manage this increase. The Plan cannot alter constraints such as the proximity of the SDNP; rare ecology; and other infrastructure including higher education / transport links - many of which are oversubscribed or situated outside of the District.

Whilst proposed numbers are small when compared to the rest of the District, any housing number above that which the current local area can reasonably accommodate is unsustainable development.

### Summary of representation changes to plan:

N/A

### Response:

The Housing Distribution Background Paper sets out the justification for the non- strategic parish numbers set out in Policy H3.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper. This has also been influenced by site availability and suitability, environmental and other constraints. Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

### Action:

No change in response to representation.

6148

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Plaistow and Ifold Parish Council

## Object

### Summary of representations:

Concerned that delivery through Neighbourhood Plans and/or subsequent DPD does not provide certainty or ensure timeliness.

Considers Southbourne (as well as other parishes with zero housing figure due to strategic site allocations) should also have a parish figure.

### Summary of representation changes to plan:

Allocation of proposed housing site (Willowbrook Riding Stables, Hambrook) within Plan to ensure timely delivery.

### Response:

The Housing Distribution Background Paper (May 2024) sets out the justification for the non- strategic parish numbers set out in Policy H3.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper. This has also been influenced by site availability and suitability, environmental and other constraints. The justification and evidence to support the latest housing trajectory is set out in the Housing Supply Background Paper (May 2024).

There is a track record of allocations successfully being made through Neighbourhood Plans and there is no evidence to suggest that this will not continue over the plan period. The Site Allocations DPD provides a mechanism for ensuring that site allocations can be made should Neighbourhood Plans not progress within a reasonable timeframe following adoption of the Local Plan.

### Action:

No change in response to representation.

6161

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Reside Developments Ltd

**Agent:** Tetra Tech

## Object

### Summary of representations:

Policy H2 identifies strategic scale and policy H3, non-strategic allocations. We have explained above that the Settlement Hierarchy Background Paper was prepared for the 2018 Preferred Options Regulation 18 Local Plan but has not been updated to provide any justification for the revised housing distribution and quantum of development for the named locations and settlements in the Regulation 19 Local Plan.

### Summary of representation changes to plan:

N/A

### Response:

The Settlement Hierarchy Background Paper (May 2024) has been updated.

### Action:

No change in response to representation.

6182

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Hanbury Properties

**Agent:** Smith Simmons Partners

Object

**Summary of representations:**

WGPC supports this statement with qualification.

In a rural village with limited land availability, developments of fewer than 6 dwellings should count towards allocated housing totals; developments of this size are more easily integrated into a village.

It is essential to delegate to the NP process the ability to make minor amendments to the H3 policy numbers.

**Summary of representation changes to plan:**

N/A

**Response:**

The Parish housing requirement is informed by potential availability of HELAA sites over 5 dwellings (the reference to 6 dwellings was an error which has been corrected).

Para 5.10 allows some flexibility for minor amendments to housing numbers.

**Action:**

No change in response to representation.

6219

Object

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Wisborough Green Parish Council

## Support

### Summary of representations:

Support in principle, but concerns re lack of infrastructure. See representation 4013.

### Summary of representation changes to plan:

N/A

### Response:

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be practical to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

### Action:

No change in response to representation.

6300

Support

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039

**Respondent:** Mrs Valerie Mourilyan

## Object

### Summary of representations:

RECEIVED LATE: Wisborough Green 75 additional houses is unacceptable – see CDC Capacity Study sub sections 166+167. There are limitations: ancient woodland; wildlife – rare habitats and species, river floodplain; and water neutrality. See HRA with reference to Mens Ancient Woodland and presence of European Protected Species, Barbastelle Bats flight paths and foraging across the parish. Also, see Natural England report Site Improvement Report and reports by Frank Greenway, 2008 et al.

### Summary of representation changes to plan:

N/A

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper.

Since the publication of the Preferred Approach Local Plan, work has had to be undertaken to look at the capacity of the north east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure).

As set out in the SA and Housing Distribution Background Paper a range of scenarios were considered in the north plan area and the final scenarios are the most appropriate for each settlement when taking into account the factors above.

### Action:

No change to plan.

**6500****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039**Respondent:** CPRE Sussex**Agent:** CPRE Sussex**Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039, 5.9****Object****Summary of representations:**

Object: A11 has large number of local objections, is outside settlement boundary and is countryside which should be protected.

**Summary of representation changes to plan:**

Remove Policy A11 and other sites outside settlement boundaries.

**Response:**

See response to Policy A11 (rep 3928)

**Action:**

No change in response to representation.

**3853****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039, 5.9**Respondent:** The Bosham Association**Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039, 5.10****Object****Summary of representations:**

Object: Housing developments of any size should be counted against parish allocations. There is no justification for not doing so.

**Summary of representation changes to plan:**

Include all size of developments against the housing allocation number.

**Response:**

Any size sites can be allocated but these would still be in addition to any windfall sites (that are under 5 dwellings) that may come forward (to avoid double counting).

**Action:**

No change in response to representation.

**4184****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039, 5.10**Respondent:** Chidham and Hambrook Parish Council

## Support

### Summary of representations:

Support: with qualification. In a rural village with limited land availability, developments of fewer than 6 dwellings should count towards allocated housing totals; developments of this size are more easily integrated into a village.

### Summary of representation changes to plan:

Delegate to the NP process the ability to make minor amendments to the H3 policy numbers.

### Response:

Support noted. Para 5.10 allows some flexibility for minor amendments to housing numbers.

Any size sites can be allocated but these would still be in addition to any windfall sites (that are under 5 dwellings) that may come forward (to avoid double counting).

### Action:

No change in response to representation.

## 4526

## Support

**Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039, 5.10

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

Object: Text should clarify process/mechanism for "some flexibility for minor amendments to housing numbers for individual parishes"; Disagree with text that proposes development of less than 6 dwellings not counting against 'parish housing requirement' due to these already being taken into account as windfall allowance from small sites - see attachment for reasoning; Paragraph contravenes NPPF Paragraph 70 which states that neighbourhood planning groups should consider opportunities for small and medium sites rather than reject them as CDC is suggesting;

### Summary of representation changes to plan:

Text should clarify process/mechanism for "some flexibility for minor amendments to housing numbers for individual parishes"

Policy should clarify what is meant by 'draft neighbourhood plan'; define 'demonstrable progress'

### Response:

Wording in 5.10 refers to 'some flexibility' subject to the detailed investigation and assessment of potential sites.

Therefore any minor amendments to the numbers would need to be justified as a result of that process.

The term 'demonstrable progress' has been used to make sure that at this stage parishes progressing neighbourhood plans are not up against a hard identified deadline of reaching a certain stage by a fixed time, as each parish will be working to different timescales.

### Action:

No change in response to representation.

**5840****Object****Document Element:** Policy H3 Non-Strategic Parish Housing Requirements 2021 - 2039, 5.10**Respondent:** Kirdford Parish Council**Agent:** Troy Planning + Design**Longer Term Growth Requirements, 5.11****Object****Summary of representations:**

Object: The recognition of longer-term growth requirements welcomed although it should be stated that there exist significant material constraints that are unlikely to be removed through subsequent plans, but are not identified. These constraints should be identified now to provide confidence for investment going forward, and to local communities.

A review of the plan could be in as little as 5 years. For example, areas designated for open green or blue space and well used, key view lines, or areas preventing coalescence, should have a degree of permanency attached, to offer a presumption against their early release in subsequent plans.

**Summary of representation changes to plan:**

Long term environmental, economic and social constraints to development, should be identified and protected through policies that can be rolled-forward through subsequent reviews of the local plan.

**Response:**

The bullet points in para 5.14 set out the potential considerations that will influence longer term growth options, which includes consideration of constraints.

**Action:**

No change in response to representation.

**4298****Object****Document Element:** Longer Term Growth Requirements, 5.11**Respondent:** The Goodwood Estates Company Limited**Agent:** HMPC Ltd



## Object

### Summary of representations:

Object: bearing in mind the national policy guidance for a 30 year or so vision to allow for the planning and site identification for a new settlement, we see no reason why that part of the lower-case text at paragraph 5.14 of the Regulation 19 Plan should not be elevated into actual Plan policy. Such an approach would deliver benefits to the plan anyway in offering a 'land supply reserve' in the event the Examiner for the Local Plan finds that it should meet OAN in accordance with the 'positively prepared' test. If a new settlement is needed to contribute to OAN, it would then form part of the development strategy of the Plan and justify the policy in principle. We therefore propose a new Policy H4 – A New Settlement as set out in section 6 below.

### Summary of representation changes to plan:

New Policy H4 – A New Settlement as set out:

'In order to progress the identification of a site for a new settlement to contribute to housing need, the following considerations will guide potential discussions with the LPA. The selected site will be included in the Site Allocations DPD or a site-specific Development Brief. • The site will be of sufficient scale to support potential long-term development needs arising and comprehensively planned in consultation with existing communities and key stakeholders; • Deliver a sustainable, inclusive, and cohesive community promoting self-sufficiency and with high levels of sustainable transport connectivity; • Allow for the inclusion of on-site measures to avoid and mitigate any significant adverse impacts on any protected habitats; • Provide a mix of uses to meet longer term development needs and contribute towards its distinctive identity; and • The layout and form of development avoids coalescence with existing settlements and does not undermine their separate identity; • Avoids harm to the designated Area of Outstanding Natural Beauty, respects the historic and landscape character, and conserves and where possible enhances the character, significance and setting of heritage assets.

### Response:

The text in paras 5.11 – 5.14 is to provide an indication of the considerations for future growth, rather than provide a policy framework for the allocation of a specific site or sites, as the plan provides a sufficient supply of housing to meet the constrained housing requirement over the plan period.

### Action:

No change in response to representation.

5035

Object

**Document Element:** Longer Term Growth Requirements, 5.11

**Respondent:** Northgate Properties Ltd

**Agent:** Smith Simmons Partners

## Longer Term Growth Requirements, 5.12

Support

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**Summary of representations:**

Support: I agree with this paragraph.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No change in response to representation.

5187

Support

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**Document Element:** Longer Term Growth Requirements, 5.12

**Respondent:** John Newman

Support

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**Summary of representations:**

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Supporting collaborative working.] Support: welcome the opportunity to work with you to monitor future population, household growth, commuting patterns and any excessive in-commuting as part of the update of this Local Plan within the next five years.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No change in response to representation.

5289

Support

---

**Document Element:** Longer Term Growth Requirements, 5.12

**Respondent:** National Highways

## Background, 5.15

Support

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### Summary of representations:

Very pleased to see this paragraph included and hope that it really will mean appropriate action

### Summary of representation changes to plan:

N/A

### Response:

Comment noted

### Action:

N/A

5188

Support

---

Document Element: Background, 5.15

Respondent: John Newman

## Background, 5.16

Support

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### Summary of representations:

WGPC supports this statement

### Summary of representation changes to plan:

N/A

### Response:

Comment noted

### Action:

N/A

4529

Support

---

Document Element: Background, 5.16

Respondent: Wisborough Green Parish Council

## Background, 5.17

## Object

### Summary of representations:

This cannot be achieved through the mix of housing as set out in H4. Less than half of this identified need will be met. The Council should be aspiring to meet this need to enable people to afford homes. The vision as described will not be reached unless it is

### Summary of representation changes to plan:

Change the tenure mix so the identified need is met

### Response:

The Council is seeking to maximise the delivery of affordable forms of rented housing, however, significant viability constraints limit what can be achieved in practice. Moreover, national policy also requires the provision of other forms of affordable housing such as First Homes. Furthermore, focusing solely on social and affordable rented accommodated would have significant viability implications and could actually reduce the total amount of affordable housing delivered

### Action:

No change proposed in response to this representation

**4183****Object**

Document Element: Background, 5.17

Respondent: Chidham and Hambrook Parish Council

## Background, 5.18

## Support

### Summary of representations:

Fully agrees

### Summary of representation changes to plan:

N/A

### Response:

Comment noted

### Action:

N/A

**5189****Support**

Document Element: Background, 5.18

Respondent: John Newman

## Policy H4 Affordable Housing

## Object

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### Summary of representations:

Inadequate. By the Council's own metric the Council are missing the target of need of 200 homes pa. identified in the HEDNA. The affordable/ social rented element would result in only 93 homes pa.

This would have been an opportunity for CDC to transform housing for low income families/ single people by taking out loans to build up and replace social housing stock which would more than pay for itself. Housing for low income families should not be left to the vagaries of the market

### Summary of representation changes to plan:

A commitment to ensure that the 200 homes pa are built.

That the Council will seek to investigate building housing stock of their own within the Government guidelines.

### Response:

The Council would certainly like to see a higher level of affordable housing delivery, however, this is significantly constrained by infrastructure related issues and viability considerations, as set out in the viability appraisal which forms part of the evidence base.

The approach advocated in terms of the council delivering affordable housing is noted, and it is acknowledged that this has been undertaken by some local authorities. However, this is an extremely risky approach in financial terms, leading to the effective insolvency of some Councils. Consequently, as things currently stand it is considered that the approach advocated would be imprudent

### Action:

No change proposed in response to this representation

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**3992****Object**

**Document Element:** Policy H4 Affordable Housing

**Respondent:** Mrs Jane Towers

## Object

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### Summary of representations:

Questions why there is a more generous % of affordable homes specified in the North of the District than the South. States that there is clearly an inadequate number of social and affordable rented properties, that will not meet the need of 200pa as identified in the HEDNA 2022. Of the annual figure of 535, 160 homes will be affordable. Of that 91 will be for social and affordable rent. This is less than half the number required. This policy will only serve to increase the gap between market and affordable housing, meaning fewer can afford a home

### Summary of representation changes to plan:

The tenure mix should be changed to allow for 200 affordable and social rented homes pa.

### Response:

The HEDNA clearly states that the highest house prices are in the north of the plan area (para 2.2 and 2.23). When this is combined with the lower financial contributions with respect to infrastructure, it means that there is a more favourable viability position, meaning that a higher affordable housing threshold can be achieved in that area. The Council is certainly seeking to maximise the delivery of social and affordable rented accommodation. However, this is hampered by the significant constraints which are faced in terms of viability and delivery. Consequently, while this is clearly a very difficult situation, and the Council would obviously prefer to increase the level of social and afforded rented accommodation, this is not considered to be achievable in reality

### Action:

No change proposed in response to this representation

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**4182****Object**

**Document Element:** Policy H4 Affordable Housing

**Respondent:** Chidham and Hambrook Parish Council

## Object

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**Summary of representations:**

The local plan should lead the provision of affordable housing through specific policy requirements that reflect local need and ensure delivery on suitably located sites. Consequently, the plan should introduce additional local policies to clearly identify the need for affordable housing on most sites, to limit the ability of developers to challenge affordable housing provision through generic viability statements, or allow a default position of contributions towards developments elsewhere

**Summary of representation changes to plan:**

The plan's primacy should identify sites (or parts of sites) best located to meet identifiable need for affordable housing and require a demonstration of delivery

**Response:**

The level of specificity envisaged by this response is considered to be out of step with the conventions of such policies. Policy H4 is considered to be appropriate in terms of following the traditional approach of setting out general affordable housing requirements, and is informed by local evidence, particularly that set out in the HEDNA 2022 and the viability appraisal. The policy also seeks to prevent the reduction in those requirements unless it is absolutely necessary, but does allow for some flexibility where it can be demonstrated on a case-by-case basis that the requirements cannot be met. The policy is considered to be consistent with national policy and the conventions for how such policies are drafted

**Action:**

No change proposed in response to this representation

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**4224****Object**

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**Document Element:** Policy H4 Affordable Housing

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

### Summary of representations:

The policy indicates commuted sums will be acceptable only in exceptional circumstances, and is supported. However, it would be helpful if the plan offers guidance on the circumstances where a site might be considered unsuitable for affordable housing. This is not a decision which should be left to the developer. Where commuted sums are obtained it will be helpful to the community to understand where those sums will be spent and in what timescale, to avoid the potential for all sites suitable for affordable housing in the areas where they are needed, being used in preference for open market housing

### Summary of representation changes to plan:

The plan should offer guidance on those circumstances which might dictate a site being considered unsuitable for affordable housing provision.

Where commuted sums are obtained it will be helpful to the community to understand where those sums will be spent and in what timescale

### Response:

While such an amendment could provide greater clarity, it is not considered necessary to render the plan sound; the plan should provide a framework for decision making, rather than a precise set of prescriptions akin to legislation. In addition, it could actually increase the likelihood of such exceptions being utilised if they were clearly spelled out, which would be counterproductive. In addition, it is not possible to provide greater clarity at this stage in terms of when and where those contributions will be spent, as this depends on the size and timing of contributions. The council also does not have a housebuilding arm like some councils, and so does not have a pipeline of sites already identified which it is looking to develop for affordable housing schemes

### Action:

No change proposed in response to this representation

4299

Object

**Document Element:** Policy H4 Affordable Housing

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

### Summary of representations:

Wisborough Green Parish Council supports the provision of affordable housing for the North of the Plan area

### Summary of representation changes to plan:

N/A

### Response:

Comment noted

### Action:

N/A



4532

Support

**Document Element:** Policy H4 Affordable Housing**Respondent:** Wisborough Green Parish Council

Support

**Summary of representations:**

Gladman support the current approach of draft Policy H4 and welcome the flexibility within the policy which allows for reduced rates of affordable housing where viability concerns exist.

Gladman support the provision of affordable housing on site but consider that all affordable housing requirements are tested thoroughly to ensure that they are viable and deliverable alongside the other policy requirements.

The Local Plan should consider that the NPPF determines a minimum affordable housing requirement of 10%, and that it is preferred that a proportion of affordable housing are First Homes

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted. The Council considers that the policy provides the right balance in terms of maximising delivery in a manner which maintains the viability of proposals and the policy approach proposed is compliant with national policy and guidance

**Action:**

N/A

4577

Support

**Document Element:** Policy H4 Affordable Housing**Respondent:** Gladman Developments Ltd

Object

**Summary of representations:**

First Homes should be flexibly applied, with more clarity on responding to local needs in favour of rented and shared ownership affordable homes

**Summary of representation changes to plan:**

The Council should consider omitting the tenure altogether

**Response:**

First Homes can only be provided in the manner set out in national guidance and the Council considers that it would be difficult to go against national guidance

**Action:**

No change proposed in response to this representation

4634

Object

**Document Element:** Policy H4 Affordable Housing**Respondent:** Ms Meghan Rossiter

Object

**Summary of representations:**

Would like to see a higher percentage of affordable housing secured, included more single person accommodation and higher densities

**Summary of representation changes to plan:**

Would like to see a higher percentage of affordable housing secured, included more single person accommodation and higher densities

**Response:**

Policy H4 and the supporting text set out how the Council is addressing the need for affordable housing. The Council is certainly seeking to maximise the delivery of affordable housing. However, this is hampered by the significant constraints faced in terms of affordable housing delivery. Consequently, while this is clearly a difficult situation, and the Council would obviously prefer to increase the amount of affordable housing coming forward, this is not considered to be achievable.

Density is covered by Policy P3 which requires efficient use of land.

**Action:**

No change in response to representation.

4668

Object

**Document Element:** Policy H4 Affordable Housing**Respondent:** Mr Simon Davenport

Support

**Summary of representations:**

We have no comment on overall proposed level of affordable housing as it would relate to the West of Chichester site. Miller and Vistry are pleased that the West of Chichester site is delivering 30% affordable housing on site in accordance with Policy H4.

**Summary of representation changes to plan:**

N/A

**Response:**

Comment noted

**Action:**

N/A

4801

Support

**Document Element:** Policy H4 Affordable Housing**Respondent:** Miller Homes and Vistry Group**Agent:** Tetra Tech

Support

**Summary of representations:**

House prices in Chichester District are 14 times the average earnings for those working within it and there is a need for 200 social and affordable rented houses per annum for the Plan period (to 2039). Rydon Homes Ltd agrees that more affordable homes need to be built in the District in order to meet this need

**Summary of representation changes to plan:**

N/A

**Response:**

Comment noted

**Action:**

N/A

4865

Support

**Document Element:** Policy H4 Affordable Housing**Respondent:** Rydon Homes Limited**Agent:** DMH Stallard LLP

Object

**Summary of representations:**

Consider that the viability assessment clearly shows that specialist housing for older people is only marginally viable. Concerned that the level of financial contributions attributed to achieving nitrate neutrality and water neutrality are massively underrepresented

**Summary of representation changes to plan:**

The Council ensure that there is sufficient headroom in the viability of developments and that its policy requirements are robustly tested and the inputs for water neutrality and nitrate neutrality in particular are re-evaluated

**Response:**

The viability assessment demonstrates that older persons housing schemes are viable and the costings are based on the latest available information. The respondent does not appear to have submitted any actual evidence to contradict the findings of the viability assessment

**Action:**

No change proposed in response to this representation

**4991****Object****Document Element:** Policy H4 Affordable Housing**Respondent:** The Planning Bureau on behalf of McCarthy Stone**Agent:** Miss Natasha Styles**Object****Summary of representations:**

With regard to the approach proposed around tenure mix, VIVID consider that this requires further consideration. At a time when the delivery of social rent homes is critical, they consider that the mix weighting needs to be increased to at least 35%, 30% shared ownership and 10% affordable rent

**Summary of representation changes to plan:**

The provision of social rent should be increased to at least 35%, 30% shared ownership and 10% affordable rent

**Response:**

The logic of this suggestion is understood in terms of the desirability of increasing the proportion of social rent. However, the proposed amendment would not increase the level of social rent (the policy already requires 35% as set out in the proposed amendment), all the amendment would do is reduce the amount of affordable rented accommodation in order to provide more shared ownership. Furthermore, any changes to the tenure mix at this stage would require reappraising the viability work.

**Action:**

No change proposed in response to this representation

**4998****Object****Document Element:** Policy H4 Affordable Housing**Respondent:** VIVID

## Object

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**Summary of representations:**

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seeking to understand further e.g., trip generation.] Affordable housing is especially pertinent on the Manhood peninsula, where National Highways note that caravan parks are seeking 365 days a year occupation.

National Highways seek to understand further information about the anticipated traffic generation associated with such changes

**Summary of representation changes to plan:**

N/A

**Response:**

Most caravan parks on the Manhood Peninsula are for tourist accommodation and have limited occupancy. The council has no plans for these to be used for affordable housing, nor would that be appropriate in planning terms. There have been some applications to use tourist caravans as permanent accommodation, but not in large numbers. Consequently, the Council do not consider that there is likely to be any shift towards providing affordable housing via caravans on the Manhood Peninsula, and hence there would be no commensurate traffic implications.

**Action:**

No change proposed in response to this representation

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**5295****Object**

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**Document Element:** Policy H4 Affordable Housing

**Respondent:** National Highways

## Policy H4 Affordable Housing

### Object

#### Summary of representations:

A significant consideration in the plan that supports the need for more housing supply is the need to address affordability. The district has one of the highest ratio of median earnings to house prices of 14 times and despite substantial house building during the period 2013 -2022 the ratio has increased from 10.55

#### Summary of representation changes to plan:

N/A

#### Response:

The Council is certainly seeking to maximise the delivery of affordable housing. However, this is hampered by the significant constraints faced in terms of affordable housing delivery. Consequently, while this is clearly a very difficult situation, and the Council would obviously prefer to increase the level of affordable housing provision this is not considered to be achievable

#### Action:

No change proposed in response to this representation

5348

Object

**Document Element:** Policy H4 Affordable Housing

**Respondent:** Mr Paul Bedford

### Object

#### Summary of representations:

Express concern over apparent disparity in year-on-year affordable housing needs, as flagged in the ICENI HEDNA (see attachment for detail). Given scale of affordability challenge, aspiration to optimise proportion of affordable homes is commended. Support delivery of affordable homes. Strategic allocation A5 and wider Southern Gateway could, subject to viability considerations, ensure timely provision of affordable housing within Chichester City. Great care should be taken to avoid prejudicing delivery by ensuring suitable flexibility is 'built in' to the local plan.

#### Summary of representation changes to plan:

No change

#### Response:

Iceni have confirmed that the fall in year-on-year affordable housing needs) is primarily due to the reduced levels of newly forming households (from 280 to 225 per annum). The main reason for this is a move away from using the standard method towards using published population and household projections. This is justified on the basis that the additional households linked to the uplift in the standard method will only come to the plan area if it is affordable to do so it would be inconsistent to then provide additional affordable housing to address their need.

The Council is aware of the level of affordable housing need and is seeking to maximise the level of provision, balanced against the constraints to delivery and significant viability considerations. The Council agrees that the Southern Gateway site provides an important opportunity to bring forward affordable housing in a sustainable location. The policy is informed by viability evidence and does allow for some flexibility.

#### Action:

No change proposed in response to this representation

**5401****Object****Document Element:** Policy H4 Affordable Housing**Respondent:** Bellway Homes (Wessex) Ltd**Agent:** Chapman Lily Planning**Object****Summary of representations:**

The Local Plan does not state how it will go about addressing the need for affordable homes. The District Council's record on this matter since the last plan has been inadequate and now the creation of affordable homes has become urgent, with an ever-increasing need within the District.

Policy provides no basis for reduced affordable housing 'provision' on viability grounds which is highly unusual and contrary to the viability study. In the absence of provisions within Policy H4 to allow for reduced affordable housing provision on viability grounds, the policy is likely to undermine the delivery of development

**Summary of representation changes to plan:**

N/A

**Response:**

Policy H4 and the supporting text set out how the Council is addressing the need for affordable housing. The Council is certainly seeking to maximise the delivery of affordable housing. However, this is hampered by the significant constraints faced in terms of affordable housing delivery. Consequently, while this is clearly a difficult situation, and the Council would obviously prefer to increase the amount of affordable housing coming forward, this is not considered to be achievable.

In terms of the need for flexibility in relation to viability constraints, the policy already includes such a provision

**Action:**

No change proposed in response to this representation

**5432****Object****Document Element:** Policy H4 Affordable Housing**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

In Thakeham's experience with working with Registered Providers, there is difficulty in providing both affordable and social rent on the same site

### Summary of representation changes to plan:

Re-word policy to allow for affordable OR social rent and the percentage amended accordingly

### Response:

This point is understood, however, it is considered to be largely a management issue rather than a policy issue. Moreover, there is a need for both tenures

### Action:

No change proposed in response to this representation

5616

Object

**Document Element:** Policy H4 Affordable Housing

**Respondent:** Thakeham Homes

## Object

### Summary of representations:

Churchill Retirement Living are strongly of the view that it would be more appropriate to set a nil affordable housing target for sheltered and extra care development, at the very least in urban areas in the south of the District. This approach accords with the guidance of the PPG.

The requirement for affordable housing contributions from specialist older persons' housing typologies is therefore speculative rather than based on the evidence presented. The Local Plan is therefore considered to be unsound on the grounds the affordable housing targets are not justified, positively prepared or effective

### Summary of representation changes to plan:

Request that a new subclause is added stating that:

Specialist older persons' housing will be subject to a nil affordable housing requirement on brownfield / urban sites in the South of the District and a 30% affordable housing requirement on greenfield sites

### Response:

The respondent does not appear to have submitted any evidence to substantiate their argument. Moreover, the requirement in the LP is not speculative, as this issue is addressed in the Council's viability evidence, which includes an assessment of viability position with respect to older persons accommodation (as set out in paragraphs 3.4.44 – 3.4.48 of the stage 2 Assessment). Moreover, the policy allows for some flexibility in order to address the viability issues which characterise such schemes.

### Action:

No change proposed in response to this representation



5692

Object

**Document Element:** Policy H4 Affordable Housing

**Respondent:** Churchill Retirement Living

**Agent:** Planning Issues

Object

**Summary of representations:**

Wants flexibility to reduce the affordable housing contribution on viability grounds.

**Summary of representation changes to plan:**

Wants flexibility to reduce the affordable housing contribution on viability grounds.

**Response:**

This flexibility is covered by point 4 of the policy.

The Council considers that the policy provides the right balance in terms of maximising delivery in a manner which maintains the viability of proposals and the policy approach proposed is compliant with national policy and guidance.

**Action:**

No change in response to representation.

5733

Object

**Document Element:** Policy H4 Affordable Housing

**Respondent:** Metis Homes

**Agent:** Nova Planning

## Object

### Summary of representations:

on grounds that HEDNA identifies need for 225 affordable ownership homes, disregarded within Plan; unclear how tenure mix has been identified - disproportionately large share of social and affordable rental homes compared to that needed; policy does not align with evidence.

### Summary of representation changes to plan:

As the tenure mix sought by Policy H4 does not align with the evidence, additional work will need to be undertaken to demonstrate that this is justified and that it will be effective

### Response:

The Council contend that the Local Plan does respond appropriately to the evidence set out within the HEDNA, as the plan seeks to provide as much affordable housing as is possible in light of viability constraints. In terms of the tenure mix, while this is heavily influenced by the HEDNA, which emphasises the need for social and rented accommodation, this has been balanced against other policy requirements concerning affordable housing and the protocol used by the Council's Housing Department when providing and assigning affordable housing. The policy is considered to be an appropriate reconciliation of the evidence concerning needs, balanced against other policy and deliverability considerations

### Action:

No change proposed in response to this representation

5782

Object

**Document Element:** Policy H4 Affordable Housing

**Respondent:** Beechcroft Developments Limited

**Agent:** Genesis Town Planning Ltd

## Object

### Summary of representations:

Supporting text does not set out how CDC's viability evidence base has (or has not) informed Policy - serious omission given fundamental role viability evidence plays in preparing affordable housing policy. Unclear what calculation will be for commuted sums for sites 6 to 9 dwellings in designated rural areas. Commuted sums only accepted in exceptional circumstances does not exclude homes in designated rural areas from requirement for 'exceptional circumstances' - unclear what policy approach is in this respect.

### Summary of representation changes to plan:

Paragraph 5.19 needs to be included in Policy itself

### Response:

There is no need for the viability evidence to be explicitly referred to in the supporting text. The important thing is that the Council has produced viability evidence and this supports the position taken in the Local Plan.

In terms of greater clarity being required with respect to commuted sums, this is already set out in the Council's Affordable Housing SPD. With regard to the assertion that paragraph 5.19 should be in the policy, the Council would have no objection to that, though it is not considered necessary to make the plan sound, as any neighbourhood plan would have the option of doing that in any case, provided this could be justified with suitable evidence

### Action:

No change proposed in response to this representation

**5853****Object****Document Element:** Policy H4 Affordable Housing**Respondent:** Kirdford Parish Council**Agent:** Troy Planning + Design**Object****Summary of representations:**

Any new development should provide 50% of affordable housing. Other districts have managed to make 100% of some developments affordable. The current affordable price should be agreed and statistics published to show that local people, young and old are buying/renting

**Summary of representation changes to plan:**

No change

**Response:**

The Council would certainly like to increase the affordable housing threshold if that was at all possible. However, the Council's viability evidence demonstrates that it is not achievable in practice.

In terms of some schemes being 100% affordable, that potential is supported via the new Local Plan in the case of rural exception sites. It should also be noted that it is also vital to deliver mixed communities, and hence 100% affordable housing schemes are not generally the ideal approach in any case

**Action:**

No change

**5876****Object****Document Element:** Policy H4 Affordable Housing**Respondent:** Alan and Susan Green

## Object

### Summary of representations:

The existing policy only requires on-site provision of affordable housing for 10 or more dwellings. The proposed changes to require commuted sum payments in defined rural areas on sites for between six to nine dwellings is supported.

However, this as drafted currently excludes Westbourne

### Summary of representation changes to plan:

Westbourne Parish Council would urge the District Council to ensure that this policy applies to Westbourne as it has limited opportunity for larger sites which makes it difficult to bring forward affordable housing and there is a clear need for more affordable housing in the Parish

### Response:

In effect this is not the Council's decision, as it flows from the requirements of national policy, namely paragraph 64/65 of the NPPF which does not allow for affordable housing requirements to be applied to non-major development, except in the case of a designated rural area (where a commuted sum can be collected). Westbourne is not designated as rural and hence the only way around this would be Westbourne to be redesignated. However, this is established through legislation and cannot be changed by the Council via the Local Plan

### Action:

No change proposed in response to this representation

5982

Object

**Document Element:** Policy H4 Affordable Housing

**Respondent:** Westbourne Parish Council

## Support

### Summary of representations:

The Housing Authority fully endorse and support the provisions contained in Policy H4

### Summary of representation changes to plan:

N/A

### Response:

Comment noted

### Action:

No change proposed in response to this representation

6014

Support

**Document Element:** Policy H4 Affordable Housing

**Respondent:** Chichester District Council Housing Team - Local Housing Authority

## Object

### Summary of representations:

In regards affordable tenure, we agree that there needs to be flexibility to cater to different needs, but this should also extend to management and viability considerations, as well as be flexible enough to respond to changes in national policy.

### Summary of representation changes to plan:

It is suggested the Policy is reworded to make this clear in respect of affordable tenures

### Response:

The policy does allow for some flexibility both in terms of the percentage of affordable housing required and the tenure split. The policy is considered to be sufficiently flexible and it is not considered that additional flexibility is required in order to make the plan sound

### Action:

No change proposed in response to this representation

6035

Object

**Document Element:** Policy H4 Affordable Housing

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

## Background, 5.24

## Object

### Summary of representations:

The proportions of 1/2 bed and 3/4 bed dwellings should be the other way round. One and two-bedroom dwellings are what is needed which would then release existing larger housing stock

### Summary of representation changes to plan:

The proportion of 3/4/4+ bedroom market dwellings adds to 50-65% whereas 1/2 bedroom dwellings amount to only 35-50%. These proportions should be the other way round. One and two-bedroom dwellings (bungalows/apartments/terrace houses) are what is needed which would then release existing larger housing stock

### Response:

The housing mix is based on the latest evidence set out in the HEDNA 2022. Consequently, the indicative percentages are considered to be appropriate

### Action:

No change to plan

4359

Object

**Document Element:** Background, 5.24

**Respondent:** Southbourne Parish Council

## Object

### Summary of representations:

Reduce proportion of 4 bedroom houses

### Summary of representation changes to plan:

Reduce proportion of 4 bedroom houses to 10 - 15%.

Increase other proportions equally shared

### Response:

The percentage of 4-bedroom homes is based on the latest evidence set out in the HEDNA 2022, and in any case this forms a fairly modest proportion of the overall housing mix. Consequently, the indicative percentage is considered to be appropriate. In addition, no evidence has been submitted for why the figure cited in the paragraph in question is inappropriate

### Action:

No change to plan

4719

Object

Document Element: Background, 5.24

Respondent: Mr Cliff Archer

## Policy H5 Housing Mix

## Object

### Summary of representations:

Is there any evidence that there is a local demand for 40% of the 220 proposed houses in Loxwood to be social/affordable? Given the employment and transport obstacles it seems an implausible proposition

### Summary of representation changes to plan:

Recognition that these disjoints between ambition and reality need to be eliminated before permissions to build are given

### Response:

The HEDNA 2022 sets out that there is a high need for affordable housing in the district.

The North of the Plan area has also been shown to include some of the highest housing prices/costs in the District and so opportunities to support delivery affordable housing in this area should therefore be utilised

### Action:

No change to plan

3812

Object

Document Element: Policy H5 Housing Mix

Respondent: Mr James Jewell

## Support

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**Summary of representations:**

WGPC supports this policy

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change to plan

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4533

Support

**Document Element:** Policy H5 Housing Mix

**Respondent:** Wisborough Green Parish Council

## Support

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**Summary of representations:**

Gladman is broadly supportive of the policy, but stress that it is important to note that the housing mix identified in the latest evidence is only a snapshot in time and that a flexible approach is required.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change to plan

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4561

Support

**Document Element:** Policy H5 Housing Mix

**Respondent:** Gladman Developments Ltd

## Support

### Summary of representations:

The policy text is supported, but to be more effective it would be helpful to provide a broad indication of the likely proportions of house types and sizes that may be acceptable to the Council, in table form. This is shared in many other local plans and used as a baseline against which development can be measured.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

## 4635

## Support

**Document Element:** Policy H5 Housing Mix

**Respondent:** Ms Meghan Rossiter

## Object

### Summary of representations:

There is already an imbalance in housing provision and the % of larger and detached dwellings is above national averages. The council needs to ensure that local need is met first and developments using houses as investment, holiday accommodation and second homes are strongly discouraged. Discounts applied to encourage first time buyers should be strictly controlled and repayable if the property is sold within 5 years.

### Summary of representation changes to plan:

N/A

### Response:

The housing mix is based on the latest evidence set out in the HEDNA 2022. Consequently, the indicative percentages are considered to be appropriate.

Local Plan policies cannot stop buy to let properties. Measures to reduce second homes where these are an issue can be implemented outside of the planning system.

Affordable housing has a local connection test requirement to ensure that local needs are met first. First Homes remain first homes (and therefore discounted) in perpetuity and cannot be sold as market housing.

### Action:

No change to plan

## 4670

## Object

**Document Element:** Policy H5 Housing Mix

**Respondent:** Mr Simon Davenport



## Support

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**Summary of representations:**

Generally, we support providing a mix of homes of differing size, types and tenures to meet a range of local needs.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change to plan.

---

4802

Support

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**Document Element:** Policy H5 Housing Mix

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

## Support

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**Summary of representations:**

Policy H5 Housing Mix 1.

We support Policy H5 Housing Mix in its provision to allow older person's housing schemes to provide an alternative housing mix to that detailed within the most up to date Chichester HEDNA, 2022, Icen.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change to plan

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4954

Support

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**Document Element:** Policy H5 Housing Mix

**Respondent:** The Planning Bureau on behalf of McCarthy Stone

**Agent:** Miss Natasha Styles

## Object

### Summary of representations:

As for this policy, we are supportive of the form in which it currently stands but would welcome the inclusion or recognition of single storey dwellings to help release larger family homes (but this does have an impact on achieving densities).

### Summary of representation changes to plan:

N/A

### Response:

The policy as drafted does not prevent single storey dwellings coming forward. Paragraph 5.26 supports a different housing mix where appropriate with regard to the nature of the development site and the character of the area.

Additionally Policy H8 and H10 support the delivery of specialist housing for older people and adaptable and accessible homes

### Action:

No change to plan.

**4997****Object**

**Document Element:** Policy H5 Housing Mix

**Respondent:** VIVID

## Object

### Summary of representations:

Not entirely sound as makes no mention of population in balance and its effect on housing provision

### Summary of representation changes to plan:

Should also include that there is a need to rebalance the population mix in Chichester to nearer the national average. The Council expects the percentage of over 65s to increase to 35% by 2035 and that this will challenge health and service provision. Recommend that no open market detached housing be permitted to assist in rebalancing the population mix to nearer the national average

### Response:

The housing mix is based on the latest evidence set out in the HEDNA 2022. Consequently, the indicative percentages are considered to be appropriate.

Additionally Policy H8 and H10 support the delivery of specialist housing for older people and adaptable and accessible homes

### Action:

No change to plan

**5230****Object**

**Document Element:** Policy H5 Housing Mix

**Respondent:** Mrs Sarah Headlam

## Support

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### Summary of representations:

Bellway supports draft Policy H5. Bellway welcome that planning permission can be granted for an alternative mix subject to a robust evidencing. Bellway contend that the draft Policy 'Housing Mix' as conveyed in the Pre-submission Plan has been positively prepared, is fully justified, effective and consistent with the NPPF.

### Summary of representation changes to plan:

Bellway recommend that criterion 3 also includes reference to need for the housing mix to take into account the location of the site, for example city centre sites are more suitable for a higher density form of development with smaller units vs other sites where a greater proportion of family housing may be appropriate

### Response:

Paragraph 5.26 supports a different housing mix where appropriate with regard to the nature of the development site and the character of the area

### Action:

No change to plan

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5402

Support

---

**Document Element:** Policy H5 Housing Mix

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

We do not hear much at all about the Housing Register so where is the transparency and indeed how accurate are the housing need figures?

No statistics are published which reveal the speed of uptake of new homes built and the housing market in 2023 and perhaps for several years hence is very likely to be less buoyant than it has been for decades.

We need to be certain that CDC is not chasing shadows created by an annual housebuilding target of 300,000 homes per annum

### Summary of representation changes to plan:

N/A

### Response:

The Housing Register is managed by the Housing team at CDC who support Planning Policy in drafting policies for the Local Plan, and reviewing external needs assessments such as the HEDNA. It should be noted that the Housing Register is for those needing an 'affordable' home and not market housing.

The HEDNA which was published as part of the evidence base for the Reg 19 provides a breakdown of different housing needs in the district.

There is also a Housing Strategy available on the CDC website which provides information on the housing register.

There is nothing to suggest that the overall uptake of new homes has fallen in this area where generally the housing market remains steady.

The total need figure for the plan area is calculated using the standard method as required by planning legislation. This plan proposes a reduction in this figure due to infrastructure constraints, which must be evidenced.

### Action:

No change to plan

5459

Object

**Document Element:** Policy H5 Housing Mix

**Respondent:** Mayday! Action Group

## Support

### Summary of representations:

Support inclusion of criterion 3. In addition to evidenced local need, may be other site-specific factors that justify need to provide a different mix of housing for a particular site. This could include for example, viability considerations.

### Summary of representation changes to plan:

Suggest following revision to criterion 3:

'robust evidence demonstrates that a different mix of dwellings is justified to address particular site-specific factors, or to meet local needs and demand for specific types, tenures and sizes of housing to contribute to the diversity of housing in the local area and help to redress any housing imbalance that exists

### Response:

Paragraph 5.26 supports a different housing mix where appropriate with regard to the nature of the development site and the character of the area

### Action:

No change to plan

5656

Support

**Document Element:** Policy H5 Housing Mix

**Respondent:** Countryside Properties

**Agent:** Turley

## Object

### Summary of representations:

Draft Policy H5 confirms that the housing mix for a development will be based on the most up to date HEDNA to address identified local needs and market demands

### Summary of representation changes to plan:

We suggest that the Council considers a range of criteria, including site characteristics, when determining the housing mix for individual sites and this should be reflected in wording of Policy H5

### Response:

Paragraph 5.26 supports a different housing mix where appropriate with regard to the nature of the development site and the character of the area

### Action:

No change to plan

5702

Object

**Document Element:** Policy H5 Housing Mix

**Respondent:** Church Commissioners for England

**Agent:** Lichfields

## Object

### Summary of representations:

Policy does not include reference to the ability of neighbourhood plans to be supported by Housing Needs Assessments to provide neighbourhood area / parish level evidence base to inform the housing mix for the neighbourhood area

### Summary of representation changes to plan:

Text to this effect should be included in Policy given that many neighbourhood plans are now supported by such evidence and use this to inform neighbourhood plan policies on Housing Mix.

### Response:

Criteria 1 contains a footnote on the word HEDNA that states 'Or additionally, a specific parish local housing need study'. This is to reflect where additional/or updated studies have been done to inform both applications and neighbourhood plans

### Action:

No change to plan

5854

Object

**Document Element:** Policy H5 Housing Mix

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Support

### Summary of representations:

The Housing Authority is supportive of the housing mix outlined in policy H5 and the ability to reflect local need where it is appropriate to do so. Furthermore it is right to provide this level of certainty, whilst allowing for some degree of flexibility

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change to plan

6015

Support

**Document Element:** Policy H5 Housing Mix

**Respondent:** Chichester District Council Housing Team - Local Housing Authority

## Object

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### Summary of representations:

Policy relies too heavily on HEDNA; should enable flexibility to recognize a range of local needs, site specifics and context; within large sites especially circumstances may require a less prescriptive approach; financial viability should be considered and allowed for.

### Summary of representation changes to plan:

Suggest point 1 references exceptions within point 3. Point 3 (a) provides some flexibility but is still considered too rigid to enable sites to quickly adapt to evolving housing demands

### Response:

Paragraph 5.26 supports a different housing mix where appropriate with regard to the nature of the development site and the character of the area.

### Action:

No change to plan

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6036

Object

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**Document Element:** Policy H5 Housing Mix

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

## Support

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### Summary of representations:

Support in principle

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan.

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6071

Support

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**Document Element:** Policy H5 Housing Mix

**Respondent:** VIVID

## Background, 5.29

## Object

### Summary of representations:

Object: The way of registering for self build is too onerous and makes it difficult to register.

### Summary of representation changes to plan:

The council should do a district wide survey to assess the real demand for self builds which is considerably higher than the registered numbers.

### Response:

The Council has now updated the self-build register and has taken appropriate steps to ensure that it is not overly onerous to join. Additional data has also been sought from the right to build register in order to augment the Council's understanding of the level of demand for self-build plots within the plan area. This suggests that there is a strong demand for self/custom build plots within the plan area and the Council proposes to reflect that via an amendment to the plan in order to increase the level of self/custom build provision.

### Action:

See Council's suggested Modification CM165.

4844

Object

Document Element: Background, 5.29

Respondent: Willowfield Farm

## Policy H6 Custom and/or Self Build Homes

## Object

### Summary of representations:

Object: The policy fails to allow such plots to come forward on individual sites and is limited to sites over 200 units.

### Summary of representation changes to plan:

The policy must be reworded to allow individual self build and also live/work plots to come forward in suitable locations, such as PDL.

### Response:

Self/custom build is not restricted to sites of over 200 units. There would be nothing to stop self/custom build coming forward on other sites. Furthermore, the policy itself explicitly states that self/custom build plots are encouraged as part of other development sites, which would include smaller sites. There will also be opportunities through neighbourhood planning to allocate smaller sites for self/custom build.

### Action:

No changes as a result of this representation

4361

Object

Document Element: Policy H6 Custom and/or Self Build Homes

Respondent: Mr Stephen Jupp



## Support

### Summary of representations:

Support: In principle, Gladman support the intentions of the policy, as this is in line with Government thinking concerning custom and self-build housing. Pleased to see that the Council is opting for a 12-month marketing period before plots may be built out as conventional market housing. It is generally accepted that a period of 12 months is appropriate in this regard.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

Support noted.

## 4563

## Support

**Document Element:** Policy H6 Custom and/or Self Build Homes

**Respondent:** Gladman Developments Ltd

## Object

### Summary of representations:

Object: The policy and supporting text do not reflect the scale and potential of self build demand and the sector in the north of the district. S&CB has unique contemporary potential and a position in the housing market to address emerging housing demand from families and residents of the district.

### Summary of representation changes to plan:

The plan should be amended to set out a greater requirement and emphasis on self build.

This should have regard to:

- (a) appreciation of the self build register being the lower end of demand
- (b) the particular opportunities for self build to be a good fit with the northern part of the district.

### Response:

supporting self-build in the northern part of the plan area, policy A15, concerning Loxwood does specifically allow for self-build housing to come forward, though the policy could be made explicitly more supportive in this regard should that be considered appropriate by the Inspector. In general, it is considered that there is nothing in the plan which would prevent any neighbourhood plan taking a positive approach to self-build, provided this is suitably justified.

### Action:

No changes specifically considered necessary as a result of this representation

## 4591

## Object

**Document Element:** Policy H6 Custom and/or Self Build Homes

**Respondent:** Mr William MacGeagh

## Object

### Summary of representations:

Object: The policy should explicitly state that design of custom and self build homes should follow the same requirements for good design, landscaping etc. as applicable to the area in which they will be built.

### Summary of representation changes to plan:

N/A

### Response:

The Council agree that it will be important for self/custom build homes to meet those standards, however, the plan needs to be read as a whole, and hence those policy requirements will apply in any case and there is consequently no need to cross-refer.

### Action:

No changes as a result of this representation.

## 4639

## Object

**Document Element:** Policy H6 Custom and/or Self Build Homes

**Respondent:** Mr Allen McDonald

## Object

### Summary of representations:

Object: Miller and Vistry agree that given the allocation of the site is brought forward from the previous plan and the site has already been master planned, had a concept statement agreed and is at an advanced stage of consideration, it would be inappropriate to require the West of Chichester SDL to provide any self or custom build units (as confirmed by the absence of any self or custom build requirement in Policy A6).

### Summary of representation changes to plan:

To avoid any potential confusion, suggest the first paragraph of the policy is amended to make it clear that the requirement for provision of self and/or custom build housing on SDLs is only required where the allocation policy explicitly requires it.

### Response:

Agree that clarification in relation to the issue raised is needed, however, this is already set out in the supporting text, paragraph 5.29. The Council considers that this provides sufficient clarification.

### Action:

No changes as a result of this representation

## 4803

## Object

**Document Element:** Policy H6 Custom and/or Self Build Homes

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

## Object

### Summary of representations:

Object: The policy and supporting text do not reflect the scale and potential of self build demand and the sector in the north of the district. S&CB has unique contemporary potential and a position in the housing market to address emerging housing demand from families and residents of the district.

Object: Object on grounds that policy is resistant to Self and Custom Build; Register reflects incorrect figures and is discriminatory; Bacon Review, Levelling Up and Regeneration Bill and NPPF re; S&CB should be reflected in Plan; Council should seek out and support potential sites for S&CB; incorporate Planning, Design and Sustainability Statement and Statement of Intent for S&CB Housing (see attachments); no strategy for Northern District (Loxwood).

### Summary of representation changes to plan:

Bacon Review, Levelling Up and Regeneration Bill and NPPF re; S&CB should be reflected in Plan; incorporate Planning, Design and Sustainability Statement and Statement of Intent for S&CB Housing to be inserted in Local Plan (see attachments); strategy for Northern District (100% S&CB in Loxwood).

### Response:

The Council isn't resistant to self/custom build. The Council has recently updated its register following an extensive publicity campaign. The new Local Plan includes policies to support the provision of self/custom build.

In addition, the approach clearly isn't discriminatory, as it will not discriminate against any group protected by equalities legislation.

Nevertheless, the updates to the register and additional data commissioned does suggest that there is a high need and it is proposed to amend the plan to reflect that. Policy A15 allows for self/custom build to come forward in Loxwood via neighbourhood planning.

### Action:

See Council's suggested Modification CM165.

5130

Object

**Document Element:** Policy H6 Custom and/or Self Build Homes

**Respondent:** Mr William MacGeagh

## Object

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**Summary of representations:**

Object: Council has not demonstrated that need will be met from windfall development; Council should examine whether there are opportunities to meet demand for self-build plots through the disposal of its own sites or by working with landowners to bring forward specific sites; Council to recognise within policy that it is not always feasible for large sites deliver self-build plots - development of single plots by individuals operating on sites poses both practical and health & safety concerns, plots could be left empty or unfinished detrimental to other homeowners on site.

**Summary of representation changes to plan:**

If the Council justifies the requirement for strategic sites to provide plots for self-build housing we would suggest the phrase where feasible is included.

**Response:**

The Council has considered the amount of windfall provision. The Council disagrees with the interpretation of national guidance set out. The PPG specifically suggests provision as part of allocated sites. Windfall cannot be relied upon to meet all self/custom build needs.

In terms of the feasibility of providing self/custom build on allocations, this requirement is becoming increasingly common, and there is no reason why allocation sites cannot make this provision, especially if suitable construction management conditions and phasing are employed.

In terms of the potential for plots to be left empty or unfinished, such an argument would prevent self-build plots ever being provided.

**Action:**

No changes as a result of this representation.

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**5148****Object**

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**Document Element:** Policy H6 Custom and/or Self Build Homes

**Respondent:** Home Builders Federation

## Object

### Summary of representations:

National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seeking further information regarding CEMP's.] Object: National Highways seek to understand if the Council will utilise Construction Environmental Management Plan (CEMP) to manage and coordinate the activities of individual self-build builders, especially during the construction phase, to avoid, minimise and/or mitigate effects on the road environment.

### Summary of representation changes to plan:

N/A

### Response:

The Council would indeed envisage that conditions or requirements in the s.106 agreement would manage and coordinate construction activities, including in relation to highways impacts. However, any highway impacts are likely to be extremely localised, generally restricted to activities within larger development sites or impacting the local road network, it is hard to envisage how this issue could affect the strategic road network. The Council consider that there is no necessity to include requirements in that regard within the policy, but are happy to include such wording if this is considered necessary by the Inspector.

### Action:

No changes as a result of this representation.

5290

Object

**Document Element:** Policy H6 Custom and/or Self Build Homes

**Respondent:** National Highways

## Object

### Summary of representations:

Object: Limited supporting text referring to Self Build and Custom Housing Act 2015. Support requirement for all residential schemes of 200+ homes to provide self and custom build service plots. Concern over requirement for 2% of market units provided on strategic scale housing sites (what is meant by strategic scale?). Difficult to integrate self / custom build on more modest sites (particularly higher densities). May result in lower density housing. Requirement for self / custom build products on sites of less than 200 homes might only serve to hamper delivery.

### Summary of representation changes to plan:

Confine self/custom build plots to strategic scale housing sites of 200 or more (whether allocated or speculative).  
Exclude reference to smaller sites other than to encourage allocation via Neighbourhood Plan policies.

### Response:

Paragraph 5.29 does specify that strategic-scale entails those which are larger than 200 units. While the call to remove the reference to smaller sites is noted, it is considered that the relevant part of the policy strikes the right balance between encouraging self-build provision, while noting the practical difficulties with achieving delivery as part of smaller housing sites. Furthermore, the part of the policy in question does not impose any specific requirement in this regard and hence suitably flexible. Ultimately, requiring a proportion of self/custom build within mainstream housing sites is an increasingly common policy requirement and hence there is no reason it should be a significant impediment to delivery.

### Action:

No changes as a result of this representation.

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**5403****Object**

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**Document Element:** Policy H6 Custom and/or Self Build Homes

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

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**Object**

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**Summary of representations:**

Object: Thakeham objects to the requirement for 2% of market units provided on strategic scale housing sites being self/custom build. Requirements on relatively small sites creates undesirable piecemeal provision with potential feasibility and deliverability issues. Would suggest a focused provision on sites of 500. To ensure Policy is suitably justified, CDC should consider alternative approaches to increasing supply of self-build plots as referenced in PPG.

**Summary of representation changes to plan:**

Policy H6 should be amended to read:

"On developments of 500 dwellings or more, 2% of market units should be self/custom build".

**Response:**

It is not clear why there is a concern with 'piecemeal provision' for this type of housing. This would be understandable for affordable housing, as that requires management, but it isn't clear why there would be any difficulty in self/custom build coming forward in small clusters.

There are also plenty of policies at other authorities which involve small amounts of self-build provision, with provision on much smaller sites than is proposed in this instance, such as Mid-Devon (5% on sites of 20 or more dwellings).

Finally, other sources are also supported in the Local Plan, such as via neighbourhood planning.

**Action:**

No changes as a result of this representation.

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**5617****Object**

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**Document Element:** Policy H6 Custom and/or Self Build Homes

**Respondent:** Thakeham Homes

## Support

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**Summary of representations:**

Support: The Housing Authority are in full support of this policy and fully endorse the opportunity for Neighbourhood Planning groups to bring forward Self and Custom Build serviced plots. The Housing Authority are encouraged by the potential that may arise with the call for sites for such plots. We look forward to working with our colleagues and communities to bring forward Self and Custom Build opportunities within the plan area.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No changes as a result of this representation.

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**6016****Support**

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**Document Element:** Policy H6 Custom and/or Self Build Homes

**Respondent:** Chichester District Council Housing Team - Local Housing Authority

## Support

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**Summary of representations:**

Support: Support in principle

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No changes as a result of this representation

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**6052****Support**

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**Document Element:** Policy H6 Custom and/or Self Build Homes

**Respondent:** Mr Allen McDonald

## Policy H7 Rural and First Homes Exception Sites

### Object

#### Summary of representations:

Object: The Goodwood Estate has traditionally provided housing for its workers to run estates traditionally and its associated farming practices.

With a change of role and practice, the Estate would like to explore the possibility of providing new housing for staff employed in its hospitality and non agricultural and forestry ventures. Such an initiative is frustrated by general rural housing policies.

#### Summary of representation changes to plan:

Criterion 1 should acknowledge local need as including the needs of large estates seeking to provide for staff accommodation, as these are different generally from the provision made through Policy H9.

#### Response:

Accommodation for employees of the Goodwood Estate would best sit under policy H9 as occupation would be linked to the location of employment. The policy supports provision of employment for 'rural based enterprise', of which the Goodwood Estate could be considered. Applications for accommodation in this area would be considered on a case by case basis and a needs study required.

#### Action:

No change to plan.

4300

Object

**Document Element:** Policy H7 Rural and First Homes Exception Sites

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

### Support

#### Summary of representations:

Support: I would support the aims of this policy and say that where the council has allocated land in a zone for development that constructors are unwilling to provide adequate social and affordable housing, the council should generate its own development plan to provide rented accommodation and construct to a better environmental standard at an economic cost.

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted.

#### Action:

No change to plan.



4671

Support

**Document Element:** Policy H7 Rural and First Homes Exception Sites**Respondent:** Mr Simon Davenport

## Object

**Summary of representations:**

Object: I believe that this policy rules out exception sites from coming forward. The local plan is supposed to cater for both existing and future need across the whole district, but if there is existing need within a Parish that is not being built either due to future loading of district houses or because applications are not being built out or even coming forward then exception sites should be allowed. I do not believe this is how the NPPF is intended to be interpreted.

**Summary of representation changes to plan:**

1. Should be modified to remove 'or future' as a future plan may not deal with existing (today) need with in a Parish such a Bosham where no affordable units have been built in over 10 years. The other constraints 2-7 would stop a large exception site coming forward anyway so we are only talking 5-25 units ish.

9. Similarly this seems to suggest that if homes are being planned elsewhere then exception sites cannot be built. I do not feel that is correct.

**Response:**

Criteria 1 to be updated to include the word allocated to clarify this only includes allocated sites and not undetermined permissions.

Due to need for affordable homes in the plan area it is not expected that criteria 9 will be a barrier to development.

However it has been included in the policy to ensure that should a higher number of First Homes be delivered and a need can no longer be demonstrated, a site will not be developed and remain empty or changed to market homes in a location which would not ordinarily be supported.

**Action:**

See Council's suggested Modification CM171.

4859

Object

**Document Element:** Policy H7 Rural and First Homes Exception Sites**Respondent:** Willowfield Farm

## Object

### Summary of representations:

Object: Policy H7 supports the provision of affordable housing on rural sites as an exception to countryside policies. National policy sets out that First Homes can be classified as affordable housing and that First Home exception sites need to be 'primarily' for First Homes, and hence can include a small market housing component. This should be reflected in the wording of Policy H7 which currently only refers to market housing in the context of a viability assessment being required where such housing is proposed.

### Summary of representation changes to plan:

The policy should make it clear that First Home exception sites can include a small market housing component.

### Response:

Whilst First Homes exception sites need to be 'primarily' for first homes, Planning Guidance states that First Homes exception sites can deliver a small proportion of market housing, provided that it can be demonstrated that this is necessary in order to ensure the overall viability of the site.

CDC require evidence that market housing is required on site to deliver affordable homes, to ensure that these sites outside of settlement boundaries are delivering a sufficient number of affordable homes.

### Action:

No change to plan.

**4913****Object**

**Document Element:** Policy H7 Rural and First Homes Exception Sites

**Respondent:** Mr Graham Pick

**Agent:** Batcheller Monkhouse

## Object

### Summary of representations:

National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seeking to understand Council's approach.] Object: With up to 30 dwellings per site across the region, we seek to understand how the Council plans to include such sites in an overarching monitor and manage policy which addresses the cumulative traffic impacts of these and other sites and manages their collective impact on the A27.

### Summary of representation changes to plan:

N/A

### Response:

Exception sites will be included within the proposed constrained housing figure and have therefore been included in transport modelling.

### Action:

No change to plan.

**5291****Object**

**Document Element:** Policy H7 Rural and First Homes Exception Sites

**Respondent:** National Highways

## Support

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### Summary of representations:

Support: Thakeham does not object to the content of the policy, however in order to be robust we believe Policy NE10 (Development in the Countryside) should reflect Policy H7. If a site is within the countryside it is often considered rural and therefore Policy NE10 should acknowledge the requirements within Policy H7 (see also rep no 5619 on Policy NE10).

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change to plan.

5618

Support

---

**Document Element:** Policy H7 Rural and First Homes Exception Sites

**Respondent:** Thakeham Homes

## Policy H7 Rural and First Homes Exception Sites

## Object

### Summary of representations:

Object: Concerns regarding policy criteria which limit amount of development that can be delivered;

- Criteria 2 (maximum of 30 dwellings) inconsistent with NPPF;
- Criteria 6 (proximity to settlement boundary) inconsistent with NPPF;

Policy provides no allowance for market housing on rural exception sites in addition to first homes exception sites and is inconsistent with NPPF.

### Summary of representation changes to plan:

We consider that the amount of development should not be limited and rather should be dictated on a site and need specific basis. CCE considers that for Policy H7 to be positively prepared and in accordance with National Policy, criteria 2 should be removed.

The NPPF (2021) does not specify the location of rural exception sites. As such, to be consistent with national policy, criteria 6 should also be omitted.

In relation to market housing, CCE considers Policy H7 should be amended as follows:

'Applications for rural and first homes exceptions sites that propose the inclusion of a small proportion of market housing will be expected to provide robust evidence that the site would be unviable within such housing being included'.

### Response:

Criteria 2 to be removed so that threshold does not apply. Paragraph 5.38 updated to reflect that although size threshold does not apply, applications should be proportionate to the settlement.

Criteria 6 was drafted to allow some flexibility to allow sites to come forward further from an existing settlement boundary where suitable, but to ensure development is still delivered in suitable locations.

Wording to be updated on final paragraph regarding market housing to cover both rural and first homes exception sites.

### Action:

See Council's suggested Modification CM171.

5705

Object

**Document Element:** Policy H7 Rural and First Homes Exception Sites

**Respondent:** Church Commissioners for England

**Agent:** Lichfields

## Object

### Summary of representations:

Object: What does the policy define as local? What is CDC's justification for 30 dwellings? How has 30 dwellings been decided as the upper threshold? This seems like a large scheme for small settlements. Unclear what CDC considers to be a 'local connection'? Also unclear what Policy refers to in terms of a connection to the host parish "in the first instance" but then refers to a "second instance" where immediately surrounding parishes can then be considered. Unclear as to how this would work in practice. Not possible to determine what is "adjacent" or "as close as possible to the settlement boundary".

### Summary of representation changes to plan:

Point 6: This should be altered to state that it must "adjoin the settlement boundary".

### Response:

The local connection test is set by Housing at CDC and is available to view on their webpage. Paragraph 5.31 to be updated to clarify.

The threshold of 30 dwellings was drafted to be in line with the average number of dwellings built within the limit of 1 hectare for previous entry level exception sites. Planning practice guidance has been updated to first homes and no longer includes a size limit, however should be proportionate in size to the settlement.

Criteria 4 requires occupiers to meet the local connection test, as set by Housing. Wording to be simplified.

The nature of exception sites means it is not possible to restrict them to only adjacent to the settlement boundary. Criteria 6 was drafted to allow some flexibility to allow sites to come forward further from an existing settlement boundary where suitable, but to ensure development is still delivered in suitable locations.

### Action:

See Council's suggested Modifications CM166 and CM171.

5855

Object

**Document Element:** Policy H7 Rural and First Homes Exception Sites

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Support

### Summary of representations:

Support: The Housing Authority recognise the difficulties in bringing forward exception sites for affordable housing and welcome this policy which seeks to enable the needs of our rural communities to be met.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change to plan.

6017

Support

**Document Element:** Policy H7 Rural and First Homes Exception Sites

**Respondent:** Chichester District Council Housing Team - Local Housing Authority

## Housing for older people, 5.41

Support

### Summary of representations:

Support.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change to plan.

4724

Support

**Document Element:** Housing for older people, 5.41

**Respondent:** Mr Cliff Archer

## Object

### Summary of representations:

To be consistent with national policy and the plan's own evidence the definitions used in para 5.41 should be amended to ensure consistency with national policy and to not eliminate an important element of older persons housing that being retirement living or sheltered accommodation.

To be consistent with national policy, positively prepared, effective and justified para 5.41 should be amended in line with our recommendations.

### Summary of representation changes to plan:

Recommendation

To be consistent with national policy, positively prepared, effective and justified para 5.41 should be amended as follows:

Amend para so it reads 5.41 as follows:

5.41. The Housing and Economic Development Needs Assessment (HEDNA) 2022 estimates the greatest population increase in the district by 2039 to be those in age groups 75 and over. To support an ageing population there should be provision around 2,369-3,317 units of specialist housing to meet the needs of older people delivered in Chichester over the plan period. This amounts to around 132-184 units per annum some 17% to 24% of all homes. Suitable housing options for the differing needs of individuals, include:

- age restricted general market housing,
- Retirement living or sheltered housing,
- extra care housing or housing with care,
- residential care homes and nursing homes

### Response:

The council acknowledges that the definition of older persons housing goes beyond the list in the paragraph in question. However, this is not framed as a definitive list, rather it is introduced on the basis that the definition includes the typologies specified. On that basis no amendment is strictly necessary.

### Action:

No change to plan.

4963

Object

**Document Element:** Housing for older people, 5.41

**Respondent:** The Planning Bureau on behalf of McCarthy Stone

**Agent:** Miss Natasha Styles

## Support

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**Summary of representations:**

I am very pleased to see this section.

It should also be borne in mind that there is an ever-expanding number of senior citizens who opt for the gentle climate south of the Downs.

I also think it very noticeable how few bungalows there are in Chichester and would add that, if you would persuade people like me to leave my long-time family home, there is not the supply of bungalows, which would be my obvious next step,

I am one of the baby-boomer generation. The planners need to prepare now for the impact of most of us attaining our 80s!

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No change to plan.

---

**5190****Support**

**Document Element:** Housing for older people, 5.41

**Respondent:** John Newman



## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seeking to understand Council's approach.]

Object: Those age groups 75 and over (Para 5.41) or with specialised mobility needs (Para 5.42) are less likely to use walking / cycling routes than younger persons.

Department for Transport data suggests that there has been a 20-40% change (decrease) in bus vehicle miles across West Sussex since the pandemic.

Considering these changes, and the typical inability of the aged to walk or cycle longer distances, we seek to understand how the Council will demonstrate that revenue funding can be secured to maintain the longterm viability of the public transport in proximity of the specialist accommodation for older people and those with specialist needs and how this may affect the viability of the overall sustainable transport package.

### Summary of representation changes to plan:

N/A

### Response:

The policy seeks to focus specialist housing on the most sustainable locations within the plan area, i.e. those which have be best access to local facilities and services and public transport. This will be beneficial for the residents, ensure sustainable patterns of development and inherently help to ensure the future viability of those facilities and services.

### Action:

No change to plan.

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**5292****Object**

**Document Element:** Housing for older people, 5.41

**Respondent:** National Highways

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment -Seek clarity].

Object: Local Plan evidence - Housing and Economic Development Needs Assessment (HEDNA) Final Report – April 2022. The Executive Summary Para 13 states “The District has a notably older age structure than seen regionally or nationally, with 28% of the population estimated to be aged 65 and over in 2020 (compared to a national average of 19%). The Manhood Peninsula sub-area sees a particularly old population (33% aged 65+)”

We seek clarity on how these demographics are addressed in the Plan and their transport needs managed.

### Summary of representation changes to plan:

N/A

### Response:

The points around the ageing population are noted. The council has sought to make provision for older persons housing within the relevant (i.e. those for housing) strategic sites and locations which form part of the LP, while policy H8 also allows for sites to come forward on a flexible basis. This approach seeks to focus provision on the most sustainable locations in order to minimise the need to travel.

### Action:

No change to plan.

5335

Object

**Document Element:** Housing for older people, 5.41

**Respondent:** National Highways

## Housing for older people, 5.42

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seeking to understand Council's approach.]

Object: Those age groups 75 and over (Para 5.41) or with specialised mobility needs (Para 5.42) are less likely to use walking / cycling routes than younger persons.

Department for Transport data suggests that there has been a 20-40% change (decrease) in bus vehicle miles across West Sussex since the pandemic.

Considering these changes, and the typical inability of the aged to walk or cycle longer distances, we seek to understand how the Council will demonstrate that revenue funding can be secured to maintain the long term viability of the public transport in proximity of the specialist accommodation for older people and those with specialist needs and how this may affect the viability of the overall sustainable transport package.

### Summary of representation changes to plan:

N/A

### Response:

The policy seeks to focus specialist housing on the most sustainable locations within the plan area, i.e. those which have the best access to local facilities and services and public transport. This will be beneficial for the residents, ensure sustainable patterns of development and inherently help to ensure the future viability of those facilities and services.

### Action:

No change to plan.

5293

Object

**Document Element:** Housing for older people, 5.42

**Respondent:** National Highways

## Policy H8 Specialist accommodation for older people and those with specialised needs

### Object

#### Summary of representations:

Object to policy as currently worded; runs counter to provisions of A6 allocation policy and masterplan; retrospective inclusion would threaten development approach and potentially viability.

#### Summary of representation changes to plan:

As a solution, and assuming such a policy is justified (on which no comment is made) it is recommended that the policy is reworded in a similar way to Policy H6 (subject to our comments on that policy) to make it clear that provision of specialist accommodation on SDLs will be only expected where allowed for in the relevant allocation policy having been discussed and agreed with the relevant developer or site promoter.

#### Response:

The council do not consider that such a change is necessary to make the plan sound. All of the housing allocations which have been carried forward have planning permission or a resolution to grant permission in place and hence this issue can be addressed via a pragmatic interpretation of the plan in relation to any future planning applications on those sites.

#### Action:

No change to plan.

4805

Object

**Document Element:** Policy H8 Specialist accommodation for older people and those with specialised needs

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

### Object

#### Summary of representations:

In order for Policy H8 to be more positively prepared to assist in delivering the substantial need for specialist housing for older people, policy H8 should be amended in line with our recommendation. This should ensure that some of the substantial need for specialist housing for older people is delivered without applicants having to consider policy requirements that would not be relevant for such schemes.

In addition, developers of older people's housing schemes should not be required to demonstrate need given the substantial need identified.

**Summary of representation changes to plan:****Recommendation**

In order for Policy H8 to be more positively prepared to assist in delivering the substantial need for specialist housing for older people, policy H8 should be amended so that it reads as follows:

Policy H8 Specialist accommodation for older people and those with specialised needs

**Specialist housing for older people**

All housing sites over 200 units, including those allocated in this plan, will be required to provide specialist accommodation housing for older people.

The Council will also support proposals delivering specialist housing for older people across all tenures in sustainable locations. Specialist housing for older people should be located in close proximity to everyday services, be well connected by safe and suitable walking / cycling routes or public transport for the intended occupier.

**Specialist housing**

Proposals for specialist housing, such as homes for, students, HMOs or essential worker accommodation, and other groups requiring specifically designed accommodation will be supported where the following criteria are met:

1. There is an identified need;
2. It will not lead to a concentration of similar uses in an area that would be detrimental to the character or function of an area and / or residential amenity;
3. It is in close proximity to everyday services, connecting by safe and suitable walking / cycling routes or public transport for the intended occupier;
4. It can be demonstrated that the development is designed to provide the most appropriate types of support for the target resident;
5. It can be demonstrated that revenue funding can be secured to maintain the long-term viability of the scheme (if relevant to the type of accommodation proposed); and
6. The scheme is supported by the relevant agencies (if relevant to the accommodation type to be provided).

Proposals which may result in the loss of specialist needs accommodation will not be permitted unless it can be demonstrated that there is no longer a need for such accommodation in the plan area, or alternative provision is being made available locally through replacement or new facilities.

**Response:**

There is no need to segregate these types of specialist accommodation in the policy. Criteria 1-4 apply equally to specialist accommodation for older people and those with specialist needs and criteria 5 & 6 make it clear that they only apply when relevant to the accommodation type.

**Action:**

No change to plan.

**4973****Object**

**Document Element:** Policy H8 Specialist accommodation for older people and those with specialised needs

**Respondent:** The Planning Bureau on behalf of McCarthy Stone

**Agent:** Miss Natasha Styles

## Object

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**Summary of representations:**

We consider this needs to be better defined. Given the demographic changes and if the district wishes to see a greater proportion of specialist older people's housing delivered at low cost, greater clarity is needed.

**Summary of representation changes to plan:**

At present, we do not consider the existing reference to "opportunities should be taken...." to be sufficient to really drive delivery. However, any final policy should allow for flexibility in the provision of suitable housing relative to the site in question. We would also like to see a more universal policy, which takes into account disability and other need requirements.

**Response:**

The Council agree that provision of specialist housing for the elderly is important and the council has put in place a positive, but flexible policy framework, which responds to the relevant evidence and national policy, in order to allow for such provision to be delivered.

In addition, Policy H10 Accessible and Adaptable Homes seeks to support the delivery of housing that can be adapted to different needs.

**Action:**

No change to plan.

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**4999****Object**

**Document Element:** Policy H8 Specialist accommodation for older people and those with specialised needs

**Respondent:** VIVID

## Object

### Summary of representations:

In our view however, draft Policy H8 doesn't reflect the guidance in the PPG. For instance, although the policy sets out a threshold of provision for specialist housing of housing sites of 200 or more units, there is no guidance on the actual % provision as there is for example, on affordable housing. All it says is the specific type and amount of accommodation required will depend on the size and location of the site.

The supply of specialist housing should not just be focused on large scale housing schemes. The landscape and environmental constraints across the district even outside the national park would not necessarily allow for large 200 plus unit schemes in all locations. To support an ageing population policy should support the provision of suitable specialist housing to meet the differing needs of individuals across a range of options and in a range of locations.

### Summary of representation changes to plan:

We propose an amendment to policy H8 to confirm that specialist accommodation for older persons can be supported without any policy qualification for a site's location within or outside a settlement boundary or within an AONB where a proposal in its local context is not deemed to represent major development.

Rather than rely on the criteria based approach, the policy should also allow for the allocation of sites for specialist accommodation for older people in a Neighbourhood Plan where a site has the support of local people.

### Response:

The council agree that provision of specialist housing for the elderly is important and the council has put in place a positive policy framework in order to allow for such provision to be delivered. The council would certainly agree that neighbourhood planning provides an important opportunity to increase the supply of older persons housing. However, the suggested approach of unrestricted windfall provision is considered to be contrary to national policy and inconsistent with a plan-led system.

### Action:

No change to plan.

5030

Object

**Document Element:** Policy H8 Specialist accommodation for older people and those with specialised needs

**Respondent:** Hanbury Properties

**Agent:** Smith Simmons Partners

## Object

### Summary of representations:

It is noted that the plan refers to older person housing as specialist housing. WSCC strategy supports the provision of 'extra care housing' while this might be similar development it enables younger people to access the accommodation for whatever medical reason i.e. MS, strokes rather than limiting it to a certain age group. Officers are happy to meet and discuss this further.

### Summary of representation changes to plan:

N/A

### Response:

Subheading to be added and paragraph 5.43 to clarify that policy supports accommodation for those of different ages.

### Action:

See Council's suggested Modifications CM173 and CM174.

5094

Object

**Document Element:** Policy H8 Specialist accommodation for older people and those with specialised needs

**Respondent:** West Sussex County Council

## Object

### Summary of representations:

Policy is unsound as it is not effective. Only through site allocations can the Council be certain the needs of older people be met. Important that policy provides: effective mechanism through which decisions on accommodation can be made on basis of need for and supply of such development; sets out how many specialist homes for older people are required in Chichester; commitment is made to monitoring supply against level of need across plan period; presumption in favour of development be applied if supply of land for such development falls below identified annual needs. Needs to be clear as to what is required and how a decision maker should react to ensure those needs are met. By including level of need in policy or supporting text, greater weight will be given to this in decision making, leading to the more positive approach that is required to meet housing the needs of older people.

### Summary of representation changes to plan:

Set out the level of need to be clear what is required.

### Response:

It is clearly important to recognise and respond to the increasing need for older persons housing. The council is proposing provision as part of the proposed site allocations in order to increase the certainty of delivery.

### Action:

No change to plan.

5149

Object

**Document Element:** Policy H8 Specialist accommodation for older people and those with specialised needs

**Respondent:** Home Builders Federation



## Support

### Summary of representations:

I agree with Policy H8 and indeed think that this is what older people would want too (even if they were perhaps more sensitive to noise than some!)

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change to plan.

## 5191

## Support

**Document Element:** Policy H8 Specialist accommodation for older people and those with specialised needs

**Respondent:** John Newman

## Object

### Summary of representations:

No confirmation on the quantum of specialist accommodation that this policy or other site allocations will secure and how the specific need for each application is calculated. Policy H8 fails to address identified overall need clearly, as required by National guidance. It is recommended Local Plan allocates sites to deliver this type of accommodation as intended by the HEDNA. This approach risks land on these sites being unable to deliver both the expected market/affordable housing and the specialist accommodation on site. Site promoted at Land to North of Gosden Green as suitable.

### Summary of representation changes to plan:

It is recommended Local Plan allocates sites to deliver this type of accommodation as intended by the HEDNA. Site promoted at Land to North of Gosden Green is suitable.

### Response:

The council agree that provision of specialist housing for the elderly is important and the council has put in place a positive, but flexible policy framework, which responds to the relevant evidence and national policy, in order to allow for such provision to be delivered. The policy approach which has been proposed is designed to be flexible, reflective of the different site typologies and constraints involved, including with respect to viability.

### Action:

No change to plan.

## 5238

## Object

**Document Element:** Policy H8 Specialist accommodation for older people and those with specialised needs

**Respondent:** Hallam Land Management Limited

**Agent:** LRM Planning

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seek to understand/resolve several matters e.g., trip generation.]

Object: We seek to understand and resolve several matters including but not limited to:

- reliance on others e.g., service providers to provide the required services
- how, when, and where additional revenue will be sought to cover the cost of services
- how the Council will assess what would be realistic trip generation
- which locations have been considered for specialist accommodation?
- how many facilities have been considered?
- How Over 55's accommodation has been distinguished from aged care accommodation
- How residents in Over 55's accommodation in full-time employment (and still commuting to and from work) have been considered
- what percentage of the population are anticipated to live in these facilities?

### Summary of representation changes to plan:

N/A

### Response:

The council has sought to make provision for older persons housing within the relevant (i.e. those for housing) strategic sites and locations which form part of the LP, while policy H8 also allows for sites to come forward on a flexible basis. This approach seeks to focus provision on the most sustainable locations in order to minimise the need to travel.

Detailed points around trip generation and service provision etc. in relation to specialist accommodation are too detailed to consider at this stage, especially given the range of typologies this can encompass, and hence will need to be assessed on a case-by-case basis as part of relevant planning applications.

### Action:

No change to plan.

5294

Object

**Document Element:** Policy H8 Specialist accommodation for older people and those with specialised needs

**Respondent:** National Highways

## Support

### Summary of representations:

Support: The demographics of our area are different from other areas and it is recognised that our ageing population will grow during the plan period.

It is also clear that more specialist accommodation will be needed in our area for both married and single pensioners.

We support the outlined policy.

Paras 5.53 – 5.58 suggest that CDC's Planning team will have a significantly greater workload if they are to vet these applications for delivery on the essential detail. Are they sufficiently resourced? Do they have planners with this specialist knowledge?

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change to plan.

5460

Support

**Document Element:** Policy H8 Specialist accommodation for older people and those with specialised needs

**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

To be consistent with the approach outlined in the first paragraph of Policy H6/H8, it is suggested requirements are set out and justified in relevant site-specific allocation policies. Any specific requirements for non-allocated sites should also be clarified, with appropriate flexibility built in to ensure this can account for specific site circumstances.

### Summary of representation changes to plan:

Suggest first paragraph be amended to:

'All New housing sites over 200 units, which are allocated in the Local Plan, will provide specialist accommodation for older people as set out in the relevant site-specific allocation policies. The specific type and amount of accommodation required will depend on the size and location of the site.'

### Response:

As drafted, Policy H8 seeks to deliver specialist housing on all sites over 200 dwellings not just those allocated in the plan. Policy H6 has different requirements as the number of units to be delivered on individual site allocations were calculated on the latest available custom and self build register.

### Action:

No change to plan.

**5658****Object**

**Document Element:** Policy H8 Specialist accommodation for older people and those with specialised needs

**Respondent:** Countryside Properties

**Agent:** Turley

**Object**

**Summary of representations:**

Draft Policy H8 confirms that all housing sites over 200 units, including those allocated in this plan, will be required to provide specialist accommodation for older people with a support or care component.

**Summary of representation changes to plan:**

We request that this policy is amended to add 'where appropriate and viable', acknowledging that viability and site-specific factors need to be taken into consideration.

**Response:**

Older persons housing requirements have been assessed as part of the council's viability appraisal work and hence the council is confident that it will be financially viable to make appropriate provision. In addition, the nature of this housing typology, and the current drafting of the policy, is such that there is flexibility available to provide a form of older persons housing which works with the site constraints.

**Action:**

No change to plan.

**5706****Object**

**Document Element:** Policy H8 Specialist accommodation for older people and those with specialised needs

**Respondent:** Church Commissioners for England

**Agent:** Lichfields

## Object

### Summary of representations:

The plan fails to adequately consider the need for housing for older people, given that the population over 65 across CDC is significantly in excess of the average in the county, south east and county as a whole.

Whilst this approach goes some way to addressing the care needs it is felt that the policy lacks effectiveness and should take a far more constructive and positive approach to the provision of housing for older people.

### Summary of representation changes to plan:

It is considered that a residential care home (including housing for dementia needs) could be developed on the Land South of Main Road without causing harm to the AONB and this would provide for a clear need within the village whilst also providing employment to local workers.

### Response:

The council agree that provision of specialist housing for the elderly is important and the council has put in place a positive, but flexible policy framework, which responds to the relevant evidence and national policy, in order to allow for such provision to be delivered.

Site submission noted.

### Action:

No change to plan.

5971

Object

**Document Element:** Policy H8 Specialist accommodation for older people and those with specialised needs

**Respondent:** Obsidian Strategic

**Agent:** Andrew Black Consulting

## Support

### Summary of representations:

The Housing Authority strongly advocate for the inclusion of specialist accommodation for older people, and the intention is to secure affordable housing across all specialist accommodation for older people, including Extra Care to meet the needs of those unable to secure such accommodation in the open market.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change to plan.

6018

Support

**Document Element:** Policy H8 Specialist accommodation for older people and those with specialised needs

**Respondent:** Chichester District Council Housing Team - Local Housing Authority

## Policy H9 Accommodation for Agricultural, Horticultural and other Rural Workers

### Object

#### Summary of representations:

Policy and Appendix C fails to deal with new businesses, should be provision to allow 3 yr temp permission for caravan/ accommodation to enable business to develop

#### Summary of representation changes to plan:

There should be provision within the policy and in Appendix C to allow a 3yr temp permission for a caravan or other temporary accommodation to enable a business to develop and to then demonstrate viability

#### Response:

Appendix C11 provides for the rural enterprise to demonstrate it is financially sound and has a clear prospect of remaining so. Neither the policy nor the Appendix precludes new businesses. Temporary occupational accommodation is referred to at paragraph 5.50 and in the first paragraph of the policy.

#### Action:

No change

4366

Object

**Document Element:** Policy H9 Accommodation for Agricultural, Horticultural and other Rural Workers

**Respondent:** Mr Stephen Jupp

### Support

#### Summary of representations:

Support

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted

#### Action:

No change

4672

Support

**Document Element:** Policy H9 Accommodation for Agricultural, Horticultural and other Rural Workers

**Respondent:** Mr Simon Davenport

## Support

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**Summary of representations:**

Onsite accommodation for workers would attract many people otherwise not able to afford to rent rooms in wider Chichester area

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted

**Action:**

No change

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5547

Support

**Document Element:** Policy H9 Accommodation for Agricultural, Horticultural and other Rural Workers

**Respondent:** West Sussex Growers' Association

## Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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6019

Support

**Document Element:** Policy H9 Accommodation for Agricultural, Horticultural and other Rural Workers

**Respondent:** Chichester District Council Housing Team - Local Housing Authority

## Background, 5.58

# Support

### Summary of representations:

I agree with the sentiment of what is written here, though I do not know enough to know if you have got your numbers right

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No Change

## 5192

## Support

Document Element: Background, 5.58

Respondent: John Newman

## Policy H10 Accessible and Adaptable Homes

# Object

### Summary of representations:

Criterion b is pre-empting the government bringing forward into statute its responses to the consultation document.

If that is not followed through then there is no sound basis to require EVERY new dwelling to met M4(2)

### Summary of representation changes to plan:

Delete b or reword so that it comes into force when it is made statue or change to allow some exceptions

### Response:

Whilst the building regulations are due to be updated to include M4(2) as standard, this has not yet taken place. The policy was drafted to reflect the needs of the local population and therefore has remained as drafted to ensure delivery of M4(2) dwellings should there be a delay or change to the building regs update

### Action:

No change to plan.

## 4367

## Object

Document Element: Policy H10 Accessible and Adaptable Homes

Respondent: Mr Stephen Jupp



## Object

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### Summary of representations:

Whilst supportive in principle of providing accessible and adaptive housing, Miller and Vistry have concerns about the implications and soundness of the policy requirement for all dwellings to meet the M4(2) accessibility and adaptability standards. It is through the national building regulations that such standards should be implemented. Such an approach also does not take account of the technical and financial implications of a blanket approach or potential implications on the land take required having regard to the need to make the most efficient use of land. It is also not clear how payment of a commuted sum (the calculation for which should form part of the plan) would meet the tests

### Summary of representation changes to plan:

If CDC do consider it necessary and justified to require a proportion of M4(2) housing to be delivered ahead of any Building Regulations changes, the policy should be made more flexible to make it clear that such provision is subject to technical feasibility and ideally a more realistic proportion.

### Response:

Whilst the building regulations are due to be updated to include M4(2) as standard, this has not yet taken place. The policy was drafted to reflect the needs of the local population and therefore has remained as drafted to ensure delivery of M4(2) dwellings should there be a delay or change to the building regs update.

The Council's Affordable Housing SPD will be updated to cover new requirements of the Local Plan, including commuted sums for wheelchair accessible homes.

The commuted sum payment would be equivalent to on site provision (which has been factored in to viability testing), not an additional cost, therefore meeting the tests.

### Action:

No change to plan. Update Affordable Housing SPD.

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**4809****Object**

**Document Element:** Policy H10 Accessible and Adaptable Homes

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

## Object

### Summary of representations:

Although adaptable housing can assist it does not remove the need for specific older person's housing.

Housing built to M4(3) standard may serve to institutionalise an older person's scheme reducing independence.

M4 (2) is to be incorporated into the Building Regulations - there is no need for the plan to repeat this element.

M43b relates to wheelchair accessible housing which can only be required on affordable housing where the Council has nomination rights. This should be clarified

### Summary of representation changes to plan:

Recommendation:

The policy should be amended to reflect the building regulations so it reads as follows:

Policy H10 Accessible and Adaptable Homes

On all residential development sites:

a. 5% of affordable housing must meet wheelchair accessibility standards M4(3)((2)(b)) where there is an identified need on the Housing Register and the Council will have nomination rights.

### Response:

Whilst the building regulations are due to be updated to include M4(2) as standard, this has not yet taken place. The policy was drafted to reflect the needs of the local population and therefore has remained as drafted to ensure delivery of M4(2) dwellings should there be a delay or change to the building regs update.

Paragraph 5.55 covers nomination of wheelchair accessible housing, however wording of policy will be updated as suggested to ensure this is clear.

### Action:

See Council's suggested Modification CM175.

4980

Object

**Document Element:** Policy H10 Accessible and Adaptable Homes

**Respondent:** The Planning Bureau on behalf of McCarthy Stone

**Agent:** Miss Natasha Styles

## Object

### Summary of representations:

Policy should be amended to reflect changes to Building Regulations

Government will make part M4(2) the mandatory standard. Whilst this is still to be introduced, given the likelihood that the Government will make M4(2) the mandatory standard we would recommend that the Council amend its policy accordingly to ensure no unnecessary repetition of building regulations

### Summary of representation changes to plan:

Policy should be amended to reflect changes to Building Regulations, ensure no unnecessary repetition of building regulations within planning policy

### Response:

Whilst the building regulations are due to be updated to include M4(2) as standard, this has not yet taken place. The policy was drafted to reflect the needs of the local population and therefore has remained as drafted to ensure delivery of M4(2) dwellings should there be a delay or change to the building regs update.

### Action:

No change to plan

5150

Object

**Document Element:** Policy H10 Accessible and Adaptable Homes

**Respondent:** Home Builders Federation

## Object

### Summary of representations:

M4(2) typically results in a 10% increase in floorspace over and above standard market house types, with a commensurate increase in build costs - seldom reciprocated in an increase in GDV. Will be important to test implications of requirement on whole plan viability. Consider would be more appropriate for only a proportion of dwellings to be M4(2). Should M4(2) compliance be enforced through Part M of building regulations, would be inappropriate to duplicate matters covered (paragraph 16f of the NPPF) in National Policy.

### Summary of representation changes to plan:

N/A

### Response:

Whilst the building regulations are due to be updated to include M4(2) as standard, this has not yet taken place. The policy was drafted to reflect the needs of the local population and therefore has remained as drafted to ensure delivery of M4(2) dwellings should there be a delay or change to the building regs update.

The policy has been viability tested alongside all other policy requirements

### Action:

No change to plan

**5414****Object****Document Element:** Policy H10 Accessible and Adaptable Homes**Respondent:** Bellway Homes (Wessex) Ltd**Agent:** Chapman Lily Planning**Object****Summary of representations:**

Part b is too onerous for developers. Majority of other Local Planning Authorities in the South only require a percentage of the development to be to M4(2) standards and this is commonly over a threshold for development size for example on developments larger than 20 or 50 dwellings. Requiring dwellings to be constructed to M4(2) standards requires plots to have a larger footprint and therefore impacts the number of houses and the viability of developments

**Summary of representation changes to plan:**

Part b of the policy should be re-worded to allow for 10% percent of dwellings on developments over 20 dwellings to accord to M4(2) standards

**Response:**

The policy was drafted to reflect the needs of the local population.  
The policy has been viability tested alongside all other policy requirements

**Action:**

No change to plan

**5620****Object****Document Element:** Policy H10 Accessible and Adaptable Homes**Respondent:** Thakeham Homes**Object****Summary of representations:**

Government will make part M4(2) the mandatory standard. Whilst this is still to be introduced, given the likelihood that the Government will make M4(2) the mandatory standard we would recommend that the Council amend its policy accordingly to ensure no unnecessary repetition of building regulations

**Summary of representation changes to plan:**

N/A

**Response:**

Whilst the building regulations are due to be updated to include M4(2) as standard, this has not yet taken place. The policy was drafted to reflect the needs of the local population and therefore has remained as drafted to ensure delivery of M4(2) dwellings should there be a delay or change to the building regs update

**Action:**

No change to plan

**5660****Object****Document Element:** Policy H10 Accessible and Adaptable Homes**Respondent:** Countryside Properties**Agent:** Turley**Object****Summary of representations:**

The Government has published its response to the consultation on Building Regulations - Part M. This response states that the Government intends to make part M4(2) the mandatory standard.

**Summary of representation changes to plan:**

Would recommend that the Council amend its policy to ensure no unnecessary repetition of Building Regulations within planning policy

**Response:**

Whilst the building regulations are due to be updated to include M4(2) as standard, this has not yet taken place. The policy was drafted to reflect the needs of the local population and therefore has remained as drafted to ensure delivery of M4(2) dwellings should there be a delay or change to the building regs update

**Action:**

No change to plan

**5734****Object****Document Element:** Policy H10 Accessible and Adaptable Homes**Respondent:** Metis Homes**Agent:** Nova Planning**Support****Summary of representations:**

Support in principle

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

**6039****Support****Document Element:** Policy H10 Accessible and Adaptable Homes**Respondent:** Miller Homes and Vistry Group**Agent:** Tetra Tech

## Background, 5.60

## Object

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### Summary of representations:

Government policy is clear that pitches only need to be provided for Gypsies and Travellers that meet the PPTS 2015 definition. CDC appear to have gone beyond the PPTS requirements in seeking to provide accommodation for full cultural need. The plan therefore provides provision in excess of actual defined need.

### Summary of representation changes to plan:

N/A

### Response:

Planning Policy for Traveller Sites (PPTS) has been amended since the Regulation 19 consultation. Consequently, the GTAA consultants have revised the need levels, and clarified the methodology for how the need levels have been established. Only the PPTS 2023 need has to be met via policy H11. Caravan dweller need which doesn't relate to the PPTS definition of travellers is generally a wider housing need to be addressed via other policies. However, there could still be instances where non-PPTS individuals of traveller origin require culturally appropriate accommodation (i.e. caravans). The Council has proposed amendments to the plan to reflect the changes which have been made to PPTS.

### Action:

No change

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4641

Object

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Document Element: Background, 5.60

Respondent: Mr Allen McDonald

## Policy H11 Meeting Gypsies, Travellers and Travelling Showpeoples' Needs

### Object

#### Summary of representations:

While the level of need and lack of available sites is noted, this doesn't mean that the proposed locations for pitches are appropriate. The allocations also wouldn't accommodate the overall level of need. Consequently, approach not robust. There are also pitches available at Pinks Four (HELAA site) which have not been utilised. No evidence that travellers want to live on the strategic housing allocations. Providing pitches on strategic allocations will be difficult to deliver owing to the large vehicles involved.

#### Summary of representation changes to plan:

N/A

#### Response:

The gypsy and traveller site design guidance from 2008 encourages provision as part of mainstream residential development. The reasons for not allocating the Pinks Four are clearly explained in the background paper. In terms of the reference to large vehicles, it is not clear why the respondent thinks pitches will be utilising large vehicles, and in any case all residential development has to be designed to accommodate large vehicles such as refuse vehicles. Also, if that argument is valid then presumably this policy requirement would always be rejected, but it clearly hasn't as there are numerous examples now of this approach being found sound.

#### Action:

See Council's suggested Modification CM185.

5045

Object

**Document Element:** Policy H11 Meeting Gypsies, Travellers and Travelling Showpeoples' Needs

**Respondent:** Crownhall Estates Limited & Martin Grant Homes

**Agent:** Henry Adams LLP

### Support

#### Summary of representations:

Policies H11, H12 and H13 are supported, including the mechanisms for making provision for traveller's accommodation, i.e. provision of pitches on new strategic allocations and appropriate intensification of existing authorised sites. SDNP welcome continued joint working between the coastal authorities and the South Downs National Park Authority in regard to addressing any unmet need (from the SDNP).

#### Summary of representation changes to plan:

N/A

#### Response:

The comments are noted and the council is happy to continue joint working with neighbouring authorities, including the SDNP. However, given the extremely high need within the plan area it is not likely to be realistic for the council to accommodate additional pitches from elsewhere.

#### Action:

No change

5141

Support

**Document Element:** Policy H11 Meeting Gypsies, Travellers and Travelling Showpeoples' Needs**Respondent:** South Downs National Park Authority

## Object

**Summary of representations:**

Consider that the parish council have not been consulted regarding this policy and that this is a breach of the relevant legislation. State that 12 new pitches and 12 new plots is a considerable number to accommodate in addition to those already occupied within the parish and therefore it is considered appropriate to raise an objection.

The proposed intensification of the site at Sunrise in Southbourne is not deliverable (Policy H12 – Proposed 1 additional pitch at Sunrise as shown in Local Plan Appendix I) – see response to Policy H12.

**Summary of representation changes to plan:**

N/A

**Response:**

The parish council has been notified as part of the formal Regulation 19. consultation as per the legal requirements. The number of pitches and plots for Southbourne is reflective of the scale of the Broad Local for Development. In terms of the Sunrise site, based on the comments received, it may be that an additional mobile home could have been placed on the site without authorisation since the submission Local Plan was drafted. This may be blocking the original route of the public right of way (PRoW). The Local Plan evidence base is clear that there is space for an additional pitch on the site vis-à-vis the single pitch originally consented, and that this is capable of being provided without blocking the original route of the PRoW.

**Action:**

See Council's suggested Modification CM190.

5247

Object

**Document Element:** Policy H11 Meeting Gypsies, Travellers and Travelling Showpeoples' Needs**Respondent:** Southbourne Parish Council



## Support

### Summary of representations:

Notes CDCs position and requirement to provide a number of pitches and plots for the travelling community during the plan period. Support policy position for intensification of existing pitches. Horsham District can't at this point in time accommodate any of CDC's unmet Gypsy, Traveller and Travelling Show people requirement. Happy to continue duty to cooperate discussions moving forwards, and this issue will be covered in the statement of common ground.

### Summary of representation changes to plan:

N/A

### Response:

The comments are noted and the council is happy to continue engaging positively in future duty to co-operate discussions regarding this issue.

### Action:

No change

5266

Support

**Document Element:** Policy H11 Meeting Gypsies, Travellers and Travelling Showpeoples' Needs

**Respondent:** Horsham District Council

## Object

### Summary of representations:

National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seeking to understand further e.g., digital nomads.] This policy does not acknowledge or address Motor Homes, Caravans, Vans, converted Buses, Tiny Homes, or other forms of mobile housing in response to the housing crisis and low rental vacancy rates. Nor does this policy address the rise in nomadic and digital-nomad lifestyles. Both have the potential to generated large numbers of additional vehicle movements on the SRN and to create new impacts, for example van dwellers sleeping in road lay-bys.

### Summary of representation changes to plan:

N/A

### Response:

The policy is focused on the accommodation needs of gypsies and travellers as people, rather than on particular forms of mobile accommodation per se.

The wider needs of those living in caravans and houseboats is a legal requirement and the Council will be addressing this in an additional evidence base document, which will be available at the Examination.

In terms of the impact of nomadic and digital nomad lifestyles, National Highways have not presented any evidence that such lifestyles are associated with the Chichester plan area or are having a significant impact on the strategic highways network and therefore it is difficult for the Council to address this issue.

### Action:

No change

5296

Object

**Document Element:** Policy H11 Meeting Gypsies, Travellers and Travelling Showpeoples' Needs**Respondent:** National Highways**Support****Summary of representations:**

Whilst Thakeham does not object to the general direction of the policy, with plots to be included on larger strategic sites, we believe there should be a caveat within the policy to make sure they are carefully designed, for example they have separate entrances.

**Summary of representation changes to plan:**

N/A

**Response:**

The Council agree that it is important that the pitches and plots in question are carefully designed. However, there is already a specific policy within the plan which addresses site design. It would indeed be expected that each pitch/plot would have its own access. However, if the representation means that the pitches should be separated off from the rest of the housing with a separate vehicular access then that is likely to be an unreasonable requirement, as no such requirement would generally be applied to other forms of housing.

**Action:**

No change

5621

**Support****Document Element:** Policy H11 Meeting Gypsies, Travellers and Travelling Showpeoples' Needs**Respondent:** Thakeham Homes

## Object

### Summary of representations:

While the level of need and lack of available sites is noted, this doesn't mean that the proposed locations for pitches are appropriate. The allocations also wouldn't accommodate the overall level of need. Consequently, approach not robust. There are also pitches available at Pinks Four (HELAA site) which have not been utilised. No evidence that travellers want to live on the strategic housing allocations. Providing pitches on strategic allocations will be difficult to deliver owing to the large vehicles involved.

### Summary of representation changes to plan:

N/A

### Response:

The gypsy and traveller site design guidance from 2008 encourages provision as part of mainstream residential development. The reasons for not allocating the Pinks Four are clearly explained in the background paper. In terms the reference to large vehicles, it is not clear why the respondent thinks pitches will be utilising large vehicles, and in any case all residential development has to be designed to accommodate large vehicles such as refuse vehicles. Also, if that argument is valid then presumably this policy requirement would always be rejected, but it clearly hasn't as there are numerous examples now of this approach being found sound.

### Action:

See Council's suggested Modification CM185.

5756

Object

**Document Element:** Policy H11 Meeting Gypsies, Travellers and Travelling Showpeoples' Needs

**Respondent:** Barratt David Wilson Homes

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

Object to provision of 12 gypsy and traveller pitches and provision of travelling showpeople site in relation to Policy A13 site allocation.

### Summary of representation changes to plan:

N/A

### Response:

The reasoning behind this approach is set out in the Council's background paper regarding gypsy and traveller accommodation.

### Action:

No change

6073

Object

**Document Element:** Policy H11 Meeting Gypsies, Travellers and Travelling Showpeoples' Needs

**Respondent:** Wates Developments and Seaward Properties

**Agent:** Barton Willmore now Stantec

## Policy H12 Intensification sites

## Object

### Summary of representations:

States that for sites on this list, why do any additional caravans have to meet an identified need only on that site to be acceptable? Considers that such a requirement is unreasonable bearing in mind the overwhelming need identified. Asks why is the land to the north and south of the proposed allocation at Five Paddocks excluded?

### Summary of representation changes to plan:

N/A

### Response:

The policy focuses on ensuring that the level of need associated with each site can be met on that site wherever possible, and it cannot be assumed that additional accommodation on sites would or should be made available other than for those who are need of such accommodation.

The issues in relation to the land around five paddocks is addressed in the background paper.

### Action:

No change

4371

Object

**Document Element:** Policy H12 Intensification sites

**Respondent:** Mr Stephen Jupp

## Object

### Summary of representations:

Argues that there is an inconsistency in the approach to the sites. Makes specific reference to the 2 show person sites referred in H12 as being temporary due to flood risk but at the same time an additional traveller pitch is proposed immediately to the south at The Stables and that is not to be temporary. States that all the recent permissions at Five Paddocks Farm have been permanent and the allocation should also be permanent.

### Summary of representation changes to plan:

N/A

### Response:

The reason for the difference is that The Stables site is less at risk of flooding than the Five Paddocks site, as per the latest version of the SFRA. The increased level of flood risk is also the reason for taking a different approach vis-à-vis the previous consents referred to, as these pre-date the current SFRA. This is set out in the relevant background paper.

However, on balance, while the level of flood risk is less with respect to The Stables, it may be that a more circumspect approach would be for this to be based on the same restrictions as Five Paddocks. Especially as the access appears to be affected by future flood risk.

Furthermore, having done further research it would appear that personal permissions would be another alternative to temporary consents, and hence the wording of the policy should be amended to include this as another possible option for making provision in a manner which does not conflict with future flood risk concerns.

### Action:

See Council's suggested Modification CM189.

4472

Object

**Document Element:** Policy H12 Intensification sites**Respondent:** Mr Stephen Jupp**Support****Summary of representations:**

Note that no sites are within any medium to high-risk flood zones, which the EA is supportive of. Some sites may need to consider wastewater infrastructure availability, bearing in mind the Planning Practice Guidance for Water supply, wastewater and water quality (i.e. "the first presumption is to provide a system of foul drainage discharging into a public sewer to be treated at a public sewage treatment works"). EA supports the policy.

**Summary of representation changes to plan:**

N/A

**Response:**

Comment noted, no change is considered to be required, though the relevant national level guidance will need to be considered when determining relevant planning applications.

**Action:**

no change

4854

Support

**Document Element:** Policy H12 Intensification sites**Respondent:** Environment Agency**Support****Summary of representations:**

Policies H11, H12 and H13 are supported, including the mechanisms for making provision for travellers accommodation, i.e. provision of pitches on new strategic allocations and appropriate intensification of existing authorised sites. SDNP welcome continued joint working between the coastal authorities and the South Downs National Park Authority with regard to addressing any unmet need (from the SDNP).

**Summary of representation changes to plan:**

N/A

**Response:**

The comments are noted and the council is happy to continue joint working with neighbouring authorities, including the SDNP. However, given the extremely high need within the plan area it is not likely to be realistic for the council to accommodate additional pitches from elsewhere.

**Action:**

no change

5142

Support

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**Document Element:** Policy H12 Intensification sites

**Respondent:** South Downs National Park Authority

## Policy H12 Intensification sites

## Object

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### Summary of representations:

Consider that the parish council have not been consulted regarding this policy, which is a breach of the relevant legislation. State that the Sunrise site is already fully occupied and includes the controversial encroachment over a significant length of a PRow. An unauthorised park-home has been recently located over the original route of the PRow. The site does not have its own access to fresh water or the sewer system and its permission was granted without the requirement for this. They consider that CDC is attempting to use this proposed intensification to regularise this unauthorised development, which is not acceptable.

### Summary of representation changes to plan:

N/A

### Response:

The parish council has been notified as part of the formal Regulation 19. consultation as per the legal requirements. In terms of the Sunrise site, based on the comments received, it may be that an additional mobile home has been placed on the site without authorisation since the submission Local Plan was drafted. This may be blocking the original public right of way (PRow). The evidence base is clear that there is space for an additional pitch on the site vis-à-vis the single pitch consented, and that this is capable of being provided without blocking the original route of the PRow.

Given that the site is on the edge of an established residential area, it would seem reasonable to assume that water related facilities can be provided in the same manner as for any other residential unit in this location, this matter can be addressed as part of future planning applications.

### Action:

See Council's suggested Modification CM190.

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**5248****Object**

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**Document Element:** Policy H12 Intensification sites

**Respondent:** Southbourne Parish Council

## Object

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**Summary of representations:**

Object: Westbourne Parish Council (WPC) is concerned to avoid intensification of traveller and travelling showpeople sites within the Parish. Westbourne already has one of the highest concentrations of such uses anywhere in the District. WPC would argue that locations with lower intensities of such use should be utilised. Concerning the site at Cemetery Lane, there have been many enforcement issues in this area with unauthorised pitches and unauthorised industrial and commercial development, and further increases in the quantity of pitches will exacerbate the situation to the detriment of the balanced and cohesive community that the Parish Council seeks to protect and enhance.

**Summary of representation changes to plan:**

N/A

**Response:**

The Council has sought to take a balanced approach to the intensification of sites, which seeks to ensure that clusters of pitches do not become overcrowded or excessively large, but while also considering the needs of those identified in the GTAA as requiring accommodation. This is set out in detail within the relevant background paper. The Council believes it has struck the appropriate balance in this regard.

**Action:**

No change

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**5983****Object**

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**Document Element:** Policy H12 Intensification sites

**Respondent:** Westbourne Parish Council



## Policy H13 Accommodation for Gypsies, Travellers and Travelling Showpeople

### Object

#### Summary of representations:

Criteria 1 refers to well-related but this is not explained in any details. It needs to be made clear that this is in terms of its scale and not location. Asks how does the LPA envisage 'dominate' being assessed - is it on a parish basis and if so then at what level is it considered unacceptable?

#### Summary of representation changes to plan:

N/A

#### Response:

It is considered that well-related is a reasonable requirement, indeed, it is already a requirement within the equivalent policy in the current Local Plan (policy 36). In addition, it is considered to be relatively clear that this must relate to location, as there is also reference to scale in this requirement.

In terms of the proposed change related to how 'dominate' needs to be assessed. Paragraph 14 of PPTS uses essentially the same terminology, and therefore it is considered an appropriate term to include.

#### Action:

No change

4372

Object

**Document Element:** Policy H13 Accommodation for Gypsies, Travellers and Travelling Showpeople

**Respondent:** Mr Stephen Jupp

### Support

#### Summary of representations:

We support the specific criteria in this policy to ensure that sites avoid locations where there are significant constraints including flood risk (criteria 2).

#### Summary of representation changes to plan:

N/A

#### Response:

Comment noted

#### Action:

No change

4855

Support

**Document Element:** Policy H13 Accommodation for Gypsies, Travellers and Travelling Showpeople

**Respondent:** Environment Agency

## Support

### Summary of representations:

Policies H11, H12 and H13 are supported, including the mechanisms for making provision for travellers accommodation, i.e. provision of pitches on new strategic allocations and appropriate intensification of existing authorised sites. SDNP welcome continued joint working between the coastal authorities and the South Downs National Park Authority with regard to addressing any unmet need (from the SDNP).

### Summary of representation changes to plan:

N/A

### Response:

The comments are noted and the council is happy to continue joint working with neighbouring authorities, including the SDNP. However, given the extremely high need within the plan area it is not likely to be realistic for the council to accommodate additional pitches from elsewhere.

### Action:

No change

## 5143

## Support

**Document Element:** Policy H13 Accommodation for Gypsies, Travellers and Travelling Showpeople

**Respondent:** South Downs National Park Authority

## Support

### Summary of representations:

We specifically support the inclusion of criterion 4 in Policy H13 which requires consideration of the potential impact of new pitches on nationally protected landscapes and nature conservation sites.

### Summary of representation changes to plan:

N/A

### Response:

Comment noted, though please see associated representation – 6127.

### Action:

No change

## 5846

## Support

**Document Element:** Policy H13 Accommodation for Gypsies, Travellers and Travelling Showpeople

**Respondent:** Natural England

## Object

### Summary of representations:

For the avoidance of doubt NE would strongly recommend including additional wording in this policy (as has already been done in E8) to make clear that new pitches will be required to contribute to the relevant access management strategies.

### Summary of representation changes to plan:

N/A

### Response:

The Council are happy to make this amendment. Though it is considered most appropriate to apply this amendment to policy H11, as presumably it would apply to all applications for pitches, not just those approved on the basis of policy H13.

### Action:

See Council's suggested Modification CM188.

**6127****Object**

**Document Element:** Policy H13 Accommodation for Gypsies, Travellers and Travelling Showpeople

**Respondent:** Natural England

## Object

### Summary of representations:

Object: Westbourne Parish Council (WPC) is concerned to avoid intensification of traveller and travelling showpeople sites within the Parish. Westbourne already has one of the highest concentrations of such uses anywhere in the District. WPC would argue that locations with lower intensities of such use should be utilised. Concerning the site at Cemetery Lane, there have been many enforcement issues in this area with unauthorised pitches and unauthorised industrial and commercial development, and further increases in the quantity of pitches will exacerbate the situation to the detriment of the balanced and cohesive community that the Parish Council seeks to protect and enhance.

### Summary of representation changes to plan:

N/A

### Response:

This policy provides a general framework for new sites and the intensification or expansion of existing sites. It is considered that the policy strikes an appropriate balance between meeting the needs of those requiring accommodation, while preventing unacceptable levels of harm flowing from such proposals. This policy does not specify particular areas where such proposals would or would not be supported, and to do so is considered to be overly prescriptive.

### Action:

No change

**6188****Object**

**Document Element:** Policy H13 Accommodation for Gypsies, Travellers and Travelling Showpeople

**Respondent:** Westbourne Parish Council

## Policy H14 Gypsy and Traveller, and Travelling Showpeople site design policy

### Object

#### Summary of representations:

The policy should require that activities within a site that is to be included within a strategic land allocation (SAL), should align with activities for that strategic land allocation. For example in a residential SAL with no manufacturing, engineering, building, storage, etc activities, the site should be prohibited from operating a similar type of business, and should not be used for the storage of plant, materials, equipment and waste etc. This would help alignment with items e), f) and g) of this policy.

#### Summary of representation changes to plan:

N/A

#### Response:

In general terms this policy does not facilitate the activities referred to in the representation. The only exception is arguably with respect to storage, where some will be required in relation to travelling showpeople. Nevertheless, the policy, along with other policies within the Plan, such as those covering noise, provide an appropriate framework for ensuring that the impacts flowing from such uses are appropriately mitigated.

In addition, PPTS encourages the consideration of mixed residential and business use sites for travellers, so the amendments proposed would appear to be inconsistent with PPTS.

Moreover, this is a general policy, and hence any restrictions pertaining to the strategic site allocations should be included within the relevant site allocation policies, especially as some of the allocation policies do support employment uses.

#### Action:

No change

4642

Object

**Document Element:** Policy H14 Gypsy and Traveller, and Travelling Showpeople site design policy

**Respondent:** Mr Allen McDonald

Support

#### Summary of representations:

Support.

#### Summary of representation changes to plan:

N/A

#### Response:

Comment noted.

#### Action:

No change

6053

Support

**Document Element:** Policy H14 Gypsy and Traveller, and Travelling Showpeople site design policy

**Respondent:** Mr Allen McDonald

## Background, 6.1

## Object

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**Summary of representations:**

on grounds high quality environment contradicts with proposed strategic allocation at Loxwood

**Summary of representation changes to plan:**

Lessen the amount of houses!

**Response:**

It is recognised that the representation does not propose changes to policy P1 or its supporting text, and that an objection to Policy H2, which proposes the allocation at Loxwood, has also been made. This representation seems most pertinent to policy H2 and does not result in a need for any changes to this policy

**Action:**

No change in response to representation

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**3820****Object**

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**Document Element:** Background, 6.1

**Respondent:** Ms Louise Williamson

## Support

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**Summary of representations:**

Supportive

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

N/A

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**5193****Support**

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**Document Element:** Background, 6.1

**Respondent:** John Newman

## Object

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### Summary of representations:

on grounds section covers themes to be addressed by Chichester Neighbourhood Plan at non-strategic level. Proposed variety of references to opportunities that Neighbourhood Plans provide in interpreting and applying the place-making, health and well-being topics at site and neighbourhood level

### Summary of representation changes to plan:

References to Chichester Neighbourhood Plan throughout Chapter

### Response:

A variety of references would be excessive, but the Council indeed propose to include reference to neighbourhood planning in this section as it agrees that neighbourhood planning does provide an important opportunity to provide a more locally distinctive aspect to design policy and guidance.

### Action:

See council suggested modification CM192

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5745

Object

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**Document Element:** Background, 6.1

**Respondent:** Chichester City Council Neighbourhood Plan Steering Group

## Background, 6.2

## Support

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### Summary of representations:

Supportive

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

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5194

Support

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**Document Element:** Background, 6.2

**Respondent:** John Newman

## Background, 6.3

Support

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**Summary of representations:**

Supportive

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

N/A

5195

Support

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**Document Element:** Background, 6.3

**Respondent:** John Newman

Support

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**Summary of representations:**

We welcome the opportunity to be invited to be involved in the pre-application scoping stage and to review Sustainability Statement to reduce impacts associated with traffic

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comments noted

**Action:**

N/A

5297

Support

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**Document Element:** Background, 6.3

**Respondent:** National Highways

## Background, 6.4

Support

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**Summary of representations:**

Supportive

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

N/A

5196

Support

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**Document Element:** Background, 6.4

**Respondent:** John Newman

## Background, 6.5

Support

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**Summary of representations:**

Supportive

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

N/A

5197

Support

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**Document Element:** Background, 6.5

**Respondent:** John Newman



## Background, 6.6

# Support

### Summary of representations:

Supportive

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

N/A

## 5198

## Support

Document Element: Background, 6.6

Respondent: John Newman

## Policy P1 Design Principles

# Object

### Summary of representations:

on grounds to be sound and legal the development shall satisfy the new Future Homes Standard FHS in the amended and updated building regulations. All homes and businesses will have to meet rigorous new energy efficiency standards to lower energy consumption and bills, helping to protect the environment. To achieve net zero by 2025.

### Summary of representation changes to plan:

To be sound and legal the development shall satisfy the new Future Homes Standard FHS in the amended and updated building regulations. All homes and businesses will have to meet rigorous new energy efficiency standards to lower energy consumption and bills, helping to protect the environment. To achieve net zero by 2025

### Response:

The Future Homes Standards, and the potential amendments to it (which form the subject of the government consultation in December 2023), form part of building regulations. The Local Plan is not required to, and should not, repeat building regulations. Moreover, the policy already does all it reasonably can in the current policy context to support sustainable approaches to development, including with respect to energy efficiency

### Action:

No change in response to representation

## 4046

## Object

Document Element: Policy P1 Design Principles

Respondent: Mr Jan Davis

## Support

### Summary of representations:

Support in principle. Comment surrounding concern as to whether CDC has the resources required to uphold such ambitious principles. Notes that certain recent housing developments around Chichester have fallen way short of the aims set out

### Summary of representation changes to plan:

N/A

### Response:

Support and comment noted. Ensuring that the requirements for high quality design are met will put pressure on resources, but a strong policy framework will improve the Council's ability to achieve such standards, and the future production of a design code will further support the process

### Action:

No change

4181

Support

**Document Element:** Policy P1 Design Principles

**Respondent:** Chidham and Hambrook Parish Council

## Object

### Summary of representations:

Support in principle. Objection on grounds provision of local design codes should be a priority and plan should clarify expectations of design quality, ensure all development responds positively to National Design Code as a minimum

### Summary of representation changes to plan:

The plan should clarify its expectations of design quality and ensure that all development responds positively to the National Design Code as a minimum – this could be written into general development management policies

### Response:

Support in principle noted. Please see separate response to representation 4291 with regards to objections raised

### Action:

See Council suggested modifications CM192 and CM193

4259

Object

**Document Element:** Policy P1 Design Principles

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

### Summary of representations:

Objection on grounds Plan should demonstrate how objectives are to be measured and achieved. Policy should reference role of more specific, local design guides in delivering high quality local neighbourhoods. Policy should require adherence to NDG as a minimum, and evidence how compliance is met – generic wording insufficient

### Summary of representation changes to plan:

The policy should require the adherence to the National Design Guide as a minimum and to local (including specific site) design guides where they exist. Where no design guidance exists or where developments wish to introduce a differing design approach, they must be required to demonstrate why guidance nationally or locally should be set aside.

Policies should require developments to demonstrate with evidence how compliance with guidance is met - it will not be sufficient to rely on generic wording that a development meets the set criteria

### Response:

The Council agrees that both a design code for the plan area and local level design codes would be very helpful for ensuring the achievement of high quality design and policy P1 is proposed to be amended accordingly. The Council considers that prior to the production of a local design code adherence to the National Design Guide is essential. The policy intended for this to be a core requirement, but in light of this representation an amendment is proposed in order to clarify that position.

### Action:

See council proposed modifications CM192 and CM193

4291

Object

**Document Element:** Policy P1 Design Principles

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

Support

### Summary of representations:

Support policy intent

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

4564

Support

**Document Element:** Policy P1 Design Principles

**Respondent:** Wisborough Green Parish Council

## Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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4727

Support

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**Document Element:** Policy P1 Design Principles

**Respondent:** Mr Cliff Archer

## Support

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**Summary of representations:**

General support of policy and wording

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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4810

Support

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**Document Element:** Policy P1 Design Principles

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

## Object

### Summary of representations:

Objection and proposed change to all green infrastructure references to green/blue infrastructure to ensure water environment not marginalised or ignored

### Summary of representation changes to plan:

Change all references to 'green infrastructure' to say 'green/blue infrastructure' to ensure that opportunities in the water environment alongside the terrestrial environment are not marginalised or ignored

### Response:

As per our response to representation 4860, Local Plan references to Green Infrastructure as an overarching term is consistent with terminology within the NPPF, Planning Practice Guidance and the Natural England Green Infrastructure Framework. The Local Plan Appendix J Glossary does, however, define Green and Blue Infrastructure as a multifunctional network of green and blue spaces

### Action:

No proposed change in response to representation

4856

Object

**Document Element:** Policy P1 Design Principles

**Respondent:** Environment Agency

## Object

### Summary of representations:

Concerns new build requirements don't meet PassiveHaus standards or equivalent. No mention of solar panels for example

### Summary of representation changes to plan:

N/A

### Response:

Unfortunately, the Council it is not in a position to specify particular sustainable design standards, as recently set out by Lee Rowley (Housing Minister) to the House of Commons on 13 December 2023. The Council does seek to achieve high quality, sustainable design. In this regard policy P1 makes reference to sustainable technology, which would include solar panels. Ultimately, this issue will be addressed by the progression of the Future Homes Standard, which was consulted upon by the government on 13 December 2023.

### Action:

No change in response to representation

5006

Object

**Document Element:** Policy P1 Design Principles

**Respondent:** Hunston Parish Council

## Object

### Summary of representations:

Objection on grounds policy needs to include reference to existing site constraints including utilities such as overhead power lines and other NGET assets to ensure consistency with national policy

### Summary of representation changes to plan:

Therefore, to ensure that Design Policy P1 is consistent with national policy we would request the inclusion of a policy strand such as:

"x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites

### Response:

The Council recognises the importance of consultation with the appropriate bodies when considering applications for development around utility infrastructure assets, as per the NPPF reference. It is not considered necessary, however, to restate this requirement within the Local Plan to ensure its soundness

### Action:

No change in response to representation

5011

Object

**Document Element:** Policy P1 Design Principles

**Respondent:** National Grid

**Agent:** National Grid

## Object

### Summary of representations:

HBF recognises importance of reducing embodied carbon in new homes but the extent to which material can be used will be varied. Proposed change to "...including, where possible, the use of materials...'

### Summary of representation changes to plan:

Suggest that the policy is amended to read "... including, where possible, the use of materials ..."

### Response:

The Council agrees to a certain extent that the practicalities of sourcing materials means that some flexibility is required but wish to avoid weakening the policy excessively. Therefore, a compromise is proposed which introduces a degree of flexibility but without defeating the goal of the policy, this would entail including the words "wherever possible", instead of "where possible

### Action:

See council suggested modification CM194

5151

Object

**Document Element:** Policy P1 Design Principles

**Respondent:** Home Builders Federation

## Support

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**Summary of representations:**

Supportive

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

N/A

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**5199**
**Support**


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**Document Element:** Policy P1 Design Principles

**Respondent:** John Newman

## Object

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**Summary of representations:**

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Noting SRN policies and NH processes.] Objection on grounds policy 6 does not cover signage. No reference is made to the SRN or National Highways. It is a requirement of the LPA to consult NH on the road safety aspects of advertisements proposed alongside the SRN, for example adverts

**Summary of representation changes to plan:**

N/A

**Response:**

Policy P1 recognises safety as a design consideration. The reference and the overall policy is purposefully high level and it is not considered necessary to provide an explicit reference to road safety considerations in relation to signage in this policy. Moreover, this issue is addressed in paragraph 141 of the NPPF, and it is considered that there is no need to repeat those requirements in this policy

**Action:**

No change in response to representation

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**5298**
**Object**


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**Document Element:** Policy P1 Design Principles

**Respondent:** National Highways

## Support

### Summary of representations:

Supportive of policy intent. Query whether Sustainability Statement should be required for all development proposals. Point A is welcomed, albeit a proportionate and flexible approach is required, particularly given challenges in sourcing materials. Will be important to avoid making mechanism too prescriptive

### Summary of representation changes to plan:

N/A

### Response:

Support and comments noted. The Council agrees that it isn't reasonable to expect all proposals to submit a sustainability statement, and hence proposes an amendment to revert to the same criteria which currently apply to sustainable construction and design statements. The issue raised concerning the need for some flexibility regarding the sourcing of materials is considered to be addressed by the proposed amendment in relation to representation 5151

### Action:

See council suggested modification CM195

## 5416

## Support

**Document Element:** Policy P1 Design Principles

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Support

### Summary of representations:

Supports admirable policy. Queries whether achievable on grounds of monitoring requirements

### Summary of representation changes to plan:

N/A

### Response:

Support and comment noted. Comment noted. Monitoring is addressed in Appendix F

### Action:

No change in response to representation

## 5461

## Support

**Document Element:** Policy P1 Design Principles

**Respondent:** Mayday! Action Group



## Object

### Summary of representations:

Objection on grounds policy does not consider safe and efficient access, focusing on sustainable transport modes, in accordance with NPPF. Proposes additional statement "development will be designed to make access and movement using walking, cycling and public transport the natural first choice, and demonstrated through the D&AS how such modes are afforded the most direct, safe, reliable and efficient routes within, to and from the proposals, especially when compared with car use".

### Summary of representation changes to plan:

Policy P1 must include an additional statement to be compliant and effective with NPPF paragraph 104-105 and 112 a): "Development will be designed to make access and movement using walking, cycling and public transport the natural first choice, and demonstrate through the Design and Access Statement how such modes are afforded the most direct, safe, reliable and efficient routes within to and from the proposals, especially when compared with car use."

### Response:

The Council agrees with the point made in terms of prioritising walking, cycling and public transport, but consider that this is an issue already addressed in the National Design Guide, and compliance with that is already required via this policy. This issue is also addressed in depth within policy T3

### Action:

No change in response to representation

**5538****Object**

**Document Element:** Policy P1 Design Principles

**Respondent:** Stagecoach South

## Object

### Summary of representations:

Objection on grounds policy requirement for D&AS to address all 10 characteristics is unnecessary and overcomplicated

### Summary of representation changes to plan:

N/A

### Response:

The Council agree that some further clarification in this regard would be helpful in terms ensuring that this requirement can be met in a manner which works efficiently in practice. Ultimately, this part of the policy will need to be applied in a pragmatic manner via the development management process.

### Action:

See council suggested modification CM193

**5622****Object**

**Document Element:** Policy P1 Design Principles

**Respondent:** Thakeham Homes

## Object

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**Summary of representations:**

Objection on grounds application of materials within A will vary according to sites, and elements within B may not be appropriate for all developments and therefore ineffective. Proposed amendments i) to A: '...including,, where possible, the use of materials...' and ii) B 'The proposals include measures to adapt to climate change, such as the provision where possible of GI....

**Summary of representation changes to plan:**

Suggest Part A is amended to read '...including, where possible, the use of materials ...'

Would suggest the following revision to Part B: 'The proposals include measures to adapt to climate change, such as the provision where possible of green infrastructure, sustainable urban drainage systems (SuDS), suitable shading of pedestrian routes and open spaces, a mixture of drought and rain tolerant native planting and the incorporation of green or blue roofs or green walls;'

**Response:**

The Council agrees to a certain extent that the practicalities of sourcing materials means that some flexibility is required but wish to avoid weakening the policy excessively. Therefore, a compromise is proposed which introduces a degree of flexibility but without defeating the goal of the policy. In relation to the second point, the Council agrees that the suitability of adaptation measures will vary according to the characteristics of particular developments and sites. However, there is already considered to be sufficient flexibility within the policy to address this point (the policy doesn't require that all of the list is utilised). Moreover, the proposed amendment by the respondent doesn't seem to fundamentally change the policy requirement

**Action:**

See council suggested modification CM194

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**5663****Object**

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**Document Element:** Policy P1 Design Principles

**Respondent:** Countryside Properties

**Agent:** Turley

## Support

### Summary of representations:

Support but proposes amendment to criterion A to recognise extent to which materials can be sourced and used will vary from development to development. Proposed change to "including, where feasible, the use of material that reduce the embodied carbon"

### Summary of representation changes to plan:

Recommend criteria A is amended as follows:

A. The proposals apply sound sustainable design, good environmental practices, sustainable building techniques and technology, including where feasible the use of materials that reduce the embodied carbon of construction and make use of re-used or recycled materials;

### Response:

The Council agree to a certain extent that the practicalities of sourcing materials means that some flexibility is required. However, the proposed wording is considered to be too flexible and would weaken the policy excessively. Therefore, a compromise is proposed which introduces a degree of flexibility but without defeating the goal of the policy

### Action:

See council suggested modification CM194

5735

Support

**Document Element:** Policy P1 Design Principles

**Respondent:** Metis Homes

**Agent:** Nova Planning

## Support

### Summary of representations:

Supports

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

5847

Support

**Document Element:** Policy P1 Design Principles

**Respondent:** Natural England

## Object

### Summary of representations:

Objection on grounds i) policy does not go beyond national policy and guidance. ii) P1 and P2 should point to the ability for communities to prepare local design codes through neighbourhood plans – more specific than design policies. iii) Policy currently unclear about need for 'major development' to provide a detailed masterplan or design codes or development briefs – focus solely on D&AS requirement – policy hooks re specific design tool and document are important for clarity and effectiveness

### Summary of representation changes to plan:

N/A

### Response:

The point in relation to reliance on national policy is noted, but reliance on national policy in this regard is appropriate in the interim while a plan area design code is being prepared. The Council agree that it is important for the policy to reflect the importance of the neighbourhood/local level in relation to the production of design codes, this is addressed via the amendment proposed in relation to representation 4291. In relation to masterplans, these requirements are set out in relation to the site-specific allocation policies. There will also be opportunities to add masterplans to any site-specific design codes.

### Action:

See council suggested modification CM192

5859

Object

**Document Element:** Policy P1 Design Principles

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Object

### Summary of representations:

Objection on grounds policy needs to reflect design around underground gas transmission pipelines and other assets to ensure compliance with national policy. Proposed amendment as follows: 'x. taking a comprehensive and coordinated approach to development including respecting existing site constraints including utilities situation within sites

### Summary of representation changes to plan:

o ensure that Design Policy P1 is consistent with national policy we would request the inclusion of a policy strand such as:

"x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."

### Response:

Objection and comments noted. The Council recognises the importance of consultation with the appropriate bodies when considering applications for development around utility infrastructure assets, as per the NPPF reference. It is not considered necessary, however, to restate this requirement with the Local Plan to ensure its soundness

### Action:

No change in response to representation

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**5966****Object**

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**Document Element:** Policy P1 Design Principles**Respondent:** National Gas Transmission**Agent:** Avison Young

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**Object**

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**Summary of representations:**

Objection on grounds points A-C are overly prescriptive and relate to inappropriate matters of detail covered elsewhere

**Summary of representation changes to plan:**

N/A

**Response:**

The NPPF highlights the importance of sustainable design, (paragraph 126/131). The same paragraph also refers to the Local Plan needing to clearly set out design expectations. Furthermore, the National Design Guide emphasises sustainability throughout.

Consequently, it is considered that emphasising the need to ensure the achievement of sustainable approaches to design, and the need for this to be clearly explained, are consistent with national policy and guidance.

**Action:**

No change in response to representation

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**6040****Object**

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**Document Element:** Policy P1 Design Principles**Respondent:** Miller Homes and Vistry Group**Agent:** Tetra Tech

## Object

### Summary of representations:

Objection on grounds i) Strategic Objective 3: Housing specifies a clear requirement to ensure that good design is understood in the subsequent masterplanning and detailed design and build. li) CDC has declared a Climate Emergency and it should set requirements over those stated in Building Regulations. This lack of ambition is acknowledged in the SA (section 9.6).

### Summary of representation changes to plan:

Plan should set requirements over those stated in Building Regulations.

### Response:

In relation to point i) the plan taken as a whole sets out clear requirements in relation to design, and further clarity will be provided by a future design code(s); ii) While the Council sympathises with the desire to set standards which exceed building regulations, Housing Minister Lee Rowley stated in the House of Commons on 13 December that Council's are not permitted to pursue such a course of action. Therefore, all the Council can do is seek other means to try and encourage sustainable approaches to design, and the plan already seeks to do that.

### Action:

No change in response to representation

6050

Object

**Document Element:** Policy P1 Design Principles

**Respondent:** Mr Allen McDonald

## Object

### Summary of representations:

RECEIVED LATE: Consider that Local Plan should include a policy requiring all new-build homes to be equipped and sold with solar PV panels, roof or wall mounted.

### Summary of representation changes to plan:

Local Plan should include a policy requiring all new-build homes to be equipped and sold with solar PV panels, roof or wall mounted.

### Response:

Objection noted. Policy P1 requires development to accord with the National Design Guide, a key characteristic of which is achieving functional, healthy and sustainable homes. Furthermore, the policy makes reference to sustainable technology, which would include solar panels. The council considers that progression of the Future Homes Standard will address the detailed requirements of new homes in relation to solar technologies.

### Action:

No change in response to representation.

6498

Object

**Document Element:** Policy P1 Design Principles

**Respondent:** CPRE Sussex

**Agent:** CPRE Sussex

## Background, 6.7

## Object

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### Summary of representations:

Objection on grounds Plan should make appropriate provision for the protection of local character and distinctiveness, applicable equally to open areas and the built environment. Proposes this is achieved through the identification of overarching character areas to which specific DM policies apply.

### Summary of representation changes to plan:

It is important the Plan makes appropriate provision for the protection of local character and distinctiveness and this applies equally to open areas (countryside and urban fringe) as it does to the built environment. This can be achieved through the identification of character areas to which overarching and specific development management policies apply.

### Response:

Objection and proposed changes noted. It is considered that Policy P2 already sets expectations for development to protect, enhance and integrate with local area characteristics, including the built environment and surrounding landscapes. As per our response to your representation 4293, it is recommended that P1 be amended to reference the proposed production of local level design guides. It is envisaged that these guides will articulate a baseline understanding of the local context and an analysis of local character and identity, as per the National Design Guidance. It is suggested production of the local design guides will address your concerns. No modifications to P2 are recommended on this basis.

### Action:

No change to P2 in response to representation.

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**4735****Object**

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**Document Element:** Background, 6.7

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Background, 6.8

## Object

### Summary of representations:

on grounds 220 houses proposed for Loxwood incompatible for protection and enhancement of local character.

### Summary of representation changes to plan:

Reduce the amount of houses assigned to Loxwood

### Response:

Objection noted. It is recognised that the representation does not propose changes to policy P2 or its supporting text, and that an objection to Policy H2, which proposes the 220 allocation at Loxwood, has also been made. No further action is recommended in relation to Policy P2

### Action:

No change in response to representation

3821

Object

Document Element: Background, 6.8

Respondent: Ms Louise Williamson

## Policy P2 Local Character and Distinctiveness

## Support

### Summary of representations:

Support for policy, criteria 7 and 8 particularly.

### Summary of representation changes to plan:

N/A

### Response:

Support and comments noted

### Action:

N/A

4214

Support

Document Element: Policy P2 Local Character and Distinctiveness

Respondent: Chidham and Hambrook Parish Council



## Object

### Summary of representations:

Objection on grounds generic criteria should go further and reference design guides indicating key elements of an area that define its character and which are desirable to maintain and enhance. Should correlate with P3, P4, P5, P6, P7 and P8 as all are interconnected and cannot be applied in isolation

### Summary of representation changes to plan:

In addition to the generic requirements set out in criteria 1 – 9, the policy should reference design guides that indicate the key elements of an area that define its character and which are desirable to maintain and enhance.

This policy should correlate with Policies P3 Density, P4 layout and Access, P5 Spaces, P6 Amenity, P7 Extensions, and P8 Materials and detail. All are interconnected and the plan should indicate that a policy cannot be applied in isolation, but as a whole

### Response:

Objection and proposed changes noted. The Council agree that it would be helpful to make reference to other design guidance, but not in multiple design policies, and hence it is considered that this point will be addressed by making reference to local level design guides/codes via proposed amendments to Policy P1.

### Action:

No change to P2 in response to representation

4293

Object

**Document Element:** Policy P2 Local Character and Distinctiveness

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

Support

### Summary of representations:

Supports policy intent

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

4565

Support

**Document Element:** Policy P2 Local Character and Distinctiveness

**Respondent:** Wisborough Green Parish Council

## Object

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### Summary of representations:

Objection on grounds housing allocations A11, A12 and A14 contravene policy, especially in relation to maintenance of separate distinct identity of different settlements and a clear transition between built up areas and the countryside

### Summary of representation changes to plan:

A significant reduction in the housing allocation along the A259 corridor between Chichester and Southbourne and the removal of A11 Highgrove Farm allocated site in particular.

### Response:

Objection noted. It is recognised that the representation does not propose changes to policy P2 or its supporting text, and that objections to Policies A11, A12 and A13 have also been made on the basis of conflict with other policies in the Plan. No further action is recommended in relation to Policy P2

### Action:

No changes in response to representation

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4604

Object

**Document Element:** Policy P2 Local Character and Distinctiveness

**Respondent:** Chichester Harbour Trust

## Policy P2 Local Character and Distinctiveness

# Support

### Summary of representations:

Agree with policy

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

## 5200

## Support

**Document Element:** Policy P2 Local Character and Distinctiveness

**Respondent:** John Newman

# Object

### Summary of representations:

Bellway supports the draft Policy P2. Bellway welcome the in-built flexibility of the policy which enables justification of non-compliant areas to allow for alternative design styles. Bellway contend that the draft Policy 'P2' as conveyed in the draft Plan has been positively prepared, is fully justified, effective and consistent with the NPPF. Suggested amendments to the policy.

### Summary of representation changes to plan:

Proposes amendments:

i) Remove reference to building typologies and silhouettes; ii) remove bullet 5 as covered by P9; iii) bullet 6 should state 'retains where possible existing boundary treatments...'; iv) bullet 8 should state 'respects and where possible retains, enhances or creates vistas, panoramas and views.'

### Response:

Proposed changes noted. i) it is not considered necessary to remove references to building typologies and silhouettes to ensure the soundness of the Plan. Indeed the National Design Guidance makes reference to typologies in relation to consideration of the local vernacular; ii) It is not considered necessary to remove bullet 5 as its inclusion reinforces the need to consider the heritage of the area as part of local character considerations; iii) it is not considered necessary to alter bullet 6 as the wording ensures the retention of only boundary treatments that contribute positively iv) it is not considered necessary to alter bullet 8 as suggested as this may weaken regard for the importance of protecting landscapes.

### Action:

No change in response to representation.

5417

Object

**Document Element:** Policy P2 Local Character and Distinctiveness**Respondent:** Bellway Homes (Wessex) Ltd**Agent:** Chapman Lily Planning

Object

**Summary of representations:**

Objection on grounds developers insufficiently policed to enforce policy points 7 and 8

**Summary of representation changes to plan:**

N/A

**Response:**

The Council understands the points made and certainly thinks that enforcement and preventing inappropriate site clearance is important. However, there are limits to what the Council can do in this regard as any development can clear their site, providing that doing so doesn't breach relevant legislation or planning conditions or involve the removal of protected features such as TPOs. Unfortunately planning policies cannot change this situation. However, the new biodiversity net gain requirements should discourage such practices, as site clearance will then mean that extra BNG credits would be required, which would make it disadvantageous for developers pursue such an approach.

**Action:**

No change in response to representation;

5462

Object

**Document Element:** Policy P2 Local Character and Distinctiveness**Respondent:** Mayday! Action Group

Object

**Summary of representations:**

Objection to ambiguity of para. 6.9. Clarity should be provided to understand what would be deemed 'too many similar house types'.

**Summary of representation changes to plan:**

N/A

**Response:**

Objection and comment noted. It is considered that the supporting text sufficiently describes the potential harm to local character associated with repetition in larger schemes. To attempt to further define would hinder flexibility in its applicability to a variety on contexts

**Action:**

No change in response to representation

5623

Object

**Document Element:** Policy P2 Local Character and Distinctiveness**Respondent:** Thakeham Homes

Support

**Summary of representations:**

Supports policy and welcomes requirement for developments to respect existing natural features

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comments noted

**Action:**

N/A

5848

Support

**Document Element:** Policy P2 Local Character and Distinctiveness**Respondent:** Natural England

Object

**Summary of representations:**

Objection on ground policy is more about general principles than specific to the District. Policies P1 and P2 should refer to community preparation of local design codes through neighbourhood plans – policy hooks important for effectiveness and clarity. Lack of clarity regarding whether major development required to provide detailed masterplan or development briefs. Focus solely on design and access statements

**Summary of representation changes to plan:**

N/A

**Response:**

The Council considers that policy P2 is actually quite clear and specific rather than general. The respondent requests that both this policy and policy P1 highlight the ability to produce local design codes. It should be stressed that the ability to produce local level design codes exists independently of the Local Plan and hence technically these doesn't need to be mentioned at all in order for local communities to utilise that opportunity. Nevertheless, it is considered worth highlighting them in the Local Plan, as clearly they can be an important design tool and helpful with respect to local distinctiveness, and an amendment to policy P1 in order to make reference to them is proposed.

In terms of the reference to policies focusing solely on the requirements of design and access statements, this certainly isn't the case with respect to policy P2, which contains a number of specific requirements with respect to the design of new development and doesn't even mention design and access statements.

**Action:**

No change to P2 in response to representation

**5864****Object****Document Element:** Policy P2 Local Character and Distinctiveness**Respondent:** Kirdford Parish Council**Agent:** Troy Planning + Design**Support****Summary of representations:**

■ Support in principle

**Summary of representation changes to plan:**

■ N/A

**Response:**

■ Support in principle noted

**Action:**

■ N/A

**6027****Support****Document Element:** Policy P2 Local Character and Distinctiveness**Respondent:** Bellway Homes (Wessex) Ltd**Agent:** Chapman Lily Planning**Support****Summary of representations:**

■ Support in principle

**Summary of representation changes to plan:**

■ N/A

**Response:**

■ Support in principle noted

**Action:**

■ N/A

**6311****Support****Document Element:** Policy P2 Local Character and Distinctiveness**Respondent:** The Goodwood Estates Company Limited**Agent:** HMPC Ltd

## Background, 6.11

## Object

### Summary of representations:

Objection on grounds minimum density value of 35dpm not explained, and conflict with P1 and P2 in terms of innovative design. Removal of 35 expectation would allow balanced approach between P1, P2 and P3

### Summary of representation changes to plan:

Remove all reference to an expected minimum dwelling density

### Response:

The Housing Density Evidence Study provides evidence to justify the continued expectation of a 35 dph as a minimum. Furthermore, the proposed P3 policy requirements for a design-led site-specific approach that responds to site context and character are considered to enable the effective balancing of land optimisation with site constraints.

### Action:

No proposed change in response to representation

## 4643

## Object

**Document Element:** Background, 6.11

**Respondent:** Mr Allen McDonald

## Support

### Summary of representations:

on grounds 35 dpha achievable and not that high. Believes that well designed small communities that can be self-sufficient and connected by better public transport, could be a solution for the current wasteful use of prime agricultural land

### Summary of representation changes to plan:

N/A

### Response:

Support noted. The Housing Density Evidence Study justifies the continued expectation of 35 dph as a minimum

### Action:

No proposed change in response to representation

## 4674

## Support

**Document Element:** Background, 6.11

**Respondent:** Mr Simon Davenport

## Policy P3 Density

## Object

### Summary of representations:

On grounds i) it should be specifically stated that wildlife and biodiversity needs to be taken into account. ii) Needs to relate to different areas – rural not suitable for 35 houses per hectare

### Summary of representation changes to plan:

As per summary of representations.

### Response:

Policy P3 does not attempt to duplicate or contradict the criteria of NE5, which explicitly address biodiversity and require the provision of minimum of 10% biodiversity net gain, as determined by the existing ecological value of the site. ii) The expected 35 dwellings per hectare minimum standard is stated within the supporting text rather than being a mandated policy requirement. Therefore, it is a guideline rather than a specific policy requirement. The policy itself instead requires a design-led site-specific approach that considers the surrounding context, such as rural settings, to ensure appropriate densities are achieved.

### Action:

No proposed change in response to representation

**4180****Object**

**Document Element:** Policy P3 Density

**Respondent:** Chidham and Hambrook Parish Council

## Support

### Summary of representations:

Supports policy intent

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

**4566****Support**

**Document Element:** Policy P3 Density

**Respondent:** Wisborough Green Parish Council



## Support

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**Summary of representations:**

Policy generally supported

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

N/A

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**4811**
**Support**


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**Document Element:** Policy P3 Density

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

## Object

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**Summary of representations:**

Objection on grounds density of development would need to increase within Runcton HDA

**Summary of representation changes to plan:**

The policy needs to recognise that the density of development will need to increase within the Runcton HDA during the plan period and the Council should proactively plan for this in order to maintain the economic momentum of the Chichester food cluster.

**Response:**

The comments are noted, but appear more pertinent to policy H4

**Action:**

No proposed change in response to representation

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**4989**
**Object**


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**Document Element:** Policy P3 Density

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Support

### Summary of representations:

Support, not least point 4

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

## 5201

## Support

**Document Element:** Policy P3 Density

**Respondent:** John Newman

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seeking further information.] Support proposals to make the most efficient use of land but seek to understand how associated constraints (e.g. traffic generation and network capacity) will be assessed and reported. Also, need to understand how car-less or low-car would be managed – potential for outspill to impact SRN, with associated safety, freight and junction operation impacts

### Summary of representation changes to plan:

N/A

### Response:

The policy is considered appropriate in terms of supporting efficient use of land and in so doing will support sustainable patterns of development which will be advantageous from a transport perspective. The council acknowledge that parking issues can be complicated in relation to higher density proposals. This will need to be considered on a site by site basis, and ultimately the issues raised will primarily be considered under the transport policies, particularly policy T4

### Action:

No proposed change in response to representation

## 5299

## Object

**Document Element:** Policy P3 Density

**Respondent:** National Highways

## Support

### Summary of representations:

Support in principle requirement to make efficient use of land and emphasis on design-led approach. Propose integration for P2 to rationalise policies

### Summary of representation changes to plan:

Pertinent parts of draft policy P3 could well be integrated with draft Policy P2, thereby helping to rationalise the number of policies

### Response:

The Council welcomes the support in relation to the P3 Density Policy. We consider it appropriate to separate the policy from P2, which considers character and distinctiveness more broadly. This is to ensure sufficient attention is given to the range of constraints to be considered in relation to optimisation of sites, not limited to surrounding context and character.

### Action:

No proposed change in response to representation

5418

Support

**Document Element:** Policy P3 Density

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

Objection on grounds i) 35dpha inappropriate in semi-rural area ii) absence of reference to biodiversity. Iii) Expectations of transition from car transport unrealistic without measures to secure land for active travel routes and regular and affordable sustainable public transport

### Summary of representation changes to plan:

N/A

### Response:

Objections noted. i) The Housing Density Evidence Study demonstrates the appropriateness of 35 dph as a minimum density expectation. Furthermore, the proposed P3 policy requires a design-led approach to be taken that considers site-specific constraints including surrounding context (such as a rural setting) to ensure that the optimum site density is appropriate. ii) P3 does not specify requirements relating to biodiversity so as not to duplicate or contradict requirements proposed within NE5. iii) Policies T1 and T2 propose how development be required to encourage sustainable travel and avoid or reduce need to travel by car. P3 does not attempt to duplicate these requirements but will support that approach by facilitating sustainable patterns of development.

### Action:

No proposed changes in response to representation

**5463****Object****Document Element:** Policy P3 Density**Respondent:** Mayday! Action Group**Object****Summary of representations:**

Objection on grounds wording suggests CDC requires minimum of 35dpha to meet 5YHLS – clarity required to confirm how well-designed lower density schemes accommodated at constrained sites.

**Summary of representation changes to plan:**

N/A

**Response:**

Objection noted. Paragraph 6.11 of the supporting text is focused on ensuring the efficient use of land, setting an expectation of a minimum density of 35 dph, continued from the adopted Local Plan approach, and explained within the Housing Density Evidence Study. P3 is flexibly worded, however, requiring a design-led approach where site capacity is determined once relevant constraints are considered. It is therefore suggested that this approach as currently drafted does not prevent lower density schemes on constrained sites.

**Action:**

No proposed change in response to representation

**5624****Object****Document Element:** Policy P3 Density**Respondent:** Thakeham Homes**Support****Summary of representations:**

Support efficient use of land and non-prescription of district density. Suggest reference made to density varying according to site specific circumstances – could be higher where transport and service access good

**Summary of representation changes to plan:**

N/A

**Response:**

Support and proposed changes noted. The Council welcomes your support for our proposed design-led policy approach, which reflects the need to consider site-specific constraints prior to determining housing capacity. We agree that supporting higher density schemes in the most sustainable locations is to be encouraged, and consider that the policy already enables this approach.

**Action:**

No proposed change in response to representation

**5707****Support****Document Element:** Policy P3 Density**Respondent:** Church Commissioners for England**Agent:** Lichfields**Support****Summary of representations:**

■ Support in principle

**Summary of representation changes to plan:**

■ N/A

**Response:**

■ Support in principle noted

**Action:**

■ N/A

**6089****Support****Document Element:** Policy P3 Density**Respondent:** Chidham and Hambrook Parish Council**Background, 6.12****Object****Summary of representations:**

■ Objection relating to proposed housing in Loxwood increasing traffic and impact rural life

**Summary of representation changes to plan:**

■ N/A

**Response:**

■ Objection noted. It is recognised that the representation does not propose changes to policy P4 or its supporting text, and that an objection to Policy H2, which proposes the 220 homes at Loxwood, has also been made. No further action is recommended in relation to Policy P4

**Action:**

■ No change in response to representation

**3822****Object****Document Element:** Background, 6.12**Respondent:** Ms Louise Williamson

## Object

### Summary of representations:

Objection on grounds that while need for vehicle access is accepted, cul-de-sacs enable traffic slowing and people/community interactions. Plan should consider needs of all road users, and restrictions to pedestrians/cyclists only can help create better environments, esp for high density dwelling areas

### Summary of representation changes to plan:

ighway layout needs to concentrate on all road users and pedestrians/ cyclists restricting access in some areas to create better environments especially for areas of high density dwellings.

### Response:

Objection and comment noted. The Council agrees that the layout of developments should prioritise pedestrian and cyclist environments, as reflected within paragraph 6.13 and Point 2 of Policy P4. It is considered that the general avoidance of cul-de-sacs as reflected within paragraph 6.12 helps to ensure access via a well-connected network for all users , but this does not preclude the provision of environments where pedestrians and cyclist would have priority.

### Action:

No change in response to representation

**4675****Object**

**Document Element:** Background, 6.12

**Respondent:** Mr Simon Davenport

## Background, 6.15

## Object

### Summary of representations:

RECEIVED LATE: Question the statement in Para 6.15 that 'solar gain' could create 'issues of overheating'. Surely this can be prevented by good design?

### Summary of representation changes to plan:

N/A

### Response:

Objection noted. We consider that the sentence within paragraph 6.15 already recognises that good design would respond to site opportunities to benefit from solar gain without creating issues of overheating.

### Action:

No change in response to representation.

**6499****Object**

**Document Element:** Background, 6.15

**Respondent:** CPRE Sussex

**Agent:** CPRE Sussex

## Background, 6.17

## Object

### Summary of representations:

Objection on grounds that the statistical basis for car parking numbers is likely to be inaccurate as insufficient for two or more working family members

### Summary of representation changes to plan:

N/A

### Response:

Objection noted. The extent and adequacy of car parking provision is subject of Policy T4 and informed by West Sussex Parking Standards. Representation therefore duplicated to T4 (rep 6312 refers). As no changes to Policy P4 or its supporting text are proposed, no further action is recommended

### Action:

No change in response to representation

4179

Object

Document Element: Background, 6.17

Respondent: Chidham and Hambrook Parish Council

## Policy P4 Layout and Access

## Support

### Summary of representations:

Support for policy; in particular for development to have roads adopted to ensure high standard of construction and that development does not become exclusive, hindering access for local residents

### Summary of representation changes to plan:

N/A

### Response:

Support and comments noted . The need for inclusive access to development is reflected within Policy P4. It is considered beyond the scope of the Local Plan to specify requirements related to the adoption of roads.

### Action:

No change in response to representation

4178

Support

Document Element: Policy P4 Layout and Access

Respondent: Chidham and Hambrook Parish Council

## Support

### Summary of representations:

Supports policy intent

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

4567

Support

**Document Element:** Policy P4 Layout and Access

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

Objection on grounds policy is overly detailed and prescriptive, relating to matters more appropriately included in a design guide. Duplicative of points made in P2 and P5

### Summary of representation changes to plan:

N/A

### Response:

Objection noted. Paragraph 126 in the NPPF states that being clear about design expectations is essential for achieving a high standard of design and creating better places. In addition, the detailed policies naturally follow on from the policies which focus on more high-level design principles, meaning there is an inevitable degree of repetition necessary. Furthermore, policy is clearly a more effective mechanism for achieving these important objectives when compared with relying solely on SPDs or other guidance such as the National Design Guide. Therefore, it is considered that this detailed policy framework is the clearest and most effective way of achieving these important design objectives.

### Action:

No change in response to representation

4812

Object

**Document Element:** Policy P4 Layout and Access

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech



## Support

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**Summary of representations:**

Supportive, especially of Point 2

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted

**Action:**

N/A

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**5202**
**Support**


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**Document Element:** Policy P4 Layout and Access

**Respondent:** John Newman

## Object

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**Summary of representations:**

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seeking clarity on the approach e.g., severance.] Considerations should be given, and evidence provided, of how new active travel links will integrate with the wider network and how facilities will be funded, monitored and maintained. Important to reducing demand on road network (inc. A27). Seeks clarity on how severance will be addressed.

**Summary of representation changes to plan:**

N/A

**Response:**

Comments noted. Policy T3 is focused on the provision of active travel, including expectations on new development to deliver well-connected cycling and walking routes, ensuring integration with wider networks. The supporting text for T3 reflects benefits including reduced demand on the road network. It is therefore considered unnecessary to duplicate these points within P4, which is principally concerned with design matters associated with development layout and access.

**Action:**

No change in response to representation

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**5300**
**Object**


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**Document Element:** Policy P4 Layout and Access

**Respondent:** National Highways

## Object

### Summary of representations:

Recommend flexibility be built into policy to enable responsiveness to specific site opportunities and constraints.  
Proposes changes to policy to enable deviation from design parameter subject to justification

### Summary of representation changes to plan:

Bellway suggest adopting similar wording to that in draft Policy P2 which enables deviation to the design parameter subject to justification

### Response:

Objection and comments noted. It is considered that the design requirements within Policy P4 can be broadly applied and reflect general principles to be complied with rather than specific or overly rigid criteria. The need to provide further flexibility is therefore considered not to be necessary.

### Action:

No change in response to representation

5419

Object

**Document Element:** Policy P4 Layout and Access

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

Policy considered unsound as unrealistic; district unable to provide integrated public transport system and no evidence of future-proof master planning to this end

### Summary of representation changes to plan:

N/A

### Response:

Objection and comments noted. The provision of an integrated public transport network and associated expectations on new development (including contributions) are reflected within policies T1 and T2. It is therefore considered unnecessary to duplicate these points within P4, which is principally concerned with design matters associated with development layout and access

### Action:

No change in response to representation

5464

Object

**Document Element:** Policy P4 Layout and Access

**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

Objection on grounds policy does not acknowledge need for buses to access and circulate within large-scale developments. Proposes change to point 1. "Provide safe, direct and attractive conditions for inclusive access, egress and active travel between all locations and providing direct high-quality links to integrated public transport, and where appropriate efficient access and circulation to bus services, unimpeded by excessive parking, at a suitably early point in the development phasing."

### Summary of representation changes to plan:

Policy P4 needs to be modified to address this point:

"1. Provide safe, direct and attractive conditions for inclusive access, egress and active travel between all locations and providing as good direct high quality links to integrated public transport, and where appropriate efficient access and circulation to bus services, unimpeded by excessive parking, at a suitably early point in the development phasing"

### Response:

Objection and proposed changes noted. The Council agrees with the premise of the point made, however, it is considered that this issue is predominantly addressed within policy T2 – Transport and Development. Again, this is consistent with the NPPF, as paragraph 112 is within the transport section as opposed to the design section. The Council will therefore consider these points within its response to your representation 5591 relating to T2

### Action:

No changes in response to representation

5539

Object

**Document Element:** Policy P4 Layout and Access

**Respondent:** Stagecoach South

## Support

### Summary of representations:

Support in principle

### Summary of representation changes to plan:

N/A

### Response:

Support in principle noted

### Action:

N/A

6028

Support

**Document Element:** Policy P4 Layout and Access

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Background, 6.23

## Object

### Summary of representations:

Proposed changes to 6.23 to refer to cooling benefits of trees due to transpiration as well as for shade.

### Summary of representation changes to plan:

N/A

### Response:

Objection and proposed changes noted. We agree that the cooling benefits of trees should be further emphasised and will consider amendments to Policy P5 and its supporting text to reflect this.

### Action:

See council suggested modification CM197

4968

Object

Document Element: Background, 6.23

Respondent: Chichester Tree Wardens

## Background, 6.24

## Object

### Summary of representations:

Proposed changes to 6.24 to refer to cooling benefits of trees due to transpiration as well as for shade.

### Summary of representation changes to plan:

Ideally this and similar paragraphs (e.g. 6.23, but there may be others) which refer to trees for shade would recognise the additional cooling benefit of trees due to transpiration - the release of water from leaves, effectively creating a natural air conditioner

### Response:

Objection and proposed changes noted. We agree that the cooling benefits of trees should be further emphasised and will consider amendments to Policy P5 and its supporting text to reflect this. We do not propose including a specific reference to transpiration cooling within 6.24, which relates to internal spaces where the microclimate may be less permissive to cooling effects

### Action:

No change in response to representation

4970

Object

Document Element: Background, 6.24

Respondent: Chichester Tree Wardens

## Background, 6.25

## Support

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### Summary of representations:

See also NE8 representations

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation

4978

Support

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Document Element: Background, 6.25

Respondent: Chichester Tree Wardens

## Background, 6.26

## Support

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### Summary of representations:

See also NE8 representations particularly regarding biosecurity

### Summary of representation changes to plan:

N/A

### Response:

Support noted. Proposed changes to plan in relation to biosecurity have been considered within representation 4839 as appropriate

### Action:

No change in response to representation

4990

Support

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Document Element: Background, 6.26

Respondent: Chichester Tree Wardens

## Background, 6.27

Support

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### Summary of representations:

See also NE8 representations particularly regarding retention of existing and planted trees for the long term and demonstration of succession planning

### Summary of representation changes to plan:

N/A

### Response:

Support noted. Proposed changes to plan in relation to the retention of existing and planted trees have been considered within your representation 4839 as appropriate

### Action:

No change in response to representation

4993

Support

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**Document Element:** Background, 6.27

**Respondent:** Chichester Tree Wardens

## Policy P5 Spaces and Landscaping

## Object

### Summary of representations:

unsound as unsustainable. Proposed change to bullet 4 to include reference to SDNP Dark Skies policy directive as a climate change adaption measure to ensure lighting is designed to be sensitive to nature; proposed change to bullet 8 to conserve existing planting and build around established trees and hedges creating healthy sustainable places.

### Summary of representation changes to plan:

Paragraph 4 of Policy P5 needs to add the consideration of climate change adaption measure including the the Dark Sky policy directive from The South Downs National Park, as a design aspiration so that all lighting is designed to be sensitive to the needs of nature.

Para 8 needs to conserve planting already in place and build developments around hedges and trees that are already established as per new directive ; Creating healthy and sustainable places for West Sussex.

Without these additions the policy is unsound as it is unsustainable

### Response:

Objection and proposed change noted. In terms of climate change and how it relates to design, the Council agree that addressing this issue is very important and this is already addressed in policy P1. Furthermore, this issue will be addressed by the government requirement for new housing to comply with the Future Homes Standard from 2025 (which will be administered as part of the building regulations system rather than planning).

In addition, the Council agree that dark skies are important for various reasons, and that this needs to be addressed in the Local Plan. However, it is considered that this matter is appropriately addressed via policy NE21 and hence there is no need to repeat the consideration of this issue policy. That policy also makes reference to how development in the plan area needs to be aligned with the protection afforded to the SDNP in this regard. In terms of protecting existing planting, again, the Council agrees that this is very important, but it is considered that this issue has already been suitably addressed by policy NE8.

### Action:

No change in response to representation

4097

Object

**Document Element:** Policy P5 Spaces and Landscaping

**Respondent:** Jenny Cole

## Support

### Summary of representations:

Supportive, especially of bullets 8, 9, 10 and 11

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

4476

Support

**Document Element:** Policy P5 Spaces and Landscaping**Respondent:** The Woodland Trust

Support

**Summary of representations:**

Supports policy intent

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

4569

Support

**Document Element:** Policy P5 Spaces and Landscaping**Respondent:** Wisborough Green Parish Council

Object

**Summary of representations:**

on grounds policy is overly detailed and prescriptive and replicates points made in P2 and P4 in particular.

**Summary of representation changes to plan:**

As with Policies P2 and P4, whilst the principles of providing attractive, well landscaped space is supported, the policy is overly detailed and prescriptive, relating to matters more appropriately included in a design guide rather than planning policy. It is also considered the policy replicates points made in policies 2 and 4 in particular

**Response:**

Paragraph 126 in the NPPF states that being clear about design expectations is essential for achieving a high standard of design and creating better places. In addition, the detailed policies naturally follow on from the policies which focus on more high-level design principles, meaning there is an inevitable degree of repetition necessary. In addition, policy is clearly a more effective mechanism for achieving these important objectives when compared with relying solely on SPDs or other guidance such as the National Design Guide. Therefore, it is considered that this detailed policy framework is the clearest and most effective way of achieving these important design objectives

**Action:**

No change in response to representation



4814

Object

**Document Element:** Policy P5 Spaces and Landscaping**Respondent:** Miller Homes and Vistry Group**Agent:** Tetra Tech

Object

**Summary of representations:**

- Proposed change to amend reference to green infrastructure to green/blue infrastructure

**Summary of representation changes to plan:**

- Amending the reference to green infrastructure to green/blue infrastructure as per our comments for Policy P1

**Response:**

Objection and proposed change noted. In line with our response to your representation 4860, we consider Local Plan references to Green Infrastructure as an overarching term to be consistent with terminology within the NPPF, Planning Practice Guidance and the Natural England Green Infrastructure Framework. The Local Plan Appendix J Glossary does, however, define Green and Blue Infrastructure as a multifunctional network of green and blue spaces. To ensure the inclusion of blue infrastructure is emphasised within Policy P5 we will consider a minor modification to the policy to specifically reference blue infrastructure assets.

**Action:**

- See council suggested modification CM201

4858

Object

**Document Element:** Policy P5 Spaces and Landscaping**Respondent:** Environment Agency

Object

**Summary of representations:**

- Proposed amendments to ensure consistency and completeness, including: bullet 8,. Add "and hedgerows" after existing trees; bullet 10. Add "and transpiration" after solar shading

**Summary of representation changes to plan:**

- P5, para.8 add "and hedgerows" after "existing trees".

- P5, para. 10 add "and transpiration" after "solar shading" (before "benefits").

**Response:**

Objection and proposed amendments noted. We will consider a minor amendment to Policy P5 to refer to the retention of existing hedgerows to ensure consistency with Policy NE8. In addition, we agree that the cooling benefits of trees should be further emphasised and will consider amendments to Policy P5 and its supporting text to reflect this

**Action:**

- See council suggested modifications CM200 and CM202

**4996****Object****Document Element:** Policy P5 Spaces and Landscaping**Respondent:** Chichester Tree Wardens**Support****Summary of representations:**

Supportive

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

**5203****Support****Document Element:** Policy P5 Spaces and Landscaping**Respondent:** John Newman**Support****Summary of representations:**

Propose clarification of assertion that all open space should be lit.

**Summary of representation changes to plan:**

As per representation summary.

**Response:**

Support and comments noted. We will consider a minor amendment to the policy to avoid any assertion that all open space should be lit.

**Action:**

See council suggested modification CM198

**5420****Support****Document Element:** Policy P5 Spaces and Landscaping**Respondent:** Bellway Homes (Wessex) Ltd**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

Objection and proposed clarification to 6.20 to encourage planting rather than assumed request for brick wall on boundaries facing the public realm, for aesthetic and biodiversity benefits

### Summary of representation changes to plan:

Propose clarification to 6.20 to encourage planting rather than assumed request for brick wall on boundaries facing the public realm, for aesthetic and biodiversity benefits

### Response:

The Council would agree that brick walls are not always the best form of boundary treatment, for the reasons set out. However, it is contended that the policy does not explicitly require the use of brick walls and other forms of boundary treatment would appear to fit the description set out in the policy, such as estate railings for example. However, some clarification in this regard is proposed in response to the concern raised.

### Action:

See council suggested modification CM196

5625

Object

**Document Element:** Policy P5 Spaces and Landscaping

**Respondent:** Thakeham Homes

## Object

### Summary of representations:

Objection on grounds bullet 7 inconsistent with drainage hierarchy specified within PPG and unreasonably restrictive. Proposed amendment to align with PPG.

### Summary of representation changes to plan:

It is recommended that this be addressed with an amendment to follow the recommendations of the PPG

### Response:

Objection and comment noted. We recognise that bullet 7 has the potential to be narrowly interpreted as inconsistent with PPG and will therefore consider a minor amendment to remove this reference to permeable materials and drainage matters more comprehensively addressed within Policy NE15

### Action:

See council suggested modification CM199

5685

Object

**Document Element:** Policy P5 Spaces and Landscaping

**Respondent:** Barratt David Wilson Homes

**Agent:** Henry Adams LLP

## Object

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**Summary of representations:**

■ Duplicate of 5625

**Summary of representation changes to plan:**

■ Amend P5 to follow recommendations of PPG

**Response:**

■ As above.

**Action:**

■ N/A

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5751

Object

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**Document Element:** Policy P5 Spaces and Landscaping

**Respondent:** Barratt David Wilson Homes

**Agent:** Henry Adams LLP

## Policy P5 Spaces and Landscaping

# Support

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### Summary of representations:

Supportive, particularly of opportunities to promote biodiversity and positively contribute to GI connectedness

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

## 5849

## Support

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**Document Element:** Policy P5 Spaces and Landscaping

**Respondent:** Natural England

# Object

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### Summary of representations:

Objection and proposed recommendation to set a tree canopy cover target to support the Council's Climate Emergency Action Plan.

### Summary of representation changes to plan:

We recommend setting a tree canopy cover target to support the Council's Climate Emergency Action Plan. The Woodland Trust supports the UK Committee on Climate Change's recommended increase in UK woodland cover from the current 13% of land area to at least 19% by 2050.

### Response:

Objection and proposed change noted. Policy P5 expects development to exploit opportunities for appropriate new trees planting, and Policy NE8 requires proposals to maximise opportunities for tree planting, as well as all major development to provide street tree planting.

### Action:

No change in response to representation

## 6067

## Object

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**Document Element:** Policy P5 Spaces and Landscaping

**Respondent:** The Woodland Trust

## Background, 6.29

## Object

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**Summary of representations:**

Definition of amenity is required

**Summary of representation changes to plan:**

Definition of amenity is required

**Response:**

Objection and proposed change noted. Definitions for amenity and amenity space are provided within Appendix J: Glossary

**Action:**

No change in response to representation

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**4213****Object**

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**Document Element:** Background, 6.29

**Respondent:** Chidham and Hambrook Parish Council

## Policy P6 Amenity

## Support

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**Summary of representations:**

Support in principle

**Summary of representation changes to plan:**

N/A

**Response:**

Support in principle noted

**Action:**

N/A

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**4212****Support**

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**Document Element:** Policy P6 Amenity

**Respondent:** Chidham and Hambrook Parish Council

## Object

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### Summary of representations:

Policy unsound as does not cross-reference P11 (giving protection to views into and out of area) over and above separation distances in relation to Conservation Areas. Separation distances considered insufficient and could result in harm to heritage assets.

### Summary of representation changes to plan:

Proposed change to ensure longer separation distances for new development next to conservation area.

### Response:

Objection and proposed change noted. Policy P6 is concerned with separation distances to ensure amenity by mitigation of impacts such as overlooking, loss of privacy and loss of daylight. This is separate to any need to consider heritage impacts associated with views into and out of conservation areas, addressed by Policy P11. Cross-referencing is therefore not required to avoid conflation of these issues. Loss of private views is not a planning matter.

### Action:

No change in response to representation

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4320

Object

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**Document Element:** Policy P6 Amenity

**Respondent:** Mr Matthew Rees

## Support

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### Summary of representations:

Supports policy intent

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

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4570

Support

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**Document Element:** Policy P6 Amenity

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

on basis of: i) replication of policy points relating to noise and lighting; ii) requirement for justification of proposed adoption of space standards; iii) clarification required on 21 metre separation distances at first floor level

### Summary of representation changes to plan:

In respect of separation distances, it is suggested that the 21 meter back to back distance be clarified that this is between first floor windows. Lower separation distances may be acceptable between single storey dwellings such as bungalows.

### Response:

Objection and proposed changes noted. i) While the policy does address some issues covered in other policies, it seeks to address the design and amenity angle in relation to these issues and how those issues can be considered holistically as part of the design process. ii) Our Residential Space Standards Evidence Study provides evidence to justify adoption of the NDSS within the Plan Area and will be submitted as part of the examination documents. We will consider a modification to the policy to ensure clarity in interpretation and implementation of this requirement. iii) In terms of the issue of back-to-back distances referred to, the Council agrees that some clarification is required in relation to this issue. It will consider a modification to the policy and supporting text to provide this.

### Action:

See council suggested modifications CM203, CM204, CM205

4818

Object

**Document Element:** Policy P6 Amenity

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

## Object

### Summary of representations:

Policy unsound as evidence of justification for NDSS adoption is not provided. Policy should be deleted if evidence is not provided

### Summary of representation changes to plan:

If the Council cannot provide sufficient evidence to support the adoption of these standards, then this policy should be deleted.

### Response:

Objection and proposed change noted. Our Residential Space Standards Evidence Study provides evidence to justify adoption of the NDSS within the Plan Area and will be submitted as part of the examination documents. Deletion of the policy is therefore not required. We will consider a modification to the policy to ensure clarity in interpretation and implementation of this requirement, however.

### Action:

See council suggested modification CM204



5152

Object

**Document Element:** Policy P6 Amenity

**Respondent:** Home Builders Federation

Support

**Summary of representations:**

Supports policy

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

N/A

5204

Support

**Document Element:** Policy P6 Amenity

**Respondent:** John Newman

## Object

### Summary of representations:

on grounds of: i) criteria overlap with other policies; ii) requirement to meet NDSS in combination with M4(2) may have viability implications due to influencing overall site densities iii) vigorous adherence to 21 metre separation distance may result in unintended consequences

### Summary of representation changes to plan:

N/A

### Response:

Objection and comments noted. i) While the policy does address some issues covered in other policies, it seeks to address the design and amenity angle in relation to these issues and how those issues can be considered holistically as part of the design process. ii) Our Residential Space Standards Evidence Study addresses the matter of NDSS and M4(2) adoption, noting that whilst the combined impacts cannot be fully assessed until the technical requirements of M4(2) are determined, it is anticipated that the standards will be complementary, NDSS having been recognised as a potential common baseline within the Government's consultation. Furthermore, there is provision for flexibility, with the Government proposing for exceptional circumstances to be considered if the application of M4(2) is justified as being impractical and unachievable on specific sites. The conclusion of the Local Plan Viability Assessment was that the proposed requirement for NDSS compliance is viable. The study provides evidence that NDSS adoption will not prompt developers to increase dwelling footprints. Site densities are therefore unlikely to be affected. This evidence will be submitted as part of the examination documents. We will consider a modification to the policy to ensure clarity in interpretation and implementation of this requirement iii) In terms of the issue of back-to-back distances referred to, the Council agrees that some flexibility is required in relation to this issue. It considers this is offered within the policy but will consider a modification to the policy and its supporting text to provide clarity

### Action:

See council suggested modifications CM203,CM204,CM205

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**5423****Object**

**Document Element:** Policy P6 Amenity

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

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**Summary of representations:**

on grounds policy: i) inconsistent for SA as does not protect the natural environment, health and well being or heritage; ii) in case of Saxon Meadow development, 21 metre separation distance would impact health and wellbeing, property value, the conservation area and biodiversity

**Summary of representation changes to plan:**

As per representation summary.

**Response:**

Objection and proposed changes noted. i) The Council cannot agree with the points made. The new Local Plan involves a vast number of policies which protect and enhance the natural environment, the historic environment, ensure a high standard of design, and support open space provision, all of which are important in and of themselves, but will in so doing support health and wellbeing. ii)

The separation distance of 21m is a general parameter which has been used in planning for many years and is hence a reasonable figure to include within the new Local Plan.

Ultimately, it is considered that it would appear that the concerns raised may be more focused on policy A14 than the policies referred to in this representation (especially when considered in light of the changes proposed to the plan).

Objections and proposed changes duplicated to A14 (rep 6310 refers).

**Action:**

No change in response to representation

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**5587****Object**

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**Document Element:** Policy P6 Amenity

**Respondent:** Ms Lindsay Davey

## Object

### Summary of representations:

on grounds of i) clarity on whether point 1 applies to private and public amenity space; setting aside private amenity space for flats can be difficult to achieve; ii) clarity on whether g) applies to air source heat pumps as enclosures can restrict air flow; iii) 21 metres separation distances not achievable on front to front or front-side scenarios – would impact 35dph density target

### Summary of representation changes to plan:

Suggest wording of Point 1 is amended. suggest further clarity is provided re; (g). Separation Distances paragraph 2 needs reviewing and clarifying to ensure it's consistent with wider aspirations of the Local Plan

### Response:

Objection and proposed changes noted. i) The Council considers the supporting text for policy 6 to sufficiently clarify that private, shared and communal spaces all contribute to amenity. ii) It is considered that point g) is sufficiently flexible to allow service equipment, such as air source heat pumps, to be fully integrated or inconspicuously located. Provision of an alternative ensures function need not be impeded. iii) The Council considers that the policy offers flexibility by allowing separation distances to be considered on an individual basis. It will consider modifications to the policy and its supporting text to ensure that the range of potential scenarios are reflected. It should be stressed, however, that the 35 dph figure quoted in the supporting text of policy P3 is not a density target, but a guideline and hence shouldn't form a basis for any inappropriate spatial relationships between buildings.

### Action:

- i) No proposed change in response to representation;
- ii) No proposed change in response to representation;
- iii) See council suggested modifications CM203 and CM205

5626

Object

**Document Element:** Policy P6 Amenity

**Respondent:** Thakeham Homes

## Object

### Summary of representations:

on grounds unclear is PV, EV or ASHPs are defined as service equipment as full integration of equipment difficult. Propose clarity provided.

### Summary of representation changes to plan:

N/A

### Response:

Objection and proposed change noted. It is considered that bullet g) is sufficiently flexible and clear as it does not require full integration (location in visually inconspicuous locations is presented as an alternative).

### Action:

No change in response to representation

5664

Object

**Document Element:** Policy P6 Amenity**Respondent:** Countryside Properties**Agent:** Turley

Support

**Summary of representations:**

Support in principle

**Summary of representation changes to plan:**

N/A

**Response:**

Support in principle noted

**Action:**

N/A

6029

Support

**Document Element:** Policy P6 Amenity**Respondent:** Bellway Homes (Wessex) Ltd**Agent:** Chapman Lily Planning

Object

**Summary of representations:**

Proposed change to distinguish between or zone city centre uses to protect residents from amenity impacts associated with the night time economy

**Summary of representation changes to plan:**

A clear distinction between the Residential areas of the City Centre. Zoning of Bar/Club night time economy should be sought for the protection of the Conservation Area and Residents

**Response:**

Objection and proposed change noted. Policy P6 ensures proposals for development including change of use does not result in unacceptable impacts on the amenity of an area or its users, including residents and occupiers. The proposed imposition of zoning within the city centre is therefore considered disproportionate and unjustified.

**Action:**

No proposed change in response to representation

6307

Object

**Document Element:** Policy P6 Amenity**Respondent:** RADAR

## Object

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### Summary of representations:

Proposed change for PC and local residents to be consulted on detail of amenity assessment at pre-application stage

### Summary of representation changes to plan:

Parish Councils and local residents should be consulted on the detail at this stage.

### Response:

Proposed change noted. As per our Statement of Community Involvement, CDC strongly recommends developers undertake pre-application consultation with local residents and other consultees, especially for larger schemes. It is not considered, however, that pre-application consultation of this nature is justified for all development and is therefore not required by the policy

### Action:

No change in response to representation

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6309

Object

---

**Document Element:** Policy P6 Amenity

**Respondent:** Chidham and Hambrook Parish Council

## Policy P7 Alterations and Extensions

## Support

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### Summary of representations:

Supports

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

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4211

Support

---

**Document Element:** Policy P7 Alterations and Extensions

**Respondent:** Chidham and Hambrook Parish Council

## Support

---

**Summary of representations:**

■ Supports

**Summary of representation changes to plan:**

■ N/A

**Response:**

■ Support noted

**Action:**

■ N/A

---

4571

Support

---

**Document Element:** Policy P7 Alterations and Extensions

**Respondent:** Wisborough Green Parish Council

## Support

---

**Summary of representations:**

■ Supports

**Summary of representation changes to plan:**

■ N/A

**Response:**

■ Support noted

**Action:**

■ N/A

---

4701

Support

---

**Document Element:** Policy P7 Alterations and Extensions

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates

## Object

### Summary of representations:

Objection and proposed change to require development for provide for one or more street trees to be planted to complement the site's setting, or if no opportunities exists, on the public highway adjacent to the site

### Summary of representation changes to plan:

Add:

"Increase tree cover by providing for one or more street trees to be planted to complement the site's setting, or nearby if no opportunity exists on public highway adjacent to the site.

### Response:

Objection and proposed changes noted. Policy P7 places expectations on developments involving alterations and extensions to retain boundary treatments that contribute positively to the street scene, and to retain appropriate amounts of soft landscaping and trees. It is considered unreasonable to further require development, which may be modest in scale, to provide additional tree planting beyond the criteria specified within Policy NE8, which already requires the planting of two trees for each one lost through development.

### Action:

No changes in response to representation

## 5001

## Object

**Document Element:** Policy P7 Alterations and Extensions

**Respondent:** Chichester Tree Wardens

## Support

### Summary of representations:

Supportive

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

## 5205

## Support

**Document Element:** Policy P7 Alterations and Extensions

**Respondent:** John Newman



## Background, 6.42

Support

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### Summary of representations:

■ Comment on the significance of the issue and need for substantial surveillance as well as detail at pre-app stage.

### Summary of representation changes to plan:

■ N/A

### Response:

■ Support and comment noted

### Action:

■ N/A

4208

Support

---

Document Element: Background, 6.42

Respondent: Chidham and Hambrook Parish Council

## Background, 6.46

Support

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### Summary of representations:

■ Supports addressing of issues associated with artificial timber effect

### Summary of representation changes to plan:

■ N/A

### Response:

■ Support noted

### Action:

■ N/A

4683

Support

---

Document Element: Background, 6.46

Respondent: Mr Simon Davenport

## Policy P8 Materials and Detailing

Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

N/A

4210

Support

---

**Document Element:** Policy P8 Materials and Detailing

**Respondent:** Chidham and Hambrook Parish Council

Support

---

**Summary of representations:**

Supports intent

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

N/A

4572

Support

---

**Document Element:** Policy P8 Materials and Detailing

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

Objection on grounds policy overly prescriptive e.g. use of cladding and avoidance of upvc. Likely to stifle innovation and is not justified. Reference to value engineering approaches is not required or justified. Each application should be assessed on its own merits.

### Summary of representation changes to plan:

Proposes policy deletion and references incorporated into other design policies

### Response:

Paragraph 131 within the NPPF emphasises the important of high quality, beautiful and sustainable design and the need to be clear about the design expectations in order to achieve this. Building materials are a key aspect of this, as emphasised in the National Design Guide, and hence need to be addressed robustly in policy. The Council would suggest that the requirement to use high-quality, sustainable materials is likely to encourage innovation rather than discourage it. In addition, the policy is framed in a flexible manner, and hence isn't considered overly prescriptive.

The reference to value engineering is considered to be very important as it is a significant problem within the planning system for schemes to be consented on the basis of a certain standard of design and materials, and for this to then be diluted through the details and compliance process or subsequent applications. This issue is also highlighted in paragraph 140 of the NPPF.

### Action:

No proposed change in response to representation

4820

Object

**Document Element:** Policy P8 Materials and Detailing

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

## Object

### Summary of representations:

Objection to requirement for entire policy dedicated to materials and detailing. Overly prescriptive, e.g. avoidance of UPVC. Alternatives would add significant cost – unclear whether considered in viability assessment

### Summary of representation changes to plan:

N/A

### Response:

Materials and detailing are key to successful design and are often not given sufficient attention, and this policy will clearly address that problem. Moreover, paragraph 126/131 in the NPPF states that being clear about design expectations is essential for achieving a high standard of design and creating better places. The policy is framed in a flexible manner, and hence isn't considered overly prescriptive. The policy has been incorporated into the viability work, as referenced in Stage 2 Appendix I, Table D.

### Action:

No proposed change in response to representation

**5425****Object****Document Element:** Policy P8 Materials and Detailing**Respondent:** Bellway Homes (Wessex) Ltd**Agent:** Chapman Lily Planning**Object****Summary of representations:**

Objection to point 6 on grounds features like chimneys can be in keeping and should not be dismissed with a blanket policy – propose re-wording; point 9 fibre cement board cladding preferable to timber due to safety benefits – not recommended by Building Regulations or Building Safety Act; point 10 recommend use of flint block assessed on case-by-case basis at design stage; point 11 upvc is robust and reliable material at reasonable price – house buyer common to find in new build – propose removal or amendment

**Summary of representation changes to plan:**

Reconsider wording of point 6 of Policy P8. Either remove point 11 or amend as follows: “The use of uPVC will not be unsupported, however the use of alternative materials with environmental benefits will be encouraged

**Response:**

The policy does not impose a wholesale prohibition on ornamental chimneys. However, in design terms it would be far more appropriate for such design elements to be utilised as an integral part of the overall design and function of buildings, rather than superficial, ornamental additions. In relation to point 9, again, from a design perspective, materials should be authentic to the overall design concept, not based on imitation materials. The policy does not presume to override or contradict legislation or building regulations. In relation to the comment concerning point 10, the Council consider that the wording of the policy achieves the appropriate balance in terms of not entirely preventing the use of flint blocks, but emphasising a preference for a traditional approach, as that will maximise the chances of achieving a high quality outcome.

In relation to point 11, UPVC is not considered to be attractive in design terms and is highly unsustainable. Consequently, it is considered that the policy strikes a reasonable balance in this regard in terms of discouraging it, but not ruling it out completely.

**Action:**

No proposed change in response to representation

**5627****Object****Document Element:** Policy P8 Materials and Detailing**Respondent:** Thakeham Homes

## Object

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**Summary of representations:**

Objection to points 9 and 11 on grounds overly prescriptive and insufficiently flexible. Penultimate para ambiguous and compromises policy effectiveness. Recommend criteria 9 and 11 and penultimate paragraph be deleted

**Summary of representation changes to plan:**

Recommend criteria 9 and 11 and penultimate paragraph be deleted.

**Response:**

Objection and comments noted. In relation to points 9 and 11, it is considered that the policy wording achieves the appropriate balance in terms of discouraging the use of less appropriate materials but not preventing their use outright. The reference to value engineering is considered to be very important as it is a significant problem within the planning system for schemes to be consented on the basis of a certain standard of design and materials, and for this to then be diluted through the details and compliance process or subsequent applications. This issue is also highlighted in paragraph 140 of the NPPF.

**Action:**

No proposed change in response to representation

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**5665****Object**

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**Document Element:** Policy P8 Materials and Detailing

**Respondent:** Countryside Properties

**Agent:** Turley

## Background, 6.48

## Object

### Summary of representations:

Objection regarding effectiveness of policy implementation and planning enforcement relating to concerns for the protection of Chichester City residential and Conservation areas. Proposes clear distinction / zoning of area uses, including night-time economy.

### Summary of representation changes to plan:

As per representation summary

### Response:

Objection and comments noted. Paragraph 6.48 provides justification for the effective maintenance of the historic environment but is not specific to Chichester City. The proposed segregation of city centre uses is considered unlikely to be justified on grounds of harm to the significance of the broad historic environment. Changes to the plan in this respect are therefore considered disproportionate. Impacts relating to residential amenity are beyond the scope of this policy (objections have also been recorded against P6 – amenity – rep 6307 refers).

### Action:

No change in response to representation.

3799

Object

Document Element: Background, 6.48

Respondent: RADAR

## Background, 6.52

## Object

### Summary of representations:

The plan fails to connect trees with the historic environment – historic trees are also a finite resource for which management and protection is needed to ensure their importance is retained.

### Summary of representation changes to plan:

N/A

### Response:

Objection and comment noted. We will consider an amendment to paragraph 6.52 to recognise that trees can be considered as an element of heritage significance, ensuring consistency with national guidance.

### Action:

See council suggested modification CM206

5003

Object

Document Element: Background, 6.52

Respondent: Chichester Tree Wardens

**Background, 6.53****Object****Summary of representations:**

Objection regarding effectiveness of policy implementation and planning enforcement relating to concerns for the protection of Chichester City residential and Conservation areas. Proposes clear distinction / zoning of area uses, including night-time economy, and Listed Buildings not to be used as amplified music venues

**Summary of representation changes to plan:**

N/A

**Response:**

Objection and comments noted. The issue raised appears to be focused on how different uses in the city centre need to be managed rather than the heritage matters which form the basis of this policy. Consequently, the point raised is considered to be beyond the scope of the policy and instead needs to be addressed by another mechanism such as licensing. In addition, the changes made to the use classes order by the Government mean that it is now much more difficult to direct evening uses to particular locations.

**Action:**

No change in response to representation.

**3800****Object**

Document Element: Background, 6.53

Respondent: RADAR

**Background, 6.54****Support****Summary of representations:**

Supports policy

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted.

**Action:**

No change

**4684****Support**

Document Element: Background, 6.54

Respondent: Mr Simon Davenport

## Policy P9 The Historic Environment

### Object

#### Summary of representations:

Objection on grounds heritage assessments focus on design, fabric and setting only and should include analysis of the contribution of a heritage asset to the local economy/economic vitality of the district.

#### Summary of representation changes to plan:

N/A

#### Response:

The plan does acknowledge the important role that the historic environment plays in relation to the local economy, as is clearly set out in paragraph 6.48. However, it is considered that the requested requirement in relation to appraising the economic aspects of development affecting a heritage asset would be inconsistent with national policy, as the NPPF specifically states in paragraph 194 that with respect to the information which can be required in relation to such applications:

“The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.”

Consequently, it appears clear that the level of information needs to be focused on the issue of significance and it would be unreasonable to require a more extensive assessment.

#### Action:

No change in response to representation.

4295

Object

**Document Element:** Policy P9 The Historic Environment

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

### Support

#### Summary of representations:

Supports the policy intent

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted

#### Action:

No change

4573

Support

**Document Element:** Policy P9 The Historic Environment

**Respondent:** Wisborough Green Parish Council



## Support

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**Summary of representations:**

Supports policy

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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**5206**
**Support**


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**Document Element:** Policy P9 The Historic Environment

**Respondent:** John Newman

## Object

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**Summary of representations:**

Policy repeats large tracts of national policy. Unclear what criteria 1, 2 and 5 add. Policy could be consolidated into single heritage policy with P10 and P11.

**Summary of representation changes to plan:**

N/A

**Response:**

Objection and comments noted. It is considered that the specification of the five high-level criteria within Policy P9 helps to establish the local policy requirements in the context of national policy and legal obligations, and enables more detailed policy requirements relating to listed buildings and conservation area to be derived and defined. Consequently, no change is required.

**Action:**

No change in response to representation.

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**5495**
**Object**


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**Document Element:** Policy P9 The Historic Environment

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

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### Summary of representations:

Policy does not clarify the council's approach to the identification of non-designated heritage assets.

### Summary of representation changes to plan:

N/A

### Response:

Objection and comments noted. This issue is addressed with Policy P12 and its supporting text, specifically paragraphs 6.71 and 6.72. Consequently, no change is considered to be required.

### Action:

No change in response to representation.

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## 5866

## Object

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**Document Element:** Policy P9 The Historic Environment

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

## Support

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### Summary of representations:

Welcomes inclusion of policies P9-P13, meeting the NPPF obligation to prepare a positive strategy.

### Summary of representation changes to plan:

N/A

### Response:

Support and comments noted.

### Action:

No change

---

## 5965

## Support

---

**Document Element:** Policy P9 The Historic Environment

**Respondent:** Historic England

## Background, 6.64

## Object

### Summary of representations:

regarding effectiveness of policy implementation and planning enforcement relating to concerns for the protection of Chichester City residential and Conservation areas. Proposes clear distinction / zoning of area uses, including night-time economy. Listed buildings in residential areas should not be used for amplified music venues.

### Summary of representation changes to plan:

As per representation summary.

### Response:

Objection and comments noted. Paragraph 6.64 recognises the need for change of use proposals to be accompanied by full information about associated impacts, such as sound attenuation and for any extant harms to be fully justified as necessary for delivering optimum viable use. Furthermore, Policy P10 states that CDC will support proposals for alternative uses which do not have an adverse impact on the character and appearance of the building and where the change will provide for its long-term conservation, which is considered to proportionately address the issue. The proposed segregation of city centre uses is considered unlikely to be justified on grounds of harm to the historic character, qualities and special interest of listed buildings. Changes to the plan in this respect are therefore considered disproportionate. Impacts relating to residential amenity are beyond the scope of this policy (objections have also been recorded against P6 – amenity – rep 6307 refers).

### Action:

No change in response to representation

## 3801

## Object

Document Element: Background, 6.64

Respondent: RADAR

## Policy P10 Listed Buildings

## Support

### Summary of representations:

Supports policy

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

## 4574

## Support

Document Element: Policy P10 Listed Buildings

Respondent: Wisborough Green Parish Council

## Support

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**Summary of representations:**

Supports policy

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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5207

Support

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**Document Element:** Policy P10 Listed Buildings

**Respondent:** John Newman

## Object

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**Summary of representations:**

Policy repeats large tracts of national policy and could be consolidated into a single heritage policy.

**Summary of representation changes to plan:**

As per representation summary

**Response:**

Objection and comments noted. It is considered that Policy P10 establishes the local policy requirements relating to listed buildings in the context of national policy and legal obligations, and relative to broader requirements regarding the historic environment. Consequently, no change is required

**Action:**

No change in response to representation

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5496

Object

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**Document Element:** Policy P10 Listed Buildings

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Support

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**Summary of representations:**

■ Comment on role of Chichester Society

**Summary of representation changes to plan:**

■ N/A

**Response:**

■ Comment noted

**Action:**

■ No change

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5955

Support

**Document Element:** Policy P10 Listed Buildings

**Respondent:** The Chichester Society

## Support

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**Summary of representations:**

■ Welcomes inclusion of policies P9-P13, meeting the NPPF obligation to prepare a positive strategy

**Summary of representation changes to plan:**

■ N/A

**Response:**

■ Support and comment noted

**Action:**

■ No change

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6183

Support

**Document Element:** Policy P10 Listed Buildings

**Respondent:** Historic England

## Policy P11 Conservation Areas

### Object

#### Summary of representations:

Objection regarding effectiveness of policy implementation and planning enforcement relating to concerns for the protection of Chichester City residential and Conservation areas. Proposes clear distinction / zoning of area uses, including night-time economy.

#### Summary of representation changes to plan:

A clear distinction between the Residential areas of the City Centre. Zoning of Bar/Club night time economy (south Street) should be sought for the protection of the Conservation Area and Residents.

#### Response:

Objection and comments noted. Policy P11 is focused on preserving or enhancing the character or appearance of conservation areas. The proposed segregation of city centre uses is considered unlikely to be justified on grounds of harm to the aesthetic characteristics of the conservation area. Changes to the plan in this respect are therefore considered disproportionate. Impacts relating to residential amenity are beyond the scope of this policy (objections have also been recorded against P6 – amenity – rep 6307 refers).

#### Action:

No change in response to representation

3809

Object

Document Element: Policy P11 Conservation Areas

Respondent: RADAR

### Support

#### Summary of representations:

Supports policy

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted

#### Action:

N/A

4575

Support

Document Element: Policy P11 Conservation Areas

Respondent: Wisborough Green Parish Council

## Support

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### Summary of representations:

Supports in principle. i) Comments that Chichester courts and bus station should be registered as a Conservation Area to preserve the early 20th century architecture. ii) Southern Gateway should be enhanced as public open space

### Summary of representation changes to plan:

N/A

### Response:

Support and comments noted. i)The Chichester Conservation Area is inclusive of Chichester Crown Court and the bus station. Furthermore, the architecture of the Crown Court is recognised by its local listing. The bus station is recognised as needing improvement / an opportunity for enhancement within the Chichester Conservation Area Character Appraisal. ii) Comments have been recorded against A3 – Southern Gateway – rep 6308 refers).

### Action:

No change in response to representation

---

4685

Support

Document Element: Policy P11 Conservation Areas

Respondent: Mr Simon Davenport

## Support

---

### Summary of representations:

Supports

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

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5208

Support

Document Element: Policy P11 Conservation Areas

Respondent: John Newman

## Object

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### Summary of representations:

Objection on grounds criteria A2 requiring protection of the setting is not positively prepared, and inconsistent with NPPF.

### Summary of representation changes to plan:

Proposed change to 'adopting sensitive approach to the setting (including views into and out of the area).

### Response:

Objection and comment noted. We will consider a minor modification to the policy to ensure consistency with the NPPF and statutory requirements in terms of the protection of the settings of heritage assets

### Action:

See council suggested modification CM207

5497

Object

---

**Document Element:** Policy P11 Conservation Areas

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning



## Policy P11 Conservation Areas

### Object

#### Summary of representations:

Objection on grounds of proposed development at Tangmere inconsistent with protection of the setting of Conservation Area and associated statutory duty

#### Summary of representation changes to plan:

N/A

#### Response:

The policies proposed in the plan are considered to form a robust basis for meeting the legal requirement to preserve or enhance the character of conservations areas. It is considered that the representation is primarily focused on policy A14 and hence this issue will be addressed in more detail in relation to that representation (rep 5573 refers).

#### Action:

No change in response to representation

5572

Object

**Document Element:** Policy P11 Conservation Areas

**Respondent:** Mr Oliver Gale

### Object

#### Summary of representations:

Objection on grounds of proposed development at Tangmere inconsistent with preservation and enhancement of Conservation Area; disregarded character appraisal.

#### Summary of representation changes to plan:

Proposes extension of Conservation Area to incorporate Tangmere and Oving.

#### Response:

The policies proposed in the plan are considered to form a robust basis for meeting the legal requirement to preserve or enhance the character of conservations areas. It is considered that the representation is primarily focused on policy A14 and hence this issue will be addressed in more detail in relation to that representation (rep 5635 refers).

#### Action:

No change in response to representation

5634

Object

**Document Element:** Policy P11 Conservation Areas

**Respondent:** Mrs Elspeth Rendall

## Support

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**Summary of representations:**

█ Welcome inclusion of policies P9-P13; consider key test of soundness to have been met

**Summary of representation changes to plan:**

█ N/A

**Response:**

█ Support noted.

**Action:**

█ N/A

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6184

Support

**Document Element:** Policy P11 Conservation Areas

**Respondent:** Historic England

### Policy P12 Non-Designated Heritage Assets

## Support

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**Summary of representations:**

█ Supports policy

**Summary of representation changes to plan:**

█ N/A

**Response:**

█ Support noted

**Action:**

█ N/A

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4576

Support

**Document Element:** Policy P12 Non-Designated Heritage Assets

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

Objection regarding i) criteria 2 c) as implies non-designated assets could be identified on sole basis of contribution to surroundings – character not heritage consideration. ii) applicability of criteria 4 a)-c) to all development involving ground works – suggest more appropriately addressed via validation checklist

### Summary of representation changes to plan:

Changes to be made

### Response:

Objection and comments noted. i) Neither the NPPF nor PPG specifies criteria for the identification of non-designated heritage assets (NDHAs), although the latter signposts Historic England advice, which suggests examples including a 'Landmark' criterion, where an asset may be selected on the basis of its contribution to the local scene. It is considered that the proposed criteria at 2 c) is aligned with this sentiment and therefore appropriate in principle. We will, however, consider amendments to the policy and its supporting text to clarify the broad categories assessed during the identification process. ii) We will consider modifications to criteria 4 a)-c) to clarify the policy, requiring a proportionate response to development proposed on sites which include or have the potential to include heritage assets with archaeological interest, in accordance with the NPPF.

### Action:

See council suggested modifications CM208, CM209, CM210

5498

Object

**Document Element:** Policy P12 Non-Designated Heritage Assets

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Support

### Summary of representations:

We welcome the inclusion of policies for the historic environment in the local plan at Policies P9 - P13 that, along with other policies, meet the obligation for preparing the positive strategy required by the NPPF. The key test of the soundness of the plan and the achievement of sustainable development as defined in the NPPF in respect of the elements that relate to the historic environment (paragraph 190), in our view, have been met

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

6185

Support

**Document Element:** Policy P12 Non-Designated Heritage Assets

**Respondent:** Historic England

## Policy P13 Registered Parks and Gardens

### Object

#### Summary of representations:

The value of the Goodwood Estate to the District (and indeed the National Park) goes well beyond the designated parkland. The Estate is an inter-linked body, where individual elements rely on other parts, activities or events to be sustainable.

#### Summary of representation changes to plan:

Request the supporting paragraphs are revised to reflect the principles set out in the accompanying letter.

#### Response:

Objection and comments noted. The Council certainly respects the importance of Goodwood House as well as the parkland. However, this policy is specifically focused on Registered Parks and Gardens, and hence the policy and supporting text needs to be focused on that issue, rather than encompassing the wider issues referred to in the representation.

#### Action:

No changes in response to representation

4296

Object

**Document Element:** Policy P13 Registered Parks and Gardens

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

### Support

#### Summary of representations:

Supports policy

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted

#### Action:

N/A

5209

Support

**Document Element:** Policy P13 Registered Parks and Gardens

**Respondent:** John Newman

## Object

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### Summary of representations:

Concerned the policy won't be regarded as positively prepared and consistent with NPPF due to criteria 4 – preserve the setting

### Summary of representation changes to plan:

Bellway recommend changing criteria 4 to 'preserve or enhance' which acknowledges that some existing features may detract from the setting

### Response:

Objection and comment noted. We will consider a minor modification to the policy to ensure consistency with the NPPF and statutory requirements in terms of the protection of the settings of heritage assets

### Action:

See council suggested modification CM211

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5499

Object

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**Document Element:** Policy P13 Registered Parks and Gardens

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Support

---

### Summary of representations:

Welcome inclusion of policies P9-P13; consider key test of soundness to have been met

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

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6186

Support

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**Document Element:** Policy P13 Registered Parks and Gardens

**Respondent:** Historic England

## Support

---

**Summary of representations:**

Policy is welcomed.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

N/A

---

6285

Support

**Document Element:** Policy P13 Registered Parks and Gardens

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

### Local Green Space, 6.82

## Support

---

**Summary of representations:**

WGPC supports this statement.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No change in response to representation.

---

4580

Support

**Document Element:** Local Green Space, 6.82

**Respondent:** Wisborough Green Parish Council

## Object

---

### Summary of representations:

RECEIVED LATE: Parishes should be encouraged to look into such areas to be included in Neighbourhood Plans.

### Summary of representation changes to plan:

N/A

### Response:

Objection noted. Paragraph 6.82 already recognises that Local Green Space designation is discretionary and can be achieved via local or neighbourhood plans.

### Action:

No change in response to representation.

---

6497

Object

---

**Document Element:** Local Green Space, 6.82

**Respondent:** CPRE Sussex

**Agent:** CPRE Sussex

## Policy P14 Green Infrastructure

## Support

---

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

N/A

---

4480

Support

---

**Document Element:** Policy P14 Green Infrastructure

**Respondent:** The Woodland Trust

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

N/A

4578

Support

**Document Element:** Policy P14 Green Infrastructure

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

Policy or supporting text should acknowledge that some GI (i.e. PROW) may require rerouting or re-provision to facilitate development. Reflected in site-specific policies but not overarching policy.

### Summary of representation changes to plan:

N/A

### Response:

Objection and proposed change noted. We will consider a modification to the policy to recognise that proposals impacting/altering existing GI may be granted if sufficient mitigation, bringing benefits to the wider GI network, can be demonstrated (i.e. if diversion of a PROW resulted in improved connectivity of the overall active travel network, or enabled other GI benefits). We wish, however, to avoid detailing specific circumstances relating to PROW re-routing within Policy P14, recognising the diversion or extinguishment of PROW requires specific consideration under the Highways Act and authorisation by WSCC. Furthermore this level of detail is considered unnecessary within a policy which is otherwise high level and broadly focused on the multi-functional nature of GI, rather than particular GI attributes.

### Action:

See council suggested modification CM216

4704

Object

**Document Element:** Policy P14 Green Infrastructure

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates



## Support

---

**Summary of representations:**

Broadly supportive.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No change

---

**4821**
**Support**


---

**Document Element:** Policy P14 Green Infrastructure

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

## Object

---

**Summary of representations:**

References to green infrastructure should be amended to green/blue infrastructure.

**Summary of representation changes to plan:**

N/A

**Response:**

Objection and proposed change noted. Local Plan references to Green Infrastructure as an overarching term is consistent with terminology within the NPPF, Planning Practice Guidance and the Natural England Green Infrastructure Framework. The Local Plan Appendix J Glossary does, however, define Green and Blue Infrastructure as a multifunctional network of green and blue spaces. To ensure the inclusion of blue infrastructure is emphasised within Policy P14 itself we will consider minor modifications to the policy to reference blue infrastructure. Furthermore, additional modifications will be made other policies, in response to separate EA representations, to refer to blue infrastructure assets and networks.

**Action:**

See council suggested modification CM212

---

**4860**
**Object**


---

**Document Element:** Policy P14 Green Infrastructure

**Respondent:** Environment Agency

## Support

### Summary of representations:

Supportive of inclusion of policy and recognition of multifunctional benefits that can be delivered strategically.

### Summary of representation changes to plan:

N/A

### Response:

Support and comments noted

### Action:

N/A

5056

Support

**Document Element:** Policy P14 Green Infrastructure

**Respondent:** Sussex Wildlife Trust

## Object

### Summary of representations:

Proposes in addition to ensuring that development proposals are not detrimental to PROW, a more proactive approach seeking enhancements to the network should be sought. Improvement, upgrading and creation of new PROW enabling greater access to the network would be beneficial. [support extracted as separate representation – see 6304]

### Summary of representation changes to plan:

N/A

### Response:

Objection and proposed change noted. We will consider minor modifications to the policy to emphasise that proposals for new development will be expected to provide integrated and enhanced active travel including PROW.

### Action:

See council suggested modification CM214

5096

Object

**Document Element:** Policy P14 Green Infrastructure

**Respondent:** West Sussex County Council

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

## 5210

## Support

**Document Element:** Policy P14 Green Infrastructure

**Respondent:** John Newman

## Object

### Summary of representations:

National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Suggest proposals should support non-car trips.] Proposals should i) maximise opportunities to link with the wider network including existing A27 footbridges and active travel routes as important means of reducing demand on the A27. ii) clarify how new facilities will be funded, monitored and maintained.

### Summary of representation changes to plan:

N/A

### Response:

Objection and proposed change noted. i) We will consider modifications to Policy P14 to emphasise that proposals should provide integrated and enhanced active travel routes, and to clarify that strategic priorities (potentially including proposals to reduce demand on the A27) will be determined by the proposed Green Infrastructure Strategy. ii) Point 7. of Policy P14 states that management and maintenance of GI will be secured via planning obligation or legal agreement. Further clarification is therefore not considered necessary.

### Action:

- i) See council suggested modification CM214
- ii) No change in response to representation.

## 5302

## Object

**Document Element:** Policy P14 Green Infrastructure

**Respondent:** National Highways

## Object

### Summary of representations:

The wording of criteria regarding 'and beyond site boundaries' is ambiguous and ineffective. Could imply a requirement to meet needs beyond that required to satisfy statutory tests and NPPF tests. Proposes change to 'and meets the needs of the development'.

### Summary of representation changes to plan:

N/A

### Response:

Objection and proposed change noted. A fundamental characteristic and importance of Green Infrastructure is the broad social, economic and environmental benefits it brings, which by nature extend beyond the boundaries of an individual development site to the wider community. We will, however, consider a modification to the policy to recognise that the expectations on development to create new GI must be proportionate.

### Action:

See council suggested modification CM213

5667

Object

**Document Element:** Policy P14 Green Infrastructure

**Respondent:** Countryside Properties

**Agent:** Turley

## Support

### Summary of representations:

Welcome inclusion of dedicated policy, recognising strategic significance and multifunctional nature. Welcome expectation proposals will have regard for the NE National Framework of GI Standard.

### Summary of representation changes to plan:

N/A

### Response:

Support and comments noted.

### Action:

N/A

5850

Support

**Document Element:** Policy P14 Green Infrastructure

**Respondent:** Natural England

## Object

---

### Summary of representations:

Reflecting that criteria 1-7 must be followed, proposes flexibility is provided to take account of site-specific circumstances.

### Summary of representation changes to plan:

N/A

### Response:

Objection and proposed change noted. We will consider an amendment to the policy to ensure that development proposals contribute to the provision of enhanced and/or additional GI as appropriate for the scale and nature of the development, the site and its wider context, ensuring flexibility in its implementation.

### Action:

See council suggested modification CM213

---

## 6041

## Object

---

**Document Element:** Policy P14 Green Infrastructure

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

## Object

---

### Summary of representations:

Recommend strengthening policy with reference to the emerging statutory requirements for Local Nature Recovery Strategies.

### Summary of representation changes to plan:

N/A

### Response:

Recommend strengthening policy with reference to the emerging statutory requirements for Local Nature Recovery Strategies

### Action:

See council suggested modification CM215

---

## 6068

## Object

---

**Document Element:** Policy P14 Green Infrastructure

**Respondent:** The Woodland Trust

## Object

---

**Summary of representations:**

Comment that proposed housing development on east/west corridor will reduce GI and decrease access to it.

**Summary of representation changes to plan:**

N/A

**Response:**

Objection and comment noted. Objections also recorded against Policies H1 and H2 (reps 4185 and 4186 refer).

**Action:**

No change

---

6090

Object

**Document Element:** Policy P14 Green Infrastructure

**Respondent:** Chidham and Hambrook Parish Council

## Support

---

**Summary of representations:**

Support in principle. Recognises positive impact GI provides with respect to health and wellbeing, biodiversity, climate change resilience and other social, economic and environmental factors

**Summary of representation changes to plan:**

N/A

**Response:**

Support in principle noted.

**Action:**

No change

---

6167

Support

**Document Element:** Policy P14 Green Infrastructure

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates

## Support

### Summary of representations:

Support in principle

### Summary of representation changes to plan:

N/A

### Response:

Support in principle noted.

### Action:

No change

## 6304

## Support

**Document Element:** Policy P14 Green Infrastructure

**Respondent:** West Sussex County Council

### Background, 6.83

## Object

### Summary of representations:

Object:

Goodwood Airfield and motor circuit offer a large open area close to Chichester City that is a valuable local recreational source. In line with Chapter 8 of the NPPF we request that the role of the circuit, airfield and the open space and recreation opportunities it offers is reflected in the Local Plan.

### Summary of representation changes to plan:

N/A

### Response:

No specific open spaces are mentioned by name in paragraph 6.83. If Goodwood were to be mentioned then all would need to be mentioned and this is unnecessary.

Paragraph 8 of the NPPF does not state that open spaces need to be named in the Local Plan.

### Action:

No changes as a result of this representation

## 4297

## Object

**Document Element:** Background, 6.83

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Background, 6.85

## Object

---

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Noting lifestyle changes since pandemic]. Object:

Notes that the Local Plan evidence on open space, sports facilities, recreation study and playing pitch strategy was completed June/July 2018 and has not been updated to address the changes in behaviours and increase in active transport participation during and since the COVID-19 global pandemic.

### Summary of representation changes to plan:

N/A

### Response:

The Open Space, Sport Facilities, Recreation Study and Playing Pitch Strategy has recently been updated and has taken account of changes in behaviour since the Covid 19 pandemic.

The access standards in table 6.3 are set by walking time ranging from 10 to 15 minutes. These are also minimum standards.

### Action:

No changes as a result of this representation

---

5336

Object

---

Document Element: Background, 6.85

Respondent: National Highways

## Background, 6.94



## Object

### Summary of representations:

#### Object:

The requirement for provision of allotments is clear under s106 as outlined in Table 6.1. The amount is prescribed in Table 6.3 as 0.3 ha per 1000 people as a minimum. This would require over 1 hectare of new allotment space for Tangmere hub.

The plan shows 46 plots. The existing plots in Tangmere are situated behind the Tangmere Museum. There are existing 42 plots non-compliant with policy

### Summary of representation changes to plan:

N/A

### Response:

Objection noted.

This objection relates to a planning application, not the Local Plan.  
The policy requirement applies to needs arising from new development.

The plan that the objector is referring to relates to a planning application.

The Local Plan does not show a map of existing plots in Tangmere and the standards and thresholds do not apply retrospectively to the existing population and existing infrastructure.

### Action:

No changes as a result of this representation

4407

Object

Document Element: Background, 6.94

Respondent: Mr John Wolfenden

## Object

### Summary of representations:

#### Object:

Wants the number of allotments and community gardens to be increased by removing the threshold figures in Table 6.1

### Summary of representation changes to plan:

N/A

### Response:

Objection noted.

The thresholds were set via an evidence based study which canvassed local views as to what the demand is, amongst other evidence including viability.

### Action:

No changes as a result of this representation

4686

Object

**Document Element:** Background, 6.94**Respondent:** Mr Simon Davenport**Policy P15 Open Space, Sport and Recreation****Support****Summary of representations:****Support:**

The Woodland Trust supports point 3 that there should be no adverse impact on biodiversity from development affecting open space.

**Summary of representation changes to plan:**

N/A

**Response:**

Support Noted.

**Action:**

No changes as a result of this representation

4506

Support

**Document Element:** Policy P15 Open Space, Sport and Recreation**Respondent:** The Woodland Trust**Support****Summary of representations:****Support:** Wisborough Green Parish Council supports this policy.**Summary of representation changes to plan:**

N/A

**Response:**

Support Noted.

**Action:**

No changes as a result of this representation

4581

Support

**Document Element:** Policy P15 Open Space, Sport and Recreation**Respondent:** Wisborough Green Parish Council

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No changes as a result of this representation

---

4730

Support

**Document Element:** Policy P15 Open Space, Sport and Recreation

**Respondent:** Mr Cliff Archer

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support Noted.

**Action:**

No changes as a result of this representation

---

4823

Support

**Document Element:** Policy P15 Open Space, Sport and Recreation

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

## Support

### Summary of representations:

#### Support:

SWT is encouraged to see the inclusion of Bullet point 3 in this policy. We feel it recognises the role of open space, including that of space for sport and recreation, in terms of potential ecological benefits.

### Summary of representation changes to plan:

N/A

### Response:

Support Noted.

### Action:

No changes as a result of this representation

5057

Support

**Document Element:** Policy P15 Open Space, Sport and Recreation

**Respondent:** Sussex Wildlife Trust

## Object

### Summary of representations:

#### Object:

Lack of clarity within supporting text and policy with regard to what is required in terms of indoor sports facilities as does not refer to development thresholds.

The requirements appear to be general standards for all communities rather than relating to specific development. As such it is unclear to a decision maker or applicant as to what is required in terms of built sport and recreation facilities. The provision of on-site built sport and recreation facilities will only be relevant in very few circumstances with improvements in provision largely being provided by the Council using the CIL or other financial contributions. The HBF would therefore recommend that reference to the provision of indoor facilities is removed from this policy. If on-site facilities are required this should be agreed with the site promoter and set out in the site allocation.

### Summary of representation changes to plan:

N/A

### Response:

Objection noted.

It is agreed to add to Table 6.1 a threshold requirement for the provision of on-site community and sports halls and to add a table note to clarify that such provision will depend on local circumstance.

Following an update to the Build Facilities and Leisure Needs Assessment (2024) it is proposed to remove from Table 6.4 the quantity standards per 1,000 population for specific indoor facilities. Instead reference will be made to the Needs Assessment to determine, based on local circumstances, the need for new or enhanced indoor facilities.

### Action:

See council suggested modifications CM219 and CM223

5153

Object

**Document Element:** Policy P15 Open Space, Sport and Recreation**Respondent:** Home Builders Federation

Support

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support Noted.

**Action:**

No changes as a result of this representation

5211

Support

**Document Element:** Policy P15 Open Space, Sport and Recreation**Respondent:** John Newman

Object

**Summary of representations:****Object:**

- Support spirit of Policy P15.

Bellway welcome opportunity to improve quality and accessibility of open space at the Police Fields, and note that the following guidance in the preceding text that on-site amenity and natural greenspace is likely to be required alongside an Equipped Play Space.

- Request change:

Existing open space is ill-defined in the final part of draft Policy P15. It is respectfully suggested that this might more appropriately reference open space and playing fields identified on the proposals map (adding this if necessary)

**Summary of representation changes to plan:**

N/A

**Response:**

Objection noted.

Existing open space is defined in paragraph 6.84

**Action:**

See council suggested modification CM224

5500

Object

**Document Element:** Policy P15 Open Space, Sport and Recreation

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

Object

**Summary of representations:**

Object:

Criterion 1 – no development threshold requirement listed in Table 6.1 for indoor facilities.

**Summary of representation changes to plan:**

Either rework table 6.1 to include thresholds for on-site indoor space, or delete and left to be expressed in individual site allocation policies.

**Response:**

Objection noted.

It is agreed to add to Table 6.1 a threshold requirement for the provision of on-site community and sports halls and to add a table note to clarify that such provision will depend on local circumstance.

**Action:**

See council suggested modification CM219

5669

Object

**Document Element:** Policy P15 Open Space, Sport and Recreation

**Respondent:** Countryside Properties

**Agent:** Turley

## Object

### Summary of representations:

Policy lacks clarity in terms of thresholds for the provision of built facilities. Requirements appear to be set on a generic basis with supporting text at paragraph 6.85 referencing Open Space, Sport and recreation Study (2018) as relevant evidence. However, at paragraph 6.96, there is reference to future area-based policies in the subsequent Allocations DPD and SPD. Evidence clearly out of date for new Plan. Policy will apply to all residential development and logically be dealt with through CIL for smaller development where on-site provision impractical. Lack of evidence supporting policy means any request for contributions would fail Regulation 122 and Paragraph 57 of NPPF. Adopting outdated generic policy approach clearly inconsistent. No threshold for built facilities whilst policy requires provision. Unclear as to what is required in terms of built sport and recreation facilities.

### Summary of representation changes to plan:

N/A

### Response:

Objection noted:

It is agreed to add to Table 6.1 a threshold requirement for the provision of on-site community and sports halls and to add a table note to clarify that such provision will depend on local circumstance.

Following an update to the Build Facilities and Leisure Needs Assessment (2024) it is proposed to remove from Table 6.4 the quantity standards per 1,000 population for specific indoor facilities. Instead reference will be made to the Needs Assessment to determine, based on local circumstances, the need for new or enhanced indoor facilities.

### Action:

See council suggested modifications CM219 and CM223

5736

Object

**Document Element:** Policy P15 Open Space, Sport and Recreation

**Respondent:** Metis Homes

**Agent:** Nova Planning

## Support

### Summary of representations:

Support:

Natural England supports this policy which includes provision to improve the GI network and protect existing by ensuring no adverse impacts on biodiversity, heritage assets or the integrity of the GI network (NPPF para 179).

### Summary of representation changes to plan:

N/A

### Response:

Support Noted.

### Action:

No changes as a result of this representation

5851

Support

**Document Element:** Policy P15 Open Space, Sport and Recreation

**Respondent:** Natural England

Support

**Summary of representations:**

Support in principle. Changes to plan in additional rep - 5500.

**Summary of representation changes to plan:**

N/A

**Response:**

Support Noted.

**Action:**

No changes as a result of this representation

6030

Support

**Document Element:** Policy P15 Open Space, Sport and Recreation

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning



## Object

### Summary of representations:

Object: It is not clear from the policy what the expectations are in terms of which developments would be expected to provide indoor facilities. Given the complex nature and cost of providing indoor sports facilities, there should not be an expectation to provide such facilities unless they have formed part of the early masterplanning of the site.

### Summary of representation changes to plan:

N/A

### Response:

Objection noted:

It is agreed to add to Table 6.1 a threshold requirement for the provision of on-site community and sports halls and to add a table note to clarify that such provision will depend on local circumstance.

Following an update to the Build Facilities and Leisure Needs Assessment (2024) it is proposed to remove from Table 6.4 the quantity standards per 1,000 population for specific indoor facilities. Instead reference will be made to the Needs Assessment to determine, based on local circumstances, the need for new or enhanced indoor facilities.

In masterplanning a site, pre-app discussions should take place to include the nature of built sports and leisure facilities.

### Action:

See council suggested modification CM219 and CM223

Add footnote to table 6.4 to clarify that Sports halls and Health and Fitness facilities can be provided in small community halls as local needs determine. – so applied flexibly.

6042

Object

**Document Element:** Policy P15 Open Space, Sport and Recreation

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

## Object

---

### Summary of representations:

#### Object:

Welcomes inclusion of natural greenspace in Table 6.3 – Minimum Open Space Quantity and Access Standards. However, it falls short of minimum standard in Natural England’s Accessible Natural Green Space of 2ha per 1000 population within 300 meters/5minutes walking time . In Addition, the Woodland Trust’s Woodland Access Standard recommends 2ha of accessible woodland within 500m.

### Summary of representation changes to plan:

Request that policy is applied as minimum and higher provision made where feasible.

### Response:

Objection noted.

It should be noted that the standards set out in Table 6.3 are minimum standards. However, following a review of the open space standards (in the Open Space, Sport Facilities, Recreation Study and Playing Pitch Strategy Update 2024) a separate standard for accessible natural green space of 1.2ha per 1000 population is proposed to be include in Table 6.3. In addition it is proposed to add reference to the Woodland Trust’s Woodland Access Standards under the accessibility standard for natural green space.

### Action:

No changes as a result of this representation

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**6069****Object**

**Document Element:** Policy P15 Open Space, Sport and Recreation

**Respondent:** The Woodland Trust

## Planning for Health and Well-being, 6.102

### Object

#### Summary of representations:

RADAR objects to this on the grounds of Soundness. CDC has a dismal track record on Planning Enforcement. What confidence can any Inspector have that the CDC will implement or enforce proposed Policies given what has happened at a Premises in West Street recently. Past performance undermines the Soundness of the Plan and possibly the Legality. The residents well-being has been affected by the CDC lack of action. What confidence will an Inspector have that this again be adhered to.

#### Summary of representation changes to plan:

N/A

#### Response:

Comments noted

#### Action:

No change to plan

3802

Object

Document Element: Planning for Health and Well-being, 6.102

Respondent: RADAR

## Health Impact Assessments, 6.104

### Support

#### Summary of representations:

This comment relates to P16 but omitted from P16 response. Relates to points 3 and 4. WGPC supports the policy intent but this cannot be applied to Wisborough Green. This is, again, a Chichester centric policy. This fails to promote a healthy lifestyle or address the inadequacies of the lack of public transport. This is not practical for the north-east parishes.

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted

#### Action:

No change to plan

4584

Support

Document Element: Health Impact Assessments, 6.104

Respondent: Wisborough Green Parish Council

## Policy P16 Health and Well-being

Support

---

### Summary of representations:

WGPC supports this approach but questions how it could be applied to Wisborough Green. Already built new development in rural NE parishes, neighbouring Billingshurst and WG has led to a shortfall or worsening of provision. The Infrastructure Development Plan is Chichester centric. How will the lack of provision in the northern parishes be addressed?

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

4582

Support

---

**Document Element:** Policy P16 Health and Well-being

**Respondent:** Wisborough Green Parish Council

## Policy P16 Health and Well-being

Support

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**Summary of representations:**

█ Vistry and Miller support the principle of this policy having allowed for land within the local centre for a healthcare facility

**Summary of representation changes to plan:**

█ N/A

**Response:**

█ Support noted.

**Action:**

█ No change to plan

4824

Support

---

**Document Element:** Policy P16 Health and Well-being

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

Support

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**Summary of representations:**

█ Cross reference to the Chichester Harbour Management Plan policy on Health and Wellbeing

**Summary of representation changes to plan:**

█ N/A

**Response:**

█ Support noted

**Action:**

█ No change to plan

4946

Support

---

**Document Element:** Policy P16 Health and Well-being

**Respondent:** Chichester Harbour Conservancy

## Support

### Summary of representations:

: I agree with Policies P2, P3 (not least point 4), P4 (not least point 2), PS, P6, P7 (though, having had an extension to our house that did project in front of the original building line, as have also my immediate neighbours, I would not want to preclude this possibility where it makes sense and is not deleterious to others), P9, P10, P11, P13, P14, P15 (the recent case of Lavant comes to mind), and P16 (not least point 3)

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

## 5212

## Support

**Document Element:** Policy P16 Health and Well-being

**Respondent:** John Newman

## Support

### Summary of representations:

This comment relates to P16 but omitted from P16 response. Relates to points 3 and 4.  
 WGPC supports the policy intent but this cannot be applied to Wisborough Green.  
 This is, again, a Chichester centric policy.  
 This fails to promote a healthy lifestyle or address the inadequacies of the lack of public transport.  
 This is not practical for the north-east parishes.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

## 5260

## Support

**Document Element:** Policy P16 Health and Well-being

**Respondent:** Wisborough Green Parish Council

## Support

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Supporting measures to reduce demand.] Support: National Highways support proposals that are safe and connected to existing and future routes that are of the same standard of infrastructure, or better, to enable cycling and walking for local trips to reduce impacts on the A27. This is an important measure to reduce demand on the A27

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

## 5304

## Support

**Document Element:** Policy P16 Health and Well-being

**Respondent:** National Highways

## Object

### Summary of representations:

Support Policy P16, note need for planning applications for 50 or more dwellings to be accompanied by a Health Impact Assessment. Unclear where this threshold has come from – no explanation in supporting text, feels a little arbitrary. Some overlap, most notably in respect of allotments (under criteria 2) with preceding Policy P15, albeit this needn't detract from the fact that the policy has been positively prepared and is broadly consistent with the NPPF.

### Summary of representation changes to plan:

Higher threshold be applied contiguous with the standards established in earlier policies and tables (for instance the full range of on-site open space, sport and recreation facilities kicks in at 100 dwellings in table 6.2).

### Response:

The inclusion of thresholds is considered to be reasonable and appropriate given the nature of the plan area. However, in order to maximise the beneficial opportunities a modification is proposed to also include a threshold of 1000sqm floorspace.

### Action:

No change to plan in relation to housing, however change to text to include floorspace: see Council's suggested Modification CM227.

## 5501

## Object

**Document Element:** Policy P16 Health and Well-being

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Support

### Summary of representations:

Support this policy which includes promotion of multi-functional GI and active travel networks (NPPF para 92).

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change to plan

5852

Support

**Document Element:** Policy P16 Health and Well-being

**Respondent:** Natural England

## Object

### Summary of representations:

Any requirements to provide land or contributions towards healthcare provision would need to be justified on a case by case basis by the appropriate healthcare body and, in the case of the provision of land, would need a willing occupier of the site.

### Summary of representation changes to plan:

Policy wording should be updated to reflect need for case by case justification.

### Response:

Comments noted. Criteria 1 to be removed due to overlap with Policy I1.

### Action:

See Council's suggested Modification CM226.

6043

Object

**Document Element:** Policy P16 Health and Well-being

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech



## Object

### Summary of representations:

WGPC supports this approach but questions how it could be applied to Wisborough Green. Already built new development in rural NE parishes, neighbouring Billingshurst and WG has led to a shortfall or worsening of provision. The Infrastructure Development Plan is Chichester centric. How will the lack of provision in the northern parishes be addressed?

### Summary of representation changes to plan:

N/A

### Response:

Comments noted. The policy applies equally to all parts of the plan area

### Action:

No change to plan

## 6220

## Object

**Document Element:** Policy P16 Health and Well-being

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

This comment relates to P16 but omitted from P16 response. Relates to points 3 and 4. WGPC supports the policy intent but this cannot be applied to Wisborough Green. This is, again, a Chichester centric policy. This fails to promote a healthy lifestyle or address the inadequacies of the lack of public transport. This is not practical for the north-east parishes.

### Summary of representation changes to plan:

N/A

### Response:

Comments noted. The policy applies equally to all parts of the plan area whether urban or more rural in context

### Action:

No change to plan

## 6234

## Object

**Document Element:** Policy P16 Health and Well-being

**Respondent:** Wisborough Green Parish Council

## Policy P17 New and Existing Local and Community Facilities including Local Shops

Support

---

### Summary of representations:

If a community facility or local shop is included in the planning permission then it is essential that this is provided and does not revert to housing

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change to plan.

4207

Support

---

**Document Element:** Policy P17 New and Existing Local and Community Facilities including Local Shops

**Respondent:** Chidham and Hambrook Parish Council

Support

---

### Summary of representations:

WGPC supports the intent but this cannot be applied to Wisborough Green.  
The policy qualifiers are not realistic about the challenges of a rural parish

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change to plan.

4585

Support

---

**Document Element:** Policy P17 New and Existing Local and Community Facilities including Local Shops

**Respondent:** Wisborough Green Parish Council

## Support

### Summary of representations:

We remain supportive of this policy and the strength it provides to ensuring valued facilities are retained, in line with paragraph 93 of the NPPF (2021). We also welcome the detail provided to support implementation through Appendix C.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change to plan.

4739

Support

**Document Element:** Policy P17 New and Existing Local and Community Facilities including Local Shops

**Respondent:** The Theatres Trust

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Issues to resolve.] Object: Can't assume that only housing and employment sites generate trips. Community Facilities may be busy in am and pm peak and offpeak.

Seek further information on how the Council intends to assess how new or improved community facilities will demonstrate they have no adverse traffic generation effects

### Summary of representation changes to plan:

N/A

### Response:

This is covered by Policy T2, which refers to all development proposals which are likely to result in significant transport impacts needing to be supported by a transport assessment and travel plan

### Action:

No change to plan

5305

Object

**Document Element:** Policy P17 New and Existing Local and Community Facilities including Local Shops

**Respondent:** National Highways

## Object

---

### Summary of representations:

: WGPC supports the intent but this cannot be applied to Wisborough Green.  
The policy qualifiers are not realistic about the challenges of a rural parish

### Summary of representation changes to plan:

N/A

### Response:

Comments noted.

### Action:

No change to plan.

---

6221

Object

**Document Element:** Policy P17 New and Existing Local and Community Facilities including Local Shops

**Respondent:** Wisborough Green Parish Council

## Background, 7.1

## Object

---

### Summary of representations:

Role of Goodwood should be reflected

### Summary of representation changes to plan:

Role of Goodwood should be reflected

### Response:

This is an introductory contextual paragraph referring to economic strategies. No individual businesses or interests are specified here so it would seem inappropriate to just identify one.

### Action:

No change in response to representation

---

4290

Object

**Document Element:** Background, 7.1

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

### Summary of representations:

Objects to Land South of Chichester) as contrary to E2 (inc in noise, adverse impact on amenity, traffic, pollution). Other options should be explored.

### Summary of representation changes to plan:

Remove allocation

### Response:

Based on other representations from the same respondent this objection appears to relate to a site proposed in the Regulation 18 consultation (Land South West of Chichester) which is not proposed for allocation in the submission version.

An alternative site South of Bognor Road was identified and is proposed in Policy A20. This site is considered to be suitably located for access to the road network, close to the City in line with the spatial strategy, and also located close to horticultural areas where there is a need for related employment space.

Policy A20 sets out site specific requirements, which along with other policies will ensure the issues referred to are fully considered and addressed in any scheme.

A range of other sites were considered – these are summarised in Appendix 2 of the Sustainability Appraisal

### Action:

No change in response to representation

4294

Object

Document Element: Background, 7.1

Respondent: David Ball

Support

### Summary of representations:

Support – but want more flexibility in horticultural policy.

### Summary of representation changes to plan:

None specified

### Response:

Support noted.

### Action:

No change in response to representation

4800

Support

Document Element: Background, 7.1

Respondent: West Sussex Growers' Association

## Object

---

### Summary of representations:

Plan does not achieve conditions for businesses to invest, expand, adapt.

### Summary of representation changes to plan:

Change "ancillary" in HDA policies to "functionally linked"

### Response:

The suggested change is not a change to this para/ policy. The suggested change has also been recorded against policies E3 and E4 and responded to there.

### Action:

No change in response to representation

---

4965

Object

---

Document Element: Background, 7.1

Respondent: Kingsbridge Estates Limited & Landlink Estates Limited

Agent: Savills

## Background, 7.2

## Support

---

### Summary of representations:

Support with general observations about the horticultural industry

### Summary of representation changes to plan:

None

### Response:

Support noted.

### Action:

No change in response to representation

---

4804

Support

---

Document Element: Background, 7.2

Respondent: West Sussex Growers' Association

## Support

---

**Summary of representations:**

Support – this para is important

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation

---

5213

Support

---

**Document Element:** Background, 7.2

**Respondent:** John Newman

## Background, 7.4

## Object

### Summary of representations:

Draft plan does not allow for suppressed demand.

Want more flexibility for HDAs

### Summary of representation changes to plan:

Change "ancillary" in HDA policies to "functionally linked"

### Response:

The suggested change is not a change to this para/ policy. The suggested change has also been recorded against policies E3 and E4 and responded to there.

In relation to suppressed demand, it is not clear how the 'suppressed demand' model presented with representations corresponds to the Planning Practice Guidance (PPG) on economic needs assessments. The Plan evidence base (HEDNAs 2020 and 2022) considers PPG compliant approaches to identifying employment needs – notable completions trends - and include a further margin for flexibility.

In addition to general employment needs a substantial allowance is recommended in the HEDNAs for horticultural floorspace both inside and outside Horticultural Development Areas (190.3 ha for 2019-36) which includes some ancillary employment uses.

### Action:

No change in response to representation

## 4964

## Object

**Document Element:** Background, 7.4

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills



## Background, 7.5

## Support

### Summary of representations:

Support with general observations about the horticultural industry [ repeat of rep 4804]

### Summary of representation changes to plan:

None specified

### Response:

Support noted

### Action:

No change in response to representation

## 4806

## Support

**Document Element:** Background, 7.5

**Respondent:** West Sussex Growers' Association

## Policy E1 Meeting Employment Land Needs

## Object

### Summary of representations:

Change ref to employment space at Land West of Chichester to 6ha rather than giving a floorspace, to allow more flexibility.

### Summary of representation changes to plan:

Change ref to employment space at Land West of Chichester to 6ha rather than giving a floorspace.

### Response:

This policy is framed in floorspace as the calculations of additional employment land to be allocated are based on floorspace figures. The figure used for Land West of Chichester is taken from a planning application. However assuming a 40% plot ratio on 5.2ha (the part of the 6ha which does not already have permission) gives an indicative floorspace of 20,800 rather than the 22,000 used. This would be more consistent with the way other figures have been calculated.

### Action:

See council suggested modification CM233

## 4827

## Object

**Document Element:** Policy E1 Meeting Employment Land Needs

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

# Object

**Summary of representations:**

Employment requirement should be higher as:

- 1) It has been suppressed due to the lower housing figure.
2. Taking account of Covid is pessimistic.
- 3.. There is an undersupply.
4. DTC process has not dealt with employment issues

**Summary of representation changes to plan:**

Higher employment target

Promoting Badger Farm for commercial development.

**Response:**

1. The HEDNA figures for employment need are not based on a labour supply scenario but on labour demand and completions trend and so the lower housing figure makes no difference.
2. The Covid adjustment reflects that some of the jobs in this period are replacing jobs lost during the pandemic and therefore do not need additional employment space, as they can return to the same premises. As well as the adjustment for Covid there is also an uplift to allow for replacement of losses and a flexible margin equivalent to 2 years of completions.( Chapter 12 of HEDNA 2022)
3. The HEDNA has considered the current undersupply in the industrial market when assessing future needs. The recommended need is based on net completions (actual change) with a margin above this for flexibility and replacement of lost space (HEDNA 2022 table 12.14) which increases the trend from 7.5 ha (table 12.13) to 22.8 ha (table 12.14) thus making a substantial increase in the past trend, although this is reduced slightly to 22-23 ha in the final recommendations (table 12.17) reflecting a weaker office market.
4. Employment has been discussed at Duty to Cooperate meetings with neighbouring authorities as documented in Statements of Common Ground.

**Action:**

No change in response to representation

**4848****Object**

**Document Element:** Policy E1 Meeting Employment Land Needs

**Respondent:** Wates Developments

## Object

### Summary of representations:

Insufficient industrial land and wording of HDA policies means insufficient land for HDA functionally linked uses.

### Summary of representation changes to plan:

E1 should recognise the importance of the horticultural industry to provide land for functionally linked uses.

### Response:

The HEDNA 2020 and 2022 make a considerable increase of over 250% above the historic trend in terms of general employment provision based on monitoring data, as can be identified in table 12.14 and 12.17 (2022 HEDNA) rising from c39,100 sqm (net trend) to c115,800 sqm (recommended).

The HEDNA 2020 considered what proportion of the industrial use figures was likely to be for horticulture related uses – being around half of the overall industrial and warehousing requirement based on analysis of planning data. This equates to 8 to 8.5ha (based on B2/B8 needs in table 12.17 of the HEDNA 2022). Policy E3 of the plan provides for approximately 67 hectares to meet predicted need within HDAs ( through space in existing HDAs plus a 21ha extension to the Runcton HDA) and Policy E4 relates to land outside of HDAs. In addition the proposed new allocation South of Bognor Road is adjacent to HDAs so would be suitable for functionally linked uses.

### Action:

No change in response to representation.

---

**4962****Object**

**Document Element:** Policy E1 Meeting Employment Land Needs

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Object

### Summary of representations:

Object to A20 – site constraints. Promoting Land N of Drayton Waterside – smaller sites will be more deliverable.

### Summary of representation changes to plan:

Allocate more smaller sites such as Land N of Drayton Waterside

### Response:

Appendix 2 of the Sustainability Appraisal sets out the range of other options considered.

The Local Plan is currently focussing on strategic level sites. If smaller sites are needed they can be allocated in the subsequent Site Allocations DPD or in neighbourhood plans.

### Action:

No change in response to representation.

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**5012****Object**

**Document Element:** Policy E1 Meeting Employment Land Needs

**Respondent:** Drayton Investments Limited

**Agent:** Drayton Investments Limited

## Support

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**Summary of representations:**

Support.

**Summary of representation changes to plan:**

None,

**Response:**

Support noted.

**Action:**

No change in response to representation.

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5517

Support

**Document Element:** Policy E1 Meeting Employment Land Needs

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

### Existing Employment Sites, 7.11

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Support

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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4442

Support

**Document Element:** Existing Employment Sites, 7.11

**Respondent:** Mr Robin Davison

## Existing Employment Sites, 7.12

### Object

#### Summary of representations:

Inconsistent with NPPF para 82(d) - requires policies to be flexible enough to accommodate needs not anticipated in Plan, allow for new and flexible working practices (such as live-work accommodation); para 7.15 contradicts GPDO conversion of commercial to residential w/o pp

#### Summary of representation changes to plan:

Please ensure plan recognises need for flexibility to accommodate needs which may not have been expected, as per the NPPF para 82(d)

#### Response:

Paragraph 7.8 refers to the provision for flexible working space to be provided through some of the new strategic site allocations whilst paragraphs 7.15 and 7.20 acknowledges the flexibility afforded under the Use Classes Order 2020 and through permitted development rights. In the final paragraph of Policy E2, there is also reference to new employment development providing a range of unit types and sizes to accommodate the needs of start-up and move-on businesses in the area.

In order to "positively and proactively encourage sustainable economic growth" (paragraph 82(a) NPPF 2021), the Council will monitor changes of use and as stated at paragraph 7.15, will explore safeguarding the provision of employment floorspace through Article 4 Directions only if considered necessary.

#### Action:

No change

**4026****Object**

**Document Element:** Existing Employment Sites, 7.12

**Respondent:** Mrs Victoria Douglas

### Support

#### Summary of representations:

Support

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted

#### Action:

No change

**5214****Support**

**Document Element:** Existing Employment Sites, 7.12

**Respondent:** John Newman

## Existing Employment Sites, 7.15

## Object

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### Summary of representations:

Inconsistent with NPPF para 82(d) - requires policies to be flexible enough to accommodate needs not anticipated in Plan, allow for new and flexible working practices (such as live-work accommodation); para 7.15 contradicts GPDO conversion of commercial to residential w/o pp

### Summary of representation changes to plan:

Plan should respect existing, approved policy, and not seek to introduce restrictive work-arounds

### Response:

Paragraph 7.8 refers to the provision for flexible working space to be provided through some of the new strategic site allocations whilst paragraphs 7.15 and 7.20 acknowledges the flexibility afforded under the Use Classes Order 2020 and through permitted development rights. In the final paragraph of Policy E2, there is also reference to new employment development providing a range of unit types and sizes to accommodate the needs of start-up and move-on businesses in the area.

In order to "positively and proactively encourage sustainable economic growth" (paragraph 82(a) NPPF 2021), the Council will monitor changes of use and as stated at paragraph 7.15, will explore safeguarding the provision of employment floorspace through Article 4 Directions only if considered necessary.

### Action:

No change

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**4027****Object**

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**Document Element:** Existing Employment Sites, 7.15

**Respondent:** Mrs Victoria Douglas

## Existing Employment Sites, 7.17

### Object

#### Summary of representations:

7.17 should recognise relevance of complimentary uses which support economic viability of marinas in compliance with paras 81/83/84 NPPF. Amend to “...for marine related and supporting and ancillary uses”. Insert in para in "Existing Employment Sites" Section of policy E2 that begins “Existing employment sites will be.....new second sentence “Changes of use which retain or increase employment will be supported.” Important to recognise leisure and community uses, not currently acknowledged, diversification for leisure uses, particularly relevant to waterside locations. CHC MP not statutory DPD and should not be cross-referenced as not compliant with national policy

#### Summary of representation changes to plan:

The policy supporting text wording for paragraph 7.17 should therefore be amended to “marine related and supporting and ancillary uses” in recognition of this, and in accordance with the NPPF, Policy NE11 and paragraph 7.17 of the Plan

#### Response:

Paragraph 7.17 reflects the Chichester Harbour Planning Principles’ reference to marine-related business uses. As referred to at paragraph 4.81 of the Regulation 19 Plan, the Chichester Harbour AONB Management Plan was adopted by the Council in 2019 and the 18 Planning Principles are referred to within the Management Plan. It is considered that the reference to preserving marine-related uses in the Regulation 19 Plan will support the economic viability of the marinas in the Local Plan Area whilst also following the aims of Section 6 of the NPPF 2021.

#### Action:

No change

5341

Object

**Document Element:** Existing Employment Sites, 7.17

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

Support

#### Summary of representations:

Support in principle

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted.

#### Action:

No change

6160

Support

**Document Element:** Existing Employment Sites, 7.17

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

## New Employment Sites, 7.18

# Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

## 4280

## Support

**Document Element:** New Employment Sites, 7.18

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Policy E2 Employment Development

# Object

### Summary of representations:

Amend new employment sites section to enable sites within rural areas. Should be exception policy to allow existing rural sites to extend beyond boundaries

### Summary of representation changes to plan:

Amended the section on new employment sites so that it enables new sites to come forward within the rural area in appropriate circumstances - it is wholly unreasonable to have an embargo

There should also be an exception policy to allow existing rural sites to extend beyond their boundaries when an exception has been demonstrated - for example the recent expansion of Rolls Royce.

### Response:

The rural economy is referred to in detail at paragraphs 4.52, 4.53, 4.57 and 4.58 of Chapter 4 of the Regulation 19 Plan. As well as rural economic development being encouraged in Chapter 4, it is considered that criterion 4 of Policy E2 deals appropriately with expansions of existing employment sites into the countryside in accordance with paragraph 85 of the NPPF 2021

### Action:

No change

## 4375

## Object

**Document Element:** Policy E2 Employment Development

**Respondent:** Mr Stephen Jupp



## Object

### Summary of representations:

7.17 should recognise relevance of complimentary uses which support economic viability of marinas in compliance with paras 81/83/84 NPPF. Amend to "...for marine related and supporting and ancillary uses". Insert in para in "Existing Employment Sites" section of policy E2 that begins "Existing employment sites will be.....new second sentence "Changes of use which retain or increase employment will be supported." Important to recognise leisure and community uses, not currently acknowledged, diversification for leisure uses, particularly relevant to waterside locations. CHC MP not statutory DPD and should not be cross-referenced as not compliant with national policy.

### Summary of representation changes to plan:

In the interest of diversifying employment uses and making the policy more effective in accordance with paragraph 35© of the NPPF, the policy should therefore be amended accordingly:

"Existing employment sites will be retained to safeguard their contribution to the local economy. Changes of use which retain or increase employment will be supported. Employment uses other than those in use classes E(g), B2 or B8 which require planning permission, will be permitted on existing employment sites provided they are of a similar character in terms of providing jobs, the skills they require and their contribution to long-term economic growth. Where the proposed alternative use is a main town centre use, the sequential test set out in national policy must be met.

Where planning permission is required for alternative non-employment uses on land or floorspace currently in or last used for employment generating uses, it must be demonstrated (in terms of the evidence requirements in Appendix C) that the site is no longer required and is unlikely to be re-used or redeveloped for employment uses to meet future demand"

### Response:

Paragraph 7.17 reflects the Chichester Harbour Planning Principles' reference to marine-related business uses. As referred to at paragraph 4.81 of the Regulation 19 Plan, the Chichester Harbour AONB Management Plan was adopted by the Council in 2019 and the 18 Planning Principles are referred to within the Management Plan. It is considered that the reference to preserving marine-related uses in the Regulation 19 Plan will support the economic viability of the marinas in the Local Plan Area whilst also following the aims of Section 6 of the NPPF 2021.

### Action:

No change.

4633

Object

**Document Element:** Policy E2 Employment Development

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

## Object

---

**Summary of representations:**

Needs further clarity re; last para of policy to highlight when requirement for start-up/move-on units will not apply ie; bespoke sites, single party, specific and bespoke employment activities

**Summary of representation changes to plan:**

Further clarity could be provided to highlight where this requirement will not apply. This could include employment development on bespoke sites where provision is for a single party and in connection with specific and bespoke employment activities

**Response:**

The last paragraph of policy E2 provides that such requirement applies where it is considered "feasible". The applicant will need to demonstrate why provision of such units would not be feasible

**Action:**

No change

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**4697****Object**

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**Document Element:** Policy E2 Employment Development

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates

## Object

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**Summary of representations:**

Plan does need to address concern about city centre shops disappearing

**Summary of representation changes to plan:**

No change

**Response:**

Policy E6 aims to enhance the retail offer where possible within the core of Chichester city centre and retain Class E uses as much as possible to help maintain active shopping frontages

**Action:**

No change

---

**5215****Object**

---

**Document Element:** Policy E2 Employment Development

**Respondent:** John Newman

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

## 5519

## Support

**Document Element:** Policy E2 Employment Development

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seeking further information.] How will Council assess/determine what would not generate unacceptable levels of traffic movement; how will it be monitored and managed if unacceptable levels are generated; how will Council monitor and manage cumulative traffic generated from multi occupancy start-up/move-on businesses

### Summary of representation changes to plan:

Seek further information on how the council will monitor and manage cumulative traffic.

### Response:

The criterion requiring proposals not to generate unacceptable levels of traffic movement has been carried forward from the adopted Chichester Local Plan. The Council will continue to assess/determine the requirements of this criterion on a site-specific basis. Proposals for new development will also be required to meet the criteria contained in the Transport policies of the Regulation 19 Local Plan including the provision of Transport Assessments, Travel Plans and Transport Statements where appropriate

### Action:

No change

## 5716

## Object

**Document Element:** Policy E2 Employment Development

**Respondent:** National Highways

## Object

### Summary of representations:

Policy should be explicit in saying development outside settlement boundaries would be supported, subject to sequential test being completed and suitable scale and form responding to edge of settlement character.

### Summary of representation changes to plan:

Reference made in policy wording for sequential test to be followed. However, should be explicit in saying that development outside settlement boundaries would be supported, subject to sequential test being completed and suitable scale and form responding to edge of settlement character.

### Response:

Development outside of settlement boundaries follows the Council's spatial strategy with new employment development to be distributed in line with the settlement hierarchy. Policy S2 Settlement Hierarchy provides that development outside of the settlement boundaries must be in accordance with policy NE10 Development in the Countryside.

### Action:

No change

5754

Object

**Document Element:** Policy E2 Employment Development

**Respondent:** Barratt David Wilson Homes

**Agent:** Henry Adams LLP

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

6159

Support

**Document Element:** Policy E2 Employment Development

**Respondent:** Premier Marinas Limited

**Agent:** CBRE Limited

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

---

6165

Support

**Document Element:** Policy E2 Employment Development

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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6243

Support

**Document Element:** Policy E2 Employment Development

**Respondent:** John Newman

## Background, 7.20

## Object

### Summary of representations:

More flexibility needed in Plan - increased need for ancillary development – Vertical Farming Projects; R&D Facilities; Alternative Energy Centres; Logistics and Distribution Centres; Engineering and Technical Support Facilities

### Summary of representation changes to plan:

Refer to rep summary

### Response:

Policy E4 makes provision for new horticultural and ancillary development which is defined at paragraph 7.29 as other processes directly related to the production of horticultural products. However, as a result of representations received from the horticulture industry, it is proposed that “functionally-linked” replaces “ancillary” as a description for those activities associated with horticultural development

### Action:

See Council's suggested Modification CM238

## 4813

## Object

**Document Element:** Background, 7.20

**Respondent:** West Sussex Growers' Association

## Object

### Summary of representations:

'Ancillary' should be changed to 'functionally linked'; expand/include explanatory text clarifying that functionally linked uses can include range of activities including food-related distribution; food manufacturing linked to HDAs food preparation; on-site renewable energy and R&D

### Summary of representation changes to plan:

As per rep summary

### Response:

Agree, 'functionally-linked' is an improved description for those processes/activities directly related to the production of horticultural products. Changes will be made within E3 and E4 to reflect this and an explanation/definition for “functionally-linked” development provided in policy E4

### Action:

See Council's suggested Modifications CM238, CM239, CM240, CM243, CM244.

## 4961

## Object

**Document Element:** Background, 7.20

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Background, 7.21

## Object

### Summary of representations:

No reference to viticulture despite sites in plan area; Unmet demand for 20 ha in Tangmere; Produce map of 4 HDAs; Expand production of viticulture on land west of Tangmere.

### Summary of representation changes to plan:

Amend the plan as follows:

7.21 The southern part of the plan area accommodates a horticultural industry which has taken advantage of the comparatively high light levels experienced in the area to become nationally and internationally competitive, The council has a long-standing track record in supporting this industry through the designation of four Horticultural Development Areas (HDAs) around Tangmere, Runcton, Sidlesham and Almodington and will publish a map of these areas. It will perform a new evaluation of the economic, social and environmental benefits of meeting the unmet demand for 20 ha horticultural land in Tangmere and will perform a consultation on the potential economic, environmental and social benefits of expanding production of English Sparkling Wine on the land to the west of Tangmere

### Response:

Whilst the HEDNA did not refer explicitly to viticulture, as part of the commercial sector, this was accounted for when analysing past development trends. The shortfall in Horticultural Development Area Land identified at paragraph 7.24 will be met through an extension to the Runcton HDA. The 4 HDAs can be accessed on the Policies Map on the Council website as referred to at paragraph 7.28

### Action:

No change

## 4125

## Object

Document Element: Background, 7.21

Respondent: Mr Matthew Rees

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

## 4816

## Support

Document Element: Background, 7.21

Respondent: West Sussex Growers' Association

## Object

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### Summary of representations:

More flexibility needed in Plan - increased need for ancillary development – Vertical Farming Projects; R&D Facilities; Alternative Energy Centres; Logistics and Distribution Centres; Engineering and Technical Support Facilities

### Summary of representation changes to plan:

Refer to rep summary

### Response:

Policy E4 makes provision for new horticultural and ancillary development which is defined at paragraph 7.29 as other processes directly related to the production of horticultural products. However, as a result of representations received from the horticulture industry, it is proposed that “functionally-linked” replaces “ancillary” as a description for those activities associated with horticultural development

### Action:

See Council's suggested Modification CM238

6192

Object

---

**Document Element:** Background, 7.21

**Respondent:** West Sussex Growers' Association



## Background, 7.23

## Object

### Summary of representations:

More flexibility needed in Plan - increased need for ancillary development – Vertical Farming Projects; R&D Facilities; Alternative Energy Centres; Logistics and Distribution Centres; Engineering and Technical Support Facilities

### Summary of representation changes to plan:

Refer to rep summary

### Response:

Policy E4 makes provision for new horticultural and ancillary development which is defined at paragraph 7.29 as other processes directly related to the production of horticultural products. However, as a result of representations received from the horticulture industry, it is proposed that “functionally-linked” replaces “ancillary” as a description for those activities associated with horticultural development

### Action:

See Council's suggested Modification CM238

4830

Object

Document Element: Background, 7.23

Respondent: West Sussex Growers' Association

## Background, 7.24

## Object

### Summary of representations:

'Ancillary' should be changed to 'functionally linked'; expand/include explanatory text clarifying that functionally linked uses can include range of activities including food-related distribution; food manufacturing linked to HDAs food preparation; on-site renewable energy and R&D

### Summary of representation changes to plan:

As per rep summary

### Response:

Agree, 'functionally-linked' is an improved description for those processes/activities directly related to the production of horticultural products. Changes will be made within E3 and E4 to reflect this and an explanation/definition for “functionally-linked” development provided in policy E4

### Action:

See Council's suggested Modifications CM236, CM238, CM239, CM240, CM243, CM244.

4960

Object

Document Element: Background, 7.24

Respondent: Kingsbridge Estates Limited & Landlink Estates Limited

Agent: Savills

## Policy E3 Addressing Horticultural Needs

### Object

#### Summary of representations:

Acknowledge SWC in policies E3 and E4

#### Summary of representation changes to plan:

Acknowledge SWC in policies E3 and E4

#### Response:

Strategic Wildlife Corridors are referred to at criterion 9 of policy E4. Policy E3 is concerned with addressing the horticultural land need identified over the local plan period.

#### Action:

No change

4915

Object

**Document Element:** Policy E3 Addressing Horticultural Needs

**Respondent:** Royal Society for the Protection of Birds (RSPB)

### Object

#### Summary of representations:

'Ancillary' should be changed to 'functionally linked'; expand/include explanatory text clarifying that functionally linked uses can include range of activities including food-related distribution; food manufacturing linked to HDAs food preparation; on-site renewable energy and R&D

#### Summary of representation changes to plan:

As per rep summary

#### Response:

Agree, 'functionally-linked' is an improved description for those processes/activities directly related to the production of horticultural products. Changes will be made within E3 and E4 to reflect this and an explanation/definition for "functionally-linked" development provided in policy E4

#### Action:

See Council's suggested Modifications CM236, CM238, CM239, CM240, CM243, CM244.

4959

Object

**Document Element:** Policy E3 Addressing Horticultural Needs

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Object

### Summary of representations:

Suggest policy more clearly reflects that it overlays a SWC and recognises the requirements of policy NE4.

### Summary of representation changes to plan:

We would suggest that this policy more clearly reflects that it overlays a Wildlife Corridor and as such must recognise the requirements of policy NE4 Strategic Wildlife Corridors when proceeding.

### Response:

Strategic Wildlife Corridors are referred to at criterion 9 of policy E4. However, the policy will be strengthened with regard to the protection of the Strategic Wildlife Corridors.

### Action:

See Council's suggested Modifications CM247 and CM249.

## 5058

## Object

**Document Element:** Policy E3 Addressing Horticultural Needs

**Respondent:** Sussex Wildlife Trust

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change

## 5520

## Support

**Document Element:** Policy E3 Addressing Horticultural Needs

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

Concern that Strategic location for Tangmere being used for housing when there is an unmet demand of 20 ha for horticultural development

### Summary of representation changes to plan:

I consider modification to the Local plan in regards to horticultural need versus housing development size and extent necessary. To review and reassess the plan so to make more horticultural land non-housing and look at alternative brownfield sites in the area

### Response:

The shortfall in Horticultural Development Area (HDA) land of 20 hectares is addressed in policy E3 through the extension of the Runcton HDA

### Action:

No change

5563

Object

**Document Element:** Policy E3 Addressing Horticultural Needs

**Respondent:** Ms Lindsay Davey

## Object

### Summary of representations:

Land at Tangmere Apron unsuitable for horticultural use, consider allocating for housing

### Summary of representation changes to plan:

Consider allocating Land at Tangmere Apron for housing should housing requirement for Tangmere increase

### Response:

Any formal proposals for amendments and deletions to the current HDAs received earlier on in the Local Plan Review process were considered and where appropriate, incorporated into the Local Plan versions prepared for the Regulation 18 and Regulation 19 consultations. Promotion of site for housing noted.

### Action:

No change

5640

Object

**Document Element:** Policy E3 Addressing Horticultural Needs

**Respondent:** West Sussex County Council

**Agent:** Henry Adams LLP

## Support

### Summary of representations:

CCE has significant landholdings (list supplied) which could assist Council with need outside HDAs

### Summary of representation changes to plan:

Consideration of CCE landholdings as listed

### Response:

Support and comment noted

### Action:

No change

## 5708

## Support

**Document Element:** Policy E3 Addressing Horticultural Needs

**Respondent:** Church Commissioners for England

**Agent:** Lichfields

## Object

### Summary of representations:

Supporting text to E3 or E4 should specifically acknowledge overlap and provide steer to potential developments as to how extension and SWC will interact. Advise protection and enhancement of SWC should take priority as inappropriate horticultural development could result in functional severance of SWC.

### Summary of representation changes to plan:

Supporting text to E3 or E4 should specifically acknowledge overlap and provide steer to potential developments as to how extension and SWC will interact.

### Response:

The Runcton HDA extension will be amended so that it falls outside of the Strategic Wildlife Corridor. Criterion 9 of policy E4 provides for consideration of a proposal's impact upon the Strategic Wildlife Corridors. However, the policy will be strengthened with regard to the protection of the Strategic Wildlife Corridors.

### Action:

See Council's suggested Modifications CM390, CM247 and CM249.

## 5856

## Object

**Document Element:** Policy E3 Addressing Horticultural Needs

**Respondent:** Natural England

## Background, 7.26

## Support

### Summary of representations:

Support.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

## 4942

## Support

**Document Element:** Background, 7.26

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Background, 7.28

## Object

### Summary of representations:

More flexibility needed in Plan, will be increased need for ancillary development – Vertical Farming Projects; R&D Facilities; Alternative Energy Centres; Logistics and Distribution Centres; Engineering and Technical Support Facilities.

### Summary of representation changes to plan:

As per rep summary

### Response:

Policy E4 makes provision for new horticultural and ancillary development which is defined at paragraph 7.29 as other processes directly related to the production of horticultural products. However, as a result of representations received from the horticulture industry, it is proposed that “functionally-linked” replaces “ancillary” as a description for those activities associated with horticultural development.

### Action:

See Council's suggested Modification CM238.

## 4836

## Object

**Document Element:** Background, 7.28

**Respondent:** West Sussex Growers' Association

## Object

### Summary of representations:

Doesn't take into account HEDNA evidence/other industry publications; doesn't acknowledge horticultural land need outside HDAs; need to take sequential approach; implies land within 4 HDAs must be used before land outside; should allow functionally-linked development rather than ancillary development; acknowledge at criterion 5 there will be landscape impacts.

### Summary of representation changes to plan:

As per summary

### Response:

The HEDNA evidence base has informed the horticultural development land need in policy E3 as well as revisions to the development management policy for horticultural development, Policy E4. The policy has been prepared to reflect the requirements of the NPPF, particularly Section 6 Building a Strong, Competitive Economy. The land required outside of HDAs for horticultural development is detailed within Policy E3. The policy approach is sequential in nature and as detailed at paragraph 7.32, provides that land within HDAs should be used first and then if not possible, and it is demonstrated that no suitable land within HDAs is available and justification for the development outside of the HDAs is provided, land outside of HDAs may be utilised. It is agreed that "functionally-linked" is an improved description for those other processes directly related to the production of horticultural products. "Ancillary" will be changed throughout policies E3 and E4 to "functionally-linked" and new explanatory wording is incorporated into both the policy and the policy pre-text. The purpose of criterion 5 is to ensure mitigation measures are provided should there be any detrimental effects resulting from the height and bulk of new development. However, the criterion text has been varied slightly as suggested with some additional amendments following Natural England's comments.

### Action:

See Council's suggested Modifications CM238, CM239, CM240, CM244 and CM245.

4958

Object

**Document Element:** Background, 7.28

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Background, 7.29

## Object

### Summary of representations:

Doesn't take into account HEDNA evidence/other industry publications; doesn't acknowledge horticultural land need outside HDAs; need to take sequential approach; implies land within 4 HDAs must be used before land outside; should allow functionally-linked development rather than ancillary development; acknowledge at criterion 5 there will be landscape impacts.

### Summary of representation changes to plan:

As per rep summary

### Response:

The HEDNA evidence base has informed the horticultural development land need in policy E3 as well as revisions to the development management policy for horticultural development, Policy E4. The policy has been prepared to reflect the requirements of the NPPF, particularly Section 6 Building a Strong, Competitive Economy. The land required outside of HDAs for horticultural development is detailed within Policy E3. The policy approach is sequential in nature and as detailed at paragraph 7.32, provides that land within HDAs should be used first and then if not possible, and it is demonstrated that no suitable land within HDAs is available and justification for the development outside of the HDAs is provided, land outside of HDAs may be utilised. It is agreed that "functionally-linked" is an improved description for those other processes directly related to the production of horticultural products. "Ancillary" will be changed throughout policies E3 and E4 to "functionally-linked" and new explanatory wording is incorporated into both the policy and the policy pre-text. The purpose of criterion 5 is to ensure mitigation measures are provided should there be any detrimental effects resulting from the height and bulk of new development. However, the criterion text has been varied slightly as suggested with some additional amendments following Natural England's comments.

### Action:

See Council's suggested Modifications CM238, CM239, CM240, CM244 and CM245.

## 4957

## Object

**Document Element:** Background, 7.29

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills



## Background, 7.31

## Object

### Summary of representations:

More flexibility needed in Plan, will be increased need for ancillary development – Vertical Farming Projects; R&D Facilities; Alternative Energy Centres; Logistics and Distribution Centres; Engineering and Technical Support Facilities

### Summary of representation changes to plan:

As per rep summary

### Response:

Policy E4 makes provision for new horticultural and ancillary development which is defined at paragraph 7.29 as other processes directly related to the production of horticultural products. However, as a result of representations received from the horticulture industry, it is proposed that “functionally-linked” replaces “ancillary” as a description for those activities associated with horticultural development

### Action:

See Council's suggested Modification CM238.

## 4840

## Object

**Document Element:** Background, 7.31

**Respondent:** West Sussex Growers' Association

## Object

### Summary of representations:

Doesn't take into account HEDNA evidence/other industry publications; doesn't acknowledge horticultural land need outside HDAs; need to take sequential approach; implies land within 4 HDAs must be used before land outside; should allow functionally-linked development rather than ancillary development; acknowledge at criterion 5 there will be landscape impacts.

### Summary of representation changes to plan:

As per rep summary

### Response:

The HEDNA evidence base has informed the horticultural development land need in policy E3 as well as revisions to the development management policy for horticultural development, Policy E4. The policy has been prepared to reflect the requirements of the NPPF, particularly Section 6 Building a Strong, Competitive Economy. The land required outside of HDAs for horticultural development is detailed within Policy E3. The policy approach is sequential in nature and as detailed at paragraph 7.32, provides that land within HDAs should be used first and then if not possible, and it is demonstrated that no suitable land within HDAs is available and justification for the development outside of the HDAs is provided, land outside of HDAs may be utilised. It is agreed that “functionally-linked” is an improved description for those other processes directly related to the production of horticultural products. “Ancillary” will be changed throughout policies E3 and E4 to “functionally-linked” and new explanatory wording is incorporated into both the policy and the policy pre-text. The purpose of criterion 5 is to ensure mitigation measures are provided should there be any detrimental effects resulting from the height and bulk of new development. However, the criterion text has been varied slightly as suggested with some additional amendments following Natural England's comments.

### Action:

See Council's suggested Modifications CM238, CM239, CM240, CM244 and CM245.

4956

Object

**Document Element:** Background, 7.31**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited**Agent:** Savills**Background, 7.32**

Object

**Summary of representations:**

Doesn't take into account HEDNA evidence/other industry publications; doesn't acknowledge horticultural land need outside HDAs; need to take sequential approach; implies land within 4 HDAs must be used before land outside; should allow functionally-linked development rather than ancillary development; acknowledge at criterion 5 there will be landscape impacts.

**Summary of representation changes to plan:**

As per rep summary

**Response:**

The HEDNA evidence base has informed the horticultural development land need in policy E3 as well as revisions to the development management policy for horticultural development, Policy E4. The policy has been prepared to reflect the requirements of the NPPF, particularly Section 6 Building a Strong, Competitive Economy. The land required outside of HDAs for horticultural development is detailed within Policy E3. The policy approach is sequential in nature and as detailed at paragraph 7.32, provides that land within HDAs should be used first and then if not possible, and it is demonstrated that no suitable land within HDAs is available and justification for the development outside of the HDAs is provided, land outside of HDAs may be utilised. It is agreed that "functionally-linked" is an improved description for those other processes directly related to the production of horticultural products. "Ancillary" will be changed throughout policies E3 and E4 to "functionally-linked" and new explanatory wording is incorporated into both the policy and the policy pre-text. The purpose of criterion 5 is to ensure mitigation measures are provided should there be any detrimental effects resulting from the height and bulk of new development. However, the criterion text has been varied slightly as suggested with some additional amendments following Natural England's comments.

**Action:**

See Council's suggested Modifications CM238, CM239, CM240, CM244 and CM245.

4976

Object

**Document Element:** Background, 7.32**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited**Agent:** Savills

## Background, 7.33

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

## 4842

## Support

**Document Element:** Background, 7.33

**Respondent:** West Sussex Growers' Association

## Object

### Summary of representations:

More flexibility needed in Plan, will be increased need for ancillary development – Vertical Farming Projects; R&D Facilities; Alternative Energy Centres; Logistics and Distribution Centres; Engineering and Technical Support Facilities.

### Summary of representation changes to plan:

More flexibility is needed in the current CDC Local Plan - Horticultural Policy to meet the needs of the Horticultural sector.

### Response:

Policy E4 makes provision for new horticultural and ancillary development which is defined at paragraph 7.29 as other processes directly related to the production of horticultural products. However, as a result of representations received from the horticulture industry, it is proposed that “functionally-linked” replaces “ancillary” as a description for those activities associated with horticultural development.

### Action:

See Council's suggested Modification CM238.

## 6191

## Object

**Document Element:** Background, 7.33

**Respondent:** West Sussex Growers' Association

## Policy E4 Horticultural Development

Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

4861

Support

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**Document Element:** Policy E4 Horticultural Development

**Respondent:** Environment Agency

Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No change

4917

Support

---

**Document Element:** Policy E4 Horticultural Development

**Respondent:** Royal Society for the Protection of Birds (RSPB)

## Object

### Summary of representations:

Doesn't take into account HEDNA evidence/other industry publications; doesn't acknowledge horticultural land need outside HDAs; need to take sequential approach; implies land within 4 HDAs must be used before land outside; should allow functionally-linked development rather than ancillary development; acknowledge at criterion 5 there will be landscape impacts.

### Summary of representation changes to plan:

As per rep summary.

### Response:

The HEDNA evidence base has informed the horticultural development land need in policy E3 as well as revisions to the development management policy for horticultural development, Policy E4. The policy has been prepared to reflect the requirements of the NPPF, particularly Section 6 Building a Strong, Competitive Economy. The land required outside of HDAs for horticultural development is detailed within Policy E3. The policy approach is sequential in nature and as detailed at paragraph 7.32, provides that land within HDAs should be used first and then if not possible, and it is demonstrated that no suitable land within HDAs is available and justification for the development outside of the HDAs is provided, land outside of HDAs may be utilised. It is agreed that "functionally-linked" is an improved description for those other processes directly related to the production of horticultural products. "Ancillary" will be changed throughout policies E3 and E4 to "functionally-linked" and new explanatory wording is incorporated into both the policy and the policy pre-text. The purpose of criterion 5 is to ensure mitigation measures are provided should there be any detrimental effects resulting from the height and bulk of new development. However, the criterion text has been varied slightly as suggested with some additional amendments following Natural England's comments.

### Action:

See Council's suggested Modifications CM238, CM239, CM240, CM244 and CM245.

4994

Object

**Document Element:** Policy E4 Horticultural Development

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Support

### Summary of representations:

National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Supporting collaborative working.] Support. NH welcomes opportunity to work with CDC on large/small-scale horticultural developments particularly HGV access onto A27/vehicle movements on SRN

### Summary of representation changes to plan:

N/A

### Response:

Support and comment noted

### Action:

No change

**5306****Support****Document Element:** Policy E4 Horticultural Development**Respondent:** National Highways**Support****Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

**5521****Support****Document Element:** Policy E4 Horticultural Development**Respondent:** Bellway Homes (Wessex) Ltd**Agent:** Chapman Lily Planning**Object****Summary of representations:**

More flexibility needed in Plan, will be increased need for ancillary development – Vertical Farming Projects; R&D Facilities; Alternative Energy Centres; Logistics and Distribution Centres; Engineering and Technical Support Facilities

**Summary of representation changes to plan:**

Make the policy more flexible

**Response:**

Policy E4 makes provision for new horticultural and ancillary development which is defined at paragraph 7.29 as other processes directly related to the production of horticultural products. However, as a result of representations received from the horticulture industry, it is proposed that “functionally-linked” replaces “ancillary” as a description for those activities associated with horticultural development

**Action:**

See Council's suggested Modification CM238.

**5545****Object****Document Element:** Policy E4 Horticultural Development**Respondent:** West Sussex Growers' Association

## Support

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**Summary of representations:**

Would welcome continued discussion with Council on how CCE sites could help meet District horticultural needs in future.

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted

**Action:**

No changes

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5709

Support

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**Document Element:** Policy E4 Horticultural Development

**Respondent:** Church Commissioners for England

**Agent:** Lichfields

## Support

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**Summary of representations:**

Support.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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5857

Support

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**Document Element:** Policy E4 Horticultural Development

**Respondent:** Natural England

## Object

### Summary of representations:

Large scale proposals within HDAs should require LVIA's to assess likely significant effects on landscape character and visual receptors.

### Summary of representation changes to plan:

Advise LVIA required for large scale proposals within the HDAs

### Response:

The final paragraph references the importance of the natural landscape policy. However, some changes have also been made to criterion 5 in relation to the landscape comments.

### Action:

See Council's suggested Modification CM245.

6128

Object

**Document Element:** Policy E4 Horticultural Development

**Respondent:** Natural England

## Policy E5 Retail Strategy and New Development

## Object

### Summary of representations:

Raises need for plan to address concern about disappearance of city centre shops and increase out of town shopping. Considers policy to be overly optimistic and para. 7.45 to be simplistic, not very accurate and arguably complacent.

### Summary of representation changes to plan:

Think of alternative uses to retail in the city centre.

### Response:

The proposed policy requires proposals for development outside of the city centre to satisfy a sequential test and (where relevant) to undertake an impact assessment. Both of these requirements are intended to ensure the protection of the viability of the city centre through the direction, where possible, of retail development to the centre.

With regard to paragraph 7.45, national policy requires local plans to allocate sites to meet identified need for the next ten years. The need that has been identified for retail and food/beverage floorspace elsewhere in the Plan area (outside of the city centre) can be accommodated through vacant floorspace within the designated local centres of Selsey and East Wittering and therefore no further allocations need to be made.

### Action:

No change to plan.

5216

Object

**Document Element:** Policy E5 Retail Strategy and New Development

**Respondent:** John Newman



## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seeking further information on approach and monitoring.] Support retail development and expansion within existing areas and re-occupation of vacant floorspace.

Seek further information on how servicing and customer traffic will be safely and conveniently accommodated by the surrounding road network will be monitored and if not safely and conveniently accommodated how the impacts will be managed and mitigated especially traffic generated in peak periods

### Summary of representation changes to plan:

None suggested

### Response:

Support noted.

Any planning application will consider the transport implications arising from any proposed development or redevelopment.

### Action:

No change to plan

5307

Object

**Document Element:** Policy E5 Retail Strategy and New Development

**Respondent:** National Highways

## Object

### Summary of representations:

Land at Barnfield Drive was allocated in adopted Local Plan for retail and business land uses. Object to proposal to deallocate the site without justification and despite ongoing discussion with the authority about development to come forward on the site.

### Summary of representation changes to plan:

Include Land at Barnfield Drive in allocation.

### Response:

Land at Barnfield Drive is located within the settlement boundary, and the Council continues to remain supportive, in principle, of development on this site.

The identified need for retail floorspace and food/beverage uses will be met through the re-occupation of vacant floorspace and through limited new development within strategic housing sites. The Local Plan does not therefore need to identify and allocate sites for retail floorspace. This does not prevent new, or already known, sites coming forward.

### Action:

No change to plan.

5351

Object

**Document Element:** Policy E5 Retail Strategy and New Development**Respondent:** Brookhouse Group**Agent:** Savills UK

Support

**Summary of representations:**

Welcome the prospect of delivering new housing to support economic development in a sustainable location.

**Summary of representation changes to plan:**

None suggested.

**Response:**

Support noted.

**Action:**

No change to plan.

5522

Support

**Document Element:** Policy E5 Retail Strategy and New Development**Respondent:** Bellway Homes (Wessex) Ltd**Agent:** Chapman Lily Planning

Object

**Summary of representations:**

Object: this needs to focus location of new development in integrated communities with active travel links directly between new residential and new employment, business and retail development, or to be located close to and with continuous, direct, safe, attractive, comfortable link with existing housing and or public transport

**Summary of representation changes to plan:**

Delete "customer traffic" from criterion 1.

Delete criterion 2 and replace with:

"The proposal is primarily accessed by active travel integral to new housing development or continuous, direct, safe, attractive, comfortable links with existing housing and/or public transport."

**Response:**

Consideration of traffic generated from customer trips is important, and any planning application will need to understand the transport implications of a proposed development, therefore the plan text should continue to refer to customer traffic.

Policy T3 Active Travel – Walking and Cycling Provision requires development proposals to promote sustainable transport and active travel. The Local Plan should be read in the round so duplication across policies is not necessary.

**Action:**

No change to plan.

5903

Object

**Document Element:** Policy E5 Retail Strategy and New Development

**Respondent:** GoVia Thameslink Railway

## Background, 7.48

Object

### Summary of representations:

on grounds of soundness. Need a clear distinction between residential areas of city centre and zoning for night time economy to protect conservation area

### Summary of representation changes to plan:

Make distinction between residential areas of city centre.  
Zone bar and night time economy areas.

### Response:

Comment noted

### Action:

No change to plan

3803

Object

**Document Element:** Background, 7.48

**Respondent:** RADAR

Object

### Summary of representations:

text refers to Chichester Vision (2017) which is outdated, and a lot has changed in terms of population and their demands. Policy is not ambitious enough

### Summary of representation changes to plan:

None suggested.

### Response:

The 2017 Chichester Vision remains the current version and the plan text should continue to refer to the Vision. The action plan relating to the Vision continues to be reviewed to ensure that it reflects the most appropriate projects

### Action:

No change to plan

4173

Object

**Document Element:** Background, 7.48

**Respondent:** Chidham and Hambrook Parish Council

## Policy E6 Chichester City Centre

### Object

#### Summary of representations:

Does not include any strategies to enhance the early evening or night-time economy as in 7.47

#### Summary of representation changes to plan:

None suggested

#### Response:

Comment noted

#### Action:

No change to plan

4172

Object

**Document Element:** Policy E6 Chichester City Centre

**Respondent:** Chidham and Hambrook Parish Council

### Object

#### Summary of representations:

refers to Chichester Vision (2017) which is out of date. The Vision should be the top priority for the Council.  
Suggest need a better system of parking e.g. underground car parks or ground floor parking with accommodation above

#### Summary of representation changes to plan:

None suggested.

#### Response:

The 2017 Chichester Vision remains the current version and the plan text should continue to refer to the Vision. The action plan relating to the Vision continues to be reviewed to ensure that it reflects the most appropriate projects

#### Action:

No change to plan

5465

Object

**Document Element:** Policy E6 Chichester City Centre

**Respondent:** Mayday! Action Group

## Support

---

**Summary of representations:**

■ Bellway welcome the prospect of delivering new housing to support economic development in a sustainable location

**Summary of representation changes to plan:**

■ None suggested

**Response:**

■ Support noted

**Action:**

■ No change to plan

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5523

Support

**Document Element:** Policy E6 Chichester City Centre

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

### Policy E7 Local Centres

## Support

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**Summary of representations:**

■ Bellway welcome the prospect of delivering new housing to support economic development in a sustainable location.

**Summary of representation changes to plan:**

■ None suggested

**Response:**

■ Support noted

**Action:**

■ No change to plan

---

5524

Support

**Document Element:** Policy E7 Local Centres

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Background, 7.56

Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

4445

Support

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**Document Element:** Background, 7.56

**Respondent:** Mr Robin Davison

## Background, 7.57

Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

5217

Support

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**Document Element:** Background, 7.57

**Respondent:** John Newman

## Policy E8 Built Tourist and Leisure Development

Support

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**Summary of representations:**

Support although infrastructure is lacking

**Summary of representation changes to plan:**

N/A

**Response:**

Support and comment noted

**Action:**

No change

5466

Support

---

**Document Element:** Policy E8 Built Tourist and Leisure Development

**Respondent:** Mayday! Action Group

Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

5525

Support

---

**Document Element:** Policy E8 Built Tourist and Leisure Development

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Support

---

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

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5858

Support

**Document Element:** Policy E8 Built Tourist and Leisure Development

**Respondent:** Natural England

## Policy E9 Caravan and Camping Sites

## Object

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### Summary of representations:

Criterion 5 to apply to AONB only; Remove "winter" from "winter storage" in penultimate para – should be year-round as storage required all year

### Summary of representation changes to plan:

Reword 5.

Remove the word 'winter' when referring to storage

### Response:

Both criterion 5 and the penultimate paragraph are carried forward from the current adopted Local Plan. The purpose of criterion 5 is to protect against adverse visual impacts across the local plan area whilst the purpose of the penultimate paragraph is to provide for storage of touring caravans/units during the winter months when caravan sites are likely to be closed to visitors

### Action:

No change

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4378

Object

**Document Element:** Policy E9 Caravan and Camping Sites

**Respondent:** Mr Stephen Jupp



## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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4863

Support

**Document Element:** Policy E9 Caravan and Camping Sites

**Respondent:** Environment Agency

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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5218

Support

**Document Element:** Policy E9 Caravan and Camping Sites

**Respondent:** John Newman

## Support

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**Summary of representations:**

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Supporting measures to reduce demand.] Support, especially winter storage as reduces number of large/towing vehicles on SRN

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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5308

Support

**Document Element:** Policy E9 Caravan and Camping Sites

**Respondent:** National Highways

## Support

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**Summary of representations:**

although tourism loads strain on water supply network

**Summary of representation changes to plan:**

N/A

**Response:**

Comment noted.

**Action:**

No change

---

5467

Support

**Document Element:** Policy E9 Caravan and Camping Sites

**Respondent:** Mayday! Action Group

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

---

5526

Support

---

**Document Element:** Policy E9 Caravan and Camping Sites

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Policy E9 Caravan and Camping Sites

### Object

#### Summary of representations:

Criterion 9 should apply to all new caravan/ camping sites and intensification/alterations to existing sites – bring in line with E8 wording (criterion 2).

#### Summary of representation changes to plan:

Proposed wording in relation to all such development:

It is located so as not compromise the essential features of nationally designated areas of landscape, historic environment or nature conservation protection, including impacts from visitors or users of the facility, particularly in relation to the potential for increased recreational pressures on Chichester Harbour, Pagham Harbour, Medmerry Compensatory Habitat and other designated sites.

#### Response:

Suggested change is noted and it is proposed that criterion 2 from Policy E8 is carried forward to Policy E9 with criterion 9 of Policy E9 retained.

#### Action:

See Council's suggested Modification CM251.

5860

Object

**Document Element:** Policy E9 Caravan and Camping Sites

**Respondent:** Natural England

### Object

#### Summary of representations:

RECEIVED LATE: The Local Plan is weak on impacts especially from the largest concentration of caravans at Selsey on Medmerry.

#### Summary of representation changes to plan:

N/A

#### Response:

The criterion for policy E9 seeks to deal with impacts from existing caravan sites with its set of policy criteria which is also applied to proposals seeking intensification/alterations of existing sites. This criteria includes the requirements for proposals to demonstrate a demonstrable need; be of an appropriate scale in relation to setting and local amenity as well as be sensitively sited so as not to be visually obtrusive whilst maintaining the tranquility of the area.

#### Action:

No change in response to this representation.

6502

Object

**Document Element:** Policy E9 Caravan and Camping Sites

**Respondent:** CPRE Sussex

**Agent:** CPRE Sussex

## Policy E10 Equestrian Development

Support

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### Summary of representations:

Support for policy and benefits of equestrian activity for different groups of people. Concern raised that DM application for Willowbrook is contrary to policy.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No changes to be made

5468

Support

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**Document Element:** Policy E10 Equestrian Development

**Respondent:** Mayday! Action Group

Support

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### Summary of representations:

Welcome the prospect of delivering new housing to support economic development in a sustainable location.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No changes to be made

5527

Support

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**Document Element:** Policy E10 Equestrian Development

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Support

### Summary of representations:

Following advice given in November 2021 pleased to note the inclusion of an additional policy requirement (9) relating to consideration of biodiversity impacts and the provision of biodiversity net gain

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No changes to be made

5861

Support

Document Element: Policy E10 Equestrian Development

Respondent: Natural England

## Background, 8.1

## Object

### Summary of representations:

In recent years the local public transport has failed to adequately support the strategic transport network. For example the local bus services have declined in terms of routes, service hours and frequency. Several bus services now do not run after 6pm and do not even reach the Chichester train station. For many school, working and commuting people local public transport is now near useless. Your plan should address this.

The emphasis on private car use is misguided, for local transport.

### Summary of representation changes to plan:

The Plan should promote local transport alternatives more

### Response:

A key objective of policy T1 is to improve access to sustainable means of travel including public transport, walking and cycling.

The policy will lead to investment and planned improvements and the strategy is to prioritise sustainable means of travel over use of the private car

### Action:

No change in response to representation

3861

Object

Document Element: Background, 8.1

Respondent: Mr Michael Wright

## Object

### Summary of representations:

Chapter 8 should make reference to the role of aviation in transportation. The NPPF (paragraph 106f) requires local planning policies to: “recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy.”

### Summary of representation changes to plan:

Chapter 8 should make reference to the role of aviation in transportation consistent with NPPF paragraph 106f.

### Response:

Although Policy T1 doesn’t include a reference to aviation, the local plan operates within the context of the National Planning Policy Framework. Whilst airfields in the Chichester plan area play an important role in the economic and recreational makeup of the area, it is not considered that aviation on the scale within Chichester plan area will play any meaningful role in the movement of people in the way in which policy T1 promotes

### Action:

No change in response to representation

4278

Object

**Document Element:** Background, 8.1

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

### Summary of representations:

- i) Insufficient evidence to demonstrate key infrastructure (i.e. Terminus Road Diversion) will be deliverable; Package of sustainable transport infrastructure and measures not yet sufficiently well-developed to demonstrate it is deliverable as part of monitor and manage process;
- ii) Insufficient evidence to demonstrate capacity of transport network can accommodate scale of development proposed as part of Southbourne BLD. See attached for reasons for issues, why soundness of Plan affected and suggested changes to remedy issues.

### Summary of representation changes to plan:

- i) Requests that feasibility work is undertaken prior to the examination to confirm deliverability of the proposed Terminus Road Diversion.
- ii) Additional evidence is required to support transport network capacity for Southbourne BLD

### Response:

- i) Further evidence has been produced to inform Terminus Road diversion and to develop package of sustainable transport measures. Both of these matters will be further refined through the monitor and manage process
- ii) Further survey work and evidence produced that supports scale of development proposed within BLD in relation to transport network

### Action:

No change in response to representation

**5085****Object****Document Element:** Background, 8.1**Respondent:** West Sussex County Council**Object****Summary of representations:**

i) To be attractive to businesses, residents and economically essential tourists, efficient, affordable, smooth-running and frequent rail and bus services are absolutely essential.

Regrettably our plan area is not well served by rail or bus services – but this is as much a national as it is a local issue.

ii) We would not agree with the suggestion that we have adequate cycle and pedestrian routes. There has been a stop/start process on dedicated cycle routes along the A259 between Fishbourne and the Havant Borough border. It is a fact that seems not to be willingly acknowledged that the A259, whilst categorised as a 'resilient road' (because it is the only viable alternative which exists to take the traffic from the A27 when that vital transport artery – dual carriage road – is out of action (which is not an infrequent occurrence)

We would contend that in parts the A259 is too narrow to allow for separate pedestrian and cycle routes. It is very clearly dangerous to have cyclists riding at 20+mph on the same route as pedestrians of all ages and very often mothers with buggies.

**Summary of representation changes to plan:**

Frequent and efficient bus and rail services are required, but the respondent considers that these are inadequate

**Response:**

i) The strategy aims to improve the availability and frequency of public transport links as well as the performance of the A27 through junction improvements at Chichester.

ii) A key objective of policy T1 is to improve access to sustainable means of travel including public transport, walking and cycling.

The policy will lead to investment and planned improvements

**Action:**

No change in response to representation

**5469****Object****Document Element:** Background, 8.1**Respondent:** Mayday! Action Group



## Background, 8.2

## Object

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### Summary of representations:

i) The Plan fails to demonstrate how the proposed new scattered development areas can reduce car travel and improve public transport coverage/service. The scattered developments are residential low rise that have insufficient density to support public transport.

ii) Secondly, The Plan acknowledges that many residents work outside Chichester but does not show a strategic plan to create substantial employment opportunities near Chichester to reduce car travel/trips and regenerate public transport. The Plan compares poorly with some other English City plans

### Summary of representation changes to plan:

Increase density of developments. Reduce encroachment into green belt areas distant from the City Centre. Explain how local public transport can transformed into a useable service by the majority of the population.

### Response:

i) A key objective of policy T1 is to improve access to sustainable means of travel including public transport, walking and cycling across the Plan Area.

The policy will lead to investment and planned improvements and the strategy is to prioritise sustainable means of travel over use of the private car.

ii) Other parts of the Plan set out the need for additional employment land with site allocations being made to bring this development forward

### Action:

No change in response to representation

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3862

Object

Document Element: Background, 8.2

Respondent: Mr Michael Wright

## Support

### Summary of representations:

I agree with this paragraph. We all know the problems of the Chichester by-pass only too well. I in fact cycled to Bognor and back this morning –the queue of cars on the A259 aiming for the roundabout connection with the A27 stretched back beyond Brick Kiln Farm while I was cycling both ways, and this is not unusual. If I am driving back from Bognor, I always turn right at the Drayton roundabout and come home via Shopwhyke Lakes - much easier! If I have been to Sainsbury's, I will often return either via Bradshaw Road or via Lavant, and I am well aware that I am not the only "rat" using these alternatives, which must annoy some people considerably. But at least one thing the authorities have got right is the new traffic lights south of the Drayton roundabout, which makes the journey for a cyclist so much safer - thank you.

i) The Plan fails to demonstrate how the proposed new scattered development areas can reduce car travel and improve public transport coverage/service. The scattered developments are residential low rise that have insufficient density to support public transport.

ii) Secondly, The Plan acknowledges that many residents work outside Chichester but does not show a strategic plan to create substantial employment opportunities near Chichester to reduce car travel/trips and regenerate public transport. The Plan compares poorly with some other English City plans

### Summary of representation changes to plan:

No suggested changes

### Response:

Support noted

### Action:

No change in response to representation

5219

Support

Document Element: Background, 8.2

Respondent: John Newman

## Background, 8.3

## Object

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### Summary of representations:

The Chi A27 bypass is well over capacity today, before CDC build another ? 15000 houses and Arun build another 15000. Spending millions on tinkering with the junctions at enormous cost will be futile. It would be better to put the money towards the ONLY sensible solution, a northern bypass.

### Summary of representation changes to plan:

N/A

### Response:

The Local Plan Transport Studies (2023 & 2024) explain the options that have been assessed and the reason the Council is proposing mitigation through the monitor and manage approach, as further set out in proposed modifications to Policy T1. There is currently no Government funding that would be required in order to consider a new bypass.

### Action:

No change in response to representation

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## 3825

## Object

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**Document Element:** Background, 8.3

**Respondent:** Mr Colin Hamilton

## Object

### Summary of representations:

There is no capacity within the strategic road network to accommodate the additional traffic the housing proposed in this plan will create and there is no guaranteed upgrade to the strategic road network planned. The proposed local plan seems to predate the Chichester District Council's Local Plan Transport Assessment (CDCLPTA) which was released in January 2023. The transport assessment confirms what residents have known for the last 10+ years: the strategic road network is at capacity. The CDCLPTA was aware that the 6 major junctions were at capacity in 2014 and nothing has been done since to improve the situation.

### Summary of representation changes to plan:

- i) The housing needs to be limited to 2,699 houses to take into account the proposed allocation from government targets reduced by 76.5% to reflect the land in the Chichester District which cannot be developed because it is in the South Downs National Park or forms part of an Area of Outstanding Natural Beauty.
- ii) Policy A11 and A12 need to be removed from the plan.
- iii) Policy A13 should be limited to 300 houses.

### Response:

The Local Plan Review Transport Studies (2023 & 2024) were commissioned to provide evidence to support the Local Plan. This highlights that in the base year (2014) and baseline scenario without the emerging Local Plan development, a number of junctions already experience capacity issues. Policy T1 has been developed to mitigate the impact of planned development on the Strategic Road Network, improve highway safety and air quality and promote more sustainable travel patterns.

- ii) The strategy set out in Policy T1 will support the level of development that is proposed by the Plan. Therefore, there is no justification for the removal of Policies A11 and A12.
- iii) as above in relation to limiting Policy A13 to 300 homes.

### Action:

No change in response to representation

3844

Object

Document Element: Background, 8.3

Respondent: The Bosham Association

## Support

### Summary of representations:

The lack of any improvements to the A27 has resulted, as predicted when CDC/WSCC rejected £350m previous funding, in severe road congestion and rat running in surrounding villages and local roads. Discussions with Lavant PC and others must commence immediately and funding must be set aside to implement mitigation measures.

### Summary of representation changes to plan:

No specific changes

### Response:

Policy T1 has been developed to mitigate the impact of planned development on the Strategic Road Network, improve highway safety and air quality and promote more sustainable travel patterns and encourage increased use of sustainable modes of travel

### Action:

No change in response to representation

3918

Support

**Document Element:** Background, 8.3

**Respondent:** lavant parish council

## Object

### Summary of representations:

Please extend this paragraph to say 'which are often neither designed nor constructed to deal with the cumulative impact and increased maximum size and weight of the new traffic'

### Summary of representation changes to plan:

Please extend this paragraph to say 'which are often neither designed nor constructed to deal with the cumulative impact and increased maximum size and weight of the new traffic'.

### Response:

There is no evidence on which to make the suggested assertion within the plan. Nonetheless, the traffic flows will be the subject of further assessment during the plan period through the monitor and manage framework, including the impact on the local road network.

### Action:

No change in response to representation

3938

Object

**Document Element:** Background, 8.3

**Respondent:** Fishbourne Parish Council

## Object

### Summary of representations:

Principal causes of A27 congestion are local traffic movements from and to an inadequate local highway network, made worse by poorly integrated new developments, and conflicted priorities between through and crossing traffic.

The solution is not a very costly "by-pass" of limited economic or environmental benefit. Past by-pass proposals failed to correctly assess the true economic cost of options promoted, the cost and benefits of tackling the issues at a local level of on-line improvements, lack of co-ordinated improvements in the local highway network and a failure to engage appropriately and positively to solve a common problem.

### Summary of representation changes to plan:

Neither the local plan nor its strategies should be based on any A27 by-pass premise and should not make provision for any A27 by-pass proposal

### Response:

The strategy set out in Policy T1 will support the level of development that is proposed by the Plan

### Action:

No change in response to representation

4141

Object

**Document Element:** Background, 8.3

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Background, 8.4

Support

### Summary of representations:

We support this in principle. In practice, it needs to be noted that the uncertainty of when this can be achieved means that similar flexibility must be accepted in neighbourhood plans if these are to deliverable

### Summary of representation changes to plan:

N/A

### Response:

Neighbourhood Plans should act in general conformity with the Local Plan. Please see the Planning Policy Guidance for more information

### Action:

No change in response to representation

3939

Support

**Document Element:** Background, 8.4

**Respondent:** Fishbourne Parish Council

## Object

### Summary of representations:

The road network is already at capacity and even if all the homes are built developer contributions would not pay for the improvements needed

### Summary of representation changes to plan:

Housing numbers reduced until a source of funding is identified and certain

### Response:

The strategy set out in Policy T1 will support the level of development that is proposed by the Plan by developing improvements to key junctions as well as other measures to promote and support access to sustainable transport modes

### Action:

No change in response to representation

4177

Object

**Document Element:** Background, 8.4

**Respondent:** Chidham and Hambrook Parish Council

## Object

### Summary of representations:

Transport Assessment validity of the data used:

The CATM model has been validated and calibrated using 2014 counts. Using 2014 data means that significant changes such as the opening of Chichester Free School immediately next to the A27 Whyke roundabout, with over 1000 pupils and over 140 staff may not have been considered.

This data is now 9 years old and conclusions drawn on this basis may be therefore unsound.

### Summary of representation changes to plan:

The projected house building target needs to be reduced and traffic calming measures on local roads increased

### Response:

The Local Plan Transport Study (2024) explains that the Chichester Area Transport Model (CATM) has been updated by Stantec to investigate travel patterns in and around the Chichester area. This included taking account of changes in response to the policies and strategy of the emerging Chichester Local Plan.

The strategy set out in Policy T1 will support the level of development that is proposed by the Plan. Therefore, there is no justification for reducing planned housing numbers below what is proposed.

### Action:

No change in response to representation.

4339

Object

**Document Element:** Background, 8.4

**Respondent:** Mr Simon Davenport

## Object

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**Summary of representations:**

Table 2.2 of the Chichester Transport Study outlines the development quanta for each site allocation assumed for the transport modelling work. This shows that only 7ha of the total 10ha R-RMC expansion site is included. This is not entirely consistent with the approach for other sites. Paragraph 1.4.2 states that the quanta of development is based on the Council's best estimate at the time. Similarly, the Infrastructure Delivery Plan (IDP) applies 7ha to the R-RMC expansion site.

It would be helpful to either update the two documents for consistency or provide additional supporting commentary to explain the discrepancy in approach

**Summary of representation changes to plan:**

Suggests either update the two documents for consistency or provide additional supporting commentary to explain the discrepancy in approach

**Response:**

Consistency change made to 2024 Transport Study Table 2-2 to report area as gross rather than net. No change to modelling as 7ha developable area modelled

**Action:**

No change

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**4710****Object**

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**Document Element:** Background, 8.4

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates



## Object

### Summary of representations:

Object on grounds that: Public Transport and Park and Ride sections of transport study requires revisiting; conclusion at 8.4.4 re; A285 New Park Road/A286 St Pancras Rd Junction 7 only supported for pedestrians, not for cyclists, further measures required; layout at figure 7-8 for A286 Northgate Gyratory does not maximise opportunity to improve convenience and safety for pedestrians, scheme requires further development; approach at Fishbourne Road West/Appledram Lane South (Junction 11) location requires re-thinking; re- consider TEMPro Background Traffic Growth Comparisons; revise north of district spatial scenarios testing and methodology for Neutral Month and Summer Month Comparison Technical Note.

### Summary of representation changes to plan:

Various areas of transport study require revisiting - see full submission/attachments

### Response:

The council is keen to work with West Sussex County Council. The specific points have been considered and text updated in 2024 Transport Study:

P&R/Parking Management – see 10.7.1 to 10.7.8

A285 New Park Road/A286 St Pancras Rd Junction 7 – see 11.3.4.

Northgate Gyratory – sustainable options included within the WSCC scheme now included at 10.2.21.

Appledram Lane – text updated at 11.4.

North of district analysis updated and now reported in Section 6.

TEMPro – this has been superseded by the Model Verification note and will need to be considered as part of the model update when that task is undertaken.

Seasonal Impacts note to be updated to remove July from neutral month.

### Action:

No change

5095

Object

**Document Element:** Background, 8.4

**Respondent:** West Sussex County Council

## Object

### Summary of representations:

- i) We would highlight that the transport assessment carried out to inform the South Downs Local Plan indicated a potential severe impact on the Petersfield Road / Bepton Road / Rumbolds Hill junction in Midhurst of additional development in the town, in the context of junctions already becoming overcapacity due to background traffic growth, for example, arising from strategic development in neighbouring planning authorities. Rumbolds Hill in Midhurst is also a designated Air Quality Management Area which came into force in January 2020.
- ii) It is noted from the Transport Assessment that there is expected to be some increase in traffic on the A286 towards Midhurst, although it is not clear from the study how this will impact the relevant junctions in Midhurst, including the designated Rumbolds Hill AQMA. SDNPA may seek further assurance that such potential impacts have been looked at, and appropriate mitigation sought.

### Summary of representation changes to plan:

- Consider the impact of the road infrastructure improvements on Midhurst

### Response:

The evidence base to support the Local Plan has considered neighbouring local authorities including South Downs National Park Authority (SDNPA), East Hampshire District Council (EHDC), Waverley Borough Council (WBC) and Horsham District Council (HDC). This has been supported by on-going discussions with these and other local authorities in the course of preparing the Local Plan.

A further update has been incorporated into the Transport Study (2024).

### Action:

- No change in response to representation

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**5144****Object**

**Document Element:** Background, 8.4

**Respondent:** South Downs National Park Authority

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seeking further information/Matter to be addressed].

i) Local Plan evidence - Chichester Transport Study (Local Plan Review Transport Assessment) - January 2023

Chapter 6 Mitigation considerations, whilst favourable, are unlikely to mitigate impacts on the A27 and its junctions.

Estimated construction costs will have fluctuated considerably, and should be subject to future detailed review.

ii) The recommended Monitor and Manage approach does not provide details, actions or recommendations to enable review of the mitigation requirements. Proposed methodology (Appendix B) does not include monitoring individual developments, or the manage approach.

iii) Seek clarity on how the Plan will address conclusions of The District Wide Collision Review and Seasonal Impact Report, particularly for A27-related matters.

### Summary of representation changes to plan:

The local plan should set out clearly how the local authority will monitor and manage the impact of developments

### Response:

i) It is recognised that infrastructure costs will fluctuate over time but the work undertaken to inform the Local Plan Transport Study (2024) is proportionate and was undertaken in consultation with the highway authorities. Any new developer funding mechanism (such as a new SPD) will include an indexation provision to provide flexibility to respond to cost changes over time.

ii) Stantec, in discussion with the highways authorities is developing further specific proposals that can be implemented through the Monitor and Manage approach, including review mechanisms and governance arrangements.

iii) 2024 Transport Study addresses the issue with additional text added to TA in Sections 5.5 and 5.6

### Action:

No change

5337

Object

Document Element: Background, 8.4

Respondent: National Highways

## Object

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### Summary of representations:

The road network is very clearly at capacity already. Journey times, particularly at peak times, are much longer in 2023 than they were and must be attributed to the numbers of new homes built in recent years both along the A259 and to the East of Chichester.

It cannot be a valid justification to build thousands more houses to raise additional CIL money from developers to provide essential road improvements WHICH SHOULD BE IN PLACE BEFORE ANY FURTHER BUILDING IS APPROVED. Cart before the horse thinking.

### Summary of representation changes to plan:

The council should deliver improvements to infrastructure before any additional housing is proposed

### Response:

Phasing the delivery of new development to align with the provision of new transport infrastructure is a key aspect of the strategy set out in Policy T1.

The policy acknowledges that it may be necessary to proactively phase development to take into account the monitoring and effectiveness of travel plans to encourage sustainable travel behaviour.

Ultimately, the council and delivery partners are dependent on developer funding to implement the measures proposed.

### Action:

No change in response to representation

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**5470****Object**

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**Document Element:** Background, 8.4

**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

8.4 Development needs accessibility built into it and active travel networks built to the standard people feel safe and comfortable to use between development and things people need to access outside the development especially railway stations so as not to increase car use. While national policy is to pay for road use through taxes rather than at point of use, increasing road capacity increases road use without development, therefore this policy will exacerbate existing problems and clog up existing settlements.

### Summary of representation changes to plan:

N/A

### Response:

The council is keen to work with relevant providers to improve accessibility to key services and facilities through sustainable modes of travel.

The local authority recognises that public transport improvements are critical to delivering its local plan. New development will be located in accessible locations.

The strategy set out in Policy T1 will support the level of development that is proposed by the Plan by ensuring key junction improvements which are necessary to avoid severe highway safety concerns. The Policy also seeks to promote and support access to sustainable transport modes.

### Action:

No change in response to representation

5904

Object

**Document Element:** Background, 8.4

**Respondent:** GoVia Thameslink Railway

## Support

### Summary of representations:

Support in principle

### Summary of representation changes to plan:

N/A

### Response:

N/A

### Action:

No change in response to representation

6170

Support

**Document Element:** Background, 8.4

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates

## Background, 8.5

## Object

### Summary of representations:

Chichester residents have already rejected Highways Agency proposals for the A27 which included building a new link road to the Fishbourne roundabout / making changes to roundabouts.

This consultation refers to proposed changes but with no description so consultees are not able to make representations.

A left turn at the Stockbridge roundabout is used to justify the new relief road as traffic couldn't cross the A27. It forces traffic to travel to the nearest roundabout to turn round to return in the opposite direction and causing congestion at roundabouts and roads.

It will turn residential streets into rat runs.

The local plan cannot guarantee any major road improvements to mitigate congestion and building housing on the scale proposed in the local plan is guaranteed to exacerbate the congestion and pollution levels in the Chichester District.

Currently every major junction is well over capacity at peak times and has been since the last local plan was produced in 2014. The roads are becoming unusable and adding 10000 houses to the district with no mitigation is against the wishes of the residents who have made Chichester District Council aware of the problem.

### Summary of representation changes to plan:

The proposed changes to junctions on the A27 and proposed new road building should be explained in the Local Plan and consultees given the opportunity to understand what these proposals actually mean and then comment on them.

### Response:

The Local Plan Transport Study (2024) sets out additional information regarding the full range of junction improvements that have been considered and Policy T1 sets out the strategy for which improvements are being proposed to support the Local Plan

### Action:

No change in response to representation

3833

Object

Document Element: Background, 8.5

Respondent: Mrs Clare Gordon-Pullar

## Object

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### Summary of representations:

The local plan cannot guarantee any major road improvements to mitigate congestion and building housing on the scale proposed in the local plan is guaranteed to exacerbate the congestion and pollution levels in the Chichester District. Currently every major junction is well over capacity at peak times and has been since the last local plan was produced in 2014. The roads are becoming unusable and adding 10000 houses to the district with no mitigation is against the wishes of the residents who have made Chichester District Council aware of the problem.

### Summary of representation changes to plan:

- i) There should be a moratorium on building in the area until there is a definitive plan for upgrading the strategic road network.
- ii) Policy A11 and Policy A12 should be removed from the plan because most of this traffic will access the strategic road network via the Fishbourne Roundabout which is the most heavily congested.

### Response:

- i) The strategy set out in Policy T1 will support the level of development that is proposed by the Plan.
- ii) Given that the strategy set out in Policy T1 supports the level of development that has been proposed in the Local Plan, there is no justification for the removal of Policies A11 and A12

### Action:

No change in response to representation

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**3845****Object**

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**Document Element:** Background, 8.5

**Respondent:** The Bosham Association

## Object

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### Summary of representations:

This "kicks the can down the road". RIS3 funding remains most uncertain as RIS2 funding was rejected by CDC/WSCC and the A27 at Chichester remains a pipeline project.

Evidence that all funding avenues have been explored to enable a holistic solution for A27 junction improvements to be implemented is unclear. In particular is there funding available via the Major Roads Network package? This is presumably available for the A259 Bognor Road junction? Before CDC/ WSCC jeopardised access to MRN funds by removing the A286 south on unproven grounds this would have facilitated the required Stockbridge Link Road .

### Summary of representation changes to plan:

CDC in collaboration with WSCC and National Highways need to have a convincing plan that the A27 junction upgrade cannot be funded in its entirety.

### Response:

The Local Plan Transport Study (2024) and Transport Background Paper explain the options that have been assessed and the reason the Council is following the strategy set out in Policy T1.

In order to deliver additional housing in the plan area the local authority must deliver infrastructure improvements.

Policy T1 states that new development will be phased to align with the provision of new transport infrastructure and the Local Plan Transport Study (2024) sets out the current position on infrastructure costs and funding availability.

### Action:

No change in response to representation

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**3919****Object**

**Document Element:** Background, 8.5

**Respondent:** lavant parish council



## Object

### Summary of representations:

Issues arising from inadequacies of the A27 and its local and national importance are acknowledged. Proposals to improve connectivity to and upgrading of that route are supported. Route improvement through the Government's RIS3 programme is to be welcomed. It is not for the local plan to make proposal for this national route but it can examine and make proposals for the local network connecting to it. Failure to invest in the local road network gives rise to many examples of movement restriction and capacity limitations, that in turn are manifest in added congestion on and around the existing A27.

While options for improvements to the A27 are not a matter for this local plan, undoubtedly comment will be raised about by-pass options and requests for the consequential safeguarding of land to facilitate construction. The planning authority will be well aware of the Estate's objection to any proposal for an A27 northern by-pass, a consequence which will result in the loss of the Goodwood Motor Circuit and airfield, with serious and direct adverse impacts for other Goodwood business sectors, and with it, loss of a significant and irreplaceable quantum of Goodwood income to the significant detriment to the district and regional economy. References to the A27 in the plan as published are acceptable. However, should it seek to accommodate A27 by-pass options it will be unsound

### Summary of representation changes to plan:

Set out clear objections to any proposal for an A27 northern by-pass

### Response:

The council is aware of the Goodwood Estate's view on any future northern bypass proposals.

The Local Plan Transport Study (2024) and Transport Background Paper explain the options that have been assessed and the reason the Council is taking forward the strategy that is outlined in Policy T1.

### Action:

No change in response to representation

## 4271

## Object

**Document Element:** Background, 8.5

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

### Summary of representations:

No further development along the A27 East West corridor including the proposed allocation of land north of Apuldram Lane to the A27 until a further public consultation is undertaken including options for a by-pass to the North of the city

### Summary of representation changes to plan:

No further development along the A27 East West corridor including the proposed allocation of land north of Apuldram Lane to the A27 until a a further public consultation is undertaken including options for a by pass to the North of the city

### Response:

The council is keen to ensure that new development is well located and designed to minimise the need for travel. The Local Plan Transport Study (2024) and Transport Background Paper explain the options that have been assessed and the reasons why the Council is proposing a monitor and manage approach

### Action:

No change in response to representation

4535

Object

Document Element: Background, 8.5

Respondent: David Ball

## Object

### Summary of representations:

8.5 Development should not be built that requires additional road capacity accept as a last resort

### Summary of representation changes to plan:

N/A

### Response:

The Transport Study concludes that there are already junctions with road capacity issues that need improvements. The strategy set out in Policy T1 will support the level of development that is proposed by the Plan by delivery of suitable mitigation through a monitor and manage process, including promotion of access to sustainable transport modes

### Action:

No change in response to representation

5905

Object

Document Element: Background, 8.5

Respondent: GoVia Thameslink Railway

## Background, 8.6

## Object

### Summary of representations:

The locations in this area, in the A259 corridor are not sustainable. The number of car journeys for day to day facilities will increase. Most of this traffic will be using the Fishbourne roundabout which will not be improved for a number of years. In the first instance development should be directed at city locations where the need for a car will be less.

### Summary of representation changes to plan:

Reduced housing numbers away from rural semi-rural locations

### Response:

The District Council is keen to promote development in sustainable locations. Policy T1 states that the council will work to improve accessibility and target investment to provide local travel options that support alternatives to the private car. The Local Plan Transport Study (2024) and Transport Background Paper explain the options that have been assessed and the reason the Council is taking forward the strategy that is outlined in Policy T1

### Action:

No change in response to representation

4167

Object

**Document Element:** Background, 8.6

**Respondent:** Chidham and Hambrook Parish Council

## Object

### Summary of representations:

This paragraph is frankly nonsensical. Most of the areas designated for significant percentage increases in numbers of residences per parish under this Draft Local Plan are NOT SUSTAINABLE LOCATIONS.

Due to the lack of frequent, affordable rail and bus services, the only means of efficient transport will be the car. And we will not be all buying electric cars for some years to come when the unit price has dropped to more affordable levels and sufficient rapid-charging stations are located throughout the UK – we are light years behind our European neighbours

### Summary of representation changes to plan:

We suggest much greater focus on Chichester City – their allocation is a mere 270 homes in the next 18 years. That is less than a service village (with MINIMAL SERVICES) with a high percentage of elderly residents and transport solutions which offer no workable alternative to the private car. Put more homes in locations where walking and cycling and buses can offer a workable solution.

### Response:

The District Council is keen to promote development in sustainable locations. Policy T1 states that the council will work to improve accessibility and target investment to promote alternatives to the use of private cars.

Policy T1, working with other parts of the Local Plan, ensures that development will be well located and designed to reduce the need for travel.

The council is working to maximise the level of sustainable development that can be accommodated within Chichester city.

### Action:

No change in response to representation

5471

Object

**Document Element:** Background, 8.6

**Respondent:** Mayday! Action Group

Support

**Summary of representations:**

8.6 Fully support that development must in the most sustainable locations, but go further, if location unable to provide access via active travel and public transport, that location is unsuitable and should not be used.

**Summary of representation changes to plan:**

N/A

**Response:**

The council is keen to work with transport and service providers promote alternatives to the use of private cars

**Action:**

No change in response to representation

5906

Support

**Document Element:** Background, 8.6

**Respondent:** GoVia Thameslink Railway

## Background, 8.8

## Support

### Summary of representations:

It is all very well to say you support cycling and alternatives to the car, but if you do not allow cycling in the centre of Chichester, including the current pedestrian area of all 4 roads leading to the Cross, then this whole plan is unsound. Time is the main factor here. I can cycle to the Cross in 25 minutes, but if it takes 10 minutes to walk my bike across the centre, it is just too much, and I will go by car instead. The door to door time to cycle has to beat the car.

### Summary of representation changes to plan:

Amend the plan to promote cycling in the centre of Chichester

### Response:

Policy T1 supports the promotion of sustainable modes of travel including cycling. This supports other relevant plans including the Local Cycling and Walking Infrastructure Plan which aims to deliver a network of walking and cycling routes within Chichester city; the West Sussex Transport Plan 2022-2036, the West Sussex County Council Walking and Cycling Strategy 2016-2026 and the Chichester Area Sustainable Transport Package which identifies a number of cycling and walking schemes to facilitate improvements throughout the Local Plan area.

### Action:

No change in response to representation

**3786****Support**

**Document Element:** Background, 8.8

**Respondent:** Mr Andrew Gould

## Object

### Summary of representations:

Measures 1 and 2 cannot be achieved by locating 2000 homes in the A259 corridor. Walking is unsafe on narrow and not fit for purpose footways. Cycling is hazardous because of the lack of integrated and continuous cycle ways. Public transport is infrequent, irregular and unaffordable.

3) The phrase managing travel demand is meaningless.

4) Impacts of travelling by car are increased emissions and decreased air quality. These cannot be miti

### Summary of representation changes to plan:

Allocate housing in different areas

### Response:

The District Council is keen to promote development in sustainable locations. Policy T1 states that the council will work to improve accessibility and target investment to promote alternatives to the use of private cars.

Policy T1, working with other parts of the Local Plan, ensures that development will be well located and designed to reduce the need for travel.

### Action:

No change in response to representation

4206

Object

**Document Element:** Background, 8.8**Respondent:** Chidham and Hambrook Parish Council

Object

**Summary of representations:**

Para 8.8 contains wishful thinking targets which, with 2000 new homes planned along the West of Chichester corridor will never be achieved.

Walking along the A259 with cyclists sharing the footway is unsafe. Public transport options offer zero solution as already commented.

Point 3 highlighted above: WHAT DOES THIS MEAN? HOW will people's travel be managed?

Point 4: There is no possible mitigation for the polluting emissions from non-electric cars. None. So this is just a meaningless and unachievable objective.

This may explain why in para 8.9 4 objectives are reduced to 3?

**Summary of representation changes to plan:**

N/A

**Response:**

The four objectives at the end of paragraph 8.8 support the change of priorities away from a presumption of car use towards the need to avoid and reduce the need to travel by car, followed by promoting access to sustainable modes of travel.

Policy T1 sets out further information regarding how these objectives would work in practice.

Managing travel demand can be achieved in a variety of ways. Travel Plans can be used to help manage the travel demand of new developments. these are monitored so their success can be considered with further actions where targets are not met.

**Action:**

No change in response to representation

5472

Object

**Document Element:** Background, 8.8**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

- i) 8.8 Increasing road capacity is not key to supporting growth, as increasing road capacity generates additional traffic that creates increased congestion in existing communities that stifles economic activity in those communities and tends to move economic activity away from local businesses out of town to locations that are good for road based activity fuelling a vicious circle.
- ii) The opening sentence of 8.8 is not compatible with Chichester District Council's declared Climate Emergency or the rest of 8.8 which is the key to the long-term future of Chichester and the rest of the coastal plain for future generations.
- iii) It is critical that the mindset changes from a presumption of car use calling active travel and public transport alternatives to the car to a presumption of everyone requiring access with a hierarchy starting with access without transport, followed by walking, cycling and public transport and a presumption that if access only possible by bottom of the hierarchy motor transport the development is unsustainable and should not go ahead.

### Summary of representation changes to plan:

- Remove section of paragraph 8.8 which suggests that road capacity has an economic benefit

### Response:

- i) Many of the A27 Chichester Bypass junctions are already at full capacity and there is real concern that any additional housing development that comes forward without mitigation will lead to significant highway safety issues. The capacity improvements proposed by Policy T1 are the minimum that would be required to avoid these impacts whilst allowing at further housing development to come forward in the south of the plan area.
- ii) Tackling the climate emergency is a key priority for the local authority and this is reflected in paragraph 8.8. However, this also needs to allow for the continuation of housebuilding within the area.
- iii) The hierarchy set out in the four objectives at the end of paragraph 8.8 supports the change of priorities away from a presumption of car use towards the need to avoid and reduce the need to travel by car, followed by promoting access to sustainable modes of travel.

### Action:

- No change in response to representation

5907

Object

**Document Element:** Background, 8.8

**Respondent:** GoVia Thameslink Railway

## Background, 8.9

## Object

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**Summary of representations:**

Where is the 4th objective which appears in 8.8?

**Summary of representation changes to plan:**

Correction needed to refer to 4 objectives

**Response:**

This will be addressed through a minor modification to paragraph 8.9

**Action:**

See Council's suggested modification CM254.

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**4176****Object**

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**Document Element:** Background, 8.9

**Respondent:** Chidham and Hambrook Parish Council

## Background, 8.10

## Support

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**Summary of representations:**

The Parish Council wishes to stress that ALL documentation, data and studies which are relevant to Transport should be included as evidence to support the Plan.

**Summary of representation changes to plan:**

N/A

**Response:**

The Council publishes all relevant evidence that has supported the preparation of the Local Plan on its website

**Action:**

No change in response to representation.

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**3942****Support**

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**Document Element:** Background, 8.10

**Respondent:** Fishbourne Parish Council



## Object

### Summary of representations:

CATM model calibrated and validated using 2014 data not taking account of developments such as Chichester Free School adjacent to A27 Whyke roundabout. Transport assessment states "all junctions on the A27 Bypass are over capacity in one or both modelled peak hours". Only 28% of traffic growth due to Local Plan development. Improvements only to Fishbourne and Bognor Roundabouts so over capacity issues still remain at other roundabouts. Plan does not effectively mitigate the impact of additional growth and is adding further demand.

### Summary of representation changes to plan:

Housing number should be further challenged on this basis

### Response:

The Local Plan Transport Study (2024) explains that the Chichester Area Transport Model (CATM) has been updated by Stantec to investigate travel patterns in and around the Chichester area. This included taking account of changes in response to the policies and strategy of the emerging Chichester Local Plan

### Action:

No change in response to representation

4049

Object

**Document Element:** Background, 8.10

**Respondent:** Donnington Parish Council

## Object

### Summary of representations:

The wording of this policy appears contradictory to the wording in paragraph 8.8 and the need to achieve net zero green gas emissions by 2050.

The provision of new road infrastructure including the proposed new link between Apuldram Lane and Fishbourne roundabout is contrary to numerous Policies set out in other chapters of this plan regarding sustainability, protecting habitat, reducing air pollution, light pollution, minimising flood risk, and maintaining the natural environment and visual amenities.

### Summary of representation changes to plan:

Remove the proposal for the Apuldram link road

### Response:

The Stockbridge Link forms part of the full A27 mitigation package that is presented in the Local Plan Transport Study (2024). This would connect to Fishbourne Roundabout by way of a new arm to Fishbourne Roundabout and link to the A286 Birdham Road, south west of Stockbridge. However, due to the high costs of the scheme as well as uncertainties over feasibility, Policy T1 is not proposing the implementation of this improvement measure within the Plan Period.

### Action:

No change in response to representation

**4541****Object****Document Element:** Background, 8.10**Respondent:** David Ball**Object****Summary of representations:**

Monitor and Manage:

Is not justified given the already identified short-term need for A27 junction improvements

Is not justified given the lack of evidence from participation of the local community

Is not effective given the improvements identified are likely not to be deliverable during plan period through lack of funding

**Summary of representation changes to plan:**

A development/transport strategy needs to be formulated which provides a pathway to ensuring that requisite road improvements to address existing problems and accommodate new development can actually be funded and delivered within an appropriate timescale. This is the stated objective of para 8.6 of this plan which is then negated by this and other provisions in this Chapter

**Response:**

The approach that the council is undertaking is designed to deliver the improvements that are required to support the level of development proposed by the Local Plan.

The Local Plan Transport Study (2024) and Transport Background Paper explain the options that have been assessed and the reason the Council is taking forward the strategy that is outlined in Policy T1.

**Action:**

No change in response to representation

**4597****Object****Document Element:** Background, 8.10**Respondent:** Mrs Gabrielle Abbott

## Object

### Summary of representations:

The 'monitor and manage' approach appears here for the first time. Absolutely no explanation as to how this approach will work and be an improvement upon 'predict and provide'.

It is very clear to everyone that the through traffic issue created by a dual carriageway road with too many dangerous roundabouts must be and indeed is an impediment to all future growth of both Chichester City and the entire district of the plan area. The fact is that it is more often quicker to go through the city centre than use the by-pass: "the by-pass that doesn't".

We have a pitifully painful and slow approach to major road infrastructure projects. Car ownership shows no sign of diminishing – indeed because of the magnetic attraction of Goodwood, we would suspect that the level of car ownership in this area is well above average

### Summary of representation changes to plan:

We find it hard to believe that no funding can be found to ensure the A27 infrastructure gets the improvements it must have BEFORE MORE NEW HOMES ARE BUILT.

### Response:

Paragraph 8.12 & 8.13 set out additional detail about the council's approach in this area as well as a brief explanation as to why the monitor and manage approach has been selected.

To oversee the delivery of the monitor and manage process a Transport Infrastructure Management Group (TIMG) has been set up, consisting of representatives from Chichester District Council, West Sussex County Council and National Highways.

Policy T1 sets out how it will be expected that new development is phased to correspond to the timely delivery of infrastructure improvements.

### Action:

No change in response to representation

5473

Object

Document Element: Background, 8.10

Respondent: Mayday! Action Group

## Object

### Summary of representations:

Traffic modelling undertaken in Transport Study uses base year of 2014 - pre-dates COVID pandemic and significant changes in work-travel patterns in subsequent years. Likely to result in significant over-estimation of traffic flows, acknowledged in report itself. Trip generation based on generic per dwelling basis without regard to sustainability/accessibility merits of locations within district. Acceptable for generic 'predict and provide' approach but mitigation based on bespoke 'monitor and manage' approach. Once it became apparent that mitigation required for 'predict and provide' approach could not be viably mitigated, new assessment should have been undertaken to look at specific characteristics of traffic generation within various locations within Southern Plan Area and the interrelationship with specific junctions on A27 - would have provided more accurate account of trip generation to define more targeted strategy for A27 junction improvements and other measures.

### Summary of representation changes to plan:

N/A

### Response:

The Local Plan Transport Study (2024) was commissioned to provide evidence to support the Local Plan. This explains that the Chichester Area Transport Model (CATM) has been updated by Stantec to investigate travel patterns in and around the Chichester area. This included taking account of changes in response to the policies and strategy of the emerging Chichester Local Plan.

The strategy set out in Policy T1 will support the level of development that is proposed by the Plan.

Undertaking new modelling work would further delay the local plan which has already been significantly delayed, and would lead to further pressures on local infrastructure.

### Action:

No change in response to representation

5737

Object

**Document Element:** Background, 8.10

**Respondent:** Metis Homes

**Agent:** Nova Planning

## Background, 8.11

## Object

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### Summary of representations:

If all the funding from housing development is going towards the upgrade of Fishbourne and Bognor roundabouts, about 45 million pounds as an upper estimate, and no funding of a similar magnitude is going towards low car neighbourhoods, cycle lanes and active travel, this policy is inconsistent with the rest of the local plan and therefore unsound

### Summary of representation changes to plan:

50 percent of the CIL money, section 106 and other money raised from housing developers will be allocated to cycle lanes, low traffic neighbourhoods and measures that promote low emission travel. This may mean that schemes that are essential to improving car travel on the A27 will need to be delayed or scrapped

### Response:

Policy T1 states that investment will be used to fund local travel options. This includes integrated bus and train networks, improved pedestrian, and cycle networks. Both CIL and s106 contributions, as well as other funding where available, will be used to fund these measures and this will not be adversely impacted by the need to secure developer contributions specifically for the highway improvements identified

### Action:

No change in response to representation

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**3807****Object**

**Document Element:** Background, 8.11

**Respondent:** Mr Andrew Gould

## Object

### Summary of representations:

Figure 7.4 Bognor Road and Vinnetrow Road Combined Concept scheme - insufficient detail.

Figure 7.7 A250 Cathedral Way/Fishbourne Road/Terminus Road proposed mitigation "Removal of existing traffic islands to facilitate all movement crossroad junction" compromises safe access to eg supermarket

Figure 7.3 No detailed figure of the Fishbourne roundabout mitigation itself. Figure includes Stockbridge Link Road which is NOT part of the submission as it is not funded.

If the transport assessment does not have correct diagrams, does this reflect a wider issue with the document not supporting the content of the Local Plan submission?

### Summary of representation changes to plan:

7.4 does not show or explain the impact to Chichester/Bognor Cycle Path. Has the impact of sustainable travel been considered as part of the mitigation?

7.7 Impact on pedestrian safety should be considered and explained

7.3 Correct the figure and remove the SLR.

Revisit the Assessment for consistency with the plan

### Response:

The description of the junction improvement work and the diagrams provided within Local Plan Transport Study (2024) have been undertaken at a high-level as proportionate evidence to support the preparation of the Local Plan. Further detailed technical and design work would be required prior to the implementation of any of the works identified.

The Transport Study 2024 sets out the options for proposed mitigation, which will be taken forward and developed further by the TIMG, through a monitor and manage process

### Action:

No change in response to representation

4060

Object

**Document Element:** Background, 8.11

**Respondent:** Donnington Parish Council

## Object

### Summary of representations:

Conditionality of delivery of improvements on monitor and manage and funding:

is not justified given the already identified short-term need for A27 junction improvements Is not effective given the improvements identified are likely not to be deliverable during plan period through lack of funding

### Summary of representation changes to plan:

A revised development/transport strategy needs to be articulated which will provide a pathway to ensuring that requisite road improvements to address existing problems and accommodate new development can actually be funded and delivered within an appropriate timescale.

### Response:

Policy T1 sets out the local authority's approach to the phasing of development.

The council considered a wide variety of mechanisms for delivering the infrastructure funding as part of the local plan process

### Action:

No change in response to representation

4598

Object

**Document Element:** Background, 8.11

**Respondent:** Mrs Gabrielle Abbott

## Object

### Summary of representations:

8.11 is incompatible with Chichester District Council's declared Climate Emergency.

Also, it does not make financial or economic sense. Active Travel infrastructure can be built at a fraction of the cost of motor vehicle infrastructure replacing the dominance of the car with people accessing what they need through active travel increases economic activity and provided active travel high enough quality continuous and direct to bus stops and railway stations, is key to increasing use of public transport.

### Summary of representation changes to plan:

N/A

### Response:

The strategy set out in Policy T1 and supporting text is focused on ensuring that the Local Plan can continue to deliver new homes for the area whilst avoiding the severe highway safety issues that are anticipated if the development came forward without appropriate mitigation. Whilst this starts with the need to reduce and avoid travel and improve accessibility to non-car modes of travel, it must also involve addressing the specific highway capacity issues that are outlined in the council's evidence base.

### Action:

No change in response to representation

5908

Object

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**Document Element:** Background, 8.11

**Respondent:** GoVia Thameslink Railway



## Background, 8.12

## Object

### Summary of representations:

The statement 'no additional funding sources have been identified.' implies all reasonable efforts have been made to identify those resources. No significant attempt has been made to secure funding from the DfT's Major Roads Network fund.

### Summary of representation changes to plan:

CDC must coordinate with WSCC to have the A286 South of Chichester included in the Major Roads Network funding pipeline

### Response:

Section 8 of the Local Plan explains that the A27 Chichester By-Pass major improvement scheme is included in the Road Investment Strategy Pipeline for the period 2031-2035 (RIS4). However, at this stage, funding is not guaranteed and its inclusion or otherwise in the final RIS4 programme will be confirmed at a later date and is dependent on National Highways option development work.

### Action:

No change in response to representation

**3764****Object**

**Document Element:** Background, 8.12

**Respondent:** James Rank

## Object

### Summary of representations:

Much of the traffic on the A27 "strategic Route" is not local. It is unreasonable for local residential low rise developments to fund substantial junction improvements to speed up strategic traffic

### Summary of representation changes to plan:

If central government will not fund A27 improvements the proposed south of the A27 should not proceed unless there is a workable strategy to shift traffic onto mass public transport

### Response:

The strategy set out in Policy T1 is designed to support the level of development that is proposed by the Plan. It is acknowledged that local plan development represents only a portion of the total traffic load that is causing capacity of the A27 to be exceeded. However, given that the strategy set out in Policy T1 supports the level of development that has been proposed in the Local Plan, there is no justification for a reduction or delay in the level of housing development proposed.

### Action:

No change in response to representation

**3863****Object**

**Document Element:** Background, 8.12

**Respondent:** Mr Michael Wright

## Object

### Summary of representations:

Not legally compliant because it is incompatible with the NPPF and has been acknowledged by the council's sustainability appraisal to be at risk of challenge. This is an unsound sticking plaster policy that does not provide necessary strategic infrastructure in a timely way given that the sustainability assessment stated (p33) "there is a clear and significant concern with higher growth scenarios, given the risk of an objection from National Highways on the grounds that the proposed monitor and manage' could be insufficient to avoid severe traffic congestion on the A27"

It is not reasonable in light of policy A14, given that the number of new cars on the A27 would be equivalent to a queue stretching all the way from Westhamptnett to Fontwell (Calculation: 1,300 homes, 1.3 cars per household, each 4.3m long).

### Summary of representation changes to plan:

The plan should be amended as follows:

8.12 The sustainability appraisal stated that capacity on the A27 is a major issue and there is a need to minimise A27 traffic as far as possible (para 5.2.23-5.2.24). It also stated that here is a clear and significant concern with higher growth scenarios, given the risk of an objection from National Highways on the grounds that the proposed 'monitor and manage' strategy could be insufficient to avoid severe traffic congestion on the A27. In order to avoid this objection the council will retain its existing approach to 'predict and provide' which forecasts the predicted growth in traffic and provides mitigation based on the forecast growth and will enhance this by identifying a package of potential highway improvements (including enhanced walking, cycling and public transport) which alongside schemes identified through the development management process, may be implemented. Given the significant increase in road congestion that would be created by building new homes in Tangmere before the introduction of necessary strategic infrastructure (e.g. a rail stop serving Tangmere and Oving) and significant investment to relieve congestion on the A27 which would be required to meet the NPPF requirements for sustainable development. Therefore the masterplan for the land to the west of Tangmere will be suspended until approvals and funding sources have been identified from public expenditure and developer contributions to provide this infrastructure in line with policy T1. Fishbourne Roundabout with the Terminus Road Link is estimated at between E9.5 and E12.9 million, and Bognor Road Roundabout with the Vinnetrow Road Link is estimated at between E1 9.4 and E30.4 million.

### Response:

The strategy set out in Policy T1 is designed to support the level of development that is proposed by the Plan. It is acknowledged that the Local Plan Transport Study (2024) demonstrates that even without the Local Plan, all of the Chichester Bypass Junctions would be severely over capacity by 2039 in the absence of the full mitigation package. Therefore, as the full mitigation package is not deliverable due to a lack of funding, a reduced level of housing development is being taken forward by the Local Plan within the southern part of the plan area. However, given that the strategy set out in Policy T1 supports the level of development that has been proposed in the Local Plan, there is no justification for a reduction in the level of housing development proposed.

### Action:

No change in response to representation

4128

Object

Document Element: Background, 8.12

Respondent: Mr Matthew Rees

## Object

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**Summary of representations:**

If no additional funding is available. The timing of these improvements will depend on the timing of development and will therefore be dependent on commercial decisions by developers. This is not a sound long-term strategy. Moving away from 'predict and provide' to 'monitor and manage' is a decision made because no additional funding sources have been identified. To build 10,350 homes in the plan area with no such certainty is leaving the A27 open to be being at gridlock constantly. It will become a car park with idling engines.

**Summary of representation changes to plan:**

Reduced housing numbers

**Response:**

The strategy set out in Policy T1 and supporting text is focused on ensuring that the Local Plan can continue to deliver new homes for the area whilst avoiding the severe highway safety issues that are anticipated if the development came forward without appropriate mitigation.

It is relatively common practice that the delivery of housing is linked to infrastructure improvements. This is through S106 and other legal agreements.

**Action:**

No change in response to representation

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**4175****Object**

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**Document Element:** Background, 8.12

**Respondent:** Chidham and Hambrook Parish Council

## Object

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### Summary of representations:

Traffic on the A27 particularly at the Portfield Roundabout is already at high density, not just in rush hour times. Gridlocks occur on a daily basis as radio traffic reports will confirm. Exiting over the A27 at Meadow Way is dangerous due to volume and speed of traffic. Closure of Oving Road lights has further added to the problem for Tangmere residents driving into Chichester.

The proposed new number of houses could add over 1,500 cars to the area crating further gridlock on the A27 and increasing traffic to village road.

A solution would be to provide a rail stop at Tangmere, improve bus routes and add cycle paths.

### Summary of representation changes to plan:

- 1) Reduce number of houses which equates to less cars on already busy roads
- 2) Upgrade infrastructure i.e. improve bus routes, provide cycle paths, construct railway station

### Response:

- i) The strategy set out in Policy T1 is designed to support the level of development that is proposed by the Plan. Given that the strategy set out in Policy T1 supports the level of development that has been proposed in the Local Plan, there is no justification for a reduction or delay in the level of housing development proposed.
- ii) Policy T1 states that investment will be used to fund local travel options. This includes integrated bus and train networks, improved pedestrian, and cycle networks. The Tangmere SDA policy (A14) also includes specific requirements for the improvement of cycle infrastructure between Tangmere and Chichester and for improvements to public transport, which is likely to focus on the 55 Bus Service.

### Action:

No change in response to representation

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**4443****Object**

**Document Element:** Background, 8.12

**Respondent:** Mrs A Cobby

## Object

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### Summary of representations:

Monitor and manage:

Is not justified given the already identified short-term need for A27 junction improvements Is not justified given the lack of evidence of participation of the local community

Is not effective given the improvements identified are likely not to be deliverable during plan period through lack of funding

### Summary of representation changes to plan:

A revised development/transport strategy needs to be articulated which will provide a pathway to ensuring that requisite road improvements to address existing problems and accommodate new development can actually be funded and delivered within an appropriate timescale.

### Response:

The Monitor and Manage approach will help ensure that development and infrastructure investment is managed and directed towards improvements and measures that will achieve a reduction in the need to travel or the promotion of non-car modes of travel

### Action:

No change in response to representation

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4599

Object

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**Document Element:** Background, 8.12

**Respondent:** Mrs Gabrielle Abbott

## Object

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### Summary of representations:

This policy is not sound because the A27 is already at breaking point and tailbacks are an everyday occurrence - not just at peak times. The proposed scale of the development and the consequent increase in number of vehicles (possibly more than one car per household) will exasperate this. There has not been sufficient investment to cater for the existing traffic operation let alone the additional burden this proposed building will place on it. We have no alternative other than the 55 bus (a good service - but will not be able to cater for the additional volume of people). There is no rail option either.

### Summary of representation changes to plan:

A significant reduction in the scale of development or more the development to a more appropriate site (e.g. use brownfield sites not green belt or good arable farmland). Reduction will help to minimise the increase in pollution, air quality will be negatively impacted and noise will affect a recognised conservation area around the old Saxon church - so use more appropriate sites to build homes.

### Response:

The strategy set out in Policy T1 will support the level of development that is proposed by the Plan. Given that the strategy set out in Policy T1 supports the level of development that has been proposed in the Local Plan, there is no justification for a reduction in the level of housing development proposed.

### Action:

No change in response to representation

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**5565****Object**

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**Document Element:** Background, 8.12

**Respondent:** Mr Gary Axon

## Object

### Summary of representations:

At peak times Google maps advises avoiding the A27 and going through the city when driving east/west from Tangmere. The bypass (built in 1930) and constantly modified is totally at maximum capacity. Building 1300 new home in the village [Tangmere] plus the existing work at Fontwell and proposed building at North Bersted will result in gridlock. This is without taking into account more building west of the city toward Havant. There has not been a rail link for Tangmere since 1962 and the 55 bus is expensive and has a very limited capacity and timetable

### Summary of representation changes to plan:

Reduce building on green field sites. Use existing property, the spaces above shops in the city are dark at night. Use the existing green field sites, close to the city and thus less car use. Visit European cities where it is common and cheap to live centrally

### Response:

The Local Plan Transport Study (2024) which forms the evidence base for the Local Plan concludes that there are already junctions with road capacity issues that need improvements. However, Policy T1 sets out a strategy to address the impact of the development proposed within the Local Plan. This includes measures to reduce the need to travel and to improve accessibility to sustainable travel modes as well as specific highway capacity improvements to address the anticipated severe highways safety issues that could result is appropriate mitigation is not implemented.

### Action:

No change in response to representation

5571

Object

**Document Element:** Background, 8.12

**Respondent:** James Hutchinson

## Object

### Summary of representations:

The plan is not sound because it is biased towards housing as a single policy objective and is not consistent with the Area Transport Strategy (ATS). ATS 7.45 recognises the A27 as the only major route east to west. The development will add to congestion without plans to upgrade the route. Plans to bypass Arundel have already been put on hold. Tourist congestion during peak summer periods (ATS 7.50) make transport around the proposed development more congestion (attached, see p200)

### Summary of representation changes to plan:

Modification of the plan to reduce or cancel the development to avoid further traffic congestion

### Response:

The strategy set out in Policy T1 is designed to support the level of development that is proposed by the Plan. It is acknowledged that local plan development represents only a portion of the total traffic load that is causing capacity of the A27 to be exceeded.

However, given that the strategy set out in Policy T1 supports the level of development that has been proposed in the Local Plan, there is no justification for a reduction or delay in the level of housing development proposed

### Action:

No change in response to representation

**5581****Object****Document Element:** Background, 8.12**Respondent:** Mr Oliver Gale**Object****Summary of representations:**

8.12 the shift away from 'predict and provide is welcome', but monitor and manage is less bad, not good.as it still focuses on highway improvements with "(including enhanced walking, cycling and public transport)" an afterthought.

Stating "The reason for this approach is that the full cost of the A27 junction improvements cannot be funded through contributions from new development alone" is indicative of the financial and economic fallacy of increasing road capacity, when the developer funding would be enough to fund active travel infrastructure that will provide far more sustainable access for the things people need locally helping to increase economic activity and help ease the Climate Emergency as well as providing better access to bus stops and railway stations where the things people need to access are not available locally.

**Summary of representation changes to plan:**

N/A

**Response:**

The strategy set out in Policy T1 and supporting text is focused on ensuring that the Local Plan can continue to deliver new homes for the area whilst avoiding the severe highway safety issues that are anticipated if the development came forward without appropriate mitigation. Whilst this starts with the need to reduce and avoid travel and improve accessibility to non-car modes of travel, it must also involve addressing the specific highway capacity issues that are outlined in the council's evidence base.

**Action:**

No change in response to representation

**5909****Object****Document Element:** Background, 8.12**Respondent:** GoVia Thameslink Railway



## Background, 8.13

## Object

### Summary of representations:

- i) Improvements to the A27 contentious locally. RIS 1 consultation in 2016 resulted in no consensus . Local Plan consultation 2018, generated significant feedback particularly regarding restricting local movements at key junctions and the Stockbridge Link Road, where the proposals were similar to those options robustly rejected in the RIS 1 consultation.
- ii) No details provided on representative selection for TIMG, nor how local residents will be consulted on the delivery of any changes as part of the monitor and manage process. Could present an opportunity for circumventing legitimate local concerns and feedback on any proposals to be delivered under this group.

### Summary of representation changes to plan:

Better explanation of the setup and selection of group members and clear detail around the accountability of the group to members of District and County Council and members of the public should be included in the Local Plan.

### Response:

- i) The strategy set out in Policy T1 involves a strategy of potential A27 junction improvements and modal shift measures.
- ii) The Transport Infrastructure Management Group (TIMG) has been set up and membership of this group includes representatives from Chichester District Council, West Sussex County Council and National Highways

### Action:

Provide information to Parish Councils about the governance of the TIMG and its role and terms of reference.

## 4056

## Object

**Document Element:** Background, 8.13

**Respondent:** Donnington Parish Council

## Object

### Summary of representations:

The plan is not sound in that it is unsustainable in relation to transport links. WSCC ATS 7.47 recognises that rural bus services are not frequent and do not present an attractive alternative to private car use. ATS 7.46 describes rail transport as typically slow and uncompetitive with travelling by private car. There is no rails service within reasonable distance of the development [Tangmere] so traffic is likely to increase substantially with consequent impact on the environment.

### Summary of representation changes to plan:

Modification of the plan to reduce or cancel the development to a level consistent with public transport infrastructure capacity to protect the environment of the village [Tangmere].

### Response:

The strategy set out in Policy T1 involves securing investment to be used to fund local sustainable travel options. This will include improvements to bus and train networks and improved pedestrian and cycle networks. The Tangmere SDA policy (A14) also includes specific requirements for the improvement of cycle infrastructure between Tangmere and Chichester and for improvements to public transport, which is likely to focus on the 55 Bus Service.

Given that the strategy set out in Policy T1 supports the level of development that has been proposed in the Local Plan, there is no justification for a reduction or delay in the level of housing development proposed.

### Action:

No change in response to representation

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**5582****Object**

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**Document Element:** Background, 8.13**Respondent:** Mr Oliver Gale

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**Object**

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**Summary of representations:**

8.13 Will not get the best outcomes unless includes active travel representatives e.g. Sustrans, and more importantly TIMG needs people with an understanding of access and what people need and different innovative ways of providing that access to move the focus away from a presumption that road transport is required to provide access. Need to change the mindset from people need to travel to people need access, then focus on providing access within local communities and to public transport where people need access unable to be provided within their local communities.

**Summary of representation changes to plan:**

N/A

**Response:**

The membership of the Transport Infrastructure Management Group (TIMG) includes representatives from Chichester District Council, West Sussex County Council and National Highways. The work will be supported as required by the Council's professional transport planning advisers. Additional information will be provided regarding the TIMG as the Local Plan progresses.

**Action:**

No change in response to representation

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**5910****Object**

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**Document Element:** Background, 8.13**Respondent:** GoVia Thameslink Railway

## Background, 8.14

## Object

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### Summary of representations:

The statement, 'There have not been any external sources of funding identified that would be able to deliver the scheme.' again implies efforts have been made to identify external sources of funding. Instead efforts have been made to remove potential external sources of funding.

### Summary of representation changes to plan:

CDC should insist WSCC seek to have the A286 South of Chichester reinstated (after WSCC requested it be removed in March 2017 see minute 4.9 WSCC Ref No: HI29 (17/18)) as a potential scheme for consideration for funding as part of the Major Roads Network. MRN funding should be sought before CDC can say with confidence full and thorough attempts have been made to identify and secure external sources of funding for the Stockbridge Link Road.

The plan should state 'CDC will work with WSCC to promote the A286 South of Chichester for external sources of funding including within the Major Roads Network.'

### Response:

The A27 Chichester Bypass is part of RIS4, which will be considered separately in due course. The Stockbridge Link Road has been demonstrated to be undeliverable as part of the proposed local plan, as set out in the Transport Background Paper

### Action:

No change in response to representation

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**3765****Object**

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**Document Element:** Background, 8.14

**Respondent:** James Rank

## Object

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### Summary of representations:

The "improvements" at Stockbridge/Whyke roundabouts will cause significant disruption. Residents will turn left and travel to either Bognor/Fishbourne roundabouts, generating more traffic on those roundabouts and roads.

This is the "trigger" for the Link Road. Leave the roundabouts alone and then the Link Road is not needed.

The Link Road will be an eyesore as it will be raised to go over the Canal, ruining the amenity of the Canal and blocking the view of the Cathedral painted by Turner.

Traffic from the south will go through the narrow North Mundham road to reach the Bognor roundabout via Vinnetrow Road

### Summary of representation changes to plan:

The proposed changes to the A27 should be removed from the plan.

Reference should be made to the fact that local residents have already voted on these and rejected them. Given that there is little new development proposed for south of the A27, the Council should look at mitigation measures rather than building a new road or making junction improvement

### Response:

Policy T1 sets out a strategy that will support the delivery of infrastructure improvements which will allow the proposed level of development to be delivered without giving rise to unacceptable levels of highway safety concerns on the Strategic Road Network.

The strategy involves a strategy of sustainable transport and active travel interventions, as well as the potential for works to junctions on the Strategic Road Network. Any junction improvements or new roads could only come forward following detailed assessment and design work

### Action:

No change in response to representation

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**3834****Object**

**Document Element:** Background, 8.14

**Respondent:** Mrs Clare Gordon-Pullar

## Object

### Summary of representations:

Fishbourne Parish Council is most concerned that the Stockbridge Link road is still even being considered when its environmental impact on the area and the huge financial cost would be totally unacceptable. The effect this Link Road would have on Fishbourne and the A259 has also not been considered.

### Summary of representation changes to plan:

N/A

### Response:

The strategy set out in Policy T1 involves a strategy of sustainable transport and active travel interventions, as well as the potential for works to junctions on the Strategic Road Network. Any junction improvements or new roads could only come forward following detailed assessment and design work

### Action:

No change in response to representation

3943

Object

Document Element: Background, 8.14

Respondent: Fishbourne Parish Council

## Support

### Summary of representations:

Looking for any existing potential plans for the Stockbridge Link Road mitigation scheme as this sounds like a potential solution

### Summary of representation changes to plan:

N/A

### Response:

N/A

### Action:

No change in response to representation

4035

Support

Document Element: Background, 8.14

Respondent: Mr David Caldwell

## Object

### Summary of representations:

Significant issues with delivery of the Stockbridge Link Road including:

- \*Building next to an AONB, SSSI, Ramsar site
- \*Link road would be intrusive/out of keeping with the area as it would need to be over 3m high to cross a flood plain
- \*Insufficient impact studies on consequences of building on the flood plain
- \*Impact on noise/air pollution considering prevailing south westerly winds
- \*Impact of road on biodiversity net gain target in local plan - removal of fertile farmland

### Summary of representation changes to plan:

Removal of plans for Stockbridge Link Road or much better assessment of the impact of the road before it is included in the Local Plan

### Response:

The strategy set out in Policy T1 involves a strategy of sustainable transport and active travel interventions, as well as the potential for works to junctions on the Strategic Road Network. Any junction improvements or new roads could only come forward following detailed assessment and design work

### Action:

No change in response to representation

4058

Object

**Document Element:** Background, 8.14

**Respondent:** Donnington Parish Council

## Object

### Summary of representations:

This is an admission that the A27 will be completely beyond capacity and that there are no funding sources available to carry out the necessary improvements identified to avoid this. This is irresponsible and would leave Chichester residents trapped. Another impact will be the increasing use of 'rat runs' through residential or rural areas to avoid the gridlock.

### Summary of representation changes to plan:

Reduced housing numbers

### Response:

The Local Plan Transport Studies (2023 & 2024) were commissioned to provide evidence to support the Local Plan. It is acknowledged that there are existing capacity issues on the existing network. However, Policy T1 sets out a strategy that will support the delivery of infrastructure improvements which will allow the proposed level of development to be delivered without giving rise to unacceptable levels of highway safety concerns on the Strategic Road Network.

### Action:

No change in response to representation

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**4174****Object**

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**Document Element:** Background, 8.14**Respondent:** Chidham and Hambrook Parish Council

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**Object**

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**Summary of representations:**

Not effective – does not provide sound transport infrastructure planning

Given that it is acknowledged that based on current forecasting junction improvements are required at Stockbridge Roundabout and Whyke Roundabout it is not clear how our highways system will be able to accommodate additional development without the requisite improvements being made here. This conflicts with the stated policy in paragraph 8.6 of the plan.

**Summary of representation changes to plan:**

A revised development/transport strategy needs to be articulated which will provide a pathway to ensuring that requisite road improvements to these junctions are made so as to be able to accommodate new development .

**Response:**

Policy T1 sets out a strategy that will support the delivery of infrastructure improvements which will allow the proposed level of development to be delivered without giving rise to unacceptable levels of highway safety concerns on the Strategic Road Network. The strategy includes investment to fund local sustainable travel options, such as improvements to bus and train networks and improved pedestrian and cycle networks.

**Action:**

No change in response to representation

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**4600****Object**

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**Document Element:** Background, 8.14**Respondent:** Mrs Gabrielle Abbott

## Object

### Summary of representations:

- i) This paragraph is an admission of the fact that the A27, due to contents of this Draft Local Plan, will not be able to cope. Honesty is to be appreciated but your district residents do not deserve to be the victims of this impossible situation. Minor roads and country lanes are already used by those who cannot have their journey times delayed. The 10,350 homes target must be reduced very significantly.
- ii) Residents of the Shopwyke development cannot get out of their development at peak times to access the A27. The same will be the case for all the developments due to pouring impatient vehicles on to the A259 if 2,000 homes are built during the plan period. A serious rethink is needed to come up with more options.

### Summary of representation changes to plan:

N/A

### Response:

- i) The Local Plan Transport Study (2024) acknowledges that there are existing capacity issues on the existing network and that development identified in the Local Plan could make these worse. However, Policy T1 sets out a strategy that will support the delivery of infrastructure improvements which will allow the proposed level of development to be delivered without giving rise to unacceptable levels of highway safety concerns on the Strategic Road Network.
- ii) Portfield junction was improved as part of the development of Shopwyke Lakes. The strategy in Policy T1 will support the delivery of further infrastructure improvements

### Action:

No change in response to representation

5474

Object

**Document Element:** Background, 8.14

**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

8.14 Package of measures described are a waste of money. For less investment cost greater accessibility can be achieved by investing in active travel infrastructure to increase viability of local businesses, reducing the need for people to travel out of their local communities, and introducing bus priority measures to facilitate more better bus reliability, including better connectivity with the railway.

### Summary of representation changes to plan:

N/A

### Response:

The strategy set out in Policy T1 involves securing investment to be used to fund local sustainable travel options. This will include improvements to bus and train networks and improved pedestrian and cycle networks

### Action:

No change in response to representation



**5911****Object****Document Element:** Background, 8.14**Respondent:** GoVia Thameslink Railway**Background, 8.15****Object****Summary of representations:**

Oving Junction Please demonstrate that this is 'bus priority' as the buses now have to travel on the A27 given that they cannot go straight across the Oving Crossroads. This is unsound as the residents will have formed a habit of using the car to leave the estate and the buses will be economically unsustainable if this is ever sorted out.

**Summary of representation changes to plan:**

There is scope to further modify this junction to make a better bus priority junction. It needs to be seen holistically and not just a part of National Highways scheme to ensnare the south side of Chichester in barren roads

**Response:**

Policy T1 sets out an approach whereby other changes to the strategic road network could be considered. Para 8.15 should be deleted

**Action:**

See Council's suggested Modification CM253.

**4395****Object****Document Element:** Background, 8.15**Respondent:** Jenny Cole

## Background, 8.17

## Object

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**Summary of representations:**

Rejuvenation of local bus services and connection to rail is urgently required. This probably cannot be achieved with low density scattered residential development

**Summary of representation changes to plan:**

N/A

**Response:**

Targeting investment to better integrate bus and train services and improve accessibility to these is a key part of the strategy that underpins Policy T1.

**Action:**

No change in response to representation.

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**3864****Object**

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**Document Element:** Background, 8.17

**Respondent:** Mr Michael Wright

## Object

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**Summary of representations:**

Not sound because fails to evaluate sustainability appraisal (p89) statement: "important high level concern is the lack of a train station at Tangmere", and not legally compliant because TI contains no assessment of whether a train station between Barnham and Chichester could support sustainable development and provide necessary strategic infrastructure in a timely way. May be non-compliant with Duty to Cooperate as the statement of compliance indicates a failure to take reasonable steps to engage with ORR (p52), which is not justified and the Infrastructure Delivery Plan excludes any consideration of a rail station, so there is a lack of evidence proportionate to the issue.

**Summary of representation changes to plan:**

Amend the plan as follows:

8.17 To redress the lack of response from the ORR in February 2019 and lack of any evidence of any other engagement (as noted in the Duty to Cooperate statement of compliance, page 52) the Council will make renewed efforts to engage with the ORR, Network Rail and train operators with the aim of gaining a firm commitment for the reinstatement of the train stop between Tangmere and Oving on the existing line. The council will work with these organisations and local stakeholders to facilitate improvements to the accessibility of railway stations and provision of new station stops and other strategic infrastructure to be available on a predict and provide basis. The council also works closely with bus operators to improve their services in and through the plan area.

Tangmere Station – site option 1 (preferred): Woodhorn Lane, access from Oving road. This is located approximately 1800m from the museum, with the benefit of adjacent land on both sides of the line and an existing level crossing. The site to the north of the track could repurposed for bus interchange, secure bike storage and bus station. Site access could be improved for pedestrian / cycle via a cost effective access to the disused airfield perimeter near the junction between Woodhorn Lane and Church Lane Oving.

Tangmere Station – site option 2: adjacent to Chichester Flood Relief Channel, access via Oving Road. This site has the benefit of existing structures at the side of the line and a disused agricultural property which could be reused for station facilities. This site also has space on both sides of the line. Train passing through the site shows that there is plenty of space for a full length station for services at this site.

**\*\*See also annotated images provided within attached document\*\***

**Response:**

Policy A14 of the emerging Local Plan requires development of the Tangmere SDA to make a range of sustainable transport improvements, including the need to explore opportunities for improving transport links with the 'Five Villages' area and Barnham rail station in Arun District. This position is based on an evaluation of all relevant sources of evidence, including the Sustainability Appraisal as well as engagement with transport service operators and technical evidence work undertaken both by the Council and by site promoters.

**Action:**

No change in response to representation.

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**4131**
**Object**

**Document Element:** Background, 8.17

**Respondent:** Mr Matthew Rees

## Object

### Summary of representations:

What is this going to deliver and when will it be delivered? What outcomes can residents expect? Shouldn't consultation already have been carried out with local transport providers? We need to have oversight of the negotiations with rail and bus operators. The volume of housing proposed in this plan and the desire to move more and more people away from using their cars makes having an economic efficient and regular bus and train service an absolute necessity.

### Summary of representation changes to plan:

N/A

### Response:

The Regulation 19 Local Plan sets out the overall framework for decision making over the plan period. This reflects the fact that the council is keen to involve parish councils in decision making as far as is practically possible.

Officers regularly engage with local transport service operators, although the specific discussions include commercial sensitivity and are held in private, but subject to scrutiny by Members.

### Action:

No change in response to representation.

4205

Object

**Document Element:** Background, 8.17

**Respondent:** Chidham and Hambrook Parish Council

## Object

### Summary of representations:

This leads us to question exactly how much regular dialogue CDC has with essential transport providers. CDC must surely realise that without significantly improved rail and bus services, expansion cannot be achieved. District residents expect to be told on a regular basis the content and status of discussions with organisations such as Network Rail and Stagecoach. The housing numbers contained in this Draft Local Plan should be based on known (now!) deliverable improvements in train and bus services. The inference here is that CDC have not been doing this essential work and without efficient, regular bus and train services the dream will become a living nightmare.

### Summary of representation changes to plan:

N/A

### Response:

The Regulation 19 Local Plan sets out the overall framework for decision making over the plan period. This reflects the fact that the council is keen to involve stakeholders in decision making as far as is practically possible.

Officers regularly engage with local transport service operators, although the specific discussions include commercial sensitivity and are held in private, but subject to scrutiny by Members.

### Action:

No change in response to representation.

5475

Object

**Document Element:** Background, 8.17

**Respondent:** Mayday! Action Group

Support

**Summary of representations:**

8.17 Very welcome, and the standard required of the proposed accessibility to railway stations is outlined elsewhere within this consultation response.

**Summary of representation changes to plan:**

N/A

**Response:**

N/A

**Action:**

No change in response to representation.

5912

Support

**Document Element:** Background, 8.17

**Respondent:** GoVia Thameslink Railway

## Policy T1: Transport Infrastructure

## Object

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### Summary of representations:

Emphasis in the plan is use of public transport or walking. Sites in policy A11 and A12 have no primary school capacity and have no room for expansion. Schools identified to serve these sites are not within walking distance or reachable by public transport. Among the schools identified as suitable for the A11 and A12 sites are Funtington, Compton and Up-Marden, Westbourne and Thorney Island. These schools do not have transport links and are not within walking distance of A11 and A12 sites.

### Summary of representation changes to plan:

This brings the sites A11 and A12 into conflict with the monitor and manage approach which the Chichester District Council Local Plan Transport Assessment suggests and Policy T1. The monitor and manage approach is focused on moving away from use of cars as is policy T1. The developments at A11 and A12 will all involve car reliance for primary school pupils.

Policy A11 and Policy A12 should be removed from the local plan.

### Response:

This representation recommends changes to Policies A11 and A12 and not to Policy T1. See responses to Policies A11 and A12 as well as latest Infrastructure Delivery Plan.

### Action:

No change in response to representation.

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**3846****Object**

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**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** The Bosham Association

## Object

### Summary of representations:

The stated conditions for new development are unrealistic and too vague.

For example: "Ensuring that new development is well located and designed to avoid or minimise the need for travel, encourages the use of sustainable modes of travel as an alternative to the private car and provides or contributes towards new or improved transport infrastructure;"

Based on planning consents to date and the planned scattered development sites this objective is going to be rarely met.

### Summary of representation changes to plan:

N/A

### Response:

Policy T1 sets out a strategy that will support the delivery of infrastructure improvements which will allow the proposed level of development to be delivered without giving rise to unacceptable levels of highway safety concerns on the Strategic Road Network. The strategy includes securing investment to be used to fund local sustainable travel options. This will include improvements to bus and train networks and improved pedestrian and cycle networks

### Action:

No change in response to representation

3865

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Mr Michael Wright

## Object

### Summary of representations:

Objection to policy - should be moratorium on housebuilding until A27 road infrastructure upgrades are guaranteed and carried out.

### Summary of representation changes to plan:

A moratorium on house building until wastewater and A27 road infrastructure upgrades are guaranteed and carried out.

### Response:

Policy T1 sets out a strategy that will support the delivery of infrastructure improvements which will allow the proposed level of development to be delivered without giving rise to unacceptable levels of highway safety concerns on the Strategic Road Network. Therefore, there is no justification for the any moratorium on housebuilding.

### Action:

No change in response to representation.

3936

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Mrs Donna-Maria Thomas

## Object

### Summary of representations:

Objection - no new roads proposed or traffic congestion mitigation. Object to proposed junction improvements. See full submission

### Summary of representation changes to plan:

A moratorium on house building in the district until there are guarantees for suitable infrastructure upgrades to the A27 junctions and wastewater treatment

### Response:

Policy T1 sets out a strategy that will support the delivery of infrastructure improvements which will allow the proposed level of development to be delivered without giving rise to unacceptable levels of highway safety concerns on the Strategic Road Network. Therefore, there is no justification for any moratorium on housebuilding

### Action:

No change in response to representation

3941

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Mr Roger Weymouth

## Object

### Summary of representations:

Basically there is a lack of priority in the plan to sustainable and active travel modes. All funding seems to be based on highway improvements to the A27 to accommodate the anticipated increase in car trips with no mitigation and no certainty of infrastructure improvements occurring in line with land release.

### Summary of representation changes to plan:

N/A

### Response:

Policy T1 sets out a strategy based on an expectation that all new development will support and embody the four objectives set out in the policy text. These focus on reducing the need to travel by car, improving access to sustainable modes of travel, managing travel demand and mitigating the impacts of car use.

### Action:

No change in response to representation.

4002

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Chichester and District Cycle Forum



## Object

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### Summary of representations:

The A259 in Fishbourne is already at capacity, with tailbacks from A27 roundabout to the village at rush hour. The road simply can not take any extra traffic as it currently is. The A259 and Clay lane road surfaces are not maintained well enough for the current flow, let alone for the planned new development from Chichester to Southbourne. Our homes on the A259 already shake from passing large vehicles, especially when the A27 is shut. Trying to cross the A259 as a pedestrian with children is already dangerous enough.

### Summary of representation changes to plan:

Only allow a number of new homes in line with what the current road network can handle and protect Chichester harbour AONB and wild life corridors from further pollution. For the roads to be better maintained before any new major development is permitted. To install 20mph zones for A259 villages and more pedestrian road crossings so people can cross safely. Consider alternative routes to the A259 when the A27 is closed

### Response:

The Local Plan Review Transport Study (2024) acknowledges that in the base year (2014) and baseline scenario without the emerging Local Plan development, a number of junctions already experience capacity issues. Policy T1 has been developed to mitigate the impact of planned development on the Strategic Road Network, improve highway safety and air quality and promote more sustainable travel patterns.

### Action:

No change in response to representation

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**4041****Object**

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**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Mr Edward Bowring

## Object

### Summary of representations:

Over capacity at the Fishbourne roundabout was identified in 2014, there has been a massive increase in housing west of Chichester between 2014 and 2023 but no improvement to the roundabouts have been implemented to date. There is no guarantee that funding to improve the A27 or Fishbourne roundabout will be available within the timescale of the Plan.

Congestion has been a problem since 2014 and this strategy does not offer a solution. There is a clear omission here that funding is not available to facilitate the improvements required to address the current and worsening congestion caused by future development.

### Summary of representation changes to plan:

Public transport is not in the control of CDC and therefore it is not possible to guarantee improved and expanded services. The proposed the £7,728 charge per unit towards infrastructure is yet to be confirmed as legally compliant. Thus an even greater reduction in housing numbers to the Chichester area is required.

### Response:

The strategy set out in Policy T1 will support the level of development that is proposed by the Plan. Therefore, there is no justification for reducing planned housing numbers below what is proposed. Following adoption of the new Local Plan, a new Supplementary Planning Document (SPD) will be prepared to set out guidance on how the proposed contribution for A27 Bypass improvements secured.

### Action:

No change in response to representation.

4063

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Bosham Parish Council

## Object

### Summary of representations:

No Statement of Common Ground has been agreed with neighbouring authorities and key statutory undertakers as required. e.g. National Highways. It is not sufficient to say this will be done in the future as many the large housing proposals require key infrastructure to be agreed in advance of development.

### Summary of representation changes to plan:

Agreed Statements of Common Ground need to be agreed before the Draft plan is examined in public so that all parties can debate the practicality as well as the desirability of the key allocations. There are an absence of transport measures proposed, especially sustainable and active, to address the current levels of congestion, pollution and degradation of the environment.

### Response:

The Council is actively engaging with neighbouring local authorities and key delivery partners on an on-going basis. Statements of Common Ground with Chichester's neighbouring authorities and with the highway authorities and other key stakeholders are being prepared.

### Action:

No change in response to representation.

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**4106****Object**

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**Document Element:** Policy T1: Transport Infrastructure**Respondent:** Chichester and District Cycle Forum

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**Object**

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**Summary of representations:**

The locations and level of housing will not minimise the need to travel by car. The A27 improvements need to be in place before the housing before it becomes impossible to travel and the climate change targets are breached. Public transport requires increased capacity, infrastructure and frequency which will need considerable investment. Is this going to be provided by Southern Rail and Stagecoach? Where is the collaboration? The West Sussex Bus Plan does not address how this will happen. There is too heavy a reliance on developer contributions for all aspects of travel, including local networks and active travel.

**Summary of representation changes to plan:**

N/A

**Response:**

Policy T1 sets out a strategy that will support the delivery of infrastructure improvements which will allow the proposed level of development to be delivered without giving rise to unacceptable levels of highway safety concerns on the Strategic Road Network. The strategy includes investment to fund local sustainable travel options, such as improvements to bus and train networks and improved pedestrian and cycle networks.

**Action:**

No change in response to representation.

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**4165****Object**

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**Document Element:** Policy T1: Transport Infrastructure**Respondent:** Chidham and Hambrook Parish Council

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**Object**

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**Summary of representations:**

Not sound because there is a lack of strategic investment for transport infrastructure. The plan fails to evaluate the important concern that was contained in the sustainability appraisal (p89) statement: "important high level concern is the lack of a train station at Tangmere", and the plan is not legally compliant because TI contains no assessment of whether a train station between Barnham and Chichester could support sustainable development and provide necessary strategic infrastructure in a timely way.

The Infrastructure Delivery Plan excludes any consideration of a rail station, so there is a lack of evidence proportionate to the issue.

The plan is not compliant with Duty to Cooperate as the statement of compliance indicates a failure to take reasonable steps to engage with ORR since February 2019 and no response at that date (p52), which is not justified given the importance of the matter

Not sound because there was once a station stop on the line between Barnham and Chichester and there are several potentially suitable sites within a short distance of Tangmere which could be considered.

**Summary of representation changes to plan:**

Amend the plan as follows:

**Policy T1: Transport Infrastructure**

Integrated transport measures will be developed to mitigate the impact of planned development on the highways network, improve highway safety and air quality, promote more sustainable travel patterns and encourage increased use of sustainable modes of travel, such as public transport, cycling and walking. The council will work with Network Rail, ORR, Southern Railways, National Highways, West Sussex County Council, other transport and service providers (including through the Traffic and Infrastructure Management Group) and developers to provide a better integrated transport network and to improve accessibility to key services and facilities including new train stops on existing lines (e.g. for Tangmere). All development is expected to demonstrate how it will support four key objectives to create an integrated transport network which will alleviate pressure on the road network, improve highway safety, encourage sustainable travel behaviours and help improve air quality, by:

- Avoiding or reducing the need to travel by car for journeys short and long;
- Enabling access to sustainable means of travel, including public transport, walking and cycling;
- Managing travel demand; and
- Mitigating the impacts of travel by car.
- Providing new station stops on existing train lines when large development is planned (e.g. Policy A14)

**Response:**

The strategy set out in Policy T1 involves securing investment to be used to fund local sustainable travel options. This will include improvements to bus and train networks and improved pedestrian and cycle networks.

Policy A14 of the emerging Local Plan requires development of the Tangmere SDA to make a range of sustainable transport improvements, including the need to explore opportunities for improving transport links with the 'Five Villages' area and Barnham rail station in Arun District. This position is based on an evaluation of all relevant sources of evidence, including the Sustainability Appraisal as well as engagement with transport service operators and technical evidence work undertaken both by the Council and by site promoters.

**Action:**

No change in response to representation

4324

Object

**Document Element:** Policy T1: Transport Infrastructure**Respondent:** Mr Matthew Rees

## Object

### Summary of representations:

I consider this policy not to be sound. The A27, its junctions and surrounding/connecting roads are already congested and will become more so with the proposed increase in the population and hence car owners/users.

The plan gives no defined or confirmed road infrastructure development nor funding/investment to enable action to reduce the detrimental impact of the proposed massive increase in populus in Tangmere and its surrounding area.

To 'monitor and manage' is not appropriate to deal with the predicted issue of congestion.

Air pollution and noise pollution will increase.

Tangmere is the largest planned high order settlement hubs (13% of total Local Plan housing - see p284 housing trajectory) and has no close proximity rail station., unlike proposed developments at Southbourne, Nutbourne and Fishbourne.

### Summary of representation changes to plan:

- i) The 'monitor and manage' strategy needs to be removed and become 'predict and provide' the emphasis being on the 'provide' being secured, which would assist in easing the predicted road congestion issues.
- ii) A railway station needs to be developed and built for the Tangmere area to improve easy access to rail travel for the increased population and this encourage alternative travel used.
- iii) To reduce the massive number of proposed new housing units to be built in and around the Tangmere area where there are already severe known traffic congestion issues, particularly at junctions and roundabouts that feed in and out and around Chichester and its surrounding.

### Response:

- i) Policy T1 sets out a strategy that will support the delivery of infrastructure improvements which will allow the proposed level of development to be delivered without giving rise to unacceptable levels of highway safety concerns on the Strategic Road Network.
- ii) Policy A14 of the emerging Local Plan requires development of the Tangmere SDA to make a range of sustainable transport improvements, including the need to explore opportunities for improving transport links with the 'Five Villages' area and Barnham rail station in Arun District.
- iii) Given that the strategy set out in Policy T1 supports the level of development that has been proposed in the Local Plan, there is no justification for the removal of Policy A14 (Tangmere SDA) or the reduction in the number of homes proposed.

### Action:

No change in response to representation.

**4463****Object****Document Element:** Policy T1: Transport Infrastructure**Respondent:** Ms Lindsay Davey**4466****Object****Document Element:** Policy T1: Transport Infrastructure**Respondent:** Ms Lindsay Davey**Object****Summary of representations:**

The Sixth Carbon Budget published by the Committee on Climate Change envisages that a reduction in traffic will be needed. This plan fails to put any suggestions forward to reduce traffic. <https://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf>

We need to reduce total car miles by 2050 by 17% and I do not believe this plan has the detail and methods to effectively decarbonise surface transport enough. Due to lack of Compulsory purchase orders, lack of funds, landownership issues some of the vital routes needed for residents to travel sustainably won't be delivered in the plan period.

**Summary of representation changes to plan:**

The plan needs to set out ways and means to reduce motorised traffic that are achievable and realistic. The walking and cycling projects need to be properly funded and achievable.

**Response:**

Policy T1 sets out a strategy based on an expectation that all new development will support and embody the four objectives set out in the policy text. These focus on reducing the need to travel by car, improving access to sustainable modes of travel, managing travel demand and mitigating the impacts of car use.

**Action:**

No change in response to representation.

**4475****Object****Document Element:** Policy T1: Transport Infrastructure**Respondent:** Sarah Sharp

## Support

### Summary of representations:

WGPC supports this approach but questions how it could be applied to Wisborough Green. This policy is Chichester-centric; Wisborough Green residents have no option other than to rely upon private cars.

### Summary of representation changes to plan:

N/A

### Response:

It is acknowledged that a key focus of Policy T1 is addressing the issues raised by the impact of traffic in the south of the plan area on the A27. However, the Local Plan as a whole does acknowledge the particular issues of the plan area's more rural communities such as Wisborough Green.

### Action:

No change in response to representation.

4586

Support

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Wisborough Green Parish Council

## Support

### Summary of representations:

WGPC supports this approach but questions how it could be applied to Wisborough Green, a village that relies upon private cars.

### Summary of representation changes to plan:

N/A

### Response:

It is acknowledged that a key focus of Policy T1 is addressing the issues raised by the impact of traffic in the south of the plan area on the A27. However, the Local Plan as a whole does acknowledge the particular issues of the plan area's more rural communities such as Wisborough Green.

### Action:

No change in response to representation.

4593

Support

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Wisborough Green Parish Council

## Object

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**Summary of representations:**

The objection relates to Criterion 7 in respect of which the same comments apply as for para 8.12 above

**Summary of representation changes to plan:**

See my comments on paragraph 8.12 above

**Response:**

undertaking is designed to deliver the improvements that are required to support the level of development proposed by the Local Plan.

**Action:**

No change in response to representation.

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4602

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Mrs Gabrielle Abbott

## Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

N/A

**Action:**

No change in response to representation.

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4732

Support

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Mr Cliff Archer



## Object

### Summary of representations:

We consider that a shift instead towards 'vision and validate' would be more aspirational for the plan. This approach will allow our Consortium to best envisage the place that Chichester District wants to create at Southbourne, and to target sustainable transport measures, alongside a carefully planned new community, that minimises travel needs and provides genuine sustainable options for movement.

### Summary of representation changes to plan:

We recommend that the BLD at Southbourne be CIL-exempt to catalyse the delivery of the infrastructure associated with the scheme and avoid the village's infrastructure funding being stagnated within a larger and district-wide funding mechanism.

### Response:

The change recommended is not one that can be taken forward within a Local Plan and will need to be directed to the consultation on any future review of CIL undertaken by the council.

### Action:

No change in response to representation.

4777

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Wates Developments and Seaward Properties

**Agent:** Barton Willmore now Stantec

## Object

### Summary of representations:

In regards to Policy T1 and Transport Infrastructure, we support efforts to secure 'the timely delivery of transport infrastructure on the A27 and elsewhere on the network, needed to support new housing, employment and other development identified in this plan'.

We note that it is proposed that all new dwellings (except for West of Chichester SDL and Tangmere SDL) contribute £7,728 (plus indexation) towards the schemes recommended to be provided within the Local Plan period via developer contributions. However, we would like to ask when will this be applicable from (i.e from what date does the indexation commence).

### Summary of representation changes to plan:

N/A

### Response:

The A27 mitigation contributions set out in paragraphs 8.20 and 8.21 will only become a part of the Statutory Development Plan on the adoption of the new Local Plan. However, National Highways considers that the baseline for assessing the impact of the development identified within the Plan commenced in January 2023 (on the publication of the Local Plan Transport Study).

### Action:

No change in response to representation.

4819

Object

**Document Element:** Policy T1: Transport Infrastructure**Respondent:** Rydon Homes Limited**Agent:** DMH Stallard LLP

Support

**Summary of representations:**

In respect of contributions towards the A27, Miller and Vistry support the confirmation in the table beneath paragraph 8.20 that the contribution to be sought from the West of Chichester development towards A27 improvements will be £1,803 per dwelling

**Summary of representation changes to plan:**

N/A

**Response:**

N/A

**Action:**

No change in response to representation

4829

Support

**Document Element:** Policy T1: Transport Infrastructure**Respondent:** Miller Homes and Vistry Group**Agent:** Tetra Tech

Object

**Summary of representations:**

The timing of delivery of transport infrastructure on the A27 will be outside of the applicant's control. Emerging policy will require financial contributions (8.20/8.21) towards a wider package of A27 improvements which will discharge the applicant's obligation with regard delivery of transport infrastructure on the A27 and beyond this it would not be reasonable for the development to be held back due to the Council's failure to deliver.

**Summary of representation changes to plan:**

Reference in the policy to "including applicants" should be removed. In the alternative, point 4 should be separated out as a council only policy

**Response:**

It is acknowledged that some of the criteria 1-7 would be the responsibility of other parties and not of applicants and developers. A minor modification will be made to this effect.

**Action:**

See Council's suggested Modification CM256.

4892

Object

**Document Element:** Policy T1: Transport Infrastructure**Respondent:** Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd**Agent:** DWD Ltd

Object

**Summary of representations:**

Current proposals will do nothing to improve the traffic flow on the A27

**Summary of representation changes to plan:**

Relying on developers contributions to resolve the issues of over capacity on the A27 is totally inadequate..It will not help local traffic and through traffic will suffer further delays of a much long duration.

There needs to be substantial investment from Highways England to provide more capacity and reduce the accidents occurring on this road.

**Response:**

Both the Local Plan Transport Study (2024) and the Plan (for example in paragraph 8.5) make it clear that the council has continued to seek Government funding for the infrastructure works, but there is no certainty that this will be received. It is therefore necessary to rely on developer funding to secure the mitigation required to allow further development to proceed. Further funding (which is also likely to come in part at least from developer contributions) will also be required to address traffic capacity issues on the local road network.

**Action:**

No change in response to representation

4900

Object

**Document Element:** Policy T1: Transport Infrastructure**Respondent:** Manhood Peninsular Action Group

Object

**Summary of representations:**

Policy T1 conflicts with the wording of policy E4 of the Local Plan which allows for horticultural development and ancillary development only. This policy wording would seek to require associated development, to be located within settlement boundary areas or other established employment sites. The siting of associated functions within these locations would increase the number of vehicular journeys associated with the industry.

**Summary of representation changes to plan:**

It is therefore suggested that Policy E4 of the local plan allows for development associated with the horticultural industry to come forward within HDA designations in order to comply with the objectives of Policy T1 of the Local Plan and in the interests of minimising congestion and vehicular movements.

**Response:**

The suggested change is to Policy E4 not T1 and is responded to under Policy E4.

**Action:**

No change in response to representation.

4948

Object

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**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Kingsbridge Estates Limited & Landlink Estates Limited

**Agent:** Savills

## Policy T1: Transport Infrastructure

## Object

### Summary of representations:

Arun District Council is concerned that Chichester District Council's Regulation 19 Local Plan Policy T1 Transport Infrastructure is not effective and should account for the cross boundary mitigation contributions and remove the uncertainty over how cross boundary contributions towards schemes such as Bognor Road and Whyke road roundabouts will be pooled to other A27 mitigation solutions such that there are no adverse implications for delivering committed developments in Arun (e.g. West of Bersted, Pagham North and South).

### Summary of representation changes to plan:

- i) Chichester District Council's Regulation 19 Local Plan Policy T1 Transport Infrastructure should account for the cross boundary mitigation contributions and remove the uncertainty over how cross boundary contributions towards schemes such as Bognor Road and Whyke road roundabouts will be pooled to other A27 mitigation solutions, such that there are no adverse implications for delivering committed developments in Arun (e.g. West of Bersted, Pagham North and South).
- ii) The policy or supporting text (e.g. paragraph 8.11) should also clarify whether any additional housing achieved via the monitor and manage approach above 575 dwellings per annum will safeguard against potential adverse cross boundary implications (e.g. on the A259 at Oystercatcher and Comet corner junctions in Arun) and how necessary mitigations would be phased/triggered with additional housing.

### Response:

- i) Further discussion as to how Arun have sought to attribute the collection of receipts toward junction improvements within S106 agreements is part of the on-going dialogue between the two local authorities.

The Local Plan is proposing to use existing funding captured through schemes in Chichester District and further contributions to be secured through future schemes identified in the Proposed Submission Local Plan in order to deliver appropriate mitigation package. This will need to capture existing development within the adopted Local Plans of both Chichester and Arun, in addition to new development within the Chichester Proposed Submission Local Plan. CDC acknowledges the potential for a range of mitigation options to be delivered within the funding available, and Policy T1 has been amended to reflect this. Arun is represented at the TIMG and will therefore be party to recommendations by this group.

Arun is represented at the TIMG and will therefore be party to recommendations by this group as to how and when mitigation should be delivered.

- ii) The council has shared technical evidence with Arun DC that draws out the impact of the Chichester Pre-Submission Local Plan on the A259 Comet Corner and Oyster Catcher junctions. The analysis demonstrates that there is negligible impact on these junctions as a result of the further growth within the Chichester plan area, as a result of the Proposed Submission Plan. As there is no significant impact identified, there are no proposals that further contributions or improvements are required to those junctions on the basis of the level of development proposed in the southern plan area.

### Action:

No change in response to representation.

4949

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Arun District Council

## Object

### Summary of representations:

Hunston Parish Council is concerned as to whether the traffic management proposals are workable.

### Summary of representation changes to plan:

N/A

### Response:

As set out in paragraph 8.13 of the Plan, a Traffic and Infrastructure Management Group will be established to oversee the delivery of the monitor and manage approach.

### Action:

No change in response to representation.

5004

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Hunston Parish Council

## Object

### Summary of representations:

i) The policy objectives to ensure new development is well located and designed to avoid or minimise the need for travel and encourage the use of sustainable modes of travel as an alternative to the private car are supported. However, the proposed contribution of £7.7k per dwelling towards A27 highway improvements applies to new housing across the district even in the NE part of the district where impacts from development on the A27 will be less than developments in the south of the district.

ii) In any event it is unclear how the contributions are justified when the responsibility for trunk road infrastructure improvements rests with National Highways.

The proposed contribution in T1 is therefore questioned and in our view, flawed. The level of contribution set out in the policy and the principle of a contribution will therefore require further testing at the forthcoming Examination.

### Summary of representation changes to plan:

The proposed per dwelling contribution to improvements to the A27 infrastructure has not been properly justified when the responsibility for trunk road infrastructure rests with National Highways. The policy requires further testing at the forthcoming Examination.

### Response:

i) The Proposed Submission Plan does clarify, based on the evidence that only the development coming forward within the south of the Plan area will have significant impacts on the A27. However, it is accepted that this could be clarified within paragraph 8.20 which sets out the proposed contribution.

ii) Both the Local Plan Transport Study (2024) and the Plan (for example in paragraph 8.5) make it clear that the council has continued to seek Government funding for the infrastructure works, but there is no certainty that this will be received. It is therefore necessary to rely on developer funding to secure the mitigation required to allow further development to proceed.

### Action:

See Council's suggested Modification CM258.

5022

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Domusea

**Agent:** Smith Simmons Partners

Object

**Summary of representations:**

WSCC previously requested proposed highways mitigation schemes within Chichester City be replaced by sustainable transport improvements to comply with West Sussex Transport Plan 2022-2036. Limited modification made to proposed schemes. Suggestion at paragraph 7.3.2 (transport study) that costs for schemes be reallocated to sustainable transport improvements which are not specified - helps to explain how sustainable transport infrastructure schemes/measures can be partially funded. Rare schemes will be fully funded using developer contributions. Funding not only issue to be overcome to secure delivery of schemes and measures. Still gaps in information, consider unlikely schemes will be fully funded using developer contributions, delivery of schemes will be partially dependent on securing funding from central Government or other sources. IDP fails to identify scheme-specific requirements for additional funding/overall scale of additional funding required. Level of information on sustainable transport package insufficient to demonstrate deliverability of credible and coordinated sustainable transport package of improved infrastructure and services. Insufficient evidence to be compliant with Paragraphs 11 and 106 of NPPF.

**Summary of representation changes to plan:**

i) Request further technical work is undertaken to develop schemes and measures in sustainable transport package prior to the examination. Focus on:

1. St. Paul's & Parklands cycle routes
2. Improving existing public transport services towards Madgwick Lane
3. Provision of improved bus services for village serving development areas of Southbourne Parish
4. Improving cycling connectivity to link built-out areas of Shopwhyke Lakes with Tangmere and Oving etc

ii) As not all severely impacted A27 junctions have a reasonable prospect of being physically improved in Plan period, more investigation into potential public transport enhancements also required, particularly to strengthen routes that cross bypass. May require further amendments to the IDP.

iii) Work should aim to identify options for sustainable transport schemes that can be a priority for investment, provide information to enable safeguarding of routes (e.g. cycle routes) from development and provide a basis for applications for third party funding to support their delivery. The relative priority of such measures would need to be considered under the monitor and manage approach by the proposed Traffic and Infrastructure Management Group for implementation in addition to the proposed improvement at the A27/A259 Fishbourne junction.

iv) To address this issue and support delivery of the sustainable transport package, the County Council also recommends the following minor amendments to Policy T1: Transport Infrastructure:

At bullet point .7 change "other small-scale junction improvements" to read "other sustainable transport and safety focused improvements, including at junctions" and change "These will increase road capacity, reduce traffic congestion, improve safety and air quality, and improve access to Chichester city from surrounding areas" to "These will increase road capacity on strategic roads, and on both strategic and local roads reduce traffic congestion, improve safety and air quality, and improve access to Chichester city from surrounding areas notably by encouraging and prioritising sustainable modes."

**Response:**

i) The council is continuing to work on the identification of specific measures, improvements and initiatives as part of the monitor and manage approach.

ii) The work on the monitor and manage approach will consider the particular issue of routes crossing the Chichester Bypass. Where works are identified, they will be included within IDP and other relevant evidence.

iii) Work on the monitor and manage approach (including through the TIMG) will consider sustainable transport measures which can be identified for priority investment, including from developer funding and including the need to safeguard land/routes to facilitate these works / initiatives.

iv) The recommended minor change to criterion 7 of Policy T1 is considered helpful and will be added to the Council's suggested modifications schedule.

**Action:**

i) Specific schemes cited considered for inclusion in IDP and/or M&M approach. Prioritisation and further development of these schemes will be realised through the TIMG

ii) CDC to work with WSCC through the TIMG to consider routes crossing Bypass, especially in areas where junctions will not be upgraded during the Plan period.

iii) CDC to work with WSCC through the TIMG to consider priority sustainable transport measures including sources of funding and any safeguarding requirements (e.g. through IDP and allocation policies)

iv) Suggested policy changes amalgamated into other suggested modifications by National Highways



**5086****Object****Document Element:** Policy T1: Transport Infrastructure**Respondent:** West Sussex County Council**Object****Summary of representations:**

It is a positive step to see PRoW acknowledged as valued by communities and as part of the area's green infrastructure. Whilst Policy P14 (Green Infrastructure) states that development proposals should not be detrimental to the network of public rights of way and bridleways (please note bridleways are Public Rights of Way), a more proactively positive approach that seeks enhancements to the network as mitigation, would be welcomed. The improvement, upgrading of existing PRoW and creation of new PRoW where possible, to allow for a greater number of users to access the network would be beneficial. This is somewhat addressed in Policy T1 which refers only to routes identified in the Local Transport Plan, Local Cycling and Walking Infrastructure Plan (LCWIP) and the Infrastructure Delivery Plan. Opportunities to these, should not be limited if they arise elsewhere.

**Summary of representation changes to plan:**

N/A

**Response:**

The council agrees that opportunities to enhance existing or to create new PRoW links should not only be limited to these identified within the Local Transport Plan and Local Cycling and Walking Infrastructure Plan. The Infrastructure Delivery Plan references the need to upgrade and enhance a number of routes, as suggested by WSCC separately. Relevant active travel measures will also be considered by the TIMG.

**Action:**

No change in response to representation.

**5097****Object****Document Element:** Policy T1: Transport Infrastructure**Respondent:** West Sussex County Council

## Object

### Summary of representations:

i) The policy objectives to ensure new development is well located and designed to avoid or minimise the need for travel and encourage the use of sustainable modes of travel as an alternative to the private car are supported. However, contributing to a multi modal shift away from the use of the private car will take traffic off the A27 and yet this hasn't been recognised in the policy. We therefore object to the funding arrangements for A27 improvements based on the proposed per dwelling contribution. In any event it is unclear how the contributions are justified anyway when the responsibility for trunk road infrastructure rests with National Highways.

ii) As noted in the viability assessment forming part of the local plan evidence base, the cumulative impact of the contribution alongside other policy requirements concerning water neutrality, nitrate neutrality, biodiversity net gain, solent recreation mitigation and CIL will impact on the overall viability of a development and could result in the loss of affordable housing. This is another reason why the proposed contribution in T1 is questioned and in our view, flawed.

### Summary of representation changes to plan:

The proposed per dwelling contribution to improvements to the A27 infrastructure has not been properly justified when the responsibility for trunk road infrastructure rests with National Highways. The policy should be deleted.

### Response:

i) The Local Plan Transport Study (2024) and Transport Background Paper highlight that in the base year (2014) and baseline scenario without the emerging Local Plan development, a number of junctions already experience capacity issues. The planned development within the new Local Plan will exacerbate this problem and so it is essential both that modal shift is supported to reduce demand on the A27 and also that targeted infrastructure improvements are delivered to key A27 junctions. Policy T1 has been developed to mitigate the impact of planned development on the Strategic Road Network, improve highway safety and air quality and promote more sustainable travel patterns.

ii) The council's viability evidence demonstrates that an A27 mitigation contribution of the average level set out in Policy T1 can be supported by the large majority development typologies that were tested, whilst also delivering full policy compliant levels of affordable housing and other essential infrastructure contributions.

### Action:

No change in response to representation.

5110

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Seaward Properties Ltd

**Agent:** Smith Simmons Partners

## Object

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**Summary of representations:**

I like Policy T1 - I wish that I could believe it will really happen!

Inadequate public transport to support aim to reduce reliance on private car; insufficient funding/inadequate infrastructure to support active travel, although cycle parking provision is good; park and ride scheme suggested; concern expressed re; cyclists safety in relation to road infrastructure and speed of cars; desire for 20 mph limit in the city, public transport hub at railway station.

**Summary of representation changes to plan:**

Park and Ride; 20 mph limit in city centre; public transport hub at railway station

**Response:**

The strategy set out in Policy T1 involves securing investment to be used to fund local sustainable travel options. This will include improvements to bus and train networks and improved pedestrian and cycle networks

**Action:**

No change in response to representation

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**5220****Object**

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**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** John Newman

## Object

### Summary of representations:

It is sufficient for us to say that if it was recognised that mitigating measures were required to cater for the huge increase in developments then it follows that the absence of such mitigation should halt completely such development. That is just pure logic.

Everyone who lives, works, uses or visits the WMP knows that having left behind the A27 they have not left behind the traffic problems. The obverse has become the "new norm" with the most minor hold up, such as refuse lorry, slow moving device or minor road works causing substantial delays and queues sometimes up to eighty vehicles long

The system whereby WSCC highways review the impact of planning applications is dysfunctional.

This is evidenced by WSCC highways department being unable to provide accurate feedback to the LPA as to the ACCUMULATIVE impact of very large developments. The modelling simply does not allow it and there is no scope for actual local experience or common sense. In not one case of over twenty applications for ten or more houses have they even flagged a cautionary note about this accumulative impact.

### Summary of representation changes to plan:

No new developments of ten or more dwellings shall be commenced until suitable mitigating road improvements to the A27 are in place

### Response:

Policy T1 sets out a strategy that will support the delivery of infrastructure improvements which will allow the proposed level of development to be delivered without giving rise to unacceptable levels of highway safety concerns on the Strategic Road Network.

As all new development will contribute to the capacity and highway safety issues on the A27 it would not be appropriate to allow smaller schemes and not larger ones in the period before infrastructure is delivered

### Action:

No change in response to representation

5257

Object

Document Element: Policy T1: Transport Infrastructure

Respondent: Manhope

## Object

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### Summary of representations:

Reword point 5:

Phasing the delivery of new transport infrastructure agreed through the Transport Assessment process to align with development phases with triggers identified based on the outcomes of monitoring travel demand. It may also be necessary to proactively phase development to take into account the monitoring and effectiveness of travel plans to encourage sustainable travel behaviour.

### Summary of representation changes to plan:

Reword point 5:

Phasing the delivery of new transport infrastructure agreed through the Transport Assessment process to align with development phases with triggers identified based on the outcomes of monitoring travel demand. It may also be necessary to proactively phase development to take into account the monitoring and effectiveness of travel plans to encourage sustainable travel behaviour.

### Response:

Criterion 5 of Policy T1 reflects the reality that the phasing of new development must take account of the timescales for funding and delivering the strategic infrastructure on the A27.

### Action:

No change in response to representation.

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**5301****Object**

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**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd

**Agent:** DWD Ltd

## Object

### Summary of representations:

Point 7 should remove reference to A27 improvements and be reworded to reflect potential for mitigation through active travel mode improvements. Suggested rewording as follows:

7. Delivering a coordinated package of infrastructure improvements as identified through the monitor and manage process. These will increase opportunities for active travel mode use, reduce traffic congestion, improve safety and air quality, and improve access to Chichester city by all modes from surrounding areas.

### Summary of representation changes to plan:

Point 7 should remove reference to A27 improvements and be reworded to reflect potential for mitigation through active travel mode improvements. Suggested rewording as follows:

7. Delivering a coordinated package of infrastructure improvements as identified through the monitor and manage process. These will increase opportunities for active travel mode use, reduce traffic congestion, improve safety and air quality, and improve access to Chichester city by all modes from surrounding areas.

### Response:

The strategy set out in Policy T1 (and highlighted in criterion 7) requires both the delivery of strategic infrastructure improvements on the A27 Chichester Bypass as well as the smaller-scale infrastructure and sustainable travel initiatives that will be required by the monitor and manage approach.

### Action:

No change in response to representation.

5303

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd

**Agent:** DWD Ltd

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Issues to resolve]

i) A27 improvements are necessary to increase capacity to accommodate current traffic levels, committed development and development allocated in the current local plan. The proposed Local Plan allocations will further exacerbate current issues.

ii) Consent for the A27 Chichester bypass improvements project cannot be assumed. The potential use of Compulsory Purchase powers to deliver the scheme should be addressed.

iii) National Highways will continue working with CDC and WSCC to progress interim mitigation measures and alternative transport measures while a long-term strategic solution is considered. This must be in combination with a robust monitor and manage policy/strategy.

iv) The monitor and manage approach must address risk of unacceptable road safety impacts. At present, we do not consider the current strategy to be robust and we seek further information and detail especially on who, when and when

monitoring and management will be undertaken.

v) There is insufficient evidence that funding, partners, and relevant processes are in place to enable the delivery of infrastructure. Nor is there a realistic prospect that longer term investment can be secured within the timescales required.

vi) We seek clarity on the role and remit of the TIMG.

vii) The Plan does not appropriately acknowledge that all housing and employment development generates demand which may create additional SRN impacts; it unclear how developments will mitigate their own impacts.

viii) Sustainable transport initiatives to supplement highway improvements are not evidenced in the Plan and so assumptions and assessment cannot be made.

ix) National Highways seeks:

a. evidence that Council and WSCC have:

- an understanding of current and future pressures and constraints in the transport system;
- identified when and where there is spare capacity;
- strategies to redistribute demand to where there is spare capacity

b. the application of robust strategies, policies, and initiatives to;

- manage travel demand more enduringly;
- mitigate the impact of additional traffic generation;
- ease recurring congestion;
- better deal with planned or unplanned special events and tourism seasons;
- support delivery of normal operations.

c. to understand;

- what initiatives would be most appropriate for proposed developments;
- when and where initiatives would be delivered;
- how they would be funded;
- who would ultimately be responsible for the delivery of initiatives.

#### **Summary of representation changes to plan:**

Recommends that a Travel Demand Management approach should be evident to:

- remode journeys using alternative or different ways to travel (re-mode);
- retime journeys to avoid peak or seasonal demands (re-time);
- reroute journeys to less congested roads (reroute);
- reduce the need to travel and unnecessary [journeys] (reduce).

**Response:**

- i) Both the Transport Study (2024) and the Proposed Submission Plan acknowledge that development proposed in the Plan plays a role in exacerbating the issues on the A27. Evidence has been shared with National Highways (NH) quantifying this role.
- ii) The council acknowledges that where necessary CPO powers may need to be used to deliver the necessary improvement works. The council has a strong track record of using CPO powers where all other land assembly options have been exhausted.
- iii) The council will continue to work with NH and WSCC and others where appropriate to progress the appropriate mitigation. Policy T1 provides a clear policy basis for the monitor and manage approach, with the detailed strategy and actions being developed through joint working with the council's delivery partners.
- iv) The monitor and manage strategy will be focused on addressing the risks outlined by seeking to reduce demand on the A27 Bypass. NH will be aware that the detailed strategy and proposed actions are being developed through the on-going engagement between the council and its delivery partners, including through the TIMG.
- v) The council is not the highway authority but is the Local Planning Authority and has accepted responsibility for securing developer funding that will be required in the continued absence of government funding. The council continues to work to secure government funding although it is acknowledged that this remains uncertain.
- vi) The role and remit of the TIMG will be developed and agreed through on-going work with NH and WSCC.
- vii) The Proposed Submission Plan acknowledges the role that all new planned development may have on the A27 Chichester Bypass in Strategic Objective 7 and in paragraphs 5.2 and 8.4. All relevant site allocation policies include requirements for specific transport mitigation to address local impacts and all new residential development would also be expected to pay the appropriate contribution towards strategic A27 mitigation through Policy T1.
- viii) Further details of the sustainable transport infrastructure improvements can be found in the Infrastructure Development Plan. However, the detailed strategy and proposed actions for the monitor and manage approach are still being developed through the on-going engagement between the council and its delivery partners.
- ix) Many of the points referred to are the responsibility of others, including WSCC. However, the council will continue to work with NH, WSCC and others to develop the evidence and strategies required to implement the monitor and manage approach and the securing of funding for this and the interim A27 mitigation works.

**Action:**

Continued engagement with National Highways is required, to cover the matters raised.

5309

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** National Highways



## Object

### Summary of representations:

- i) The phasing of delivery of new development to align with provision of new transport infrastructure such as improvements to the A27 and elsewhere on the highway network, will be key to managing impacts on the highway. This is yet another impediment to the delivery of a strategic allocations and larger scale development which would, by their very nature, generate a higher highway impact on the transport network than carefully planned smaller developments which could satisfy a much more localised need and be cause less impact on the strategic road network.
- ii) The lack of soundness to the approach of significant reliance on strategic sites, due to the current lack of capacity of the A27, is evident in the text that accompanies the policy which states that opportunities to secure funding to implement this package of improvements will be maximised by working proactively with Government agencies, other public sector organisations and private investors. Developer contributions from new development will also be sought. It is clear that smaller scale developments which would have a significantly lesser impact on the highway network could deliver housing quicker and with fewer constraints to implementation. It is for these reasons that smaller sites should be allocated, particularly in the Manhood Peninsula, for development.

### Summary of representation changes to plan:

N/A

### Response:

- i) Policy T1 sets out a strategy that will support the delivery of infrastructure improvements which will allow the proposed level of development to be delivered without giving rise to unacceptable levels of highway safety concerns on the Strategic Road Network.  
There is no intention within the Plan to unnecessarily delay any development coming forward. However, the Monitor and Manage approach set out in Policy T1 will seek to ensure that the impacts of all development coming forward are adequately addressed and that may require some phasing decisions for some schemes.
- ii) The Local Plan does make provision for a limited amount of new housing development on the Manhood Peninsula. Consideration has been given to the making of strategic allocations and parish housing requirements on the Manhood Peninsula. However, as the Local Plan has progressed this approach has been revised to take account of the large amount of development that has, since the Preferred Approach consultation, received planning permission and updated evidence in respect of flood risk.

### Action:

No change in response to representation.

5375

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Deerhyde Limited

**Agent:** Vail Williams LLP

## Object

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### Summary of representations:

For all the reasons already cited, this Policy is not only unsound it should have been sorted before the Local Plan was put out for consultation.

The locations and numbers of new homes proposed will not reduce the need to travel by car. In fact, the opposite. The A27 improvements must be in place before all these new homes. Public transport requires increased capacity, frequency, improved infrastructure and obviously substantial investment. How and when will Southern and Stagecoach deliver this? The West Sussex Bus Plan does not, we believe, deal with this issue. As a community, we should not be reliant upon developer contributions to make our everyday lives work. Developers build houses. They have no regard for anything else other than the profit they achieve once homes have been built

### Summary of representation changes to plan:

N/A

### Response:

Policy T1 sets out a strategy that will support the delivery of infrastructure improvements which will allow the proposed level of development to be delivered without giving rise to unacceptable levels of highway safety concerns on the Strategic Road Network.

Both the Local Plan Transport Study (2024) and the Plan (for example in paragraph 8.5) make it clear that the council has continued to seek Government funding for the infrastructure works, but there is no certainty that this will be received. It is therefore necessary to rely on developer funding to secure the mitigation required to allow further development to proceed.

### Action:

No change in response to representation.

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**5476****Object**

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

Not clear how developments are to mitigate impacts of travel by car, albeit assumed that encouragement for car sharing (through travel plans) and electric vehicles (through the provision of charging points) are two means. Agree there is need for new transport infrastructure to come forward alongside new development but consider phasing of development of sites that serve to minimise impacts upon the A27 (notably Southern Gateway) need not be impaired owing to City Centre location and proximity to travel interchanges. Concur it is beholden upon strategic development to promote delivery of sustainable forms of travel and deliver new transport infrastructure, must be proportionate to potential effects of development.

### Summary of representation changes to plan:

N/A

### Response:

Policy T1 sets out a strategy based on an expectation that all new development will support and embody the four objectives set out in the policy text. These focus on reducing the need to travel by car, improving access to sustainable modes of travel, managing travel demand and mitigating the impacts of car use. Although development located within Chichester city will more easily be able to meet some of these objectives, that does not mean it will not contribute to the adverse impacts on the A27 Chichester Bypass. There is no intention within the Plan to delay any developments within the city from coming forward as soon as practicable.

### Action:

No change in response to representation.

5502

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

The policy is unreasonable in that it does not address the concerns raising in the WSCC Area Transport Strategy (ATS). The ATS 7.50 recognises 'rat running on residential and rural routes to avoid congestion'. The development spine road will become another rat run and impact the safety of Tangmere residents. The ATS recognises that WSCC roads are not capable of supporting growth

### Summary of representation changes to plan:

Modification of the plan to reduce or cancel the development to avoid further congestion on the A27 and divergence of traffic through residential areas

### Response:

Given that the strategy set out in Policy T1 supports the level of development that has been proposed in the Local Plan, there is no justification for the removal of Policy A14 (Tangmere SDA) or the reduction in the number of homes proposed

### Action:

No change in response to representation

5580

Object

**Document Element:** Policy T1: Transport Infrastructure**Respondent:** Mr Oliver Gale**Object****Summary of representations:**

- i) Not engaged in discussions on scope of transport studies.
- ii) Insufficient evidence to substantiate conclusion in transport study of negligible impact on A27 Havant Bypass roundabout and A3(M)/A27 junction.
- iii) No mention of cross-boundary impact on A259/other Hampshire routes.
- iv) Insufficient evidence of scale of impact on local highway network in Hampshire.
- v) Studies don't state how highway impact of proposed Southbourne settlement hub was assessed, whether this included assessment of A259 corridor into Hampshire.
- vi) No mitigation proposed on Hampshire highway network.
- vii) Chem route ends at Hampshire boundary, fails to consider continuation of cycle route along A259 into Hampshire, connecting with cycle routes in Havant LCWIP, providing key cross-boundary sustainable transport route.

**Summary of representation changes to plan:**

The County Council would support a dialogue with Chichester District to discuss the cross-boundary transport issues specifically those associated with the A259 route within Hampshire.

Continuing the Chem route into Hampshire would connect with the cycle routes in the Havant LCWIP and provide a key cross-boundary sustainable transport route and links to key destinations in Hampshire.

**Response:**

The impact of the Chichester Local Plan and the Southbourne BLD on the A259 and relevant junctions in Hampshire is set out in a Technical Note (January 2024) prepared by the council's highway consultants Stantec.

The Technical Note considers the impact of the Local Plan, both with and without mitigation, on the A259 and the A259/North Street junction in Emsworth and A27 Warblington Interchange. Using the Chichester Area Transport Model (CATM) the analysis indicates that both junctions operate within capacity under all scenarios.

The Technical Note also addresses comments subsequently raised by Hampshire County Council that junction capacity assessments for a proposed development in Southbourne had identified that sections of the Warblington Interchange were operating over capacity. The Technical Note makes clear that there is a difference between the Local Plan modelling that provides a strategic view of the cumulative impacts of development within the study area, particularly Chichester district, and the modelling undertaken for a standalone development using specific junction modelling software. Developers would in any case be required to undertake their own Transport Assessment to identify local impacts and measures to mitigate them appropriately prior to planning consent.

Notwithstanding this, the Technical Note provides some comparative analysis and identifies that there is the potential for the Local Plan to exacerbate the existing capacity issues at the Warblington Interchange and for substantial flows to be added to the A259 Emsworth roundabout (if mitigation provided by the Fishbourne roundabout improvements is not implemented). However, as required by Policy T2 (Transport and Development) development at Southbourne will need to be supported by an appropriate Transport Assessment to look at the impacts on these junctions in more detail. There will also be consideration through the Monitor and Manage process to consider any potential mitigation in the future.

The Havant LCWIP identifies a corridor which could extend the ChEm route into and beyond Emsworth (LCWIP route 270). As recognised in the Chichester IDP and Statement of Common Ground with Havant Borough Council there may be potential to deliver this through the Havant Local Plan.

CDC are preparing a Statement of Common Ground with HCC that covers these matters.

**Action:**

- i) HCC were consulted at regulation 18 when the scope of transport work would have been pertinent, but did not engage.
- ii) No commentary included on impacts further west e.g. A27 Havant Bypass and A3(M)/A27 – this is SRN and has never come up in scope in discussions with NH
- iii & iv) The updates have focused on scale of impacts on A259 west of Emsworth and Warblington Interchange.
- v) Specific detail added to note re: Southbourne
- vi) text added to reflect consideration as part of M&M (para. 5.7.20)

**5588****Object****Document Element:** Policy T1: Transport Infrastructure**Respondent:** Hampshire County Council**Object****Summary of representations:**

Stagecoach does not see that a suitable proportionate and up-to-date basis exists to properly and appropriately address the transport issues in the plan area.

The 2023 Transport Study does not perform this role adequately but, contrary to the explanatory memorandum, is a scheme intended only to facilitate car-borne movements through some of the key junctions. There is no evidence that an holistic integrated and strategic approach to transport mitigations has been prepared. Certainly Stagecoach has not been involved in any of the discussion about appropriate transport measures in support of the plan, including the Transport Study 2023, contrary to the expectations set out in NPPF at paragraph 16 and 106.

Notwithstanding out fundamental concerns about the transport evidence case and mitigations strategy, Policy T1 reflects a weak and ineffective approach, that seeks to try and define a strategy post-adoption.

Contrary even to the explanatory memorandum for the policy, which seeks to maximise the contribution of sustainable modes, the policy is phased in such a way that it gives basis for previous “predict and provide” solutions to facilitate and support current levels of car dependency – already shown to be undeliverable and unaffordable – will nevertheless be the first rather than the last resort. There is no commitment to seek to maximise the contribution made by sustainable modes to meeting mobility needs. Nor is there any recognition that current chronic congestion and lack of network resilience jeopardises the ongoing attractiveness and long- term sustainability of the current public transport offer.

**Summary of representation changes to plan:**

To be effective and create alignment with national policy, and also provide for an up-to-date transport evidence base and strategy to be adduced, Policy T1 should be modified to read:

“Integrated transport measures will be developed to mitigate the impact of planned development on the highways network, improve highway safety and air quality, promote more sustainable travel patterns through providing in the first instance, new and improved infrastructure and services that will be credible effective in maximising the use of sustainable modes of travel, such as public transport, cycling and walking.

To achieve this, the council will work with National Highways, West Sussex County Council, other transport and service providers (including through the Traffic and Infrastructure Management Group) and developers to provide a better integrated transport network and to improve accessibility to key services and facilities...

All parties, including applicants, are expected to support these objectives by:

1. Ensuring that new development is well located and designed to avoid or minimise the need for travel, maximises the use of sustainable modes of travel as a credible alternative to the private car and directly provides or contributes towards new or improved transport infrastructure;
2. Working with relevant transport infrastructure and service providers to improve accessibility to key services and facilities with primary emphasis on sustainable modes, and to ensure that new facilities are easily accessible by sustainable modes of travel;
3. Targeting investment to provide local travel options that represent a clearly credible alternative to car use, focusing on the delivery of improved integrated bus and train services, and improved pedestrian and cycling networks, including the public rights of way network, based on the routes and projects identified in the Local Transport Plan, West Sussex Bus Service Improvement Plan, Local Cycling and Walking Infrastructure Plan (LCWIP) and the Infrastructure Delivery Plan;
4. Planning to achieve the timely delivery of transport infrastructure on and approaching the A27 and elsewhere on the network, needed to support new housing, employment and other development identified in this plan;
5. Phasing the delivery of new development to align with and where possible facilitate the provision of new and improved transport infrastructure and services and the outcomes of monitoring travel demand on the network, including that arising from areas immediately adjoining the plan area. Where necessary to achieve this alignment proactively phase development will be phased to take into account the monitoring of travel demands on the network and to ensure that measures are implemented to support the highest possible level of sustainable travel behaviour.;
6. Using robust methodologies to assess travel demand and minimise the need for new or improved transport infrastructure as part of the monitor and manage process.
7. Delivering a coordinated package of infrastructure improvements at and approaching junctions on the A27 Chichester Bypass along with other interventions within the city and elsewhere, as identified through the monitor and manage process. These will reduce traffic congestion, improve safety and air quality, and improve access to Chichester city from surrounding areas, first by maximising the contribution of sustainable modes to meeting mobility demands, then, and only as evidenced by robust modelling and option testing, providing increased highway capacity for general traffic.

**Response:**

The Local Plan Review Transport Study (2024) and Transport Background Paper highlights that in the base year (2014) and baseline scenario without the emerging Local Plan development, a number of junctions already experience capacity issues. The planned development within the new Local Plan will exacerbate this problem and so it is essential both that modal shift is supported to reduce demand on the A27 and also that targeted infrastructure improvements are delivered to key A27 junctions. Policy T1 has been developed to mitigate the impact of planned development on the Strategic Road Network, improve highway safety and air quality and promote more sustainable travel patterns. Improvements to Fishbourne and Bognor Junctions have the potential to increase bus prioritisation and reliability. Nonetheless, further modifications have removed the prioritisation and such improvements will now be considered through the TIMG as part of the monitor and manage process.

**Action:**

No change specifically in response to representation, but proposed modifications align to some of the comments made.

**5590****Object**

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Stagecoach South

**Support****Summary of representations:**

Technical officers have reviewed the document and have no comments to make. We are supportive of the general strategy set out within the proposed transport policies, which prioritises sustainable modes of transport.

**Summary of representation changes to plan:**

N/A

**Response:**

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**Action:**

No change in response to representation.

**5646****Support**

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Surrey County Council

# Object

**Summary of representations:**

I consider this policy not to be sound. The A27, its junctions and surrounding/connecting roads are already congested and will beom more so with the proposed increase in the population and hence car owners/users.

The plan gives not defined or confirmed road infrastructure nor funding /investment to enable action to reduce the detrimental impact of the proposed massive increase in populus in Tangmere and its surrounding area.

To monitor and manage is not appropriate to deal with the predicted issue of road congestion.

Air pollution and noise pollution will increase.

Tangmere is the largest planned high order settlement hub and has no close proximity railway station, unlike proposed developments at Southbourne, Nutbourne and Fishbourne.

**Summary of representation changes to plan:**

i) To make this policy more sound, the 'monitor and manage' strategy needs to be removed and become 'predict and provide' the emphasis being on the 'provide' being secured, which would assist in easing the predicted road congestion issue.

ii) A railway station needs to be developed and built for the Tangmere area to improve easy access to rail travel for the increased population and thus encourage alternative travel usage.

iii) To reduce the massive number of proposed new housing units to be built in and around the Tangmere area where there are already severe known traffic congestion issues particularly at junctions and roundabouts that feed in and out and around Chichester and its surrounds.

**Response:**

i) Policy T1 sets out a strategy that will support the delivery of infrastructure improvements which will allow the proposed level of development to be delivered without giving rise to unacceptable levels of highway safety concerns on the Strategic Road Network.

ii) Policy A14 of the emerging Local Plan requires development of the Tangmere SDA to make a range of sustainable transport improvements, including the need to explore opportunities for improving transport links with the 'Five Villages' area and Barnham rail station in Arun District.

iii) Given that the strategy set out in Policy T1 supports the level of development that has been proposed in the Local Plan, there is no justification for the removal of Policy A14 (Tangmere SDA) or the reduction in the number of homes proposed.

**Action:**

No change in response to representation.

**5653****Object**

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Ms Lindsay Davey



## Object

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**Summary of representations:**

Use of term 'reducing' in first bullet point implies that this is from a baseline. Where a development has been designed in a way that achieves this objective, the promotion of sustainable modes of transport is inherent as an outcome.

**Summary of representation changes to plan:**

- i) Suggest word 'minimise' is used instead of 'reducing' in first bullet point to ensure policy objective is effective on a site-by-site basis.
- ii) In criterion 3, consider using 'and/or' when referring to public transport options, as not all development will be required to deliver improved rail infrastructure.

**Response:**

- i) The suggested change is appropriate and would improve the sense of the first objective.
- ii) The suggested change is appropriate and would improve the sense of the first objective.

**Action:**

See Council's suggested Modifications CM255 and CM257.

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**5671****Object**

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**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Countryside Properties

**Agent:** Turley

# Object

## Summary of representations:

- i) Planned mitigation schemes at Fishbourne and Bognor roundabouts are to be funded exclusively by residential development despite allocation at 'Land South of Bognor Road'. Consequently, contributions being sought for residential development would fail CIL Regulation 122 tests for not being "fairly and reasonably related in scale and kind to the development".
- ii) Transport Study confirms planned mitigation could accommodate further 2,970 dwellings in South which would reduce per dwelling contribution. At best, cost of mitigation could be reduced in the interests of viability and affordable housing delivery. At worst, cost of mitigation would fail CIL Regulation 122 tests for not being "fairly and reasonably related in scale and kind to the development".
- iii) Strategy focusses on mitigating two junctions on A27 as priorities but applies generic cost to all sites within South. Clearly, impact on junctions will vary for sites within South in terms of location (access to alternative transport) and existing context (greenfield or brownfield) - generic approach to contributions not "fairly and reasonably related in scale and kind to the development". See further Technical Note attached.

## Summary of representation changes to plan:

N/A

## Response:

- i) Policy T1 proposes applying contributions only to residential development to avoid 'double counting' impacts on the Strategic Road Network which would result from seeking contributions from employment, leisure or other types of development. However, in relation to 'Land South of Bognor Road', Policy A20 includes provisions requiring that the specific impacts of site allocation on the transport networks and infrastructure are addressed.
- ii) as part of the Transport Study a 700 dwellings per annum (DPA) Sensitivity Test was undertaken. This test was undertaken on the basis of the full mitigation package, including Whyke and Stockbridge junctions. This concluded that whilst demands can generally be accommodated by the mitigation proposed for the 535 dpa 'core test', capacity issues get worse with the 700 dpa demands at the Portfield roundabout and Oving junction.
- iii) Approach to Policy T1 has been amended to remove prioritisation of particular junctions (these remain for consideration as part of the TIMG) and change in approach to collection of developer contributions.

## Action:

See Council's suggested Modification CM253.

5738

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Metis Homes

**Agent:** Nova Planning

## Object

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### Summary of representations:

Supports the objectives but suggests changes to remove the requirement for development to be phased as delivery of works to the A27 and elsewhere are not within the developers control.

### Summary of representation changes to plan:

Delete the first sentence of bullet 5 which requires phasing in line with transport infrastructure.

### Response:

An important objective of the Local Plan is to ensure that development coming forward is supported by essential infrastructure. However, there is no intention to unnecessarily delay development.

### Action:

No change in response to representation.

5763

Object

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**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Suez (Sita UK)

# Object

## Summary of representations:

Object on grounds that proposed “monitor and manage” approach as opposed to “plan, monitor and manage” approach inherently acknowledges that Council is failing to plan to address infrastructure or housing needs; approach not consistent with national policy and will actively constrain delivery of infrastructure and housing needed; modelling data provided in Chichester Capacity Study does not provide justification for how figure of 535 dpa was arrived at, SATURN modelling shows that 700 dpa could be accommodated; requested financial contributions are for improvements on the SRN which is the responsibility of National Highways, funding received from the Department of Transport; method by which financial contributions have been calculated is flawed.

## Summary of representation changes to plan:

Adopt a “plan, monitor and manage” approach which plans to meet housing needs in full through committing to delivery of infrastructure improvements and if necessary, phasing housing requirement towards end of plan period with progress towards infrastructure funding being monitored and delivery of sites being managed such that they will only be brought forward providing appropriate infrastructure improvements to A27 as is necessary to support each development, is provided.

ii) Chichester Capacity Study needs to be updated and use latest traffic growth modelling (Ver 8.0 SATURN modelling) to establish capacity of roundabout junction improvements and extent of funding required to carry out necessary improvements.

iii) Take into account other types of use for financial contributions in addition to residential.

## Response:

The Local Plan Transport Studies (2023 & 2024) demonstrate that taking the Local Plan forward on the basis of meeting the full housing need would require A27 junction improvements at Whyke and Stockbridge junctions (including the link road) in addition to Fishbourne and Bognor. The estimated costs for this full mitigation package would be more than £90 million. In the absence of certainty of government funding, this level of infrastructure is not deliverable and so Policy T1 takes a ‘monitor and manage approach’.

ii) The Local Plan Transport Study (Jan 2023) explains that the Chichester Area Transport Model (CATM) is based on SATURN version 11.4.07H which has been updated by Stantec to investigate travel patterns in and around the Chichester area. This included taking account of changes in response to the policies and strategy of the emerging Chichester Local Plan. Further work has since been undertaken (Local Plan Transport Study 2024) to further inform the reliability of the current model.

Undertaking new modelling work at this stage would further delay the local plan which has already been significantly delayed, and would lead to further pressures on local infrastructure.

iii) Policy T1 proposes applying contributions only to residential development to avoid ‘double counting’ impacts on the Strategic Road Network which would result from seeking contributions from employment, leisure or other types of development.

## Action:

No change in response to representation.

5780

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Beechcroft Developments Limited

**Agent:** Genesis Town Planning Ltd

## Support

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### Summary of representations:

Natural England welcomes the extensive references across this policy (and policies T2 and T3) to reductions in car use, increased provision of sustainable transport choices and increased opportunities for active travel.

### Summary of representation changes to plan:

N/A

### Response:

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### Action:

No change in response to representation.

5862

Support

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**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Natural England

# Object

## Summary of representations:

Do not believe that a sustainable and integrated transport system will be achieved through improvements.  
Change wording to criterion 3, 4, 5 & 7.

## Summary of representation changes to plan:

i) 3. need to change the wording, the mindset needs to move away from "alternative to the car"

Better wording "Targeting investment to provide local access with a focus on active travel as the obvious way for people to access their needs walking and cycle routes and networks complying with LTN1/20 with Highway Code Hierarchy of Road User built into the design to ensure it is obvious active travel users have priority. Active travel will be integral to new development while Local Walking and Cycling Infrastructure Plan and Local Transport Plan shall inform priority for investment in existing settlements ensuring continuous direct routes to bus stops and railway stations where what needs to be accessed is not available locally."

ii) 4. "Planning to achieve timely delivery of access infrastructure to ensure active travel and public transport are the obvious modes of access when first occupied to ensure car-based habits that are difficult to subsequently change to not become entrenched." It is important to stop increasing road capacity as that just generates traffic that congests existing communities stifling local economies and makes existing road journeys worse.

iii) 5. "Phase delivery of new development to align with development of the rail network as outlined in the West Sussex Connectivity Modular Plan and GTR strategy for West Coastway to be consulted later in 2023"

iv) 7. Change the wording to "Delivering a coordinated package of infrastructure improvements to provide public transport priority and eliminate severance of active travel routes to junctions on the A27 Chichester bypass along with active travel and public transport priority within the city and elsewhere to drive modal shift to local access, active travel and public transport to facilitate real reductions of motor vehicle use. These will, reduce traffic congestion, improve safety and air quality, and improve access to Chichester city from surrounding areas without increasing road capacity."

v) "Opportunities to secure funding to implement this package of improvements (in relation to criterion 7)", change to criterion 3 and 7, and only referencing criterion 7 if that is changed as described above.

## Response:

- i) Criterion 3 has been prepared to be consistent with the local transport and infrastructure plans referred to and with the wider strategy set out by Policy T1. The changes proposed do not go the 'soundness' of the Plan.
- ii) The proposed changes would not be consistent with the overall strategy in Policy T1 which is to reduce demand on the A27 and to encourage non-car modes of travel, but also to secure the necessary infrastructure that is essential to avoid what would otherwise be unacceptable highway capacity and safety concerns, to which development within the Plan will inevitably contribute.
- iii) Criterion 3 refers to the provision of new transport infrastructure which would include rail as well as road and other modes. The changes proposed to 3 to not recognise that some parts of the south of the plan area do not have and are unlikely to have favourable access to the rail network and so will continue to need to rely on the road network.
- iv) Criterion 7 is consistent with the wider strategy, and when read alongside the previous criteria 1-6. The changes proposed would not address the need to secure funding for specific A27 Chichester Bypass improvements works as part of the wider overall strategy established by Policy T1.
- v) The changes proposed would not be consistent with the wider strategy and are not required as the following paragraph within the Policy text covers the funding of other necessary transport infrastructure.

## Action:

No change in response to representation.

5878

Object

**Document Element:** Policy T1: Transport Infrastructure**Respondent:** Fishbourne Meadows Residents' Association

Object

**Summary of representations:**

Change wording to criterion 3, 4, 5 & 7.

**Summary of representation changes to plan:**

i) 3. need to change the wording, the mindset needs to move away from "alternative to the car"

Better wording "Targeting investment to provide local access with a focus on active travel as the obvious way for people to access their needs walking and cycle routes and networks complying with LTN1/20 with Highway Code Hierarchy of Road User built into the design to ensure it is obvious active travel users have priority. Active travel will be integral to new development while Local Walking and Cycling Infrastructure Plan and Local Transport Plan shall inform priority for investment in existing settlements ensuring continuous direct routes to bus stops and railway stations where what needs to be accessed is not available locally."

ii) 4. "Planning to achieve timely delivery of access infrastructure to ensure active travel and public transport are the obvious modes of access when first occupied to ensure car-based habits that are difficult to subsequently change to not become entrenched." It is important to stop increasing road capacity as that just generates traffic that congests existing communities stifling local economies and makes existing road journeys worse.

iii) 5. "Phase delivery of new development to align with development of the rail network as outlined in the West Sussex Connectivity Modular Plan and GTR strategy for West Coastway to be consulted later in 2023"

iv) 7. Change the wording to "Delivering a coordinated package of infrastructure improvements to provide public transport priority and eliminate severance of active travel routes to junctions on the A27 Chichester bypass along with active travel and public transport priority within the city and elsewhere to drive modal shift to local access, active travel and public transport to facilitate real reductions of motor vehicle use. These will, reduce traffic congestion, improve safety and air quality, and improve access to Chichester city from surrounding areas without increasing road capacity."

v) "Opportunities to secure funding to implement this package of improvements (in relation to criterion 7)", change to criterion 3 and 7, and only referencing criterion 7 if that is changed as described above.

**Response:**

- i) Criterion 3 has been prepared to be consistent with the local transport and infrastructure plans referred to and with the wider strategy set out by Policy T1. The changes proposed do not go the 'soundness' of the Plan.
- ii) The proposed changes would not be consistent with the overall strategy in Policy T1 which is to reduce demand on the A27 and to encourage non-car modes of travel, but also to secure the necessary infrastructure that is essential to avoid what would otherwise be unacceptable highway capacity and safety concerns, to which development within the Plan will inevitably contribute.
- iii) Criterion 3 refers to the provision of new transport infrastructure which would include rail as well as road and other modes. The changes proposed to 3 to not recognise that some parts of the south of the plan area do not have and are unlikely to have favourable access to the rail network and so will continue to need to rely on the road network.
- iv) Criterion 7 is consistent with the wider strategy, and when read alongside the previous criteria 1-6. The changes proposed would not address the need to secure funding for specific A27 Chichester Bypass improvements works as part of the wider overall strategy established by Policy T1.
- v) The changes proposed would not be consistent with the wider strategy and are not required as the following paragraph within the Policy text covers the funding of other necessary transport infrastructure.

**Action:**

No change in response to representation.

**5914****Object**

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** GoVia Thameslink Railway



## Object

### Summary of representations:

i) Public transport: Developments along the East-West Corridor should have good linear transport options with easy links to the primary road network, frequent bus services and rail stations. These are all available west of Chichester if a Southbourne road link is created onto the A27.

East of Chichester there will be a good direct link to the grade separated interchange at the A27/A285 west of Tangmere. However, there are no rail stations. The only frequent bus service runs to Tangmere with an irregular service to Arundel via Oving and Barnham. The sporadic new developments around Barnham seem only linked by bus to Bognor.

ii) There seems no evidence of the Duty to Co-operate between Chichester and Arun District Councils. And none of the recent greenfield developments in either district have been accompanied by new or improved bus services.

### Summary of representation changes to plan:

What is needed are: (1) a fast and frequent bus service between Chichester and Barnham station, via a new bus link from Tangmere to the B2233, and (2) extending the 55 service from Tangmere as a circular route back to the city via Shopwyke Lakes and the proposed East of Chichester SDL.

### Response:

i) Policy T1 states that investment will be used to fund local travel options. This includes integrated bus and train networks, improved pedestrian, and cycle networks. The Tangmere SDA policy (A14) also includes specific requirements for the improvement of cycle infrastructure between Tangmere and Chichester and for improvements to public transport, which is likely to focus on the 55 Bus Service.

ii) The council has been regularly engaging with Arun District Council and other neighbouring authorities throughout the process of preparing the Plan and is now in the process of agreeing a Statement of Common Ground that will be published as soon as possible.

### Action:

No change in response to representation.

5949

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** The Chichester Society

## Object

### Summary of representations:

Accessibility should be built into new development in the form of active travel networks, which will enhance permeability in people's transitions between areas.

Development requiring additional road capacity should not go ahead, except as a last resort.

### Summary of representation changes to plan:

References to a 'coordinated package of infrastructure improvements' along the A27 should be replaced with a 'coordinated package of active travel and public transport improvements infrastructure', as this is more specific in emphasising that car transport should be minimised as much as possible.

### Response:

Policy T1 sets out a strategy that will support the delivery of infrastructure improvements which will allow the proposed level of development to be delivered without giving rise to unacceptable levels of highway safety concerns on the Strategic Road Network. This is necessary to facilitate any new housing development in the south of the plan area. The strategy also includes securing investment to be used to fund local sustainable travel options. This will include improvements to bus and train networks and improved pedestrian and cycle networks.

### Action:

No change in response to representation.

5960

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Network Rail

## Support

### Summary of representations:

In general, this is supported.

### Summary of representation changes to plan:

N/A

### Response:

-

### Action:

No change in response to representation.

6131

Support

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Network Rail

## Object

### Summary of representations:

WGPC supports this approach but questions how it could be applied to Wisborough Green. This policy is Chichester-centric; Wisborough Green residents have no option other than to rely upon private cars.

### Summary of representation changes to plan:

N/A

### Response:

It is acknowledged that a key focus of Policy T1 is addressing the issues raised by the impact of traffic in the south of the plan area on the A27. However, the Local Plan as a whole does acknowledge the particular issues of the plan area's more rural communities such as Wisborough Green.

### Action:

No change in response to representation.

6222

Object

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Wisborough Green Parish Council

## Support

### Summary of representations:

I like Policy T1 - I wish that I could believe it will really happen!

### Summary of representation changes to plan:

N/A

### Response:

N/A

### Action:

No change in response to representation

6244

Support

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** John Newman

## Support

### Summary of representations:

Support in principle.

### Summary of representation changes to plan:

N/A

### Response:

-

### Action:

No change in response to representation.

6246

Support

**Document Element:** Policy T1: Transport Infrastructure

**Respondent:** Suez (Sita UK)

### Policy T1: Transport Infrastructure, 8.18

## Object

### Summary of representations:

8.18 Although GTR supports much of this policy, wording needs to change along to so mindset focuses on access by active travel to reduce motor vehicle use. The policy for a coordinated package of improvement on the A27 needs to be replaced with a coordinated package of active travel and public transport priority and improvements that will reduce traffic congestion and improve safety.

### Summary of representation changes to plan:

N/A

### Response:

Policy T1 sets out a strategy based on an expectation that all new development will support and embody the four objectives set out in the policy text. These focus on reducing the need to travel by car, improving access to sustainable modes of travel, managing travel demand and mitigating the impacts of car use.

### Action:

No change in response to representation.

5913

Object

**Document Element:** Policy T1: Transport Infrastructure, 8.18

**Respondent:** GoVia Thameslink Railway

**Policy T1: Transport Infrastructure, 8.19****Object****Summary of representations:**

8.19 Need to compare those costs Highway costs with costs of active travel and public transport provision that will deliver the objectives of improved access and reduced congestion.

**Summary of representation changes to plan:**

N/A

**Response:**

Facilitating the level of development set out with the Plan will require both investment in active travel / public transport and specific targeted improvements to the A27 Chichester Bypass. The funding mechanisms for each of these will be different, although the majority will need to come from developer contributions.

**Action:**

No change in response to representation.

**5915****Object**

**Document Element:** Policy T1: Transport Infrastructure, 8.19

**Respondent:** GoVia Thameslink Railway

**Policy T1: Transport Infrastructure, 8.20****Object****Summary of representations:**

The key improvements to the Fishbourne and Bognor roundabouts are dependent on developer contributions from developments that have, as yet, no planning permission. The likelihood is that with the current economic climate any estimates in this plan today will be exceeded by a factor of X due to the global economic environment.

**Summary of representation changes to plan:**

N/A

**Response:**

The Local Plan Transport Study (2024) sets out the work that has been done to cost the required junction improvements. Costs will change over time and so any mechanism to secure developer contributions will need to be subject to an appropriate indexation method to ensure that contributions remain at the correct level to fund the works.

**Action:**

No change in response to representation.

**4204****Object**

**Document Element:** Policy T1: Transport Infrastructure, 8.20

**Respondent:** Chidham and Hambrook Parish Council

## Object

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### Summary of representations:

8.20 Financial contribution from housing development will go much further if invested in proper active travel infrastructure, with active travel and public transport priority designed into existing roads, and integral to new developments

### Summary of representation changes to plan:

N/A

### Response:

Facilitating the level of development set out with the Plan will require both investment in active travel / public transport and specific targeted improvements to the A27 Chichester Bypass.

### Action:

No change in response to representation.

5916

Object

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**Document Element:** Policy T1: Transport Infrastructure, 8.20

**Respondent:** GoVia Thameslink Railway

## A27 Mitigation contributions

## Object

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### Summary of representations:

- i) Does this apply just to dwellings or to caravans etc?
- ii) It seems unreasonable for housing within Chichester District to pay for the improvements to Bognor Bridge roundabout when the major allocation in Arun make no contribution.
- iii) 8.20 indicates that the fire is based on allocations - therefore sites coming forward by other means should not be caught

### Summary of representation changes to plan:

- Reword and justify

### Response:

- i) The proposed contribution would be applied to all 'dwellings' and so this would not include caravans unless they were permitted for permanent occupation.
- ii) The council has been in on-going discussions with Arun DC in relation to the A27 mitigation contributions that ADC is seeking from strategic development in Arun. All developer contributions secured will be considered collectively through the TIMG
- iii) Paragraph 8.20 of the Plan clarifies that all new residential development coming forward (with the exception of the two Strategic Development Areas referred to) will be expected to make a contribution at the level set out in paragraph 8.21.

### Action:

- No change in response to representation.

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4386

Object

**Document Element:** A27 Mitigation contributions

**Respondent:** Mr Stephen Jupp

## Object

### Summary of representations:

Not justified – not an appropriate strategy

It is inequitable that the West of Chichester Development SDL Phase 2 and Tangmere SDL (which have yet to be granted planning permission) are to make lower contributions per dwelling than all other housing developments where the per dwelling contribution is to be calculated by using the prescribed formula.

### Summary of representation changes to plan:

The same formula will should apply to all developments without planning permission as at November 2022

### Response:

The treatment of the two Strategic Development Areas referred to in paragraph 8.20 reflects the particular stage each of these schemes has reached in the planning process with a 'Resolution to Grant' planning permission having been made and advanced work undertaken on the Section 106 Agreements in each case, which is supported by site-specific viability evidence work.

### Action:

No change in response to representation.

4603

Object

**Document Element:** A27 Mitigation contributions

**Respondent:** Mrs Gabrielle Abbott

## Object

### Summary of representations:

i) The Council's latest Transport Study published in January 2023 has identified that all other housing development which comes forward which is not allocated will have to pay a levy of £7,728 per dwelling which is a substantial increase per dwelling from the £1,402 per dwelling levy set out in the Planning Obligations and Affordable Housing SPD (2016) towards improvements to the Fishbourne Roundabout and the Bognor Road Roundabout.

ii) Gladman have concerns that this significant increase in the levy from the Planning Obligations and Affordable Housing SPD is going to make some speculative applications for small and medium housing sites unviable. For Gladman's scheme at land off Main Road, Birdham, a residential scheme for up to 150 dwellings, this would equate to a financial contribution of £1,159,200 (£7,728 x 150 dwellings).

### Summary of representation changes to plan:

N/A

### Response:

i) Paragraph 8.20 of the Plan clarifies that all new residential development coming forward (with the exception of the two Strategic Development Areas referred to) will be expected to make a contribution at the level set out in paragraph 8.21.

ii) It is acknowledged that the level of the expected contribution has significantly increased compared to the 2016 SPD. However, the council has fully considered the impact this higher contribution level will have on the viability of development within the south of the plan area. This evidence is set out within the council's Local Plan Viability Appraisals (Stage 2 – Jan 2023) which is available on the Local Plan webpage.

### Action:

No change in response to representation.



4930

Object

**Document Element:** A27 Mitigation contributions**Respondent:** Gladman Developments Ltd

Object

**Summary of representations:**

Arun District Council is concerned that Chichester District Council's Regulation 19 'A27 Mitigation contributions' is not effective and should account for the cross boundary mitigation contributions and remove the uncertainty over how cross boundary contributions towards schemes such as Bognor Road and Whyke road roundabouts will be pooled to other A27 mitigation solutions such that there are no adverse implications for delivering committed developments in Arun and the viability of developments.

**Summary of representation changes to plan:**

The policy table should be updated and modified to reflect the additional cross boundary contributions and how collectively what further phased A27 mitigation improvements can be achieved to ensure that there are no adverse implications for delivering committed developments in Arun and the viability of developments.

**Response:**

The Local Plan is proposing to use existing funding captured through schemes in the plan area and further contributions to be secured through future schemes identified in the Proposed Submission Local Plan in order to deliver appropriate mitigation package. This will need to capture existing development within the adopted Local Plans of both Chichester and Arun, in addition to new development within the Chichester Proposed Submission Local Plan. CDC acknowledges the potential for a range of mitigation options to be delivered within the funding available, and Policy T1 has been amended to reflect this. Arun is represented at the TIMG and will therefore be party to recommendations by this group.

**Action:**

No change in response to representation, however mods to Policy T1 cover some issues raised, and deliver solution through the TIMG

4992

Object

**Document Element:** A27 Mitigation contributions**Respondent:** Arun District Council

Object

**Summary of representations:**

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Recommendations made]

Developer contributions require updating to reflect increased costs (inflation, materials) and to ensure calculation methods reflect proposed strategic development;

Proposed developments are at various stages of realisation; it is unclear if growth will be controlled in pace with the availability of funding and the delivery of necessary transport intervention;

There is no one single development that is large enough to provide developer contributions to fund the required mitigations and so a change in direction will be required;

All new housing and employment development increases the traffic on the local and strategic highway networks; Consideration should be given to collecting contributions from smaller developments (including 10 or fewer dwellings), not just strategic allocations.

**Summary of representation changes to plan:**

i) National Highways recommends that as a priority the Council:

- reviews the 'Planning Obligations & Affordable Housing Supplementary Planning Document' SPD) which came into effect from February 2016 to reflect the proposed development in the Plan and the likely additional costs of construction associated with mitigation measures on the A27;

ii) - considers the methodology to calculate contributions in relation to current day costs;

iii) - reviews process to enable collection of contributions from all sites, including from smaller developers;

iv) - increases the rate per dwelling so that the required infrastructure can be delivered and cost of monitoring is included.

We acknowledge the work that has been done, and is being done, and we seek to continue to work with the Council, but we do seek information on the longer-term measures.

v) National Highways recommend:

- establishing what/which contributions could realistically come forward from developments;

vi) - identifying what mitigation measures could reasonably be delivered from:

a) existing contributions;

b) expected contributions:

vii) - understanding the overall deficit

- preparing a business case for any identified shortfalls

**Response:**

- i) The council is currently reviewing the relevant section of the 2016 Planning Obligations and Affordable Housing SPD and will share a draft of the new SPD text with National Highways as soon as possible.
- ii) The most up-to-date costs evidence is that set out within the Local Plan Transport Study (2024) and that will be used to support the setting of contributions. However, the council will continue to work with National Highways to keep the costs under review, through the TIMG.
- iii) The proposed contributions would be applied to all residential development coming forward (whether planned or otherwise) as set out in paragraphs 8.20 and 8.21 of the Plan (as modified). It is considered that applying contributions only to residential development will avoid 'double counting' impacts on the Strategic Road Network which would result from seeking contributions from employment, leisure or other types of development.
- iv) The proposed rate of contribution will reflect the latest available cost evidence and will be set at a level that would facilitate delivery of the agreed A27 mitigation works. The council would be pleased to discuss with National Highways what the likely costs of monitoring would be and whether these can be included within the proposed contributions, however it should be noted that the contribution level is constrained by the council's viability evidence.
- v) The council has fully considered the impact that the proposed higher contribution level will have on the viability of development within the south of the plan area. This evidence is set out within the council's Local Plan Viability Appraisals (Stage 2 – Jan 2023) which is available on the Local Plan webpage.
- vi) As stated in paragraph 8.21 of the Proposed Submission Plan, approximately £16 million in contributions have already been collected or are committed from permitted schemes or from the Strategic Development Areas that remain to be consented from the adopted Local Plan. Paragraph 8.21 also sets out the likely level of contributions that will be secured from the new Local Plan. The council will continue to engage with National Highways to identify and agree the most appropriate mitigation works to be funded.
- vii) The Local Plan Transport Study highlights that the costs of funding the full A27 mitigation works package, in the absence of government funding, would be prohibitive and this has led the council to propose a monitor and manage approach to seek to reduce overall demand on the A27 Chichester Bypass. However, the council will continue to work with National Highways and with WSCC to develop a convincing business case to secure funding from government to address the shortfall required to fund the full A27 mitigation works package as set out in the Local Plan Transport Study.

**Action:**

No change in response to representation.

5311

Object

**Document Element:** A27 Mitigation contributions

**Respondent:** National Highways

## Object

### Summary of representations:

The A27 needs significant investment in order to yield significant benefits for those travelling through the East-West corridor; this is unfunded. Essential improvements to the A27 are key to the success of any Local Plan particularly as the city's ambitions are to expand significantly in the next two decades. But any ambitions will fall flat if the A27 is not improved before such plans are implemented.. The A259 is an increasingly dangerous so-called 'resilient road' with a significant increase in accidents and fatalities in recent years. In 2011, the BBC named the road as the "most crash prone A road" in the UK. There is nothing in the Local Plan that addresses this issue. There is no capacity within the strategic road network serving our district to accommodate the increase in housing planned, and the Local Plan does not guarantee it.

### Summary of representation changes to plan:

N/A

### Response:

The strategy set out in Policy T1 will support the level of development that is proposed by the Plan. Therefore, there is no justification for reducing planned housing numbers below what is proposed.

### Action:

No change in response to representation.

5435

Object

**Document Element:** A27 Mitigation contributions

**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

8.21 and 8.22 Investing money this way will increase traffic congestion in Chichester and other existing communities in the region. If serious about improving access and reducing traffic congestion, this money will achieve far better outcomes and actually achieve those objectives if invested in active travel infrastructure including to railway stations that must be continuous, direct, safe, attractive and comfortable

### Summary of representation changes to plan:

N/A

### Response:

Policy T1 states that investment will be used to fund local sustainable travel options. This includes integrated bus and train networks, improved pedestrian, and cycle networks. Both CIL and s106 contributions, as well as other funding where available, will be used to fund these measures and this will not be adversely impacted by the need to secure developer contributions specifically for the strategic highway improvements identified

### Action:

No change in response to representation.

5917

Object

Document Element: A27 Mitigation contributions

Respondent: GoVia Thameslink Railway

**A27 Mitigation contributions, 8.21**

Object

**Summary of representations:**

- i) Developer contributions sought for improvements to these two roundabout junctions are from residential development and exclude contributions from retail development. Inconsistent with CDC's adopted CIL charging schedule. No reason or justification for omitting contributions from retail developments has been given.
- ii) Chichester Transport Study (2023) comments that forecast growth is likely to be lower than currently predicted within transport model, and mitigation identified "may not be required in the future". Given this uncertainty, SATURN modelling outputs cannot be relied upon to determine nature of any improvements that may or may not be required at these junctions. As such, mitigation identified may not actually be required in the future. Requested per dwelling contribution set out in paragraph 8.21 of Plan does not meet tests set out in CIL regulations and is therefore inconsistent with national policy.

**Summary of representation changes to plan:**

- iii) Requested per dwelling contribution set out in paragraph 8.21 of Plan needs to be clarified and based on actual works/detailed costings for these junction improvements unknown at present. Financial contribution sought should be related to likely impact that development will have on junctions. Developments on fringes of southern part of plan area less likely to generate traffic at these junctions and any financial contributions should reflect this.
- iv) Existing housing allocations in made Neighbourhood Plans should not be required to pay financial contributions towards the improvement works at these two A27 junctions as already planned and in the system

**Response:**

- i) Policy T1 proposes applying contributions only to residential development to avoid 'double counting' impacts on the Strategic Road Network which would result from seeking contributions from employment, leisure or other types of development.
- ii) The Local Plan Transport Studies (2023 and 2024) test the effect on anticipated growth projections of the full mitigation package, which includes the works at Whyke and Stockbridge junctions. It is these which the evidence suggests may not be required in the future if growth of traffic is less than currently anticipated. However, as set out in Policy T1, due to the high cost of this full package of mitigation, a monitor and manage approach is being proposed with the overall level of planned growth within the Plan being reduced consequently.
- iii) The details of the works at Fishbourne and Bognor junctions and the costings for these are set out within the Local Plan Transport Study (2024) and the accompanying appendices.
- iv) All new development coming forward within the south of the plan area, whether planned or not, has an impact on the level of capacity and highway safety on the A27 Chichester Bypass which is a strategic route. It is therefore appropriate for all development coming forward to contribute towards the necessary improvement works that will address the impact of the development coming forward now and over the Plan period.

**Action:**

- No change in response to representation.

**5421****Object****Document Element:** A27 Mitigation contributions, 8.21**Respondent:** Jennifer Asser**Agent:** Genesis Town Planning Ltd**Object****Summary of representations:**

Object on grounds that developer contributions sought for improvements exclude contributions from other development types such as industrial, retail, leisure, education which all generate traffic movements but don't appear in assessments - approach to securing financial contributions towards improvements to A27 is flawed.

**Summary of representation changes to plan:**

N/A

**Response:**

Policy T1 proposes applying contributions only to residential development to avoid 'double counting' impacts on the Strategic Road Network which would result from seeking contributions from employment, leisure or other types of development.

**Action:**

No change in response to representation.

**5783****Object****Document Element:** A27 Mitigation contributions, 8.21**Respondent:** Beechcroft Developments Limited**Agent:** Genesis Town Planning Ltd**Policy T2 Transport and Development**

## Object

### Summary of representations:

A policy to mitigate the adverse consequences in Loxwood of failing to provide a commutable bus service whilst still building additional housing leads to attempting to control the car when it is the only means of transport available to residents. The substantial developments planned by Waverley will seriously congest the A281 and the junction with it at Alfold for Loxwood residents for whom this is the main transport link for employment shopping and leisure.

### Summary of representation changes to plan:

To make any additional housing in Loxwood conditional on a commutable bus service.

### Response:

The concern is noted. All new development at Loxwood would need to demonstrate compliance with Policy T2 including the overall objective to reduce reliance on the private car and boost the opportunities for active and sustainable travel. The Transport Study (2024) considers the impact of development within the Plan on the local road network in the northern plan area, and on that of neighbouring authorities.

In Waverley District, some increases in traffic flows on the A281 through Grafham, B2133 Loxwood Road, Alfold, Dunsfold Common Road and B2127 through Ewhurst are predicted. However, these are generally very small increases equating to less than a vehicle per minute increase, which is unlikely to have a material impact.

The findings of the Transport Study have been shared with Surrey County Council (as highway authority) and Waverley Borough Council and is covered by Statements of Common Ground with each authority.

### Action:

No change in response to representation.

3824

Object

**Document Element:** Policy T2 Transport and Development

**Respondent:** Mr James Jewell

## Object

### Summary of representations:

The term "major development" should be quantified

### Summary of representation changes to plan:

The term "major development" should be quantified

### Response:

The term 'major development' is defined within the Glossary section of the Local Plan.

### Action:

No change in response to representation.

3866

Object

**Document Element:** Policy T2 Transport and Development

**Respondent:** Mr Michael Wright

## Object

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**Summary of representations:**

There needs to be a specific plan for provision of clearly-defined cycle routes. I cannot find one in the documents. I have a specific issue - next point.

**Summary of representation changes to plan:**

The cycle route between Selsey and Chichester is inadequate. The link from Selsey to the Ferry only exists in the form of a substantial diversion via the caravan site and the Medmerry perimeter track, past the waste water treatment plant, to the Ferry. The route from the Ferry onwards involves a near-useless track alongside Pagham Harbour. It is too narrow for safe mixing of cyclists and pedestrians. Much of the route beyond that point involves some complex navigation along tracks and unclassified roads. In view of the fact the cycling along the B2145 is both risky and highly problematic for other road users (and especially emergency vehicles), it's time that specific plans were incorporated in the Plan for each such key cycle route in the CDC area.

**Response:**

The concern raised is noted, although it relates to site-specific issues which go beyond the scope of the Local Plan.

**Action:**

No change in response to representation.

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**3872****Object**

**Document Element:** Policy T2 Transport and Development

**Respondent:** Mr David Akerman



## Object

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**Summary of representations:**

- i) We are concerned that the increase in housing will cause significant traffic problems through over capacity both on the A27 and other parts of the road network BEFORE any improvements can be made. The necessary road network improvements are totally dependent on developer contributions. This is a risky strategy.
- ii) There is not enough in the plan to provide new infrastructure or public transport services or reducing reliance on private cars. Too many houses are located in areas where cars will be used on a daily basis for education, employment, recreation and everyday facilities.

**Summary of representation changes to plan:**

N/A

**Response:**

- i) The concern is noted although developer contributions remain as the only significant source of funding available to address the transport infrastructure needs generated by development. Policy T2 seeks to ensure that all development coming forward is fully assessed from transport safety and demand perspectives and that the priority is placed on maximising sustainable and active forms of travel and minimising reliance on the private car.
- ii) The plan seeks to focus development in the more sustainable parts of the plan area which will increase the opportunities for sustainable transport. Policies T1 and T2 reinforce this approach but also allow for the funding and provision of new infrastructure where this is required.

**Action:**

No change in response to representation.

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**4203****Object**

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**Document Element:** Policy T2 Transport and Development

**Respondent:** Chidham and Hambrook Parish Council

## Object

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**Summary of representations:**

Support is offered to this policy and its role in encouraging sound new developments, but the Estate remains concerned that compliance is too easily claimed by developers without demonstrable evidence.

The plan should adopt a logical, common sense approach to compliance, judging accessibility and sustainability as would a 'man in the street' – the fact a development might be physically close, within reasonable walking distance of services, does not mean it will encourage people out of their cars when doing the weekly shop.

**Summary of representation changes to plan:**

The Plan must be prepared to require minimum standards of provision and evidence of compliance from developers that reflect the individual requirements and consequences of the site and development form.

**Response:**

The comment is noted although it is not clear what change is being sought to Policy T2. It can be confirmed that all planning applications are carefully assessed in relation to the compliance of proposals with policies and all permissions being built out are subject to the planning enforcement process as allowed by the Law and national planning policy and guidance.

**Action:**

No change in response to representation.

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**4256****Object**

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**Document Element:** Policy T2 Transport and Development

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Policy T2 Transport and Development

### Support

#### Summary of representations:

WGPC supports this approach but questions how it could be applied to Wisborough Green. This policy is Chichester-centric; WG residents have no option other than to rely upon private cars.

#### Summary of representation changes to plan:

N/A

#### Response:

Noted.

#### Action:

No change in response to representation.

### 4588

### Support

**Document Element:** Policy T2 Transport and Development

**Respondent:** Wisborough Green Parish Council

### Support

#### Summary of representations:

Rolls-Royce Motor Cars (R-RMC) supports the Council's commitment to securing safe, sustainable, connected and accessible transport options in the district. R-RMC wishes to encourage the Council to ensure that transport mitigation sought from development is proportionate, reasonable and directly related to the development. While cumulative impact is an important consideration, individual sites should not be burdened with a requirement to mitigate all cumulative impact singlehandedly. This would be inconsistent with national policy and the planning obligations tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010.

#### Summary of representation changes to plan:

N/A

#### Response:

Noted.

#### Action:

No change in response to representation.

### 4698

### Support

**Document Element:** Policy T2 Transport and Development

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates

## Support

### Summary of representations:

I like Policy T1 - I wish that I could believe it will really happen! I feel the same about Policy T2.

### Summary of representation changes to plan:

N/A

### Response:

Noted.

### Action:

No change in response to representation.

5221

Support

**Document Element:** Policy T2 Transport and Development

**Respondent:** John Newman

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Matters to be addressed]  
Whilst the need to increase capacity of the transport network and reduce demand is agreed, improving road traffic capacity should not be the focus.

Existing Transport Assessment and Travel Plan processes are robust but unlikely to be sufficient to achieve net zero commitments and proposed housing and employment developments. It is recommended that all new developments generating significant demand deliver a Travel Plan, that is legally binding and site specific

Addressing issues with Travels Plans, such as varying quality, inadequate targets and complex monitoring arrangements, with insufficient guidance, skills and resources to manage, is critical to a 'monitor and manage' approach.

Plans will require coordination across the area, with the approach including enforcement with financial penalties.

**Summary of representation changes to plan:****Recommend:**

- i) - Developing a process to understand what is required to support developments. For example, evidence how each residential and industrial site is related to the infrastructure network using robust data, tested scenarios and appropriate planning assumptions.
- ii) - Applications are supported by a robust Transport Assessment to show individual and cumulative effects will not unacceptably impact on the safe operation of the A27 or severely impact congestion.
- iii) - Due to the proximity to the A27 we would support the requirement for all developments to submit Travel Plans of a standard acceptable to the Highway Authorities (WSCC and National Highways).
- iv) - As appropriate, National Highways would seek to be part of pre-planning scoping meetings or consultations to ensure that necessary highway and transport mitigation measures are properly considered;
- v) - In all cases, use of planning conditions is recommended.
- vi) Management measures (supported by enforcement) should include:
  - Phasing – delivery of new developments to align with the provision of new transport infrastructure and the outcomes of monitoring travel demand;
  - Trigger points - agreed for milestones for each phase of each development;
  - Monitoring – at each trigger point and annually at each site;
  - Review to identify if further action and/or enforcement is required.
  - Remedial action.

**Response:**

- i) The recommendation is noted and it is considered that Policy T2 will support the generation of the information sought through the requirement to provide Transport Statements and Transport Assessments. The Council will however be reliant on the Highways Authorities in each case to advise on the relevant likely scenarios and impacts for each of the developments.
- ii) This objective / recommendation is achieved through paragraph 2 of Policy T2. However, the Council must have regard to the National Planning Practice Guidance on the use of these measures and so will need to be proportionate in terms of the level of information required from each applicant and so the distinction between circumstances where a full Transport Assessment will be required and where a Transport Statement will be acceptable are considered appropriate.
- iii) Paragraph 113 of the NPPF sets out that travel plans should be required where proposals generate significant amounts of movement. However, it is acknowledged that paragraph 2 of Policy T2 is not drafted in a way that is fully consistent with this National Policy. Proposed modification to change para 2 of Policy T2 to require a travel plan from all development which generate significant amounts of movements (consistent with NPPG).
- iv) This comment is noted and accepted, although it does not seek any change to Policy T2.
- v) as above.
- vi) The recommendations are noted, although it is not clear whether these points relate to travel plans or to conditions, or Section 106 agreements and further clarity from National Highways will be sought. As such, it is not clear on what aspect of Policy T2 the comment seeks a change.

**Action:**

- See Council's suggested Modification CM262.

**5312****Object****Document Element:** Policy T2 Transport and Development**Respondent:** National Highways**Object****Summary of representations:**

The content of Policy T2 (transport development) is largely supported and considered sound save for the fact that it does not seem to cover the improvement of local transport routes, particularly those that would assist in improving the circulation of traffic around smaller settlements.

**Summary of representation changes to plan:**

The policy should be amended to specifically relate to local transport improvements which are locally important to aid traffic circulation and reduce congestion.

**Response:**

Policy T2 is intended to provide policy requirements relating for developers and applicants proposing new development within the plan area. It should be read alongside the other transport policies in the Local Plan and in particular alongside the Local Transport Plan (prepared by WSCC) and the Chichester Infrastructure Delivery Plan which set out specific measures proposed to address local traffic and transport issues.

**Action:**

No change in response to representation.

**5376****Object****Document Element:** Policy T2 Transport and Development**Respondent:** Deerhyde Limited**Agent:** Vail Williams LLP

## Object

### Summary of representations:

Traffic issues are already significant in the plan area. The proposed East West corridor new homes numbers are going to cause many more traffic problems and much more frequent congestion BEFORE any recognised as essential improvements will be delivered. Being massively dependent on developer contributions is a strategy fraught with risk. The highlighted phrases in the T2 objectives reveal a distinct lack of local knowledge.

### Summary of representation changes to plan:

N/A

### Response:

The concern is noted although developer contributions remain as the only significant source of funding available to address the transport infrastructure needs generated by development. Policy T2 seeks to ensure that all development coming forward is fully assessed from transport safety and demand perspectives and that the priority is placed on maximising sustainable and active forms of travel and minimising reliance on the private car.

### Action:

No change in response to representation.

5477

Object

**Document Element:** Policy T2 Transport and Development

**Respondent:** Mayday! Action Group

## Support

### Summary of representations:

Bellway support the intent and approach of draft Policy T2. There is some overlap with draft Policy P4 titled 'layout and access' albeit this needn't detract from the fact that the policy has been positively prepared and is broadly consistent with the NPPF.

### Summary of representation changes to plan:

None

### Response:

None

### Action:

No change in response to representation.

5503

Support

**Document Element:** Policy T2 Transport and Development

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

**Summary of representations:**

Section 1 b) of T2 will be ineffective as, absent measures to ensure buses can run reliably and efficiently, improved bus services will not be possible, in support of the plan's own stated broad approach to transport mitigation, as well as wider local and national policy.

The draft policy does not require improvements to the quality of services such that sustainable choices will be materially more attractive than car use for many local journeys. Without this the Plan's Strategic Objectives cannot be fulfilled and the objectives of the Plan and this policy, read in its own terms, will not be realised, where reduction in private car use is concerned. It is thus ineffective.

Absent measures to make bus services more reliable and more efficient, by insulating them from chronic congestion as far as possible, still further operating resource and therefore costs, will be needed to just to reliably run existing service frequencies, and capacity, as vehicle productivity continues to be more and more adversely affected by chronic delay. This will be further aggravated by increasing incidence of severe unpredictable service breakdown arising from incidents of diverse kinds on the network, especially on or around the A27, including that arising from more regular severe weather events. Longer journey times can only be expected to lead to relative disadvantage of bus services compared to personal car use, entirely contrary to the objectives of national and local policy, including Policy T1. It can also expect to lead to a dampening effect not on car use, but on bus patronage, threatening the ongoing viability of bus services across the plan area.

**Summary of representation changes to plan:**

i) Section 1 b) of T2 should be modified to read:

"b) The use of sustainable travel modes through provision of direct and efficient access both to either the existing networks or and through providing such new infrastructure or public transport services, as can be credibly expected to reduce reliance on the private car and work towards achieving net zero in greenhouse gas emissions by 2050;"

ii) To be sound and effective, the policy T2 1 d.) should be changed to read:

"d) Ensure major development proposals and the supporting mitigation measures enable the use delivery of high-quality, reliable and effective public transport to present the most relevant possible choice to access local services and facilities including employment, leisure and education facilities";

iii) Policy T2 1 f.) should therefore be amended to read:

f) Ensure that the layout and design of development proposals provides effective penetration of the site by sustainable modes, at all points in the development build-out, including public transport where appropriate; and sufficient space for all vehicles to manoeuvre without compromising the safety of pedestrians and cyclists, the efficiency of bus services, or the ability to provide an appropriate level of landscaping across the site"

**Response:**

i) The suggestion is noted, although the wording provided does not allow all developers and applicants to meet the requirement as not all will be able to provide direct and efficient access to sustainable travel opportunities and so would not be an effective substitution for clause 1b) of Policy T2.

ii) The suggested wording to 1d) seeks to introduce a requirement not only for development to be located to enable access to; but also for developers to 'deliver' public transport services. This goes beyond what can be expected of all but the largest schemes and therefore, most development would be unable to comply, rendering this clause ineffective.

iii) The intentions of the suggested wording for clause 1f) can be achieved by the current wording which requires that all vehicles (which would include busses) have sufficient space for manoeuvring in safe manner.

**Action:**

No change in response to representation.



5591

Object

**Document Element:** Policy T2 Transport and Development**Respondent:** Stagecoach South

Object

**Summary of representations:**

(1)(i) should be expressed as preference of council, not binary requirement -may be subject to design considerations on site-by-site basis. Term 'accessing' is ambiguous, could refer to other modes of transport. Point 2. mentions adoption of a specific threshold of impact which is not defined for either Transport Statements or Assessments. Further clarification required. In 3. Should also be recognised that monitoring would offer an opportunity for Travel Plan targets to be reviewed regularly to ensure they remain relevant or can respond to exogenous factors/external influences. Conditions at time of production of Travel Plan may change in the future.

**Summary of representation changes to plan:**

i) Suggest at (1)(a) Council consider replacing 'reduce' by 'minimise', as to 'reduce' implies that this should be from a specific baseline, when in fact sustainable developments will be designed to include this objective at the outset.

ii) (1)(i) Use wording 'delivery access and servicing'.

iii) (1)(j), suggest that 'Provide' is replaced by 'Provide or contribute towards' to provide flexibility for development to jointly fund specific mitigation measures.

iv) Consider adding the following bullet:

"3. d) appoint a Travel Plan Co-ordinator whose role will be to oversee the implementation of the Travel Plan and use the outcome of monitoring to review its targets to ensure continued relevance".

**Response:**

i) The suggested replacement would impose a higher bar compared to the proposed term 'reduce' and it is considered that not all development across the plan area would be able to 'minimise' the need to travel by car, but all can play a role in reducing this.

ii) The suggestion is accepted to assist clarity.

iii) The suggestion is accepted to ensure that the policy is flexible.

iv) The suggestion is accepted to ensure that the policy is effective.

**Action:**

See Council's suggested Modifications CM259, CM260 and CM261.

5676

Object

**Document Element:** Policy T2 Transport and Development**Respondent:** Countryside Properties**Agent:** Turley

## Support

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### Summary of representations:

Natural England welcomes the extensive references across this policy (and policies T2 and T3) to reductions in car use, increased provision of sustainable transport choices and increased opportunities for active travel.

### Summary of representation changes to plan:

N/A

### Response:

Noted.

### Action:

No change in response to representation.

5863

Support

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**Document Element:** Policy T2 Transport and Development

**Respondent:** Natural England

Object

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**Summary of representations:**

1a Strongly support, it is critical that all development is designed “to avoid and/or reduce the need to travel by car and incorporate measures..... that decrease traffic speeds and flows.

1b Strongly support,

i) 1c This needs to be stronger than promoting active travel. Active travel infrastructure must not just be incorporated, but must be the core of the access within the development and between the development and places people need to access, especially bus stops and railway stations. The active travel routes must be direct, and we must understand by coherent, that these must be continuous, because as soon as an active travel route is interrupted by a road people, especially parents consider them not safe which increases car use. The design must be for the motor vehicle to give way before crossing the active travel route not the other way around.

1d Strongly support

ii) 1e Must be strengthened to say “Provide safe access to the highway for all users with Hierarchy of Road User built into the design, retrospectively if necessary”

iii) 1f Focus must be based on space for Active travel, into which vehicles require space to manoeuvre without compromising safety of people in the street walking, cycling or children playing.

Support the landscaping parts of 1f

iv) 1g Policy T4 and West Sussex County Council Guidance needs changing to facilitate modal shift to active travel and public transport, people should pay the economic price for parking space.

1h Support

1i Support

2.1 Is there no 2.1?

2.2 Support

3. Support

3. Support

**Summary of representation changes to plan:**

N/A

**Response:**

i) The point is noted but clause 1c) already goes as far as possible to ensure that safe and coherent active travel routes are included within all relevant developments. Local Plan policies must work within the context of other local and national transport planning policies which govern the detailed design frameworks and priorities for each mode of travel operating across the plan area.

ii) as above.

iii) The objective of the comment is achieved through the current wording of clause 1f). Again, the relevant space and detailed design standards for vehicular modes of travel is set out within other policy documents and it is not open to the Local Plan to alter these.

iv) Modal shift to active travel and public transport is a key component of the Local Plan transport strategy

**Action:**

No change in response to representation.

**5918****Object****Document Element:** Policy T2 Transport and Development**Respondent:** GoVia Thameslink Railway**Object****Summary of representations:**

References should be made to the concept of 15–20-minute neighbourhoods that provide a wide range of services within this walk time. The provision of amenities and leisure facilities within a 15-minute walk should be a cornerstone idea that drives mid to long term infrastructure goals for Chichester. Owing to the considerable amount of development anticipated by the Council, there is ample opportunity for local businesses and retailers to provide services within these local neighbourhoods.

**Summary of representation changes to plan:**

References should be made to the concept of 15–20-minute neighbourhoods that provide a wide range of services within this walk time.

**Response:**

The comment is noted. However, 15-20 minutes neighbourhoods require a certain level of development and certain densities of development to ensure viability of the longer term. Therefore, whilst opportunities for this approach will be taken where they arise, this is not something that can be required across a plan area like Chichester with large rural areas and many smaller settlements.

**Action:**

No change in response to representation.

**5961****Object****Document Element:** Policy T2 Transport and Development**Respondent:** Network Rail**Object****Summary of representations:**

Network Rail have concerns about the impact of future development on Southbourne and Fishbourne stations. As the stations themselves are small-sized, large-scale accessibility improvements would be potentially difficult.

**Summary of representation changes to plan:**

As a result, the provision of cycle parking facilities at both stations should be considered as crucial by the Council to ensure the station environment continues to modernize and encourage passenger use. This also ensures the stations integrate with proposed cycle/pedestrian routes across the area.

**Response:**

The comment is noted. Whilst this does not fall within the scope of Policy T2, this issue could be included within the next iteration of the Chichester Infrastructure Delivery Plan if projects advised by Network Rail.

**Action:**

No change in response to representation.

**5963****Object****Document Element:** Policy T2 Transport and Development**Respondent:** Network Rail**Support****Summary of representations:**

Parts of policy strongly supported. Wording changes set out in additional rep - 5918.

**Summary of representation changes to plan:**

N/A

**Response:**

Noted.

**Action:**

No change in response to representation.

**6116****Support****Document Element:** Policy T2 Transport and Development**Respondent:** GoVia Thameslink Railway**Support****Summary of representations:**

In general [Policy T2 is] supported in the sense it promotes seamless and continuous active travel arrangement and minimise car use.

**Summary of representation changes to plan:**

N/A

**Response:**

Noted.

**Action:**

No change in response to representation.

**6132****Support****Document Element:** Policy T2 Transport and Development**Respondent:** Network Rail

## Object

### Summary of representations:

WGPC supports this approach but questions how it could be applied to Wisborough Green. This policy is Chichester-centric; WG residents have no option other than to rely upon private cars.

### Summary of representation changes to plan:

N/A

### Response:

The comment is noted and it is acknowledged that in some parts of the plan area there will be far fewer opportunities to promote sustainable and active travel. Nevertheless, all development proposals will need to demonstrate what level of compliance is possible given the specific site context.

### Action:

No change in response to representation.

## 6223

## Object

**Document Element:** Policy T2 Transport and Development

**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

Convenient walking and cycling routes and availability of public transport should be more than a measurable distance, to include an assessment of the practicality and suitability of the routes as an alternative to use of the private car.

### Summary of representation changes to plan:

Convenient walking and cycling routes and availability of public transport should be more than a measurable distance, to include an assessment of the practicality and suitability of the routes as an alternative to use of the private car.

### Response:

The comment is noted although it is not clear what change is being sought to Policy T2.

### Action:

No change in response to representation.

## 6276

## Object

**Document Element:** Policy T2 Transport and Development

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

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**Summary of representations:**

Support is offered to this policy and its role in encouraging sound new developments.

**Summary of representation changes to plan:**

N/A

**Response:**

Noted.

**Action:**

No change in response to representation.

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**6277**
**Support**


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**Document Element:** Policy T2 Transport and Development

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

**Background, 8.24**

## Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted. The comment on the Westhampnett cycle route will be forwarded to WSCC Highways for their consideration

**Action:**

No change

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**3787**
**Support**


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**Document Element:** Background, 8.24

**Respondent:** Mr Andrew Gould

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**3792**
**Support**


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**Document Element:** Background, 8.24

**Respondent:** Mr Andrew Gould

## Object

### Summary of representations:

LCWIP Appendix B needs updating. New background text suggested emphasising importance of active travel in achieving modal shift away from motor car. Policy needs additional clause 4 emphasising walking and cycling as first choice for journeys integrated with public transport for longer journeys and priority over motor car to ensure seamless journeys without need to stop and give way to traffic – see suggested amendments.

### Summary of representation changes to plan:

The Chichester City LCWIP Appendix B needs updating.

Background needs to add “Active Travel, walking and cycling is critical to achieving modal shift away from motor vehicles for local journeys and for longer journeys using public transport.

Wording change -

4. Ensure walking and cycling is the first choice for local journeys and as part of longer journeys integrated with bus and trains by providing high quality routes that are Continuous, Direct, Safe, Attractive, Comfortable, and where conflicting with motor vehicles these routes will have Hierarchy of Road User built into the design so that people walking and cycling can continue their journeys seamlessly without a need to stop and give way to traffic

### Response:

As detailed in the LCWIP, it will be reviewed in response to new funding/delivery opportunities/after 5 years. The Local Plan transport policies aim to support the modal shift away from the motor car. Policy T3 requires development proposals to prioritise walking and cycling and promote sustainable transport in the first paragraph, whilst criterion 1 provides for connected cycling and walking routes ensuring integration with the wider networks

### Action:

The Chichester\_City\_LCWIP\_Appendix\_B\_Cycling\_revised\_final\_edit.pdf needs updating.

Background needs to add “Active Travel, walking and cycling is critical to achieving modal shift away from motor vehicles for local journeys and for longer journeys using public transport

5919

Object

Document Element: Background, 8.24

Respondent: GoVia Thameslink Railway



## Background, 8.25

Support

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**Summary of representations:**

Support.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted. The comment on the Westhampnett cycle route will be forwarded to WSCC Highways for their consideration

**Action:**

No change

3788

Support

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**Document Element:** Background, 8.25

**Respondent:** Mr Andrew Gould

Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted. The comment on the Westhampnett cycle route will be forwarded to WSCC Highways for their consideration

**Action:**

No change

3793

Support

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**Document Element:** Background, 8.25

**Respondent:** Mr Andrew Gould

## Background, 8.26

Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted. The comment on the Westhampnett cycle route will be forwarded to WSCC Highways for their consideration

**Action:**

No change

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3789

Support

**Document Element:** Background, 8.26

**Respondent:** Mr Andrew Gould

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3794

Support

**Document Element:** Background, 8.26

**Respondent:** Mr Andrew Gould

**Background, 8.27****Object****Summary of representations:**

- 1) We need segregated cycle lanes and they need to be wide enough. But what if there isn't the space? This is an omission from the plan.
- 2) No new housing until LTN1/20 compliant cycle lanes are in place that allow travel from the development to the nearest large town.

**Summary of representation changes to plan:**

Need to add "In the event of insufficient width for LTN 1/20 compliant segregated cycle lanes, traffic calming and 20 mph zones must be introduced rather than a break in the cycle route". If strategic cycle route needs to cross a road, a combined wombat crossing should be the default

**Response:**

Policy T2 provides for measures to be incorporated that decrease traffic speed and flows. The Guidance listed in the policy pre-text includes reference to crossing design to enable cycling route continuity. The comment will also be forwarded to WSCC Highways as this is a matter that would impact the local highway network

**Action:**

No change

**3795****Object**

**Document Element:** Background, 8.27

**Respondent:** Mr Andrew Gould

**Support****Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted. The comment on the Westhampnett cycle route will be forwarded to WSCC Highways for their consideration

**Action:**

No change

**6055****Support**

**Document Element:** Background, 8.27

**Respondent:** Mr Andrew Gould

## Policy T3 Active Travel - Walking and Cycling Provision

### Object

#### Summary of representations:

- 1) We need segregated cycle lanes and they need to be wide enough. But what if there isn't the space? This is an omission from the plan.
- 2) No new housing until LTN1/20 compliant cycle lanes are in place that allow travel from the development to the nearest large town.

#### Summary of representation changes to plan:

Need to add "In the event of insufficient width for LTN 1/20 compliant segregated cycle lanes, traffic calming and 20 mph zones must be introduced rather than a break in the cycle route". If strategic cycle route needs to cross a road, a combined wombat crossing should be the default

#### Response:

Policy T2 provides for measures to be incorporated that decrease traffic speed and flows. The Guidance listed in the policy pre-text includes reference to crossing design to enable cycling route continuity. The comment will also be forwarded to WSCC Highways as this is a matter that would impact the local highway network

#### Action:

No change

3796

Object

**Document Element:** Policy T3 Active Travel - Walking and Cycling Provision

**Respondent:** Mr Andrew Gould

### Object

#### Summary of representations:

Doesn't take into account recent changes in law and policy on sustainable travel

#### Summary of representation changes to plan:

Quiet Lanes should be encouraged, safe routes/zones for schools, maintenance and improvement of key cycleways

#### Response:

The policy has been informed by current national and local policy guidance. Development proposals will be required to address the criteria in all the transport policies which include incorporating measures to decrease traffic speed

#### Action:

No change.

3952

Object

**Document Element:** Policy T3 Active Travel - Walking and Cycling Provision

**Respondent:** Mr Robert Dewick

## Object

### Summary of representations:

Does not safeguard existing and proposed walking and cycling routes, no mechanism provided to fund improvements.; interchange facilities at sustainable travel interchanges required.

### Summary of representation changes to plan:

Alternative policy proposed

### Response:

Criterion 1 provides for delivery and contribution towards cycle and walking route improvements whilst Policy I1 Infrastructure Provision refers to the Infrastructure Delivery Plan which identifies infrastructure requirements and costings including for the transport elements: walking and cycling. The policy sets out that walking and cycling will be prioritised in development proposals. Criterion 1 requires the safeguarding of current and planned cycle and walking routes. Criterion 3 provides for cycle parking and storage facilities at publicly accessible locations. Policy T2 provides for measures that decrease traffic speed and flows

### Action:

No change

## 4001

## Object

**Document Element:** Policy T3 Active Travel - Walking and Cycling Provision

**Respondent:** Chichester and District Cycle Forum

## Object

### Summary of representations:

needs detail on cycle routes which can be improved/created

### Summary of representation changes to plan:

N/A

### Response:

Criterion 1 lists the documents where planned cycle and walking routes are identified

### Action:

No change

## 4202

## Object

**Document Element:** Policy T3 Active Travel - Walking and Cycling Provision

**Respondent:** Chidham and Hambrook Parish Council

## Support

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### Summary of representations:

CHC would like to open-up more farmland for walking and cycling, propose this is reflected in the policy

### Summary of representation changes to plan:

Chichester Harbour Conservancy would like to open-up more farmland, along the agricultural fringe, for walking and cycling. Perhaps that should be reflected in the policy?

### Response:

Support noted. The aim of Policy T3 is to require that development proposals promote sustainable transport and prioritise walking and cycling.

### Action:

No change.

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4947

Support

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**Document Element:** Policy T3 Active Travel - Walking and Cycling Provision

**Respondent:** Chichester Harbour Conservancy

## Object

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### Summary of representations:

No mention of PRoW network which provides extensive walking and cycling opportunities and important links between places and non-PRoW routes.

### Summary of representation changes to plan:

N/A

### Response:

Reference to PRoW incorporated into paragraph 8.24.

### Action:

See Council's suggested Modification CM263.

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5098

Object

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**Document Element:** Policy T3 Active Travel - Walking and Cycling Provision

**Respondent:** West Sussex County Council

## Object

### Summary of representations:

policy makes no mention of danger of mixing cyclists and pedestrians on same path

### Summary of representation changes to plan:

It is essential to separate cycle paths and footpaths to allow walkers to use safely including for enjoyment, exercise, fresh air, particularly those using sticks, scooters, walking aids etc, accompanied by spouses, friends, families with pushchairs, small active children, dogs on leads.

### Response:

Paragraph 8.27 states that walking and cycling routes should incorporate segregation whilst the policy emphasises a need for safe routes/a safe environment

### Action:

No change.

5229

Object

**Document Element:** Policy T3 Active Travel - Walking and Cycling Provision

**Respondent:** Mrs Sarah Headlam

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Noting proposals should maximise opportunities for non-car trips]. Object: Proposals should maximise opportunities to link with wider network including existing A27 pedestrian and cycle footbridges and active travel routes along/ intersecting A27 corridor and explain how new facilities will be funded, monitored and maintained

### Summary of representation changes to plan:

N/A

### Response:

The policy requires proposals to promote sustainable transport and recognises at paragraph 8.27 how this can help to facilitate modal shift away from private car use. Criterion 1 of the policy also requires integration with the wider networks. Policy I1 Infrastructure Provision refers to the Infrastructure Delivery Plan which identifies infrastructure requirements and costings including for the transport elements: walking and cycling. Monitoring and maintenance would be considered on a case-by-case basis at the planning application stage

### Action:

No change

5313

Object

**Document Element:** Policy T3 Active Travel - Walking and Cycling Provision

**Respondent:** National Highways

## Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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5504

Support

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**Document Element:** Policy T3 Active Travel - Walking and Cycling Provision

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Support

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**Summary of representations:**

Support.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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5865

Support

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**Document Element:** Policy T3 Active Travel - Walking and Cycling Provision

**Respondent:** Natural England



## Object

### Summary of representations:

LCWIP Appendix B needs updating. New background text suggested emphasising importance of active travel in achieving modal shift away from motor car. Policy needs additional clause 4 emphasising walking and cycling as first choice for journeys integrated with public transport for longer journeys and priority over motor car to ensure seamless journeys without need to stop and give way to traffic – see suggested amendments.

### Summary of representation changes to plan:

Wording change -

4. Ensure walking and cycling is the first choice for local journeys and as part of longer journeys integrated with bus and trains by providing high quality routes that are Continuous, Direct, Safe, Attractive, Comfortable, and where conflicting with motor vehicles these routes will have Hierarchy of Road User built into the design so that people walking and cycling can continue their journeys seamlessly without a need to stop and give way to traffic

### Response:

As detailed in the LCWIP, it will be reviewed in response to new funding/delivery opportunities/after 5 years. The Local Plan transport policies aim to support the modal shift away from the motor car. Policy T3 requires development proposals to prioritise walking and cycling and promote sustainable transport in the first paragraph, whilst criterion 1 provides for connected cycling and walking routes ensuring integration with the wider networks

### Action:

No change

5920

Object

**Document Element:** Policy T3 Active Travel - Walking and Cycling Provision

**Respondent:** GoVia Thameslink Railway

## Object

### Summary of representations:

policy should be strengthened to reflect walking/ cycling as first choice for local journeys, integrated with bus/transport network for longer trips to allow seamless journeys. Routes prioritised over vehicles so that vehicles wait for walkers/cyclists

### Summary of representation changes to plan:

Policy should be strengthened to reflect walking/cycling as the first choice for local journeys; and for longer journeys part of an integrated bus/train transport chain that allows people to continue seamlessly

### Response:

The Local Plan transport policies aim to support the modal shift away from the motor car. Policy T3 requires development proposals to prioritise walking and cycling and promote sustainable transport in the first paragraph, whilst criterion 1 provides for connected cycling and walking routes ensuring integration with the wider networks

### Action:

No change

**5959****Object****Document Element:** Policy T3 Active Travel - Walking and Cycling Provision**Respondent:** Network Rail**Support****Summary of representations:**

Support.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted. The comment on the Westhampnett cycle route will be forwarded to WSCC Highways for their consideration

**Action:**

No change

**6056****Support****Document Element:** Policy T3 Active Travel - Walking and Cycling Provision**Respondent:** Mr Andrew Gould**Object****Summary of representations:**

Needs provision of clearly-defined cycle routes

**Summary of representation changes to plan:**

Suggested improvements to cycle route between Selsey and Chichester

**Response:**

Criterion 1 refers to the planned cycle and walking routes as identified in the Chichester City LCWIP and the West Sussex County Council documents. The comment will also be forwarded to WSCC Highways for their consideration

**Action:**

No change

**6061****Object****Document Element:** Policy T3 Active Travel - Walking and Cycling Provision**Respondent:** Mr David Akerman

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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6117

Support

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**Document Element:** Policy T3 Active Travel - Walking and Cycling Provision

**Respondent:** GoVia Thameslink Railway

## Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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6130

Support

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**Document Element:** Policy T3 Active Travel - Walking and Cycling Provision

**Respondent:** Network Rail

## Background, 8.29

Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

5222

Support

---

**Document Element:** Background, 8.29

**Respondent:** John Newman

## Policy T4 Parking Provision

Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

4589

Support

---

**Document Element:** Policy T4 Parking Provision

**Respondent:** Wisborough Green Parish Council

## Object

---

### Summary of representations:

: principle of this approach is recognised, it is important that the Local Plan clearly sets out that the adopted Parking Standards should be seen as a starting point for assessing parking needs in a development

### Summary of representation changes to plan:

Amend policy to be flexible in individual circumstances where standards may not be appropriate

### Response:

Any proposal must provide adequate parking provision informed by the Parking Standards. Parking provision will be determined on a case-by-case basis at the planning application stage

### Action:

No change

---

## 4700

## Object

---

**Document Element:** Policy T4 Parking Provision

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates

## Object

---

### Summary of representations:

underground car parking, Park and Ride should be envisaged, train and bus options totally inadequate.

### Summary of representation changes to plan:

Update Vision for Chichester and take forward urban regeneration. Fewer small car parks and daily Park and Ride should be provided plus underground car parking

### Response:

This policy is concerned with ensuring that parking provision is provided with development proposals in accordance with the Parking Standards published by West Sussex County Council. In relation to car park provision, the Chichester District Car Park Strategy referred to at paragraph 8.33 provides a review and action plan.

### Action:

No change

---

## 5478

## Object

---

**Document Element:** Policy T4 Parking Provision

**Respondent:** Mayday! Action Group

## Object

---

### Summary of representations:

Add "Motor vehicle parking spaces on public roads and in public parking areas will be charged at the economic price for parking spaces."

### Summary of representation changes to plan:

Add "Motor vehicle parking spaces on public roads and in public parking areas will be charged at the economic price for parking spaces."

### Response:

This policy is concerned with ensuring that parking provision is provided with development proposals in accordance with the Parking Standards published by West Sussex County Council

### Action:

No change

5921

Object

---

**Document Element:** Policy T4 Parking Provision

**Respondent:** GoVia Thameslink Railway

## Support

---

### Summary of representations:

Support.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

6166

Support

---

**Document Element:** Policy T4 Parking Provision

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates

## Object

---

### Summary of representations:

The statistical base used for the number of cars used by homeowners is almost certainly inaccurate as the amount of parking needs to be sufficient to cater for households where there are two or more working family members.

### Summary of representation changes to plan:

N/A

### Response:

Objection noted. The extent and adequacy of car parking provision is subject of Policy T4 and informed by West Sussex Parking Standards. As no changes to Policy T4 or its supporting text are proposed, no further action is recommended

### Action:

No change in response to representation.

6312

Object

---

**Document Element:** Policy T4 Parking Provision

**Respondent:** Chidham and Hambrook Parish Council

## Background, 9.1

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seeking further information].

Object: IDP January 2023

National Highways seeks to understand:

- The Council's strategy if developer contributions are insufficient;
- The Council's governance associated with collected contributions and their use
- How developers will be charged if additional contributions are required.

### Summary of representation changes to plan:

N/A

### Response:

Objection noted.

The Council's strategy is set out in Chapter 8 of the Local Plan (as proposed to be modified by the Council's suggested modifications).

It is recognised that an upgrade to all of the junctions on the A27 Chichester Bypass is simply unaffordable in the absence of government funding. This has led to a monitor and manage approach, which has been developed in discussion with the two highway authorities. The Local Plan viability assessment (January 2023) has determined a 'target contribution level' for development in the south of the Plan Area to contribute to the transport mitigation funding. The actual level of contribution will be determined by applying an apportionment and averaging factor to the target contribution level. Should necessary changes to the total funding requirement, apportionment or average factors be evidenced through the monitor and manage process, this will inform an annual review of the contribution and apportionment methodology.

### Action:

No changes as a result of this representation

5338

Object

Document Element: Background, 9.1

Respondent: National Highways



## Background, 9.2

## Object

---

### Summary of representations:

■ Comment: Essential that infrastructure precedes development.

### Summary of representation changes to plan:

■ N/A

### Response:

■ It would not be desirable to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

### Action:

■ No changes as a result of this representation

4166

Object

---

**Document Element:** Background, 9.2

**Respondent:** Chidham and Hambrook Parish Council

## Background, 9.2

## Object

### Summary of representations:

Comment: The plan should provide greater weight to the importance of developer contributions in the delivery of infrastructure. It should seek contributions towards significant infrastructure deficits that exist.

### Summary of representation changes to plan:

N/A

### Response:

S106 has to meet the requirements set out in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended) meaning that its use is limited to addressing the impacts of its development. CIL is to be used to address the cumulative impacts of new development, and cannot be used to address underlying infrastructure deficits unless these are also required to support the new development.

### Action:

No changes as a result of this representation

## 4255

## Object

**Document Element:** Background, 9.2

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Mixed

### Summary of representations:

Wisborough Green supports this approach but questions how it could be applied to Wisborough Green

### Summary of representation changes to plan:

N/A

### Response:

The background text applies to the Local Plan area including Wisborough Green.

For specific strategic infrastructure requirements for Wisborough Green please see IDP under plan area requirements sections

For infrastructure that is related to thresholds such as open space, Wisborough Green Neighbourhood Plan could ensure that infrastructure is maximised by identifying one larger site for its housing number rather than scattering development thinly.

### Action:

No changes as a result of this representation

## 4592

## Support

**Document Element:** Background, 9.2

**Respondent:** Wisborough Green Parish Council

## Support

---

**Summary of representations:**

Support: This is so important

**Summary of representation changes to plan:**

N/A

**Response:**

Support Noted

**Action:**

No changes as a result of this representation

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**5223**
**Support**


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**Document Element:** Background, 9.2

**Respondent:** John Newman

## Mixed

---

**Summary of representations:**

Wisborough Green supports this approach but questions how it could be applied to Wisborough Green

**Summary of representation changes to plan:**

N/A

**Response:**

The background text applies to the Local Plan area including Wisborough Green.

For specific strategic infrastructure requirements for Wisborough Green please see IDP under plan area requirements sections

For infrastructure that is related to thresholds such as open space, Wisborough Green Neighbourhood Plan could ensure that infrastructure is maximised by identifying one larger site for its housing number rather than scattering development thinly.

**Action:**

No changes as a result of this representation

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**6225**
**Object**


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**Document Element:** Background, 9.2

**Respondent:** Wisborough Green Parish Council

## Background, 9.3

## Support

### Summary of representations:

Support: This is so important

### Summary of representation changes to plan:

N/A

### Response:

Support Noted

### Action:

No changes as a result of this representation

5224

Support

Document Element: Background, 9.3

Respondent: John Newman

## Background, 9.4

## Object

### Summary of representations:

Object: If development does not have all accompanying infrastructure in place in time it should not go ahead. There should be no exceptions. Until infrastructure is completed no homes should be sold

### Summary of representation changes to plan:

N/A

### Response:

Without solutions for critical infrastructure such as adequate sewerage capacity development would not be allowed to proceed.

However, non-critical infrastructure can be phased during the build out of a development and linked to triggers such as housing numbers completed. It would not be desirable to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable. Paragraph 9.4 is simply saying that in exceptional cases regarding proven viability a trade-off could be made.

### Action:

No changes as a result of this representation

3790

Object

Document Element: Background, 9.4

Respondent: Mr Andrew Gould

## Policy I1 Infrastructure Provision

## Object

### Summary of representations:

Object: Want policy amended to read:

“Water Supply & Wastewater Infrastructure: Where appropriate, planning permission for developments which result in the need for off-site upgrades will be subject to conditions to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development”.

### Summary of representation changes to plan:

N/A

### Response:

This text is in the Infrastructure Delivery Plan (updated April 2024) on pages 59 and 60. The IDP is referred to in paragraph 9.1 of the Local Plan.

The suggested policy amendments are too detailed for this generic policy, and point (vi) of the policy provides sufficient information to address these concerns. The policy itself also signposts to the IDP where this level of requested detail can be found.

See also Local Plan Chapter 4 section on treating wastewater, paragraphs 4.101 – 4.107 and Policy NE16

### Action:

No changes as a result of this representation

3954

Object

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Thames Water Utilities Ltd

## Object

---

**Summary of representations:****Object:**

- (i) Policy will be ineffectual as it does not require the necessary infrastructure to be phased, committed and provided in advance of the new housing.
- (ii) There is no agreed Statement of Common Ground, especially with National Highways and Southern Water

**Summary of representation changes to plan:**

N/A

**Response:**

- (i) Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be desirable to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

- (ii) A Statement of Common Ground is being sought with National Highways and an updated Statement (April 2024) has been agreed with Southern Water and the Environment Agency.

**Action:**

No changes as a result of this representation

---

**4016****Object**

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Chichester and District Cycle Forum

## Object

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**Summary of representations:****Comment:**

(i) Policy needs to be more robust to ensure timely provision.

Infrastructure needs to be in place from housing outset rather than when ready for occupation.

(ii) Concern about future proofing against flood risk.

**Summary of representation changes to plan:**

N/A

**Response:**

(i) Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

It would not be desirable to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

(ii) Point iv of the policy addresses future proofing.

**Action:**

No changes as a result of this representation

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**4201****Object**

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**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Chidham and Hambrook Parish Council

## Object

### Summary of representations:

#### Object:

1. Sewerage is being pumped from Bosham into Chichester Harbour, will new development make this worse?
2. Are there any proposals to combat sea level rise?
3. How will health care provision be increased?
4. How will traffic generated by new housing developments particularly around Chichester be dealt with?

### Summary of representation changes to plan:

N/A

### Response:

Many of the answers sought are answered within the IDP (updated April 2024) to which paragraph 9.1 and Policy I1 refers.

Point 1 is addressed in the IDP on page 103. See also Local Plan Chapter 4 section on Treating wastewater paragraphs 4.101 – 4.107 and Policy NE16

Point 2 Sea Level rise cannot be combatted. The Local Plan has sought to direct new major development away from flood risk areas and requires SuDs and sea defences to be provided where needed. See also Local Plan Chapter 4: Climate Change and the Natural Environment Section on Flood Risk and Water Management paragraphs 4.90 – 4.96 and policy NE15.

Point 3 is addressed in the IDP on pages 159 – 162.

Point 4 is addressed on pages 138 - 151.

### Action:

No changes as a result of this representation

4289

Object

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Mr David Myers



## Object

### Summary of representations:

Object: Too many important omissions from the policy.

Wants new wording added to the policy stating that the needs to existing dwellings must be addressed first (e.g.in relation to drainage, runoff, flooding, waste water, clean drinking water, and other essential utility services and to safeguard current amenities including rights of way, parking and amenity value of communal land).

### Summary of representation changes to plan:

N/A

### Response:

This change cannot be added as the policy is dealing with the infrastructure requirements of new development, not existing development.

Existing Open Space is protected under Policy P15. Policy NE15 protects existing development from being flooded from new development proposals. NE16 Water Management and Water Quality protects existing drinking water. Existing Rights of Way are already protected – see Policy P14 Green Infrastructure.

S106 has to meet the requirements set out in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended) meaning that its use is limited to addressing the impacts of its development. CIL is to be used to address the cumulative impacts of new development, and cannot be used to address underlying infrastructure deficits unless these are also required to support the new development.

### Action:

No changes as a result of this representation

4322

Object

Document Element: Policy I1 Infrastructure Provision

Respondent: Mr Matthew Rees

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No changes as a result of this representation

4590

Support

**Document Element:** Policy I1 Infrastructure Provision**Respondent:** Wisborough Green Parish Council

## Object

### Summary of representations:

**Object:**

Boxgrove Church of England (CoE) Primary School currently has capacity for just 70 pupils, 3 classes over 7 years. However, a typical 1 Form of Entry (FE) Primary School in England has a pupil capacity of 210 pupils. Boxgrove is a 1/3 FE School. The existing school site has the potential to increase its size/ pupil capacity, with the adjoining land under the ownership of West Sussex County Council (WSSCC) and Boxgrove Parish Council (BPC). Policy A14, Land West of Tangmere includes a new two-form entry primary school and associated development, including provision for an early years setting and a special support centre. Further land is safeguarded to facilitate potential expansion of the two-form entry primary school to three-form entry', provide 'open space', 'green infrastructure', 'community orchard', 'playing pitches', and 'sport pavilion'. However, the same infrastructure is not being provided for in the Plan for Boxgrove Parish and we would like to see this area of the Infrastructure section re-assessed.

Education infrastructure cannot be cited as a constraint to Boxgrove Parish accommodating a higher (strategic level) of growth and this should be reflected in the Plan, with the existing Boxgrove CoE Primary School having the potential land to extend on-site and/or there being adequate capacity at the proposed 2FE Tangmere Primary School to accommodate a strategic level of growth within Boxgrove Parish.

### Summary of representation changes to plan:

N/A

### Response:

Objection noted.

Tangmere has been allocated 1,300 new homes, whereas Boxgrove has been allocated 50 new homes. It therefore follows that a development of 1,300 new homes will need more new educational infrastructure to be provided than an allocation of 50 new homes, therefore no change to infrastructure is necessary to be re-visited for Boxgrove

### Action:

No changes as a result of this representation

4825

Object

**Document Element:** Policy I1 Infrastructure Provision**Respondent:** Rydon Homes Limited**Agent:** DMH Stallard LLP

## Object

---

### Summary of representations:

#### Support:

Would like point (v) to be clarified that the ongoing costs of infrastructure management and maintenance that come under the jurisdiction and control of statutory providers to be met by those providers.

### Summary of representation changes to plan:

N/A

### Response:

Agree that this should be clarified

### Action:

See council suggested modification CM265.

4831

Object

---

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

## Object

### Summary of representations:

#### Object:

Boxgrove Church of England (CoE) Primary School currently has capacity for just 70 pupils, 3 classes over 7 years. However, a typical 1 Form of Entry (FE) Primary School in England has a pupil capacity of 210 pupils. Boxgrove is a 1/3 FE School. The existing school site has the potential to increase its size/ pupil capacity, with the adjoining land under the ownership of West Sussex County Council (WSSCC) and Boxgrove Parish Council (BPC). Policy A14, Land West of Tangmere includes a new two-form entry primary school and associated development, including provision for an early years setting and a special support centre. Further land is safeguarded to facilitate potential expansion of the two-form entry primary school to three-form entry', provide 'open space', 'green infrastructure', 'community orchard', 'playing pitches', and 'sport pavilion'. However, the same infrastructure is not being provided for in the Plan for Boxgrove Parish and we would like to see this area of the Infrastructure section re-assessed.

Education infrastructure cannot be cited as a constraint to Boxgrove Parish accommodating a higher (strategic level) of growth and this should be reflected in the Plan, with the existing Boxgrove CoE Primary School having the potential land to extend on-site and/or there being adequate capacity at the proposed 2FE Tangmere Primary School to accommodate a strategic level of growth within Boxgrove Parish.

### Summary of representation changes to plan:

N/A

### Response:

Objection noted.

Tangmere has been allocated 1,300 new homes, whereas Boxgrove has been allocated 50 new homes. It therefore follows that a development of 1,300 new homes will need more new educational infrastructure to be provided than an allocation of 50 new homes, therefore no change to infrastructure is necessary to be re-visited for Boxgrove

### Action:

No changes as a result of this representation

4849

Object

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Rydon Homes Limited

**Agent:** DMH Stallard LLP

## Object

---

### Summary of representations:

Object:

Implies that this policy has been used as a constraint to strategic growth at Boxgrove in relation to wastewater infrastructure

### Summary of representation changes to plan:

N/A

### Response:

This is a generic policy and does not mention wastewater constraints at Boxgrove.

### Action:

No changes as a result of this representation

## 4857

## Object

---

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Rydon Homes Limited

**Agent:** DMH Stallard LLP

## Support

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### Summary of representations:

Support: Agree with project for the creation of a bridleway linking Boxgrove Parish to Tinwood Lane, and support the upgrade to bridleways in conjunction with the Tangmere development

### Summary of representation changes to plan:

N/A

### Response:

Support Noted

### Action:

No changes as a result of this representation

## 4862

## Support

---

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Rydon Homes Limited

**Agent:** DMH Stallard LLP

## Support

### Summary of representations:

Support: Pleased that their comments from the Regulation 18 consultation have been incorporated into this policy reference included relating to flood defences and SuDS infrastructure

### Summary of representation changes to plan:

N/A

### Response:

Support Noted

### Action:

No changes as a result of this representation

4864

Support

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Environment Agency

## Object

### Summary of representations:

Object:

A requirement to meet in perpetuity costs of infrastructure and its maintenance is unlikely to meet policy tests

Want 'in perpetuity' to be deleted.

### Summary of representation changes to plan:

N/A

### Response:

Objection noted.

The intention is that infrastructure providers take responsibility to ensure that the infrastructure it provides is maintained into the future. It is up to the developer to make such arrangements to ensure this happens. This often happens by the developer after the first year or so setting up a management company, whereby the residents pay a management fee to maintain the up-keep of communal facilities.

### Action:

No changes as a result of this representation

4893

Object

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd

**Agent:** DWD Ltd

## Object

### Summary of representations:

#### Object:

Part vii) of the policy is unsound as it is inconsistent with national policy and is unjustified.

Against new development having gigabit-capable broadband infrastructure at first occupation.

Given that the type of connection required of development is also set out in Part R of the Building Regulations we consider it unnecessary to set this out in local plan policy.

Want vii to be deleted.

### Summary of representation changes to plan:

N/A

### Response:

The NPPF says:

10. Supporting high quality communications infrastructure

Paragraph 114:

Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

The policy at vi is in accordance with the building regulations Section 1 RA1

Approved Document R Volume 1: Physical infrastructure and network connection for new dwellings  
(publishing.service.gov.uk)

The requirement for a functioning connection to a gigabit-capable public electronic communications network is set out in the Building Regulations 2010 (amended 2022) in section 1 requirement RA2 (at the same link above).

### Action:

See council suggested modification CM266

## 5154

## Object

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Home Builders Federation

## Support

### Summary of representations:

Support: Agrees with Policy I1. Would want solar panels fitted to all new buildings, if possible, and would want national regulations to require this.

### Summary of representation changes to plan:

N/A

### Response:

Support Noted

### Action:

No changes as a result of this representation

## 5225

## Support

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** John Newman

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seeking clarity]

Object: The Plan should evidence who will fund, be responsible for and maintain improved accessibility to necessary facilities and services by sustainable travel modes from the outset as well as on an ongoing basis and into the future.

### Summary of representation changes to plan:

N/A

### Response:

Objection noted.

As much information as the Council has at present is included within the Infrastructure Delivery Plan which accompanies this Local Plan.

### Action:

No changes as a result of this representation

## 5314

## Object

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** National Highways



## Object

---

**Summary of representations:**

Object: Timescale of the crucial improvements to infrastructure and particularly sewer and WTW capacity is of particular concern. SW's Drainage and Wastewater Management Plan v1May 2020 set out in very comprehensive way what needs to be achieved and indication of time scale -placing most in AMP8 the next 5 yr business cycle and OFWAT approval would be needed for the scale of expenditure that is many hundred of millions. These time scale constraints should be reflected in the phasing of any housing development that will have to utilise the network. There is no direct indication that such phasing will be actively enforced.

**Summary of representation changes to plan:**

N/A

**Response:**

Objection noted.

As much information as the Council has at present is included within the Infrastructure Delivery Plan which accompanies this Local Plan.

An updated Statement of Common Ground (April 2024) has been agreed with Southern Water and the Environment Agency.

**Action:**

No changes as a result of this representation

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**5346****Object**

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Mr Paul Bedford

## Object

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**Summary of representations:****Object:**

Policy is not strong enough and developers will not deliver on their promises.

Want the policy to state that infrastructure must be delivered in advance or in tandem with housing delivery. Without the necessary infrastructure the housing should be deferred until such time that the infrastructure is provided.

**Summary of representation changes to plan:**

N/A

**Response:**

Objections noted.

As much information as the Council has at present is included within the Infrastructure Delivery Plan which accompanies this Local Plan.

Critical infrastructure would have to be delivered in advance, but all other infrastructure would be delivered in tandem with development, particularly that infrastructure to be delivered through S106 linked to triggers in the S106 agreement.

It would not be desirable to prevent all development from being provided until all accompanying infrastructure is completed as that would not be economically viable.

**Action:**

No changes as a result of this representation

---

**5479****Object**

---

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Mayday! Action Group

# Object

**Summary of representations:****Object:**

Support approach of Policy I1 but want River Lavant Flood Alleviation Scheme to be referenced.

Assume that any and all relevant in-perpetuity cost as described in criteria (v) have been taken into account in whole plan viability modelling.

Assume that feasibility and costs associated with installing Gigabit-capable broadband have informed whole plan viability modelling.

**Want:**

(i) River Lavant Flood Alleviation Scheme to be referenced in supporting text to 9.3.

(ii) Would be grateful if commitment to alleviation scheme could be drawn out in IDP together with an indication of programme, as well as potential upgrade works to Apuldram Waste Water Treatment Works.

**Summary of representation changes to plan:**

N/A

**Response:**

Objection noted.

The consultants who undertook the viability assessment took into account all policies which have policy costs.

(i) Paragraph 9.3 mentions flood defences, rivers and streams. It would be odd to mention a specific stream without mentioning all schemes. The policy is designed to be generically inclusive rather than naming individual schemes.

(ii) As much information as the Council has at present is included within the Infrastructure Delivery Plan which accompanies this Local Plan.

**Action:**

No change to be made as a result of this objection to the policy.

**5505****Object**

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

#### Object:

The Chichester Transport Study 2023 does not attempt to provide a realistic assessment of costs to deliver these schemes, nor does it offer any assurance that the schemes are technically deliverable. The measures that the Plan relies on are thus considered to have a high degree of risk. Since Policy I1 is founded on these assumptions, it cannot be considered effective.

#### Want changes:

Policy I1 iii modified to read: Safeguard the requirements of infrastructure providers, having regard to requirements within and where appropriate across the boundaries of the plan area, including but not limited to:...

Highways including specific measures to accommodate improved active travel and public transport level of service and....At limb v) the Policy expects developers to meet the "in perpetuity costs of operating and maintaining infrastructure". This shackles development management decisions to developers assuming what are infinite costs – given that "in perpetuity", read properly, can only mean "without any limit in time". This means that it is impossible to meet the statutory tests on developer obligations set out in the Community Infrastructure Levy Regulations 2010 (as amended) at Regulation 122, also repeated in the NPPF. This policy cannot be lawfully implemented and it is thus ineffective. In the absence of an up to date transport mitigation strategy that is fit for purpose, at the point the Plan is examined these costs of any additional infrastructure are not known in any case. The strategy and its costs, including its affordability and deliverability, are crucial to assessing if the Plan is sound. Subject to an appropriate defined transport mitigation strategy being arrived at, to be sound, the Policy I1 v) should be modified as follows: v To consider and meet as appropriate the delivery costs of infrastructure and, where appropriate, improved services, to the point where its long-term operational sustainability is credibly assured from mainstream sources. Where adoption is not envisioned by local authorities, that must include arrangements for its ongoing management and maintenance.

### Summary of representation changes to plan:

N/A

### Response:

Objection noted

The updated Transport Study (April 2024) provides details of a number of potential sustainable transport and other sustainable mitigation measures. This has informed the Local Plan approach to transport (as proposed to be modified by the council's suggested modifications).

Modification to iii) is not necessary as transport infrastructure providers requirements are already included.

Modification v) is not needed as it states as appropriate before in-perpetuity. The proposed modification also seems to be implying that the infrastructure costs and ongoing maintenance costs of private infrastructure providers should be picked up by local authorities.

### Action:

No changes as a result of this representation

5592

Object

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Stagecoach South

# Object

**Summary of representations:**

Object:

Want amendment to penultimate point (vii) to read:

Ensure new development benefits from gigabit-capable broadband infrastructure (where such facilities are locally available) at the point of occupation.

**Summary of representation changes to plan:**

N/A

**Response:**

The NPPF says:

10. Supporting high quality communications infrastructure

Paragraph 114:

Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

The policy at vi is in accordance with the building regulations Section 1 RA1

Approved Document R Volume 1: Physical infrastructure and network connection for new dwellings  
(publishing.service.gov.uk)

The requirement for a functioning connection to a gigabit-capable public electronic communications network is set out in the Building Regulations 2010 (amended 2022) in section 1 requirement RA2 (at the same link above).

**Action:**

See council suggested modification CM266

## 5628

## Object

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Thakeham Homes

## Object

### Summary of representations:

Object:

Sub-point (iv) can only require future proofing to be secured through the application of reasonable allowances, rather than be treated as an absolute term, and hence is ineffective in its current form.

In (v) if the intention is to ensure that appropriate fixed commuted sums are identified to cover a period of maintenance for infrastructure this should be stated.

Want plan to read:

At iv) Appropriate allowances should be made to future-proof development to take account of the impacts of climate change.

At v) To consider and meet the costs of construction for infrastructure, including for its future management and maintenance through appropriate commuted sum payments.

At vii) add "where possible" after the word 'benefits'.

### Summary of representation changes to plan:

N/A

### Response:

Objection noted.

Suggestion to reword (iv) will be taken on board.

(v) the suggestion is not to collect commuted sums for the council to maintain infrastructure that it does not own. The intention is that infrastructure providers take responsibility to ensure that the infrastructure it provides is maintained into the future. It is up to the infrastructure providers to make such arrangements to ensure this happens. This often happens by the developer after the first year or so setting up a management company, whereby the residents pay a management fee to maintain the up-keep of communal facilities.

No change will be made to (vii) as this will weaken the policy and make it ineffective.

### Action:

See council suggested modifications CM264 and CM266

5680

Object

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Countryside Properties

**Agent:** Turley

## Object

### Summary of representations:

#### Object:

Policy I1 Policy requires all residential development to provide gigabit-capable broadband infrastructure at first occupation. However, delivery of such connections is dependent on infrastructure providers and the feasibility/viability of connections. The policy as currently drafted may restrict housing delivery. Part R of the Building Regulations addresses the requirement for new development and part vii can be removed from the policy on that basis. If the provision is retained, then it is recommended that this policy be amended as follows (suggested amendments in red):  
 "vii seek where possible to provide gigabit-capable broadband infrastructure"

### Summary of representation changes to plan:

N/A

### Response:

Objection noted

### Action:

See council suggested modification CM266

5739

Object

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Metis Homes

**Agent:** Nova Planning

## Object

### Summary of representations:

#### Object:

Developers should not be responsible for costs of infrastructure "in perpetuity".

Want: "removal of words 'in perpetuity'".

### Summary of representation changes to plan:

N/A

### Response:

Objection noted.

The intention is that infrastructure providers take responsibility to ensure that the infrastructure it provides is maintained into the future. It is up to the infrastructure providers to make such arrangements to ensure this happens. This often happens by the developer after the first year or so setting up a management company, whereby the residents pay a management fee to maintain the up-keep of communal facilities.

### Action:

No changes as a result of this representation

5762

Object

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Suez (Sita UK)

Object

**Summary of representations:**

Object:

Concerned that development might not be supported by sufficient key infrastructure.

**Summary of representation changes to plan:**

N/A

**Response:**

Objection noted.

As much information as the Council has at present is included within the Infrastructure Delivery Plan which accompanies this Local Plan.

Critical infrastructure would have to be delivered in advance, but all other infrastructure would be delivered in tandem with development, particularly that infrastructure to be delivered through S106 linked to triggers in the S106 agreement.

**Action:**

No changes as a result of this representation

5877

Object

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Fishbourne Meadows Residents' Association



## Support

### Summary of representations:

References should be made to the concept of 15-20 minute neighbourhoods that provide a wide range of services within this walk time. The provision of amenities and leisure facilities within a 15 minute walk should be a cornerstone idea that drives mid to long term infrastructure goals for Chichester, Owing to the considerable amount of development anticipated by the Council, there is ample opportunity for local businesses and retailers to provide services within these local neighbourhoods.

Want: references to be made to the concept of 15-20 minute neighbourhoods that provide a wide range of services within this walk time.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No changes as a result of this representation

5962

Support

**Document Element:** Policy I1 Infrastructure Provision

**Respondent:** Network Rail

## Object

### Summary of representations:

Late objection

Where are the new schools, doctor, dentist? All these houses and no infrastructure, I have lived here all my life and no new doctors and only private dentists, where do my grandchildren go? Let alone people who move here, still not enough school places for all the children, lots of promises...Grayingwell Estate..eco town? Life is getting harder to move around as you know the roads are awful and please improve the bus station but don't move it!

### Summary of representation changes to plan:

N/A

### Response:

Objection noted.

As much information as the Council has at present is included within the Infrastructure Delivery Plan which accompanies the Local Plan.

### Action:

No changes as a result of this representation

**5998****Object****Document Element:** Policy I1 Infrastructure Provision**Respondent:** Julie Fogden**Support****Summary of representations:**

Support in principle

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No changes as a result of this representation

**6091****Support****Document Element:** Policy I1 Infrastructure Provision**Respondent:** Chidham and Hambrook Parish Council**Support****Summary of representations:**

Support:

In general I1 is supported in the sense that it promotes seamless and continuous active travel arrangements and minimise car use.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No changes as a result of this representation

**6133****Support****Document Element:** Policy I1 Infrastructure Provision**Respondent:** Network Rail

# Object

## Summary of representations:

Object.

Support approach but queries how it could be applied to Wisborough Green. Please refer to response to Policy H3 which details the parish's concerns as set out below.

The inconsistency in consideration of infrastructure limitations in this draft LP renders it unsound; whilst the need to conserve rural character is acknowledged, there is inconsistency in treatment of infrastructure constraints. It is unjustified to assert the A27 as a measured and limiting factor for the south, yet in comparison no proportionate measure appears to be considered for the NE plan area. In effect, a proportionately large overall growth, in percentage terms, is being allocated to the NE area despite the infrastructure roads/water/sewerage/electricity/schools all at their breaking limits. Further, it is evident from details in the Infrastructure Development Plan that infrastructure improvements are focused around Chichester. Apart from St Richards Hospital in Chichester, the majority of WG residents do not look to Chichester for services. Primarily as a result of the SDNP splitting Chichester District, the northern parishes are remote from Chichester. The proposal related to WG is purely for housing development. 'The strategy is to locate development in areas which are well located to other uses'; Wisborough Green is not. WGPC has concerns that the claims made will be neither addressed nor achieved in Wisborough Green:

- Public or sustainable transport
- Education places
- Healthcare provision
- Wastewater treatment capacity
- Water supply

## Summary of representation changes to plan:

N/A

## Response:

Objection noted.

The policy is generic and applies to the Local Plan area including Wisborough Green.

For specific strategic infrastructure requirements for Wisborough Green please see IDP under plan area requirements sections. The infrastructure assessment is based on current capacity and assessed needs arising from the scale of development proposed.

In terms of sustainable transport, footpath and bridleway projects are included for Wisborough Green Parish, as well as early years places, primary school places, sixth form places, secondary school places, sports facilities, and water neutrality mitigation. The nearest doctor's surgery is at Loxwood and currently has capacity, and this will be kept under review by NHS Sussex.

For infrastructure that is related to thresholds such as open space provision, Wisborough Green Neighbourhood Plan could ensure that infrastructure is maximised by identifying one larger site for its housing number rather than scattering development thinly.

## Action:

No changes as a result of this representation

**6224****Object****Document Element:** Policy I1 Infrastructure Provision**Respondent:** Wisborough Green Parish Council**Chapter 10: Strategic and Area Based Policies, 10.1****Object****Summary of representations:**

: Insufficient justification for not meeting full need or considering unmet need from adjoining authorities; Transport Study supports A27 having capacity to accommodate higher growth; increased housing requirement could assist with funding for necessary highway improvements

**Summary of representation changes to plan:**

Site proposed for additional allocation - see attachment.

**Response:**

The justification for not meeting the full housing need is set out in the Housing Requirement and Transport Background Papers. As the Council is currently unable to meet its own housing need, it is unable to accommodate the needs of other local authorities. Promotion of alternative site noted

**Action:**

No changes

**5158****Object****Document Element:** Chapter 10: Strategic and Area Based Policies, 10.1**Respondent:** Spiby Partners Ltd**Agent:** Henry Adams LLP

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Encourage approaches to support net zero, travel behaviour etc]. Object: Cannot cater for unconstrained traffic growth generated by new developments and therefore encourage: policies and proposals which incorporate measures to reduce traffic generation at source; more sustainable travel behaviour; net zero, reduce emissions and act on climate emergency

### Summary of representation changes to plan:

No change

### Response:

Policy T1 has been developed to mitigate the impact of planned development on the Strategic Road Network. The Local Plan Transport Assessment (2023) explains the options that have been assessed and the reason the Council is proposing the specific improvements referred to in Policy T1. A key objective of policy T1 is to improve access to sustainable means of travel including public transport, walking and cycling across the Plan Area. The use of sustainable travel modes can be expected to reduce reliance on the private car and work towards achieving net zero in greenhouse gas emissions by 2050 as set out in Policy T2

### Action:

No change

5316

Object

**Document Element:** Chapter 10: Strategic and Area Based Policies, 10.1

**Respondent:** National Highways

## Support

### Summary of representations:

Note that policies include requirements relating to natural environment, wildlife corridors, biodiversity net gain, GI, SuDS, wastewater/nutrient neutrality and protected landscape considerations. Appreciate advice on specific site allocations has been incorporated Difficult to provide detailed advice on potential impacts for broad locations for development although policy requirements provide thus far appear reasonable.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

5867

Support

**Document Element:** Chapter 10: Strategic and Area Based Policies, 10.1

**Respondent:** Natural England

## Object

### Summary of representations:

Allocation Policies should specify the minimum standard each should meet in terms of Plan objectives and require developers to provide demonstrable evidence in support.

### Summary of representation changes to plan:

Policies applicable to allocations or general developments should specify the minimum standard each should meet in terms of Plan objectives and developers required to provide demonstrable evidence in support

### Response:

The Strategic Allocation policies contain a mixture of standards within the policy criteria which relate to the strategic objectives set out in Chapter 2. Some standards are specific to the nature of the allocation site such as achieving nutrient neutrality and retention of views whilst others are more generic such as delivering biodiversity net gain and provision of infrastructure and community facilities in accordance with the Infrastructure Delivery Plan. In order to demonstrate that the criteria are met, developers will need to provide the relevant evidence at the planning application stage

### Action:

No changes

6275

Object

**Document Element:** Chapter 10: Strategic and Area Based Policies, 10.1

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Chichester City, 10.2

## Object

### Summary of representations:

update to refer to forthcoming Chichester Neighbourhood Plan

### Summary of representation changes to plan:

Change paragraph to remove reference to the existing vision document and replace with Chichester Neighbourhood Plan

### Response:

The 2017 Chichester Vision remains the most recent version, so reference should continue to be made. Policy A2 and supporting text makes reference to the Chichester Neighbourhood Plan

### Action:

No change to plan.

5750

Object

**Document Element:** Chichester City, 10.2

**Respondent:** Chichester City Council Neighbourhood Plan Steering Group

## Object

### Summary of representations:

need to make walking route between Chichester railway station and the city centre continuous, without waiting at signalised crossing.

Relocate parking outside of city walls and south of railway line to allow bus lanes and release land for people oriented priorities

### Summary of representation changes to plan:

Relocate parking outside of city walls and south of railway line

### Response:

Comment noted. Bullet points 9 and 10 of the policy cover supporting public transport

### Action:

No change to plan

**5922****Object**

**Document Element:** Chichester City, 10.2

**Respondent:** GoVia Thameslink Railway

## Chichester City, 10.4

## Object

### Summary of representations:

no confidence that CDC will implement or enforce proposed policies

### Summary of representation changes to plan:

Make clear distinction between residential areas in city centre.

Zone for bar and night time economy.

Take account of conservation area

### Response:

Comment noted. The proposed segregation of city centre uses is considered unlikely to be justified on grounds of harm to the significance of the broad historic environment. Changes to the plan in this respect are therefore considered disproportionate at this time.

The policy includes wording relating to the requirement to have regard to the Conservation Area and the need to support development proposals with historic characterisation assessments and heritage impact assessments.

### Action:

No change to plan

**3804****Object**

**Document Element:** Chichester City, 10.4

**Respondent:** RADAR

## Policy A1 Chichester City Development Principles

Support

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**Summary of representations:**

intention to maximise opportunities for integration of natural features to achieve biodiversity net gain and sustainable water management

**Summary of representation changes to plan:**

None suggested

**Response:**

Support noted

**Action:**

No change to plan

4866

Support

---

**Document Element:** Policy A1 Chichester City Development Principles

**Respondent:** Environment Agency

Support

---

**Summary of representations:**

criterion for green infrastructure and biodiversity net gain

**Summary of representation changes to plan:**

None suggested

**Response:**

Support noted

**Action:**

No change to plan

5059

Support

---

**Document Element:** Policy A1 Chichester City Development Principles

**Respondent:** Sussex Wildlife Trust



## Object

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### Summary of representations:

need to think about alternatives for the city centre. Resolve the state of the pavements. City could do with a park and ride scheme

### Summary of representation changes to plan:

Include a park and ride scheme

### Response:

Support noted

### Action:

No change to plan

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5226

Object

---

**Document Element:** Policy A1 Chichester City Development Principles

**Respondent:** John Newman

## Support

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### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Support]. Support preparation of SPD/DPDs as a framework for coordinated transport/traffic planning and identifying required transport improvements

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan

---

5317

Support

---

**Document Element:** Policy A1 Chichester City Development Principles

**Respondent:** National Highways

## Object

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### Summary of representations:

Question why city only considered for 450 additional properties. Suggest more brownfield sites in city should be developed

### Summary of representation changes to plan:

Plan should be more ambitious and utilise brownfield sites for redevelopment

### Response:

The Council is required to identify sites to meet its housing need; Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

### Action:

No change to plan

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5480

Object

---

**Document Element:** Policy A1 Chichester City Development Principles

**Respondent:** Mayday! Action Group

## Support

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### Summary of representations:

welcome opportunity to contribution to realisation of Policy A1, providing development in Southern Gateway

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan

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5506

Support

---

**Document Element:** Policy A1 Chichester City Development Principles

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

plan should ensure that the approach to city centre regeneration maintains and enhances public transport access.  
Concerns over proposals to remove bus station

### Summary of representation changes to plan:

Modify plan to remove proposals to remove bus station.

Amend wording:

This will include provision for development and proposals that:

- Support and strengthen the vitality and viability of the city centre and its role as a shopping/visitor destination, employment centre, public transport hub, and a place to live.

Include additional wording:

Facilitate improved access to the city with increased emphasis on sustainable modes of travel, with particular regard to enhancing the public transport interchange role of the city centre area, in accordance with the transport strategy for the city.

### Response:

Comment noted. With regards to first point regarding removal of proposals for bus station, see responses to representations on Policy A4.

Policy A4 also includes criteria relating to improving connections for public transport users

### Action:

No change to plan

5593

Object

**Document Element:** Policy A1 Chichester City Development Principles

**Respondent:** Stagecoach South

## Object

### Summary of representations:

support references to importance of design quality. Should be strengthened to include need for Chichester-specific design review panel

### Summary of representation changes to plan:

Include reference to Chichester Neighbourhood Plan

### Response:

Comment noted. Policy A2 and supporting text includes reference to the Chichester Neighbourhood Plan

### Action:

No change to plan

5746

Object

**Document Element:** Policy A1 Chichester City Development Principles**Respondent:** Chichester City Council Neighbourhood Plan Steering Group

Object

**Summary of representations:**

Support, but see suggested changes.

**Summary of representation changes to plan:**

Strengthen the improved access to the city and sustainable modes of travel by revising the bullet point.

- “Support and promote improved access to the city by active travel and public transport, especially providing continuous direct walking routes between the railway station and all areas of the city centre, updating the transport strategy as necessary.”

There should be another bullet point about reducing car use in the city centre

- “Move car parking spaces from city centre locations to locations further out for people to walk into the city centre, with only disabled and expensive premium parking within the city walls.”

**Response:**

Comments noted. Bullet points 9 and 10 of the policy cover supporting public transport.

**Action:**

No change in response to this representation.

5923

Object

**Document Element:** Policy A1 Chichester City Development Principles**Respondent:** GoVia Thameslink Railway

## Policy A1 Chichester City Development Principles

### Object

#### Summary of representations:

relocate parking outside city centre. Expand Chichester Gate to multi-storey car park and build high level walkway from car park across railway line to South Street

#### Summary of representation changes to plan:

None suggested

#### Response:

Comment noted.

#### Action:

No change to plan

5928

Object

**Document Element:** Policy A1 Chichester City Development Principles

**Respondent:** GoVia Thameslink Railway

### Object

#### Summary of representations:

bus services should be able to access West Street and Southgate

#### Summary of representation changes to plan:

Amend criterion 9 to read:

Support and promote improved access to the city and sustainable modes of travel including provision for all bus services to access both West Street and Southgate in accordance with the transport strategy for the city.

#### Response:

Comment noted. It is not within the remit of the Local Plan to set bus routes, as this is for West Sussex County Council as the highway authority. Policies T1 and T2 cover the provision of and improvements to transport infrastructure

#### Action:

No change to plan

5950

Object

**Document Element:** Policy A1 Chichester City Development Principles

**Respondent:** The Chichester Society

## Support

---

**Summary of representations:**

■ in principle

**Summary of representation changes to plan:**

■ None suggested

**Response:**

■ Support noted

**Action:**

■ No change to plan

---

6118

Support

**Document Element:** Policy A1 Chichester City Development Principles

**Respondent:** GoVia Thameslink Railway

## Support

---

**Summary of representations:**

■ in principle

**Summary of representation changes to plan:**

■ None suggested

**Response:**

■ Support noted

**Action:**

■ No change to plan

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6245

Support

**Document Element:** Policy A1 Chichester City Development Principles

**Respondent:** John Newman

## Policy A2 Chichester City – Strategic housing location

### Object

#### Summary of representations:

Cannot either support or object as the allocation lacks detail on its environmental impact

#### Summary of representation changes to plan:

Any future allocation should require a site survey for ancient woodland and ancient and veteran trees, and appropriate buffers should be applied before number and layout of dwellings is agreed

#### Response:

Criterion 5 of proposed policy NE8 Trees, Hedgerows and Woodlands requires proposals to have a minimum 15 metre buffer zone from the boundary of ancient woodland and veteran trees

#### Action:

No change to plan

4530

Object

**Document Element:** Policy A2 Chichester City – Strategic housing location

**Respondent:** The Woodland Trust

### Support

#### Summary of representations:

support requirements for allocations to accord with sequential approach for flood risk, and the need for phasing to sure that wastewater disposal capacity is available

#### Summary of representation changes to plan:

None suggested

#### Response:

Support noted

#### Action:

No change to plan

4867

Support

**Document Element:** Policy A2 Chichester City – Strategic housing location

**Respondent:** Environment Agency

## Object

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### Summary of representations:

allocation should comprise a minimum figure. Should also set out that the Council should consider a mix of both city centre and edge of city sites to ensure a mix of house types and sizes.

### Summary of representation changes to plan:

Allocation should be a minimum figure. Include flexibility to allow mix of both city centre and edge of city sites.

### Response:

Comment noted. The policy already refers to a minimum figure.

The policy allows flexibility for a mix of sites in that the delivery of the housing figure will be through the Chichester Neighbourhood Plan. The Neighbourhood Plan group will undertake their own site assessments to establish which sites will be suitable.

### Action:

See Council's suggested Modification CM267.

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5016

Object

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**Document Element:** Policy A2 Chichester City – Strategic housing location

**Respondent:** Landacre (Chichester) Limited

**Agent:** Henry Adams LLP

## Object

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### Summary of representations:

no defined site so cannot give specific impacts on biodiversity.

### Summary of representation changes to plan:

Policy should include reference to importance of delivering strategic green infrastructure.

### Response:

Comment noted. Agree that reference should be made to delivering green infrastructure.

### Action:

See Council's suggested Modification CM270.

---

5060

Object

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**Document Element:** Policy A2 Chichester City – Strategic housing location

**Respondent:** Sussex Wildlife Trust



## Object

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**Summary of representations:**

■ references to safeguarding minerals is inconsistent.

**Summary of representation changes to plan:**

■ Include reference to safeguarding minerals and waste infrastructure.

**Response:**

■ Comment noted.

**Action:**

■ See Council's suggested Modifications CM268 and CM269.

---

5090

Object

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**Document Element:** Policy A2 Chichester City – Strategic housing location

**Respondent:** West Sussex County Council

## Support

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**Summary of representations:**

■ hope that sustainable transport options will happen

**Summary of representation changes to plan:**

■ None suggested

**Response:**

■ Support noted

**Action:**

■ No change to plan

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5227

Support

---

**Document Element:** Policy A2 Chichester City – Strategic housing location

**Respondent:** John Newman

## Support

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Noting the need for a master plan and to collaborate]. Support: reinforce that a masterplanning process allows for consultation with key stakeholders to develop a transport strategy.

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan

5322

Support

**Document Element:** Policy A2 Chichester City – Strategic housing location

**Respondent:** National Highways

## Object

### Summary of representations:

not the primary area of focus when 270 houses represents 2.6% of total housing need

### Summary of representation changes to plan:

None suggested

### Response:

Comment noted

### Action:

No change to plan.

5481

Object

**Document Element:** Policy A2 Chichester City – Strategic housing location

**Respondent:** Mayday! Action Group

## Support

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### Summary of representations:

support allocation figure and that the development should be design-led.

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan

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5507

Support

---

**Document Element:** Policy A2 Chichester City – Strategic housing location

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

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### Summary of representations:

support references to importance of design quality. Need to strengthen to include requirement for a Chichester specific design review panel

### Summary of representation changes to plan:

Insert references to the Chichester Neighbourhood Plan.

### Response:

Comment noted. The policy wording already refers to the development being planned and provided for through the Chichester Neighbourhood Plan. It does not seem necessary to repeat references within the policy

### Action:

No change to plan

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5747

Object

---

**Document Element:** Policy A2 Chichester City – Strategic housing location

**Respondent:** Chichester City Council Neighbourhood Plan Steering Group

## Object

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**Summary of representations:**

Policy criteria 7 and 8 need amending.

**Summary of representation changes to plan:**

Amend policy wording:

7. Provide safe and suitable access points for all users and facilitate the requisite contributions for active travel infrastructure off-site highway improvements, and public transport which will include promoting sustainable transport options.
8. Ensure all new housing is linked with the city centre and railway station by continuous, direct, safe, attractive, comfortable walking and cycling routes. Facilitate improved sustainable travel modes, and new improved cycle and pedestrian routes.

**Response:**

Comment noted. It is considered the criterion as drafted and the cross reference to Policies T1 and T2, as well as Policy P4, which are not solely concerned with 'highway' improvements but transport infrastructure more widely, including sustainable modes of travel provides an appropriate approach and level of detail.

**Action:**

No change to plan.

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**5924****Object**

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**Document Element:** Policy A2 Chichester City – Strategic housing location

**Respondent:** GoVia Thameslink Railway

## Object

### Summary of representations:

encourage higher density in city centre development, such as Southern Gateway

### Summary of representation changes to plan:

(i) Amend policy wording:

1. To be masterplanned and designed to provide for a high-quality, high density form of development...

(ii) Add wording:

Proactively encourage the relocation of unneighbourly uses to the periphery of the city close to the A27 to free up sustainable sites for housing development within walking distance of the city centre (e.g. within the western part of Quarry Lane industrial estate.)

### Response:

Comment noted.

(i) Policy P3 encourages development proposals to make the most efficient use of land and that optimum density should result from a design-led approach. Chichester city has historic significance and development will be required to have regard to the historic character. This may mean that 'high density' development proposals are not necessarily appropriate in every location. Given that this policy provides for the development sites to be allocated through the Chichester Neighbourhood Plan it would not be appropriate to blanket designate high density as each site will need to respond to its context and surroundings.

(ii) This suggestion is understood. The policy and the plan are limited in their ability to encourage the relocation of existing uses.

### Action:

No change to plan

5951

Object

**Document Element:** Policy A2 Chichester City – Strategic housing location

**Respondent:** The Chichester Society

## Southern Gateway Regeneration Area, 10.11

### Support

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**Summary of representations:**

Proposes a more ambitious masterplan extending beyond the 2 allocated sites

**Summary of representation changes to plan:**

Not specified but attaches an alternative masterplan.

**Response:**

Policy A3 sets the development principles for the wider area of land. The 2 allocations are focussed on those sites with greater certainty of availability and deliverability

**Action:**

No change in response to representation

3950

Support

---

**Document Element:** Southern Gateway Regeneration Area, 10.11

**Respondent:** Ms Catharina de Haas

### Object

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**Summary of representations:**

Proposes a more ambitious masterplan extending beyond the 2 allocated sites.

**Summary of representation changes to plan:**

Not specified but attaches an alternative masterplan

**Response:**

Policy A3 sets the development principles for the wider area of land. The 2 allocations are focussed on those sites with greater certainty of availability and deliverability

**Action:**

No change in response to representation

3976

Object

---

**Document Element:** Southern Gateway Regeneration Area, 10.11

**Respondent:** Mr James Birkett

## Southern Gateway Regeneration Area, 10.13

### Object

#### Summary of representations:

Object to loss of bus station

#### Summary of representation changes to plan:

Build a new bus station near railway station

#### Response:

The policy needs to be deliverable.

Bus stops would be reprovided in line with the WSCC Bus Service Improvement Plan which indicates a vision for a transport hub which is defined as "railway station, bus stops, toilets, EVCP, bike racks, café and car parking in close proximity".

Additional wording proposed in response to rep 5952 will clarify this (council suggested modifications CM721).

#### Action:

No change in response to representation

4004

Object

**Document Element:** Southern Gateway Regeneration Area, 10.13

**Respondent:** Mr Joseph O'Sullivan

### Object

#### Summary of representations:

Object to loss of bus station

#### Summary of representation changes to plan:

Build a new bus station near railway station

#### Response:

The policy needs to be deliverable.

Bus stops would be reprovided in line with the WSCC Bus Service Improvement Plan which indicates a vision for a transport hub which is defined as "railway station, bus stops, toilets, EVCP, bike racks, café and car parking in close proximity".

Additional wording proposed in response to rep 5952 (council suggested modifications CM721) will clarify this.

#### Action:

No change in response to representation

4018

Object

**Document Element:** Southern Gateway Regeneration Area, 10.13

**Respondent:** Mrs anna corbett

## Object

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### Summary of representations:

Proposed change to wording

### Summary of representation changes to plan:

Reword to "Relocation of the existing bus stops is likely to will be required with the bus station being upgraded or replaced by new bus stops a new transport hub immediately to the north of the rail station booking hall

### Response:

The policy needs to be deliverable but some wording changes can be made for clarity.

Bus stops would be reprovided in line with the WSCC Bus Service Improvement Plan which indicates a vision for a transport hub which is defined as "railway station, bus stops, toilets, EVCP, bike racks, café and car parking in close proximity".

### Action:

See council suggested modification CM271

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5952

Object

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**Document Element:** Southern Gateway Regeneration Area, 10.13

**Respondent:** The Chichester Society

## Southern Gateway Regeneration Area, 10.17

## Object

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### Summary of representations:

Says support but goes on to say the 2017 masterplan vision should be retained and improved. Not ambitious enough

### Summary of representation changes to plan:

None specified but summary wants a masterplan

### Response:

Comment noted

### Action:

No change in response to representation

---

3977

Object

---

**Document Element:** Southern Gateway Regeneration Area, 10.17

**Respondent:** Mr James Birkett



## Support

---

**Summary of representations:**

Support in principle.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No change in response to representation.

---

6238

Support

**Document Element:** Southern Gateway Regeneration Area, 10.17

**Respondent:** Mr James Birkett

### Policy A3 Southern Gateway Development Principles

## Object

---

**Summary of representations:**

Rail station should be a public transport interchange/hub

**Summary of representation changes to plan:**

As per summary

**Response:**

The rail station is outside of the allocation as no land there has been made available at present.

**Action:**

No change in response to representation.

---

3868

Object

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** Mr Michael Wright

## Object

---

**Summary of representations:**

but goes on to say that more emphasis should be made on providing additional uses and more housing to create a green, car free area.

**Summary of representation changes to plan:**

None specified

**Response:**

Support noted

**Action:**

No change in response to representation

---

3979

Object

---

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** Mr James Birkett

## Object

---

**Summary of representations:**

Too much emphasis on retail, café and restaurant use rather than housing. Opportunity for affordable car free homes

**Summary of representation changes to plan:**

Should be more emphasis on housing rather than retail

**Response:**

The 2 proposed allocations within the Southern Gateway area are primarily residential but a mix of uses is envisaged across the wider area, should other parcels of land become available, including an element of retail/restaurant uses around the canal basin

**Action:**

No change in response to representation

---

4171

Object

---

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** Chidham and Hambrook Parish Council

## Support

---

**Summary of representations:**

Too much emphasis on retail, café and restaurant use rather than housing. Opportunity for affordable car free homes

**Summary of representation changes to plan:**

Should be more emphasis on housing rather than retail

**Response:**

The 2 proposed allocations within the Southern Gateway area are primarily residential but a mix of uses is envisaged across the wider area, should other parcels of land become available, including an element of retail/restaurant uses around the canal basin

**Action:**

No change in response to representation

---

**4437****Support**

---

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** Mrs Jane Towers

## Support

---

**Summary of representations:**

summary says "not possible".

**Summary of representation changes to plan:**

None

**Response:**

Comment noted

**Action:**

No change in response to representation

---

**4733****Support**

---

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** Mr Cliff Archer

## Support

---

### Summary of representations:

mentions para 10.14 and recommends that developers take account of the flood risk in masterplanning

### Summary of representation changes to plan:

None specified

### Response:

Support noted – the site-specific policies require the flood risk to be addressed

### Action:

No change in response to representation

---

4868

Support

---

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** Environment Agency

## Object

---

### Summary of representations:

Need a cohesive approach to green infrastructure and BNG across A3,4,5.

### Summary of representation changes to plan:

Additional bullet:

Deliver an integrated and cohesive approach to green infrastructure across the southern gateway, as part of a wider strategic network

### Response:

Such an approach is required by policy P14

### Action:

No change in response to representation

---

5061

Object

---

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** Sussex Wildlife Trust

## Support

---

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Support with a requirement for connections]. Support -agree with designing to encourage and facilitate active travel. But it will be challenging.

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation

---

5330

Support

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** National Highways

## Object

---

### Summary of representations:

Queries whether the rest of the sites are available – policy aspirational at best

### Summary of representation changes to plan:

None specified

### Response:

Comment noted – agreed this is an aspirational policy to ensure there are some principles to apply should the sites become available. They are not allocated for that reason

### Action:

No change in response to representation

---

5482

Object

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** Mayday! Action Group

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation

## 5508

## Support

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Object

### Summary of representations:

support the principle but development is dependent on finalising suitable sites for a replacement bus depot, and city centre interchange facilities

### Summary of representation changes to plan:

Expand 5th bullet to read: "Be designed to encourage and facilitate substantial increase in the use of active travel and public transport to, from and through the city centre. "

### Response:

Discussion on relocation sites is understood to be progressing with the Council as landowner, which is separate to the planning function.

5th bullet can be expanded.

### Action:

See council suggested modification CM273

## 5594

## Object

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** Stagecoach South

## Support

---

### Summary of representations:

Support

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation one

---

5925

Support

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** GoVia Thameslink Railway

## Object

---

### Summary of representations:

Want additional community and conference facilities, esp for young people

### Summary of representation changes to plan:

Add: "a large multi-use community hall suitable for exhibitions, conferences and musical events particularly for the younger demographic

### Response:

Unclear who would deliver such a proposal or how it would be funded

### Action:

No change in response to representation

---

5953

Object

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** The Chichester Society

## Support

### Summary of representations:

Support in principle

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

## 6088

## Support

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** Chidham and Hambrook Parish Council

## Object

### Summary of representations:

There is a once-in-a-generation opportunity to redevelop the city centre Southern Gateway area of Chichester to provide many more affordable houses than that included in the Local Plan including the provision of a major hotel, retail, restaurants, a health centre, music venues, modernised Law Courts, a transport hub based at the train station and an innovation centre in the historic bus depot.

### Summary of representation changes to plan:

The Plan should acknowledge the potential of the Southern Gateway to deliver AT LEAST 270 dwellings, potentially many more, and state that work will continue to create a visionary masterplan for the area through liaison with WSCC, the Post Office, British Rail, the Department of Justice, and other large landowners in the town centre.

### Response:

Policy A3 sets the development principles for the wider area of land. The 2 allocations are focussed on those sites with greater certainty of availability and deliverability.

### Action:

No change in response to representation.

## 6099

## Object

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** Dr Carolyn Cobbold



## Support

---

### Summary of representations:

Support in principle.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

---

6239

Support

---

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** Mr James Birkett

## Object

---

### Summary of representations:

If not accepted already, the Courts & Bus Station and related area should be registered a conservation area to preserve the early 20th century architecture and style

### Summary of representation changes to plan:

Southern Gateway should be public open space

### Response:

Comments noted. In relation to the comment about the courts and bus station: The Chichester Conservation Area is inclusive of Chichester Crown Court and the bus station. Furthermore, the architecture of the Crown Court is recognised by its local listing. The bus station is recognised as needing improvement / an opportunity for enhancement within the Chichester Conservation Area Character Appraisal.

### Action:

No change

---

6308

Object

---

**Document Element:** Policy A3 Southern Gateway Development Principles

**Respondent:** Mr Simon Davenport

## Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park

### Object

---

**Summary of representations:**

Policy should refer to maintaining and improving the amenity of the canal basin, including development to the North of the basin

**Summary of representation changes to plan:**

N/A

**Response:**

The canal basin is outside of this allocation. Policy A3 refers to the types of uses that would be appropriate facing on to the canal basin.

**Action:**

No change in response to representation

---

**3835**

**Object**

---

**Document Element:** Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park

**Respondent:** Mrs Clare Gordon-Pullar

### Object

---

**Summary of representations:**

Need a more ambitious masterplan to bring multiple sites together

**Summary of representation changes to plan:**

Remove policy

**Response:**

Comment noted – any allocations in the plan need to be deliverable in the plan period.

**Action:**

No change in response to representation

---

**3887**

**Object**

---

**Document Element:** Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park

**Respondent:** Dr Carolyn Cobbold

## Object

---

### Summary of representations:

particularly to replacement of bus station with bus stops – need a transport interchange/ transport hub

### Summary of representation changes to plan:

Include a transport hub

### Response:

The proposed replacement bus stops form part of the transport hub approach set out in the WSCC Bus Service Improvement Plan which defines a transport hub as “railway station, bus stops, toilets, electric vehicle charging points (EVCP), bike racks, café and car parking in close proximity.”

This will be clarified in additional wording in para 10.13.

### Action:

No change in response to representation

---

## 3896

## Object

---

**Document Element:** Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park

**Respondent:** Mr Roger Keyworth

## Support

---

### Summary of representations:

Support.

### Summary of representation changes to plan:

Additional allocated parking for Basin Road residents.

### Response:

Support noted.

### Action:

No change in response to representation.

---

## 3897

## Support

---

**Document Element:** Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park

**Respondent:** Miss Joanna Batty

## Object

### Summary of representations:

Bus station site should be used for central employment/government hub for CDC, WSCC, Police and Fire Authority and Medical Centre, releasing other sites for housing.

Bus depot should be used as a world class music venue

### Summary of representation changes to plan:

Uses should include a central employment/ government hub and world class music venue

### Response:

Any allocations in the plan need to be deliverable in the plan period. Unclear who would deliver or fund such uses

### Action:

No change in response to representation

## 3982

## Object

**Document Element:** Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park

**Respondent:** Mr James Birkett

## Object

### Summary of representations:

to loss of bus station without a new transport hub integrated with the railway station

### Summary of representation changes to plan:

Include integrated transport hub

### Response:

The proposed replacement bus stops form part of the transport hub approach set out in the WSCC Bus Service Improvement Plan which defines a transport hub as “railway station, bus stops, toilets, electric vehicle charging points (EVCP), bike racks, café and car parking in close proximity.”

This will be clarified in additional wording in para 10.13.

### Action:

No change in response to representation

## 4170

## Object

**Document Element:** Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park

**Respondent:** Chidham and Hambrook Parish Council

## Object

---

### Summary of representations:

particularly to replacement of bus station with bus stops – need a transport interchange/ transport hub

### Summary of representation changes to plan:

Include a transport hub

### Response:

The proposed replacement bus stops form part of the transport hub approach set out in the WSCC Bus Service Improvement Plan which defines a transport hub as “railway station, bus stops, toilets, electric vehicle charging points (EVCP), bike racks, café and car parking in close proximity.”

This will be clarified in additional wording in para 10.13.

### Action:

No change in response to representation

---

4440

Object

---

**Document Element:** Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park

**Respondent:** Mrs Jane Towers

## Object

---

### Summary of representations:

Wording clarification

### Summary of representation changes to plan:

Replace “treatment” with “disposal” in criterion 9

### Response:

Make change proposed

### Action:

See council suggested modification CM277

---

4469

Object

---

**Document Element:** Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park

**Respondent:** Southern Water

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation

4870

Support

---

**Document Element:** Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park

**Respondent:** Environment Agency

## Object

---

**Summary of representations:**

due to increase in traffic

**Summary of representation changes to plan:**

Should be overarching planning rather than piecemeal developments

**Response:**

Comment noted – any allocations in the plan need to be deliverable in the plan period. Policies T1, 2 and 3 set out requirement to support active travel and reduce the need to travel by car

**Action:**

No change in response to representation

4938

Object

---

**Document Element:** Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park

**Respondent:** Ms Jacqueline Jones

## Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park

### Object

---

#### Summary of representations:

Allocation policies should specify min 10% BNG – could be much more on urban sites

#### Summary of representation changes to plan:

Need a cohesive approach to green infrastructure and BNG across A3,4,5 (as per rep 5061).

#### Response:

Need a cohesive approach to green infrastructure and BNG across A3,4,5 (as per rep 5061).

#### Action:

No change in response to representation

5062

Object

---

**Document Element:** Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park

**Respondent:** Sussex Wildlife Trust

### Object

---

#### Summary of representations:

particularly to replacement of bus station with bus stops – need a transport interchange/ transport hub

#### Summary of representation changes to plan:

Include a transport hub

#### Response:

The proposed replacement bus stops form part of the transport hub approach set out in the WSCC Bus Service Improvement Plan which defines a transport hub as “railway station, bus stops, toilets, electric vehicle charging points (EVCP), bike racks, café and car parking in close proximity.”

This will be clarified in additional wording in para 10.13.

#### Action:

No change in response to representation

5163

Object

---

**Document Element:** Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park

**Respondent:** John Newman

## Object

### Summary of representations:

Concern about removal of bus station without equivalent replacement. Concern about proposed bus stops along ADC

### Summary of representation changes to plan:

3. Enhance the public interchange function of the immediate area, particularly connections to the railway station and the city centre via South Street, Southgate and Basin Road for pedestrians, cyclists and public transport users, and to National Cycle Route 2 and Route 88 which run close by. Suitable replacement bus stops and layover facilities should be provided to replace those at the bus station reflecting the objectives of the West Sussex Bus Service Improvement Plan, and to facilitate growth to meet the requirements of the plan's development strategy. Routes and crossings should reflect pedestrian desire lines. 4. Enhance the public realm, in support of this and wider objectives, incorporating public art and other measures to create a strong and attractive sense of place. ...(renumber remaining points)

### Response:

Comment noted – Discussion on relocation sites is progressing with the Council as landowner'

Point 3 requires that replacement facilities align with the West Sussex Bus Service Improvement Plan.

Additional wording is proposed in para 10.13 to clarify the meaning of transport hub as set out in the WSCC Bus Service Improvement Plan (see rep 5952).

### Action:

No change in response to representation

5595

Object

**Document Element:** Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park

**Respondent:** Stagecoach South

## Object

### Summary of representations:

particularly to replacement of bus station with bus stops – need a transport interchange/ transport hub

### Summary of representation changes to plan:

Include a transport hub

### Response:

The proposed replacement bus stops form part of the transport hub approach set out in the WSCC Bus Service Improvement Plan which defines a transport hub as "railway station, bus stops, toilets, electric vehicle charging points (EVCP), bike racks, café and car parking in close proximity."

This will be clarified in additional wording in para 10.13.

### Action:

No change in response to representation



**5781****Object****Document Element:** Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park**Respondent:** Mr Peter Lansley**Object****Summary of representations:**

but suggesting changes.

**Summary of representation changes to plan:**

3. emphasise that walking and cycling routes must be continuous, direct, safe, attractive, comfortable and following desire lines. Hierarchy of road users at crossings.

11 Provide safe and suitable access points for all users and facilitate the requisite contributions for active travel infrastructure improvements and public transport

**Response:**

Support noted.

These points raised are covered in T1, 2 and 3 and P4

**Action:**

No change in response to representation

**5926****Object****Document Element:** Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park**Respondent:** GoVia Thameslink Railway**Support****Summary of representations:**

Support in principle but changes needed.

**Summary of representation changes to plan:**

See additional rep - 5926 for details.

**Response:**

Support noted.

**Action:**

No change in response to representation.

**6119****Support****Document Element:** Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park**Respondent:** GoVia Thameslink Railway

## Policy A5 Southern Gateway – Police Field, Kingsham Road

### Object

#### Summary of representations:

Need a more ambitious masterplan to bring multiple sites together {same as rep 3887}

#### Summary of representation changes to plan:

Remove policy

#### Response:

Comment noted – any allocations in the plan need to be deliverable in the plan period

#### Action:

No change in response to representation

### 3888

### Object

**Document Element:** Policy A5 Southern Gateway – Police Field, Kingsham Road

**Respondent:** Dr Carolyn Cobbold

### Object

#### Summary of representations:

Should be part of an overall masterplan rather than separate allocation

#### Summary of representation changes to plan:

Build housing on or along the field, on a raised deck where affected by flood risk. Integrate into larger ecological schemes such as greening the Lavant

#### Response:

The design and location of building in the site will have to address the flood risk on the site. Policy P14 sets out the requirement in relation to green infrastructure

#### Action:

No change in response to representation

### 3949

### Object

**Document Element:** Policy A5 Southern Gateway – Police Field, Kingsham Road

**Respondent:** Ms Catharina de Haas

### 3951

### Object

**Document Element:** Policy A5 Southern Gateway – Police Field, Kingsham Road

**Respondent:** Ms Catharina de Haas

## Object

---

### Summary of representations:

Police land and WSCC land on Kingsham Road should be merged for residential uses

### Summary of representation changes to plan:

Merge police and WSCC land for a car free neighbourhood

### Response:

WSCC land was not included because of uncertainty around timing of land availability and delivery

### Action:

No change in response to representation

---

## 3985

## Object

---

**Document Element:** Policy A5 Southern Gateway – Police Field, Kingsham Road

**Respondent:** Mr James Birkett

## Object

---

### Summary of representations:

Minor wording change

### Summary of representation changes to plan:

Replace "treatment" with "disposal"

### Response:

Agree

### Action:

See council suggested modification CM282

---

## 4471

## Object

---

**Document Element:** Policy A5 Southern Gateway – Police Field, Kingsham Road

**Respondent:** Southern Water

## Support

---

### Summary of representations:

Support

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation

4871

Support

**Document Element:** Policy A5 Southern Gateway – Police Field, Kingsham Road

**Respondent:** Environment Agency

Object

**Summary of representations:**

Support points 5-9. Want to maximise opportunities to deliver Green Infrastructure and BNG

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

Green Infrastructure and BNG are covered by policies P14 and NE5

**Action:**

No change in response to representation

5063

Object

**Document Element:** Policy A5 Southern Gateway – Police Field, Kingsham Road

**Respondent:** Sussex Wildlife Trust

## Support

### Summary of representations:

Support BUT - see changes proposed.

Query timing of delivery – would like to develop sooner.

Would like to know more about the River Lavant Flood Alleviation Scheme and headroom at Apuldram which are strategic, and how these have been considered in viability assessment

### Summary of representation changes to plan:

1.70 dwellings should be a minimum or “approximately”

2.Point 3 – change “protected” to “respected”.

3.Point 7 – need to clarify who is responsible for replacement provision and how it will be delivered

### Response:

1. Para 10.1 of the Plan makes it clear that the strategic site allocation policies include an anticipated number of dwellings to come forward on each site and that any variation to this through the development management process would need to be justified with up to date evidence, for example, through a Transport Assessment. A modification is proposed to include ‘approximately’ to reflect this flexibility.

2. change not considered necessary.

3. Policy P15 sets out the need for replacement provision – this is the responsibility of the developer, whether by financial contribution towards the pitches at the High School identified in the IDP or an alternative, depending on timing of delivery.

In response to the other comments – the first phase of the River Lavant Flood Alleviation Scheme was delivered by the Environment Agency in 2003, with a further phase commencing in 2014. This scheme is not specifically referred to in the policy but is mentioned in the SFRA Level 2 in the context that such flood defences will need to be managed and maintained to ensure ongoing safety of development on the site. The issue of infiltration restricting the availability of headroom at Apuldram WWTW, and the need to comply with the Position Statement, is a longstanding known issue – development in the catchment needs to demonstrate no net increase in flow until such time as the situation changes and the Apuldram Position Statement is removed. The whole plan viability study assumes costs for all development to comply with policies on Flood Risk and on Wastewater Management. The housing trajectory does not preclude earlier delivery if all the requirements can be met sooner.

### Action:

See council suggested modification CM280

5509

Support

**Document Element:** Policy A5 Southern Gateway – Police Field, Kingsham Road

**Respondent:** Bellway Homes (Wessex) Ltd

**Agent:** Chapman Lily Planning

## Support

---

### Summary of representations:

Support but changes suggested

### Summary of representation changes to plan:

Need to emphasise that walking and cycling routes must be continuous, safe, attractive etc .... (as per rep 5926)

### Response:

Such a requirement is set out in Policy P4

### Action:

No change in response to representation

---

5927

Support

**Document Element:** Policy A5 Southern Gateway – Police Field, Kingsham Road

**Respondent:** GoVia Thameslink Railway

## Object

---

### Summary of representations:

Concerned about the capacity of Apuldram WwTW to accommodate development on this site.

### Summary of representation changes to plan:

No further development until the necessary infrastructure improvements are delivered

### Response:

Point 14 of the policy sets out that development may need to be phased to ensure adequate wastewater capacity is available. Policy NE16 sets out that development in the Apuldram catchment must comply with the Apuldram Position Statement and must result in no net increase in flows to the sewer network of the Apuldram WwTW.

### Action:

No change

---

6097

Object

**Document Element:** Policy A5 Southern Gateway – Police Field, Kingsham Road

**Respondent:** Donnington Parish Council

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation

---

6252

Support

---

**Document Element:** Policy A5 Southern Gateway – Police Field, Kingsham Road

**Respondent:** Sussex Wildlife Trust

### West of Chichester, 10.20

## Support

---

**Summary of representations:**

Support.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No change

---

4832

Support

---

**Document Element:** West of Chichester, 10.20

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

## Object

---

**Summary of representations:**

Amend 10.20, pavilion provided with phase 1; 10.21 amend surface water bullet point to reflect NPPF and criterion 13; A6 too far advanced for H6/H8 to apply; express brought forward employment land at west of Chichester as hectares; point 14 requires clarification – matter beyond control of developers, lies with SW.

**Summary of representation changes to plan:**

The full sized pavilion is currently being built out. The paragraph should be amended to reflect this.

**Response:**

Bullet point relating to surface water will be amended to reflect criterion 13 of the policy. Paragraph 10.20 to also be amended to omit reference to a pavilion as part of Phase 2. Criterion 14 and 15 have been amended to reflect the wording of the adopted Local Plan for this site allocation, in order to provide clarity in relation to wastewater infrastructure.

Policy H6 Custom and/or Self Build Homes is clear in that it applies to the strategic allocations listed whilst Policy H8 Specialist Accommodation applies to all new housing sites so also would not apply to this allocation carried forward from the adopted Local Plan.

How the floorspace for the West of Chichester employment allocation detailed in policy E1 is calculated is as set out in the HEDNA April 2022 which details the plot ratio assumptions which inform the floorspace calculations.

**Action:**

See Council's suggested Modifications CM286, CM289, CM296 and CM297.

---

**6045****Object**

---

**Document Element:** West of Chichester, 10.20

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech



## Site Specific Considerations, 10.21

### Object

#### Summary of representations:

Concern over knock-on effects from development on A259; suggest install 20 mph zones on A259; limit no. of dwellings to surrounding road network capacity

#### Summary of representation changes to plan:

Only allow a number of new homes in line with what the current road network can handle and protect Chichester harbour AONB and wild life corridors from further pollution. For the roads to be better maintained before any new major development is permitted. To install 20mph zones for A259 villages and more pedestrian road crossings so people can cross safely. Consider alternative routes to the A259 when the A27 is closed

#### Response:

The Sustainability Appraisal and the Transport Study considered the impacts from the planned development. The policy provides at criterion 9 for mitigation for potential off-site traffic impacts

#### Action:

No Change

3895

Object

**Document Element:** Site Specific Considerations, 10.21

**Respondent:** Mr Edward Bowring

### Object

#### Summary of representations:

Amend 10.20, pavilion provided with phase 1; 10.21 amend surface water bullet point to reflect NPPF and criterion 13; A6 too far advanced for H6/H8 to apply; express brought forward employment land at west of Chichester as hectares; point 14 requires clarification – matter beyond control of developers, lies with SW.

#### Summary of representation changes to plan:

To avoid confusion and compliance with the NPPF, this bullet point should be updated to reflect criterion 13 of the Policy A6 wording.

#### Response:

Bullet point relating to surface water will be amended to reflect criterion 13 of the policy. Paragraph 10.20 to also be amended to omit reference to a pavilion as part of Phase 2. Criterion 14 and 15 have been amended to reflect the wording of the adopted Local Plan for this site allocation, in order to provide clarity in relation to wastewater infrastructure.

Policy H6 Custom and/or Self Build Homes is clear in that it applies to the strategic allocations listed whilst Policy H8 Specialist Accommodation applies to all new housing sites so also would not apply to this allocation carried forward from the adopted Local Plan.

How the floorspace for the West of Chichester employment allocation detailed in policy E1 is calculated is as set out in the HEDNA April 2022 which details the plot ratio assumptions which inform the floorspace calculations.

#### Action:

See Council's suggested Modifications CM286, CM289, CM296 and CM297.

**4835****Object****Document Element:** Site Specific Considerations, 10.21**Respondent:** Miller Homes and Vistry Group**Agent:** Tetra Tech**5099****Object****Document Element:** Site Specific Considerations, 10.21**Respondent:** Miller Homes and Vistry Group**Agent:** Tetra Tech**Object****Summary of representations:**

Off-site traffic generation should be kept to a minimum with improvements focussed on active travel/ bus priority not additional capacity for cars. New wording suggested for point 9 confined to funding for walking and cycling routes that link to key destinations; point 10 to focus on bus services

**Summary of representation changes to plan:**

No change

**Response:**

Enhancing active travel is provided for at criterion 10 of the policy. Paragraph 1.12 states that the plan should be read as a 'whole' and policies will not be applied in isolation. The suite of transport policies also provide for active travel including public transport services as well as the safeguarding and delivery of current and planned cycle and walking routes

**Action:**

No change

**5929****Object****Document Element:** Site Specific Considerations, 10.21**Respondent:** GoVia Thameslink Railway

## Policy A6 Land West of Chichester

### Object

#### Summary of representations:

ancient woodland areas should not be included in allocation – re-draw site boundary to exclude areas (sites detailed); should be minimum 50m buffer; change suggested to point 6 inserting provision of 50m buffer unless developer can demonstrate smaller buffer would suffice

#### Summary of representation changes to plan:

Our preference would be for the site boundary to be withdrawn to exclude the area of ancient woodland.

We recommend appending new wording to 6. Deliver a measurable net gain to biodiversity in accordance with Policy NE5 (Biodiversity and Biodiversity Net Gain), and protect and enhance the setting of Brand Hole Copse Local Nature Reserve and areas of ancient woodland and other priority habitats, including chalk streams, including provision of a 50m buffer unless the developer can demonstrate that a smaller buffer would suffice

#### Response:

The policy seeks to protect ancient woodland with the requirement of appropriate buffers and buffer zones, such matters being determined at planning application stage

#### Action:

Changes to be made

4539

Object

**Document Element:** Policy A6 Land West of Chichester

**Respondent:** The Woodland Trust

### Support

#### Summary of representations:

Support.

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted

#### Action:

No change

4798

Support

**Document Element:** Policy A6 Land West of Chichester

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

4837

Support

**Document Element:** Policy A6 Land West of Chichester**Respondent:** Miller Homes and Vistry Group**Agent:** Tetra Tech

## Object

**Summary of representations:**

Concerned about allowance for new culverts. Additional wording for 12b suggested keeping additional culverts to a minimum and design limiting impact on watercourse.

**Summary of representation changes to plan:**

Additional wording to requirement 12 b:

"Any new additional culverts must be kept to an absolute minimum with alternative approaches explored first, such as natural flood management measures. Any new culvert must be designed in such a way so as to limit their impact on the watercourse, such as by allowing for a suitable depth of substrate to reflect the natural watercourse bed and including mammal ledges as appropriate."

**Response:**

Agreed that additional wording required in relation to culverts. Suggested wording has been summarised for policy purposes as the finer details such as exploring alternative approaches and design suggestions would be considered at the determination of any planning application.

**Action:**

See Council's suggested Modifications CM288 and CM294.

4874

Object

**Document Element:** Policy A6 Land West of Chichester**Respondent:** Environment Agency

## Object

**Summary of representations:**

Question whether sufficient opportunity taken to adequately protect features of SWC. Suggest point 6 reference NE8 given ancient woodland on site.

**Summary of representation changes to plan:**

Should bullet point 6 also reference Policy NE8 Trees Hedgerows and Woodland, given the ancient woodland on site?

**Response:**

Policy NE4 Strategic Wildlife Corridors provides protection for development proposals within or in close proximity to the wildlife corridors and Policy NE8 provides the necessary protection for woodland. Paragraph 1.12 states that the plan should be read as a 'whole' and policies will not be applied in isolation. For the sake of consistency, specific reference to Policy NE5 at criterion 6 has been removed.

**Action:**

See Council's suggested Modification CM292.

**5064****Object****Document Element:** Policy A6 Land West of Chichester**Respondent:** Sussex Wildlife Trust**Object****Summary of representations:**

Phase 2 should include nursery and SEND provision, 10.19/10.20 and third bullet point to be amended. Infrastructure and community facilities provision wording varies between policies.

**Summary of representation changes to plan:**

Policy to refer to 'Phase 2 should include expansion of the primary school for the further 1FE of teaching accommodation with nursery and SEND provision'. Paragraph 10.19 is amended to read: 'a local centre with retail, community and employment uses (minimum of approximately 2500 sqm E(g)(i) Use Class), two form entry (2FE) primary school and one form entry (1FE) teaching accommodation with nursery and SEND, informal and formal open space (including a country park), allotments,...'. Should also be included in 3rd bullet point of Policy A6 or the wording of the policy should be drafted to reflect more recent policy requirements i.e. Provide for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan. Include 'Provide for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan.' as appears in other allocation policies.

**Response:**

Proposed amendments in relation to education provision are agreed. In relation to the infrastructure criteria that appears in new allocation policies only, it is not considered necessary for this wording to be inserted into those allocation policies carried forward from the adopted Local Plan.

**Action:**

See Council's suggested Modifications CM285, CM286 and CM291.

**5088****Object****Document Element:** Policy A6 Land West of Chichester**Respondent:** West Sussex County Council

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Support measures to support consistency and mitigation funding]. Measures to provide consistency for transport assessment; list measures for mitigation fund for potential off-site traffic impacts.

### Summary of representation changes to plan:

Proposed consistency measures:

- using one agreed set of trip rates and changing/appropriate trip rates over time;
- interlinkages of Transport Assessments and Travel Plans between different developers ;
- the creation of consortiums or Transport Reference Groups to manage the impacts for the whole development;
- occupation and monitoring trigger points for the development as a whole.

Mitigation provision to address:

- improvements to access onto the A27 in combination with A27 improvement
- improved access to the A27 and surrounding road improvements
- reducing access to the A27 so that the SRN performs more efficiently
- reducing access to the A27 to increase demand for sustainable trips

### Response:

Noted. The specific details are finalised at the planning application stage

### Action:

Changes to be made

**5320****Object**

**Document Element:** Policy A6 Land West of Chichester

**Respondent:** National Highways

## Object

### Summary of representations:

wastewater infrastructure should not be put in place after development has taken place. No provision for cycle and pedestrian routes into centre nor secure cycle storage facilities in city centre.

### Summary of representation changes to plan:

No change

### Response:

This policy is carried forward from the adopted Local Plan with development already commenced and connected to the Tangmere pipeline. The Council collects money for off-site infrastructure through CIL, with funding for specific projects such as secure cycle parking in the city centre being passed to delivery partners (e.g. WSCC). The current Infrastructure Business Plan (IBP) includes project IBP/658 which is a city centre cycle parking project which WSCC are the delivery lead on

### Action:

No change

**5483****Object****Document Element:** Policy A6 Land West of Chichester**Respondent:** Mayday! Action Group**Object****Summary of representations:**

Amend point 10 to provide more detail on bus services. Question funding source for bus service, policy not clear, basis for securing costs and developer contributions does not exist.

**Summary of representation changes to plan:**

Policy A6 should be modified to read:

"...

10. Make provision to accommodate and secure delivery of for regular bus services running through the site to Chichester city centre operating at least every 30 minutes Monday-Saturday, and new and improved cycle and pedestrian routes linking the site with the city

**Response:**

The finer details relating to the matters mentioned in the policy, including bus service provision, are determined at planning application stage. I1 Infrastructure Provision policy refers to the Infrastructure Delivery Plan which provides timings and costings for infrastructure requirements to support planned development in the local plan. Required monies have been secured for the bus service and conversations with bus providers will take place regarding the delivery of the service once the infrastructure is in place.

**Action:**

No change as a result of this representation.

**5596****Object****Document Element:** Policy A6 Land West of Chichester**Respondent:** Stagecoach South**Object****Summary of representations:**

Concern re; environmental impacts and light pollution. Question whether point 12 is achievable

**Summary of representation changes to plan:**

No change

**Response:**

Paragraph 1.12 states that the plan should be read as a 'whole' and policies will not be applied in isolation. Policy NE21 Lighting as well as the suite of environmental policies will also need to be complied with in order for development proposals to be granted planning permission.

**Action:**

No change

5880

Object

**Document Element:** Policy A6 Land West of Chichester**Respondent:** Fishbourne Meadows Residents' Association

Object

**Summary of representations:**

Off-site traffic generation should be kept to a minimum with improvements focussed on active travel/ bus priority not additional capacity for cars. New wording suggested for point 9 confined to funding for walking and cycling routes that link to key destinations; point 10 to focus on bus services.

**Summary of representation changes to plan:**

Change wording as follows

9. Provide or fund improved and new walking and cycle routes that are continuous, direct, safe, attractive and comfortable to the city centre, railway station, Fishbourne, South Downs National Park including additional access on to Centurion Way and other destinations ready for use before first occupation.

**Response:**

Enhancing active travel is provided for at criterion 10 of the policy. Paragraph 1.12 states that the plan should be read as a 'whole' and policies will not be applied in isolation. The suite of transport policies also provide for active travel including public transport services as well as the safeguarding and delivery of current and planned cycle and walking routes

**Action:**

Changes to be made

5930

Object

**Document Element:** Policy A6 Land West of Chichester**Respondent:** GoVia Thameslink Railway

Object

**Summary of representations:**

Change point 4 to designate the two fields as SANG and include in Brandy Hole Copse Local Nature Reserve/Centurion Way Wildlife Corridor - wording proposed

**Summary of representation changes to plan:**

We suggest that Section 4, land north of the B2178 Old Broyle Road, is revised to read: 'The two fields to be designated as a SANG, planted as wildflower meadows, added to Brandy Hole Copse Local Nature Reserve and included within the proposed Centurion Way Wildlife Corridor.'

**Response:**

It is considered that criterion 4 provides sufficient protection to the land north of the B2178 by the requirement to keep it in open use and free from built development

**Action:**

Changes to be made



5954

Object

**Document Element:** Policy A6 Land West of Chichester**Respondent:** The Chichester Society

Object

**Summary of representations:**

Amend 10.20, pavilion provided with phase 1; 10.21 amend surface water bullet point to reflect NPPF and criterion 13; A6 too far advanced for H6/H8 to apply; express brought forward employment land at west of Chichester as hectares; point 14 requires clarification – matter beyond control of developers, lies with SW.

**Summary of representation changes to plan:**

Amend 10.20, pavilion provided with phase 1; 10.21 amend surface water bullet point to reflect NPPF and criterion 13; A6 too far advanced for H6/H8 to apply; express brought forward employment land at west of Chichester as hectares; point 14 requires clarification – matter beyond control of developers, lies with SW.

**Response:**

Bullet point relating to surface water will be amended to reflect criterion 13 of the policy. Paragraph 10.20 to also be amended to omit reference to a pavilion as part of Phase 2. Criterion 14 and 15 have been amended to reflect the wording of the adopted Local Plan for this site allocation, in order to provide clarity in relation to wastewater infrastructure.

Policy H6 Custom and/or Self Build Homes is clear in that it applies to the strategic allocations listed whilst Policy H8 Specialist Accommodation applies to all new housing sites so also would not apply to this allocation carried forward from the adopted Local Plan.

How the floorspace for the West of Chichester employment allocation detailed in policy E1 is calculated is as set out in the HEDNA April 2022 which details the plot ratio assumptions which inform the floorspace calculations.

**Action:**

See Council's suggested Modifications CM286, CM289, CM296 and CM297.

6037

Object

**Document Element:** Policy A6 Land West of Chichester**Respondent:** Miller Homes and Vistry Group**Agent:** Tetra Tech

6038

Object

**Document Element:** Policy A6 Land West of Chichester**Respondent:** Miller Homes and Vistry Group**Agent:** Tetra Tech

6044

Object

**Document Element:** Policy A6 Land West of Chichester

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

6046

Object

**Document Element:** Policy A6 Land West of Chichester

**Respondent:** Miller Homes and Vistry Group

**Agent:** Tetra Tech

Support

**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change to plan

6120

Support

**Document Element:** Policy A6 Land West of Chichester

**Respondent:** GoVia Thameslink Railway

## Land at Shopwyke (Oving Parish), 10.22

### Object

#### Summary of representations:

Change sought to site specific considerations relating to sustainable travel links. Seeks grade separated foot and cycle crossing at A27/Oving Road Junction. Point 5 in policy should be strengthened and Point 6 should make reference to links with railway station with both provided prior to first occupation

#### Summary of representation changes to plan:

The bullet point starting "Maximise the potential for sustainable travel links to the city and towards ...." needs to be strengthened, change wording to "This will include a grade separated foot and cycle crossing at the A27/Oving Road Junction as part of continuous, direct, safe, attractive, comfortable walking and cycle routes to Chichester City Centre and railway station, and a new foot/cycle bridge following the desire line across the A27 via Coach Road to Westhampnett village.

#### Response:

Comments are noted. However, this allocation has been carried forward from the current adopted Local Plan/Site Allocations DPD and as is detailed at paragraph 10.25, planning permission has been granted for the housing allocation. The terms of the planning consents are available to view on the planning application portal on the council website

#### Action:

No changes

**5931****Object**

**Document Element:** Land at Shopwyke (Oving Parish), 10.22

**Respondent:** GoVia Thameslink Railway

## Policy A7 Land at Shopwyke (Oving Parish)

### Support

#### Summary of representations:

Support

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted

#### Action:

No change

**4875****Support**

**Document Element:** Policy A7 Land at Shopwyke (Oving Parish)

**Respondent:** Environment Agency

## Object

### Summary of representations:

No acknowledgment of SWC, propose allocation boundary be amended so site is outside SWC, buffers inside boundary.  
Amend point 8 to include delivering net gains for biodiversity

### Summary of representation changes to plan:

SWT proposes that the allocation boundary be amended to take it outside the area identified as a Strategic Wildlife Corridor in the 2021 consultation, and that sufficient buffers are incorporated within the new redline boundary to protect the integrity and function of the corridor.

The following addition could be made to bullet point 8:

8) Demonstrate that development would not have an adverse impact on the nature conservation interest of identified sites and habitats and; deliver net gains for biodiversity

### Response:

This allocation has been carried forward from the current adopted Local Plan/Site Allocations DPD and as is detailed at paragraph 10.25, planning permission has been granted for the housing allocation. Consequently, the site boundary cannot be amended. Biodiversity net gains are referred to in the third bullet point of paragraph 1 of the policy criteria

### Action:

No change

5065

Object

**Document Element:** Policy A7 Land at Shopwyke (Oving Parish)

**Respondent:** Sussex Wildlife Trust

## Object

### Summary of representations:

Needs to include reference to safeguarding waste infrastructure

### Summary of representation changes to plan:

Paragraph 10.26, last bullet point, amended to read: "Taking account of the West Sussex Joint Minerals Local Plan, Waste Local Plan, and associated guidance, in relation to the site being within a defined Minerals Safeguarding Area and in close proximity to safeguarded waste infrastructure." Criterion 12 to read: "Proposals for the development should have regard to the West Sussex County Council Minerals Safeguarding Area, safeguarded waste infrastructure and associated guidance."

### Response:

The West Sussex County Council minerals and waste Plans and Guidance were taken into account during the determination of the planning applications. Last bullet point at paragraph 10.26 and criterion 12 of policy will be amended to include reference to Waste Local Plan and proximity to safeguarded waste sites

### Action:

See suggested Council's Modifications CM299 and CM300.

**5091****Object****Document Element:** Policy A7 Land at Shopwyke (Oving Parish)**Respondent:** West Sussex County Council**Object****Summary of representations:**

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seeking continued collaboration and further information]. Object: Seek further info re; provision of mitigation for potential off-site traffic impacts on A27 Portfield/Oving Rd junctions; cycle/ pedestrian crossing at A27/Oving Road junction and walking and cycling footbridge across A27 to Coach Rd.

**Summary of representation changes to plan:**

No change

**Response:**

Comments noted. Planning permission has been granted for the full allocation and the terms of the planning consents are available to view on the planning application portal on the council website

**Action:**

No change

**5319****Object****Document Element:** Policy A7 Land at Shopwyke (Oving Parish)**Respondent:** National Highways**Object****Summary of representations:**

Questions impact of development for Chidham and Hambrook and level of residents' input in planning permissions

**Summary of representation changes to plan:**

No change

**Response:**

Comments are noted. However, the planning permissions have now been granted. Members of the public had the opportunity to raise any issues with the development prior to determination of the planning applications

**Action:**

No change

**5484****Object****Document Element:** Policy A7 Land at Shopwyke (Oving Parish)**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

bus service failed to be delivered. Policy ineffective

### Summary of representation changes to plan:

No change

### Response:

Comment noted and passed to WSCC Highways Department for consideration. WSCC advise that the 500 bus goes via the site and is funded by BSIP (Bus Service Improvement Plans). The developer is to extend/divert the number 55 bus service through the development, prior to the occupation of 475 dwellings. The trigger for the S106 contribution has not yet been reached and discussions with the developers will take place at the relevant time

### Action:

No change

5597

Object

**Document Element:** Policy A7 Land at Shopwyke (Oving Parish)

**Respondent:** Stagecoach South

## Object

### Summary of representations:

Change sought to site specific considerations relating to sustainable travel links. Seeks grade separated foot and cycle crossing at A27/Oving Road Junction. Point 5 in policy should be strengthened and Point 6 should make reference to links with railway station with both provided prior to first occupation

### Summary of representation changes to plan:

No change

### Response:

Comments are noted. However, this allocation has been carried forward from the current adopted Local Plan/Site Allocations DPD and as is detailed at paragraph 10.25, planning permission has been granted for the housing allocation. The terms of the planning consents are available to view on the planning application portal on the council website

### Action:

No change

5932

Object

**Document Element:** Policy A7 Land at Shopwyke (Oving Parish)

**Respondent:** GoVia Thameslink Railway

## Object

### Summary of representations:

Site specific considerations could recognise existing trees, hedgerows and woodland and prioritise their protection, enhancement and expansion as part of biodiversity net gains. Acoustic screen could use trees

### Summary of representation changes to plan:

No change

### Response:

Comments are noted. However, this allocation has been carried forward from the current adopted Local Plan/Site Allocations DPD and as is detailed at paragraph 10.25, planning permission has been granted for the housing allocation. The terms of the planning consents are available to view on the planning application portal on the council website

### Action:

No change

5987

Object

**Document Element:** Policy A7 Land at Shopwyke (Oving Parish)

**Respondent:** Forestry Commission

## Land East of Chichester, 10.35

Support

### Summary of representations:

Support: Site bounded by Network Railway between Chichester and Barnham. Site would not allow access to railway for maintenance, which would prevent vehicular access during unsocial hours and avoid trespass and theft from railway.

### Summary of representation changes to plan:

None suggested.

### Response:

Support noted.

### Action:

No change to plan.

4656

Support

**Document Element:** Land East of Chichester, 10.35

**Respondent:** Mr Allen McDonald

## Policy A8 Land East of Chichester

### Object

#### Summary of representations:

Object: not clear whether provision of gypsy and traveller pitches is required at this site.

#### Summary of representation changes to plan:

Remove requirement to provide gypsy and traveller accommodation.

#### Response:

Comment noted. The Council is required to meet needs for gypsies and travellers. The Gypsy and Traveller and Travelling Showpeople Background Paper sets out the importance of providing traveller pitches on the new strategic allocations, as this is one of the few mechanisms available to deliver a planned solution to meeting the needs identified.

#### Action:

No change to plan.

4657

Object

Document Element: Policy A8 Land East of Chichester

Respondent: Mr Allen McDonald

### Object

#### Summary of representations:

Object: impact on barbastelle bat habitat; object to use of recreational uses in buffers adjacent to strategic wildlife corridors.

#### Summary of representation changes to plan:

Remove land within Pagham to Westhampnett Strategic Wildlife Corridor (as shown in consultation 2021).  
Remove 'recreational use' from buffers as per criterion 8.

#### Response:

Objection noted. The justification for the amendment to the width of the corridor is set out in the Strategic Wildlife Corridor Background Paper. It would not be appropriate to remove recreational buffers from criterion 8; some forms of development, such as open space and recreation, may be deemed acceptable within a buffer to a corridor.

#### Action:

No change to plan.

4658

Object

Document Element: Policy A8 Land East of Chichester

Respondent: Mr Tom Broughton



## Object

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### Summary of representations:

Object: unclear if single access from Shopwyke Road will be adequate for size of development. Plans do not specify improvements to Tangmere Road.

### Summary of representation changes to plan:

Further work required on vehicular access to establish full impact on local roads.

### Response:

Objection noted. Criterion 11, in conjunction with Policies T1 and T2, will ensure delivery of appropriate transport infrastructure. As part of the planning application, a Transport Assessment/ Travel Plan will be required which will assess the impact of development on transport infrastructure, including local roads.

### Action:

No change to plan.

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## 4660

## Object

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**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Mr Allen McDonald

## Object

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### Summary of representations:

Object: criteria 7 and 12 – provision of linkages and cycle/pedestrian routes should include Oving.

### Summary of representation changes to plan:

Criteria 7 and 12 – provision of linkages and cycle/pedestrian routes should include Oving.

### Response:

Comment noted. Agree that criteria should include linkages outside of the city.

### Action:

See Council's suggested Modifications CM307 and CM308.

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## 4661

## Object

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**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Mr Allen McDonald

## Object

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### Summary of representations:

Object: existing pedestrian route to Chichester is via Oving crossroads, this provision must be maintained irrespective of any A27 improvements.

### Summary of representation changes to plan:

Commitment in plan to maintain pedestrian access to Chichester via Oving crossroads.

### Response:

Comment noted. Criterion 12 requires pedestrian linkages with Chichester, however it is not within the Council's ability ensure access is maintained as this responsibility lies with the local highway authority and their transport strategy.

### Action:

No change to plan.

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4662

Object

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**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Mr Allen McDonald

## Object

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### Summary of representations:

Object: policy should make clear that the New Fields development is an existing neighbour. Proposed development should not require vehicular access through New Fields

### Summary of representation changes to plan:

Add statement to policy ensuring that the New Field development will not provide vehicular access to/from the proposed development.

### Response:

Objection noted. The primary access to the site would be from Shopwyke Road, and not through the New Fields development.

### Action:

No change to plan.

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4666

Object

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**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Mr Allen McDonald

## Policy A8 Land East of Chichester

## Support

### Summary of representations:

Support: wish to see built development solely within Flood Zone 1.

### Summary of representation changes to plan:

Built development only within Flood Zone 1.

### Response:

Support noted. As part of the masterplanning and planning application process, the local planning authority would seek to ensure that built development is within Flood Zone 1.

### Action:

No change to plan.

4876

Support

**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Environment Agency

## Object

### Summary of representations:

Object: number of dwellings should be a minimum. Cross reference policy H11 to allow off-site provision of gypsy and traveller pitches.

### Summary of representation changes to plan:

(i) Amend first bullet to read:

Development to include at least 680 dwellings...

(ii) Amend final bullet to cross reference to policy H11, which makes specific allowance for off-site provision where this is justified.

### Response:

Comment noted.

(i) Para 10.1 of the Plan makes it clear that the strategic site allocation policies include an anticipated number of dwellings to come forward on each site and that any variation to this through the development management process would need to be justified with up to date evidence, for example, through a Transport Assessment. A modification is proposed to include 'approximately' to reflect this flexibility.

(ii) As the Local Plan is intended to be read in the round it is not considered necessary to duplicate Policy H11 within this policy.

### Action:

See Council's suggested Modification CM303.

**4894****Object****Document Element:** Policy A8 Land East of Chichester**Respondent:** Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd**Agent:** DWD Ltd**Object****Summary of representations:**

Object: propose removal of boundary section that includes the woodland/scrub habitat of the Pagham-Westhampnett strategic wildlife corridor (as set out in 2021 consultation). An appropriate buffer should be provided to safeguard this habitat and the wider corridor.

**Summary of representation changes to plan:**

Amend policy to remove boundary section including woodland/scrub habitat of the Pagham-Westhampnett strategic wildlife corridor (as set out in 2021 consultation).

Include appropriate buffer to corridor.

**Response:**

Comment noted. The Council does not consider to have sufficient evidence to justify the removal of the boundary section. Criterion 8 requires the provision of an appropriate buffer to the corridor within the allocation. The precise width of the boundary will need to be established through the planning application process.

**Action:**

No change to plan.

**4920****Object****Document Element:** Policy A8 Land East of Chichester**Respondent:** Royal Society for the Protection of Birds (RSPB)

## Object

### Summary of representations:

Object: 680 dwellings should be a minimum figure. Amend criterion 11 to comply with CIL regulations and NPPF.  
Wording of criterion 6 is unclear when read in conjunction with Policy NE4.

### Summary of representation changes to plan:

i) Amend first bullet to read at least 680 dwellings.

(ii) Clarify wording of criterion 6 regarding Policy NE4.

(iii) Amend criterion 11:

Provide safe and suitable access points for all users, including a vehicular access from Shopwyke Road, and Should significant impacts on the local highway network be identified through assessment, provide or fund mitigation for potential off-site traffic impacts through a package of measures in conformity with Policy T1 (Transport Infrastructure) and T2 (Transport and Development), which will include promoting sustainable transport options.

### Response:

Comment noted.

(i) Para 10.1 of the Plan makes it clear that the strategic site allocation policies include an anticipated number of dwellings to come forward on each site and that any variation to this through the development management process would need to be justified with up to date evidence, for example, through a Transport Assessment. A modification is proposed to include 'approximately' to reflect this flexibility.

(ii) The wording of criterion 6 is to ensure the functionality of the strategic wildlife corridor is kept intact. The appropriate type of landscaping and buffer will be established through the planning application process.

(iii) All the new strategic allocations are required to provide or fund mitigation for potential off-site impacts, in order to mitigate overall cumulative impact of development on the highway network.

### Action:

See Council's suggested Modification CM303.

4969

Object

**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Suez (Sita UK)

## Object

### Summary of representations:

Object: boundary of this allocation is unsound. Do not support narrowing of Pagham to Westhampnett Strategic Wildlife Corridor (since 2021 consultation). Require evidence to justify location of site boundary. Current boundary means it is not possible to avoid harm to priority species or habitat due to loss of woodland habitat.

### Summary of representation changes to plan:

Amend boundary of site to take it outside of the area identified as the modified Pagham to Westhampnett Strategic Wildlife Corridor in the 2021 consultation.

Incorporate sufficient buffers within the redline boundary to protect the integrity and function of the corridor.

### Response:

Objection noted. The justification for the amendment to the width of the corridor is set out in the Strategic Wildlife Corridor Background Paper. It would not be appropriate to include buffers within the red line boundary of the corridor, as the width of the buffer will need to be established through discussion at planning application stage, and will be based upon what is deemed suitable to ensure functionality and integrity of the corridor.

### Action:

No change to plan.

5066

Object

**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Sussex Wildlife Trust

## Object

### Summary of representations:

Object: in line with government guidance we do not request 1 form entry schools, and therefore require a two form entry school on this site.

### Summary of representation changes to plan:

Amend bullet point 3:

A neighbourhood centre incorporating local shops, a community centre, flexible space for employment/ small-scale leisure uses and a one-form (expandable to two-form) two form entry primary school with provision for early years/ childcare and special educational needs and disability;...

### Response:

Comment noted. So that the policy remains aligned with the Infrastructure Delivery Plan bullet 3 will remain unchanged, however will amend the reasoned justification for the policy in paragraph 10.35 for clarification.

### Action:

See Council's suggested Modification CM301.

5089

Object

**Document Element:** Policy A8 Land East of Chichester

**Respondent:** West Sussex County Council

## Object

### Summary of representations:

Object: criterion 4 goes beyond policy requirement in NPPF. There is no requirement in NPPF to enhance significance and difficult to see how development could achieve this.

### Summary of representation changes to plan:

Amend criterion 4 to remove reference to 'enhance'.

### Response:

Comment noted. Agree to proposed amendment.

### Action:

See Council's suggested Modification CM305.

## 5310

## Object

**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd

**Agent:** DWD Ltd

## Object

### Summary of representations:

Object: unnecessary to use terms 'substantial' and 'significant' in criterion 6.

### Summary of representation changes to plan:

- (i) Remove 'substantial' and 'significant' from criterion 6.
- (ii) Criterion 8 – make lighting restrictions less onerous.
- (iii) Criterion 10 – amend to refer to 'significant harm' rather than 'no adverse effects'.

### Response:

Comment noted.

- (i) Agree removal of substantial, however suggest replacing with 'appropriate' in line with criterion 8.
- (ii) The lighting criteria is worded to reflect an appropriate light level from the development that would not adversely impact upon the Singleton and Cocking Tunnels SAC.
- (iii) The wording of criterion 10 is supported by the Habitats Regulations Assessment, which recognises that without adequate mitigation there would be an adverse impact on the SAC as a result of the development. No change to the criterion.

### Action:

See Council's suggested Modification CM306.

## 5315

## Object

**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd

**Agent:** DWD Ltd

## Object

### Summary of representations:

Object: criterion 11 should be reworded to confirm with the requirements of the NPPF more closely, where mitigation can only be required where an impact is identified through transport assessment.

### Summary of representation changes to plan:

Amend criterion 11:

Provide safe and suitable access points for all users, including a vehicular access from Shopwyke Road, and Should significant impacts on the local highway network be identified through assessment, provide or fund mitigation for potential off-site traffic impacts through a package of measures in conformity with Policy T1 (Transport Infrastructure) and T2 (Transport and Development), which will include promoting sustainable transport options.

### Response:

Comment noted. All the new strategic allocations are required to provide or fund mitigation for potential off-site impacts, in order to mitigate overall cumulative impact of development on the highway network.

### Action:

No change to plan.

## 5318

## Object

**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd

**Agent:** DWD Ltd

## Object

### Summary of representations:

Object: criterion 16 is open-ended. Suggest amending.

### Summary of representation changes to plan:

Amend criterion 16:

Where a significant impact is identified requiring mitigation, Pprovide for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan.

### Response:

Comment noted. All the new strategic allocations are required to provide infrastructure and community facilities in accordance with the IDP, as the resultant population from the new developments will impact upon existing infrastructure. This criteria intends of ensuring that the cumulative impact of development on existing infrastructure is mitigated.

### Action:

No change to plan.

## 5321

## Object

**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd

**Agent:** DWD Ltd



## Support

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Noting the need for a master plan and to collaborate]. Support: support use of masterplanning process to allow consultation with stakeholders on development of transport strategy for the site.

### Summary of representation changes to plan:

None suggested.

### Response:

Support noted.

### Action:

No change to plan.

5323

Support

**Document Element:** Policy A8 Land East of Chichester

**Respondent:** National Highways

## Object

### Summary of representations:

Object: potential to have environmental and human impacts.

### Summary of representation changes to plan:

Clarify what constitutes an appropriate buffer to the strategic wildlife corridor.

### Response:

Objection noted. An appropriate buffer will be established through the masterplanning and planning application process.

### Action:

No change to plan.

5485

Object

**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

Object: support development at this site but depends on deliverability of a regular, reliable and direct bus service along Oving Road. Need a policy basis to secure contributions to deliver a service, which may take the form of a proportionate contribution to deliver a new service or enhance provision.

### Summary of representation changes to plan:

Amend criterion 12:

Provide high quality connectivity by sustainable travel modes focused in particular on a corridor between Chichester city and Tangmere along Shopwyke Road, including new improved cycle and pedestrian routes, and a frequent bus service taking advantage of effective bus priority measures on Oving Road at the A27

### Response:

Comment noted. Criterion 12 already refers to the pedestrian and cycle network and given the breadth of Policies T1 and T2, as referred to above, the further amendments to the wording sought by the respondent are considered unnecessary.

### Action:

No change to plan.

**5598****Object**

**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Stagecoach South

## Object

### Summary of representations:

Object: object to reduction in the Pagham to Westhampnett Strategic Wildlife corridor compared to the corridor shown in 2021 consultation. Presence of Marsh Harriers on site. Corridor should be restored to full size and A8 should proceed in a manner that will enhance biodiversity of lake and surrounds including limiting access to lake.

### Summary of representation changes to plan:

Restore corridor to width shown in 2021 consultation.

Limit proximity of access from site to lake

### Response:

Comment noted. The justification for the amendment to the width of the corridor is set out in the Strategic Wildlife Corridor Background Paper. The Council can encourage the limiting of access to the lake, however this will be for the landowner and applicant to enforce.

### Action:

No change to plan.

**5704****Object**

**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Sussex Ornithological Society

## Support

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**Summary of representations:**

Support: confirm site is available, suitable and deliverable.

**Summary of representation changes to plan:**

None suggested.

**Response:**

Support noted.

**Action:**

No change to plan.

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**5768****Support**

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**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Suez (Sita UK)

## Object

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**Summary of representations:**

Object: understanding that the Westhampnett to Pagham Strategic Wildlife Corridor has been narrowed since technical consultation in 2021. Would welcome a discussion around this given concerns over narrowness of corridors.

**Summary of representation changes to plan:**

Amend allocation boundary to remove extent of wildlife corridor consulted upon in 2021.

**Response:**

Comment noted. This comment appears to relate primarily to the Westhampnett-Pagham Strategic Wildlife Corridor. See response to representation 6109.

**Action:**

No change to plan.

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**5868****Object**

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**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Natural England

## Object

### Summary of representations:

Object: development needs to provide safe, continuous, direct routes to the city centre and railway station,.

### Summary of representation changes to plan:

Amend criterion 11:

Provide safe and suitable access points for all users. Provide or fund improved and new walking and cycle routes that are continuous, direct, safe, attractive and comfortable to the city centre, railway station, and other destinations including grade separated crossings of the A27 ready for use before first occupation. Provide vehicular access from Shopwyke Road

### Response:

Comment noted. It is considered the criterion as drafted and the cross reference to Policies T1 and T2, as well as Policy P4, which are not solely concerned with 'highway' improvements but transport infrastructure more widely, including sustainable modes of travel provides an appropriate approach and level of detail.

### Action:

No change to plan.

5933

Object

**Document Element:** Policy A8 Land East of Chichester

**Respondent:** GoVia Thameslink Railway

## Support

### Summary of representations:

Comment: welcome efforts to bolster existing woodland at the enhancements that development could bring to the proposed strategic wildlife corridor.

### Summary of representation changes to plan:

None suggested.

### Response:

Support noted.

### Action:

No change to plan.

6001

Support

**Document Element:** Policy A8 Land East of Chichester

**Respondent:** Forestry Commission

## Support

### Summary of representations:

Support in principle with suggested changes.

### Summary of representation changes to plan:

Amend criterion 11:

Provide safe and suitable access points for all users. Provide or fund improved and new walking and cycle routes that are continuous, direct, safe, attractive and comfortable to the city centre, railway station, and other destinations including grade separated crossings of the A27 ready for use before first occupation. Provide vehicular access from Shopwyke Road

### Response:

Support noted.

### Action:

No change to plan.

6121

Support

**Document Element:** Policy A8 Land East of Chichester

**Respondent:** GoVia Thameslink Railway

## Westhampnett/North East Chichester, 10.36

## Object

### Summary of representations:

"Must have improved access...." Rather than "expected to provide...."

### Summary of representation changes to plan:

No change

### Response:

Paragraphs 10.37 and 10.38 of the Plan set out that this allocation has now been permitted. Matters such as access would have been considered at the determination of the planning applications

### Action:

No change

5486

Object

**Document Element:** Westhampnett/North East Chichester, 10.36

**Respondent:** Mayday! Action Group

**Westhampnett/North East Chichester, 10.39****Object****Summary of representations:**

Unsuitable site – noise, public safety from existing operations; permission granted on land removed from strategic allocation – exceeds housing number. Policy/text should cross-reference with A16/A17 and paras 10.71 and 10.75 and Map A9A

**Summary of representation changes to plan:**

The plan must spell out the reasons why the site is unsuitable for development in greater detail including reference to the unlikely effectiveness of mitigation measures

**Response:**

Paragraphs 10.37 and 10.38 of the Plan set out that this allocation has now been permitted. Environmental, social and planning constraints would have been considered at the determination of the planning applications. As pointed out at paragraph 1.12, the plan should be read as a 'whole' and policies will not be applied in isolation

**Action:**

No change

**4265****Object**

**Document Element:** Westhampnett/North East Chichester, 10.39

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

**Policy A9 Land at Westhampnett/North East Chichester****Object****Summary of representations:**

development has encroached into Goodwood Buffer, flood plain and wildlife corridor. Plans for Stage 2 of western development should be reviewed.

**Summary of representation changes to plan:**

The plans for the Stage 2 of the western development should be reviewed urgently

**Response:**

Paragraphs 10.37 and 10.38 of the Plan set out that this allocation has now been permitted. Environmental and planning constraints would have been considered at the determination of the planning applications

**Action:**

No change

**3869****Object**

**Document Element:** Policy A9 Land at Westhampnett/North East Chichester

**Respondent:** Mr Michael Wright

## Object

### Summary of representations:

Unsuitable site – noise, public safety from existing operations; permission granted on land removed from strategic allocation – exceeds housing number. Policy/text should cross-reference with A16/A17 and paras 10.71 and 10.75 and Map A9A

### Summary of representation changes to plan:

The policy and supporting text should cross-reference with Policies A16/A17, and paragraphs 10.71- 10.75. Similar cross-reference should be made to MapA9a

### Response:

Paragraphs 10.37 and 10.38 of the Plan set out that this allocation has now been permitted. Environmental, social and planning constraints would have been considered at the determination of the planning applications. As pointed out at paragraph 1.12, the plan should be read as a 'whole' and policies will not be applied in isolation

### Action:

No change

4261

Object

**Document Element:** Policy A9 Land at Westhampnett/North East Chichester

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

4879

Support

**Document Element:** Policy A9 Land at Westhampnett/North East Chichester

**Respondent:** Environment Agency

## Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Comment noted

**Action:**

No change

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5067

Support

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**Document Element:** Policy A9 Land at Westhampnett/North East Chichester

**Respondent:** Sussex Wildlife Trust

## Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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5140

Support

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**Document Element:** Policy A9 Land at Westhampnett/North East Chichester

**Respondent:** South Downs National Park Authority



## Support

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Noting the need for a master plan and to collaborate]

### Summary of representation changes to plan:

N/A

### Response:

Comment noted

### Action:

No change

5324

Support

**Document Element:** Policy A9 Land at Westhampnett/North East Chichester

**Respondent:** National Highways

## Object

### Summary of representations:

Point 9 re; bus service has not been effected in line with policy requirement. Lack of up-to-date transport evidence, policy/allocation can only be made sound once evidence base refreshed. Amendment suggested relating to use of a modal filter to make policy sound

### Summary of representation changes to plan:

However, it is possible that the allocation could be made sound by modification of Policy A9 as follows:

"...

9. Make provision for regular, direct and reliable bus services linking the site with Chichester city centre, and new and improved safe and convenient cycle and pedestrian routes linking the site with Chichester city, the South Downs National Park and other strategic developments to the east of Chichester city including Tangmere. These objectives require a deliverable scheme to afford bus priority through Portfield, and potentially linking the development with the Graylingwell area through use of a modal filter;

..."

### Response:

Site-specific requirements such as provision of bus services are determined at the planning application stage. Paragraphs 10.37 and 10.38 of the Plan set out that this allocation has now been permitted

### Action:

No change

5599

Object

**Document Element:** Policy A9 Land at Westhampnett/North East Chichester

**Respondent:** Stagecoach South

## Object

### Summary of representations:

Point 8 should exclude off-site traffic impacts, except business, service and delivery vehicles – wording suggested.  
Change to Point 9 proposed to include reference to railway station and bus priority

### Summary of representation changes to plan:

Change wording as follows

8. Provide safe and suitable access for all users. Provide or fund improved and new walking and cycle routes that are continuous, direct, safe, attractive and comfortable to bus stops, local community facilities, city centre, railway station, South Downs National Park and other strategic development east of Chichester city including Tangmere.

9. Facilitate providing reliable frequent bus services to the city centre, railway station and other parts of the city and strategic development locations, including bus only routes, bus lanes and bus priority.

### Response:

Development considerations are determined at planning application stage. Paragraphs 10.37 and 10.38 of the Plan set out that this allocation has now been permitted

### Action:

No change

5934

Object

**Document Element:** Policy A9 Land at Westhampnett/North East Chichester

**Respondent:** GoVia Thameslink Railway

## Support

### Summary of representations:

Support.

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

6122

Support

**Document Element:** Policy A9 Land at Westhampnett/North East Chichester

**Respondent:** GoVia Thameslink Railway

## Support

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Comment noted

### Action:

No change

6279

Support

**Document Element:** Policy A9 Land at Westhampnett/North East Chichester

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Policy A10 Land at Maudlin Farm

Object

### Summary of representations:

1. Welcome criterion 10 and offer to work with developer to ensure noise mitigation measures are appropriate.
2. Owner of strip of land to west of allocation and fronting Dairy Lane. Could be included in allocation or treated as windfall site

### Summary of representation changes to plan:

N/A

### Response:

1. Noted.
2. The site east of Dairy Lane is assessed in the HELAA (HWH0005a) as being deliverable and the HELAA also recognises the potential for the site to come forward in conjunction with the larger adjoining site (proposed for allocation in the Local Plan under Policy A10).

Whilst there may be some technical and place making advantages if the two sites were developed together, the Council are not proposing any amendments to sites allocated in the Local Plan or to allocate any additional sites

### Action:

No change in response to this representation

4220

Object

**Document Element:** Policy A10 Land at Maudlin Farm

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

### Summary of representations:

Plan for a range of new housing that meets the needs of local people over their lifetimes including affordable housing and specialist accommodation. Should not overburden any one place, local infrastructure to support new development should be provided before development is approved, existing infrastructure problems should be addressed. Wastewater treatment capacity is inadequate and Old Arundel Road/Stane Street access is poor with no opportunity to improve.

### Summary of representation changes to plan:

N/A

### Response:

The Local Plan seeks to address the issues raised by the respondent. In respect of this proposed allocation the development will provide affordable housing in accordance with Policy H4 and specialist accommodation (for older persons, self build and Gypsy and Travellers).

In response to representations from the Environment Agency (4880) and Southern Water (4485) an additional criterion is proposed relating to the availability of sufficient waste water capacity

### Action:

No change in response to this representation

4328

Object

**Document Element:** Policy A10 Land at Maudlin Farm

**Respondent:** Westhampnett Parish Council

## Object

### Summary of representations:

Assessment of existing capacity of wastewater network and ability to meet forecast demand for this proposal revealed local network has limited capacity. This is not a constraint to development provided planning policy/conditions ensure occupation of development is phased to align with delivery of wastewater infrastructure.

For consistency with policies A6, A7, A8 and A14 given wastewater from development within Westhampnett parish will be conveyed to Tangmere WTW, propose following additional criterion:

Occupation of development will be phased to align with the delivery of infrastructure for adequate wastewater conveyance (meeting strict environmental standards)

### Summary of representation changes to plan:

N/A

### Response:

Agree that to address issue raised in representation and consistency with other strategic allocations an additional criterion relating to wastewater should be added. However, for consistency with the other strategic allocations it is proposed that the criterion wording from those policies be added.

### Action:

See council suggested modification CM318

4485

Object

**Document Element:** Policy A10 Land at Maudlin Farm**Respondent:** Southern Water

Support

**Summary of representations:**

Site to south of existing and proposed expanded R-RMC site and may be interrelationships between two sites as come forward for development. R-RMC committed to working with Council to ensure any cumulative impact is assessed appropriately and any required mitigation is reasonably and proportionately shared

**Summary of representation changes to plan:**

N/A

**Response:**

Comments noted

**Action:**

No changes to plan in response to this representation

4693

Support

**Document Element:** Policy A10 Land at Maudlin Farm**Respondent:** Rolls-Royce Motor Cars Limited**Agent:** David Lock Associates

Object

**Summary of representations:**

1. Lack of reference to appropriate phasing of wastewater infrastructure. Should be added as per other site allocation policies.
2. Supportive of criterion 11. Remediation measures must have regard to any risks to groundwater quality

**Summary of representation changes to plan:**

N/A

**Response:**

1. Agree that to address issue raised in representation and consistency with other strategic allocations an additional criterion relating to wastewater should be added. However, for consistency with the other strategic allocations it is proposed that the criterion wording from those policies be added.
2. Comments noted

**Action:**

See council suggested modification CM318

4880

Object

**Document Element:** Policy A10 Land at Maudlin Farm**Respondent:** Environment Agency

Object

**Summary of representations:**

Policy doesn't specify minimum BNG to be achieved. Environment Act will make minimum 10% BNG mandatory by November 2023. This should be made clear in policy or alternatively if setting more ambitious minimum of 20% BNG for major development this could be specified.

**Summary of representation changes to plan:**

N/A

**Response:**

The Local Plan contains the proposed policy NE5 (Biodiversity and Biodiversity Net Gain) and is intended to be read in the round. Policy NE5 sets out the requirement for development proposals to deliver a minimum of 10% net gain in biodiversity.

See also response to Sussex Wildlife Trust's representation to Policy NE5 (5043) regarding BNG target.

**Action:**

No change in response to this representation

5068

Object

**Document Element:** Policy A10 Land at Maudlin Farm**Respondent:** Sussex Wildlife Trust

Support

**Summary of representations:**

Reinforce that Masterplanning process presents opportunity to consider traffic associated with developments using/accessing/exiting A27; viable alternatives to private car; understand future infrastructure requirements; develop mitigation measures; utilise Travel Plan monitoring strategies; collect appropriate mitigation fundin

**Summary of representation changes to plan:**

N/A

**Response:**

Comments noted

**Action:**

No change in response to this representation

**5325****Support****Document Element:** Policy A10 Land at Maudlin Farm**Respondent:** National Highways

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**Object****Summary of representations:**

No development should be permitted that impacts visual amenity or changes in landscape between South Downs and Chichester Harbour AONB

**Summary of representation changes to plan:**

N/A

**Response:**

The Landscape Capacity Study (2019) assessed the two parcels that contribute to the site allocation as having medium and medium/high capacity for landscape change.

Where potential adverse impacts of development have been identified, it is considered that these are not insurmountable and could potentially be mitigated. Development proposals will be subject to the requirements of Policy NE2 (Natural Landscape) and the site specific requirements set out in the Policy criteria particularly, in respect of landscape impacts, criteria 1 and 2.

**Action:**

No change in response to this representation

**5487****Object****Document Element:** Policy A10 Land at Maudlin Farm**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

Support identification of site. It is close to city and near employment and services that can be reached by active travel modes. Could be made sustainable with appropriate measures to substantially boost sustainable choices.

Policy not sufficiently clear on measures to reduce car trips to improve congestion and reliability of bus services at Portfield and over wider area. Only reference is to funding highways capacity improvements but as set out in Chichester Transport Strategy these improvements do not accommodate growth from sites additional to those in adopted Local Plan. Will not secure modal shift from car use.

Second sentence of criterion 5 should be amended to read:

The development should make the requisite contributions for off-site improvements to transport infrastructure and services, with an emphasis on maximising the attractiveness of sustainable modes, in conformity with the Policy T1 (Transport Infrastructure) and T2 (Transport and Development), which will include high quality pedestrian, cycling and public transport routes

### Summary of representation changes to plan:

N/A

### Response:

As Policies T1 and T2 are not solely concerned with 'highway' improvements but transport infrastructure more widely, including sustainable modes of travel, it would be appropriate to delete reference to 'highway improvements' in criterion 5. Criterion 6 already refers to the pedestrian and cycle network and given the breadth of Policies T1 and T2, as referred to above, the further amendments to the wording sought by the respondent are considered unnecessary

### Action:

See council suggested modification CM316

5600

Object

**Document Element:** Policy A10 Land at Maudlin Farm

**Respondent:** Stagecoach South

Object



**Summary of representations:**

1. Have reached agreement with landowner of adjoining land to west off Dairy Lane. Inclusion of this additional land would provide cohesive approach to development and additional points of connectivity with Dairy Lane and development to the west.
2. Policy wording should provide more flexibility in provision of specialist accommodation for older people to ensure provision is akin to local need. Suggest amendment to wording of second bullet point to read: '... Which is appropriate 1. Have reached agreement with landowner of adjoining land to west off Dairy Lane. Inclusion of this additional land would provide cohesive approach to development and additional points of connectivity with Dairy Lane and development to the west.
2. Policy wording should provide more flexibility in provision of specialist accommodation for older people to ensure provision is akin to local need. Suggest amendment to wording of second bullet point to read: '... Which is appropriate for the site to an evidenced need of the local area
3. Object to allocation of 3 gypsy and traveller pitches. Understand underlying rationale for approach but that doesn't dictate appropriateness of locations for gypsy traveller provision. Plots currently available in other areas of the district not been taken up for allocation (namely HELAA ref. HBI0028). Clear absence of information regarding pitch requirements in localities and site specific needs required to be met. Not seen any evidence of engagement with gypsy traveller community on suitability of this suburban residential site and appears to be no consideration of how access can be accommodated. Until further evidence has been provided on suitability of approach, need in this specific location and suitability as part of housing allocation of this scale, with a single point of access, do not consider requirement for provision is appropriate.
4. Criterion 5 - secondary vehicular access not considered feasible due to the change in levels, width of the existing highway, adjoining private ownerships, an open ditch and number of large trees of merit. Widening of lane would not be feasible and would significantly alter character of the area. Requirement for secondary access should be removed from the policy wording. Pedestrian access would be more suitable, connecting into the existing footpath network to the west

**Summary of representation changes to plan:**

N/A

**Response:**

1. The site east of Dairy Lane is assessed in the HELAA (HWH0005a) as being deliverable and the HELAA also recognises the potential for the site to come forward in conjunction with the larger adjoining site (proposed for allocation in the Local Plan under Policy A10).

Whilst there may be some technical and place making advantages if the two sites were developed together, the Council are not proposing any amendments to sites allocated in the Local Plan or to allocate any additional sites.

2. As a strategic allocation the site is meeting the needs of the plan area generally.

3. As set out in the Gypsy and Traveller and Travelling Showpeople Background Paper (May 2024), the Council have explored a number of options for pitch delivery. This has included a 'Call for Sites' and an assessment of the potential for intensification on existing Gypsy and Traveller sites but the likely provision arising from these sources does not meet the assessed level of pitch need, requiring provision to be made on the proposed strategic housing sites. As indicated in the Background Paper, the site referred to was assessed as being unsuitable for allocation but would have in any case, not provided a sufficient number of pitches to avoid making provision on the strategic housing allocations.

It should also be noted that whilst as a strategic allocation this site is meeting the needs of the plan area generally, there is an immediate and future need, arising from the Easthampnett site to the east of the strategic allocation.

The Planning Policy for Traveller Sites (2023) indicates that pitches should be well integrated into the local community thereby providing good access to essential services. The good practice guidance for designing Gypsy and Traveller sites (2008), which although withdrawn still provides useful guidance for the design of Gypsy and Traveller sites, stated that where possible sites should be developed near to the settled community as part of mainstream residential developments.

4. The comment regarding the secondary access is acknowledged and an amendment to reflect this proposed. Criterion 6 already requires the provision of pedestrian and cycle access, which would include onto Dairy Lane.

**Action:**

See council suggested modification CM317

**5689****Object**

**Document Element:** Policy A10 Land at Maudlin Farm

**Respondent:** Teren Project Management Ltd

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

1. Development here should be low priority to be progressed after land that has easier sustainable access.
2. Criterion 5 – remove reference to off site highway improvements except for bus services, goods and service vehicles
3. Criterion 6 – reword to 'Provide safe and suitable access for all users. Provide or fund improved and new walking and cycle routes that are continuous, direct, safe, attractive and comfortable to bus stops, local community facilities, city centre and railway station.'

### Summary of representation changes to plan:

N/A

### Response:

1. There is a bus stop less than 100m from the site providing a bus service (to Chichester) with a good service frequency (every 20 – 30 minutes during weekday).
2. In response to another representation (from Stagecoach South) it is proposed to amend criterion 5 to delete the word 'highway', which would also address this point made by the respondent.
3. It is considered that criterion 6 as drafted, combined with the requirements of Policies T1 and T2, would achieve the points made. Policy P4 also includes criteria relating to active travel and integration with public transport

### Action:

No change in response to this representation

5935

Object

**Document Element:** Policy A10 Land at Maudlin Farm

**Respondent:** GoVia Thameslink Railway

## Support

### Summary of representations:

allocation of site. Technical work/Vision document demonstrate site is capable of delivering circa 265 dwellings during the plan period

### Summary of representation changes to plan:

N/A

### Response:

Comments noted.

### Action:

No change in response to this representation

6254

Support

**Document Element:** Policy A10 Land at Maudlin Farm

**Respondent:** Teren Project Management Ltd

**Agent:** Henry Adams LLP

Support

**Summary of representations:**

Support allocation

**Summary of representation changes to plan:**

N/A

**Response:**

Comments noted

**Action:**

No change in response to this representation

6269

Support

**Document Element:** Policy A10 Land at Maudlin Farm

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

**Bosham, 10.42****Object****Summary of representations:**

Object: poor public transport availability, primary school and GP at capacity, lack of shopping facilities.

**Summary of representation changes to plan:**

Delete Policy A11.

**Response:**

Objection noted. It is accepted that new development may affect existing infrastructure and local services and may require new or enhanced provision to meet needs. Therefore, all relevant service providers are consulted to identify if the services they provide have existing capacity or if additional capacity is needed to accommodate the proposed development. This is outlined in the Infrastructure Delivery Plan (IDP) that supports the Local Plan. It is the responsibility of service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver infrastructure by requiring developers to make financial contributions through the developer obligation process (as set out in Policy I1) or by the phasing of development in line with the expected delivery of required infrastructure. The Council will continue to work with service providers to understand the Plan Area's infrastructure needs and to regularly update the IDP.

**Action:**

No change to plan.

**3891****Object**

Document Element: Bosham, 10.42

Respondent: The Bosham Association

**Bosham, 10.43****Object****Summary of representations:**

Object: considerable local objection to site. Size of development is out of scale with village. One access into site would cause congestion and pollution.

**Summary of representation changes to plan:**

Delete Policy A11.

**Response:**

Objection noted. The spatial strategy seeks to locate development in locations which have access to a range of services and facilities, informed by the settlement hierarchy evidence. This has also been influenced by site availability and suitability, environmental and other constraints.

**Action:**

No change to plan.

**3892****Object**

Document Element: Bosham, 10.43

Respondent: The Bosham Association

## Object

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### Summary of representations:

Object: additional dwellings at Highgrove conflicts with Bosham Plan and local community preferences. Concerns over coalescence and use of agricultural land.

### Summary of representation changes to plan:

Reduce housing figure to 220. Allocate 25 dwellings at HBO0003.

### Response:

Promotion of alternative site noted

### Action:

No change to plan.

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4916

Object

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Document Element: Bosham, 10.43

Respondent: Willowfield Farm

**Bosham, 10.44****Object****Summary of representations:**

Object: site within defined countryside, conflicts with plan policies. Suggest use of Burnes Shipyard to accommodate increased number of dwellings.

Concern over impact on A27.

**Summary of representation changes to plan:**

Delete Policy A11.

**Response:**

Objection and alternative site proposal noted. The Council is required to identify sites to meet its housing need; Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

This site has been selected as it is adjacent to the boundary, and has been deemed to be suitable to bring forward new sustainable development.

CDC have and continue to work with both National Highways and WSCC to assess the impact of development, and the potential for cumulative effects, on the highway network. Where site specific mitigation is required, this is identified in the site specific policies and IDP. As part of a planning application, developers will be required to submit a Transport Assessment and/or Travel Plan to detail any highway issues and sustainable travel options, which will need to address issues identified in the Local Plan policies and IDP.

**Action:**

No change to plan.

**3893****Object**

**Document Element:** Bosham, 10.44

**Respondent:** The Bosham Association

**Object****Summary of representations:**

Object: due weight to setting of AONB and SDNP not given. Would result in loss of views.

**Summary of representation changes to plan:**

Reduce allocation to 220.

**Response:**

Promotion of alternative site noted

**Action:**

No change to plan.

**4919****Object****Document Element:** Bosham, 10.44**Respondent:** Willowfield Farm**Bosham, 10.45****Object****Summary of representations:**

Object: flood risk data for site is inconclusive and out of date. Site prone to flooding at Brooks Lane.

**Summary of representation changes to plan:**

Delete Policy A11.

**Response:**

Comment noted. The entirety of the site is located within Flood Zone 1, although it is understood that there are local concerns about flooding from groundwater. This site has planning permission (reference 21/00571/FUL). As part of the application, the report to Planning Committee considered the proposed approach to surface water drainage and considered it acceptable subject to the imposition of a planning condition. The Council is therefore satisfied that the site can be acceptably drained.

**Action:**

No change to plan.

**3894****Object****Document Element:** Bosham, 10.45**Respondent:** The Bosham Association



## Bosham, 10.45

## Support

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### Summary of representations:

Support: list of specific issues justify why allocation should be split.

### Summary of representation changes to plan:

Split allocation between Highgrove Farm and HBO0003.

### Response:

Support noted.

### Action:

No change to plan.

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4922

Support

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Document Element: Bosham, 10.45

Respondent: Willowfield Farm

## Object

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### Summary of representations:

Object: allocation should be split.

### Summary of representation changes to plan:

Split allocation between Highgrove Farm and HBO0003.

### Response:

Promotion of alternative site noted

### Action:

No change to plan.

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6190

Object

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Document Element: Bosham, 10.45

Respondent: Willowfield Farm

## Policy A11 Highgrove Farm, Bosham

### Object

#### Summary of representations:

Object: Southern Water do not have capacity to accommodate new dwellings from this development. No plans to upgrade wastewater infrastructure.

#### Summary of representation changes to plan:

Housing should not be built until wastewater infrastructure has been upgraded.

#### Response:

Objection noted. In relation to wastewater infrastructure the current position is set out in the Statement of Common Ground with Southern Water and the Environment Agency.

#### Action:

No change to plan.

3782

Object

**Document Element:** Policy A11 Highgrove Farm, Bosham

**Respondent:** Mrs Donna-Maria Thomas

### Object

#### Summary of representations:

Object: no capacity at primary school, exacerbate congestion and pollution as will increase travel.

#### Summary of representation changes to plan:

Delete Policy A11.

#### Response:

Objection noted. It is accepted that new development may affect existing infrastructure and local services and may require new or enhanced provision to meet needs. Therefore, all relevant service providers are consulted to identify if the services they provide have existing capacity or if additional capacity is needed to accommodate the proposed development. This is outlined in the Infrastructure Delivery Plan (IDP) that supports the Local Plan. It is the responsibility of service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver infrastructure by requiring developers to make financial contributions through the developer obligation process (as set out in Policy I1) or by the phasing of development in line with the expected delivery of required infrastructure. The Council will continue to work with service providers to understand the Plan Area's infrastructure needs and to regularly update the IDP.

CDC have and continue to work with both National Highways and WSCC to assess the impact of development, and the potential for cumulative effects, on the highway network. Where site specific mitigation is required, this is identified in the site specific policies and IDP. As part of a planning application, developers will be required to submit a Transport Assessment and/or Travel Plan to detail any highway issues and sustainable travel options, which will need to address issues identified in the Local Plan policies and IDP.

#### Action:

No change to plan.

**3784****Object****Document Element:** Policy A11 Highgrove Farm, Bosham**Respondent:** Mrs Donna-Maria Thomas**Object****Summary of representations:**

Object: insufficient wastewater treatment capacity; no plan for nitrate offsetting; no capacity on strategic road network; site unsuitable as risk of flooding; allocation outside of Bosham settlement boundary.

**Summary of representation changes to plan:**

Delete Policy A11.

**Response:**

Objection noted. In relation to wastewater infrastructure the current position is set out in the Statement of Common Ground with Southern Water and the Environment Agency. In relation to the highway network, CDC have worked with both National Highways and WSCC to assess the impact of development, and the potential for cumulative effects, on the highway network. Where site specific mitigation is required, this is identified in the site specific policies and IDP. As part of a planning application, developers will be required to submit a Transport Assessment and/or Travel Plan to detail any highway issues and sustainable travel options, which will need to address issues identified in the Local Plan policies and the IDP.

Development on this site will be required to comply with other policies in the plan, including NE19 Nutrient Neutrality.

The Council is required to identify sites to meet its housing need; Due to the limited availability of deliverable and/or developable brownfield sites within the plan area, relative to the level of housing need, greenfield sites are always going to be have to be the main focus for development within the Local Plan in order to meet the Plan Area's housing needs. Nevertheless, the council has still sought to allocate brownfield sites where it can, such as Southern Gateway.

This site has been selected as it is adjacent to the boundary, and has been deemed to be suitable to bring forward new sustainable development.

**Action:**

No change to plan.

**3785****Object****Document Element:** Policy A11 Highgrove Farm, Bosham**Respondent:** Mrs Donna-Maria Thomas

## Object

### Summary of representations:

Object: loss of agricultural land, coalescence, impact on village, settlement boundary, lack of biodiversity plan, insufficient wastewater treatment capacity, lack of road network capacity, lack of school capacity or locality, local opposition, insufficient facilities, nitrate neutrality, flood risk, loss of connectivity between AONB and SDNP, failure to comply with Bosham Neighbourhood Plan or advice of stakeholders.

### Summary of representation changes to plan:

Delete Policy A11.

Moratorium on house building until upgrades to A27 and wastewater treatment can be guaranteed.

### Response:

Objection noted. It is accepted that new development may affect existing infrastructure and local services and may require new or enhanced provision to meet needs. Therefore, all relevant service providers are consulted to identify if the services they provide have existing capacity or if additional capacity is needed to accommodate the proposed development. This is outlined in the Infrastructure Delivery Plan (IDP) that supports the Local Plan. It is the responsibility of service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver infrastructure by requiring developers to make financial contributions through the developer obligation process (as set out in Policy I1) or by the phasing of development in line with the expected delivery of required infrastructure. The Council will continue to work with service providers to understand the Plan Area's infrastructure needs and to regularly update the IDP. In relation to wastewater infrastructure the current position is set out in the Statement of Common Ground with Southern Water. In relation to the highway network, CDC have worked with both National Highways and WSCC to assess the impact of development, and the potential for cumulative effects, on the highway network. Where site specific mitigation is required, this is identified in the site specific policies and IDP. As part of a planning application, developers will be required to submit a Transport Assessment and/or Travel Plan to detail any highway issues and sustainable travel options, which will need to address issues identified in the Local Plan policies and the IDP.

The policy criteria, in combination with other policies in the Natural Environment chapter of the plan, is intended to ensure the development proposals come forward in a way that are sustainable and suitable.

### Action:

No change to plan.

3928

Object

**Document Element:** Policy A11 Highgrove Farm, Bosham

**Respondent:** The Bosham Association

## Object

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**Summary of representations:**

Object: nitrate neutrality, wastewater pollution and treatment, risk of flooding, lack of infrastructure, upgrades needed to road network, loss of agricultural land, biodiversity implications, air pollution, coalescence, scale of development.

**Summary of representation changes to plan:**

Moratorium on house building until upgrades to A27 and wastewater infrastructure taken place.

Reduce housing figures in plan to 2,699 to reflect 23.5% of land available.

**Response:**

Objection noted.

In relation to wastewater infrastructure the current position is set out in the Statement of Common Ground with Southern Water. In relation to the highway network, CDC have worked with both National Highways and WSCC to assess the impact of development, and the potential for cumulative effects, on the highway network. Where site specific mitigation is required, this is identified in the site specific policies and IDP. As part of a planning application, developers will be required to submit a Transport Assessment and/or Travel Plan to detail any highway issues and sustainable travel options, which will need to address issues identified in the Local Plan policies and the IDP.

The Local Plan currently does not propose to meet the full housing need for the plan area. The figure proposed is derived from infrastructure constraints. It would not be appropriate to reduce the proposed housing figure further in the absence of evidence.

**Action:**

No change to plan.

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**3931****Object**

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**Document Element:** Policy A11 Highgrove Farm, Bosham

**Respondent:** Mrs Donna-Maria Thomas

## Object

### Summary of representations:

Object: impact on road network, congestion, pollution, wastewater treatment, lack of infrastructure and loss of agricultural land.

### Summary of representation changes to plan:

Delete Policy A11.

### Response:

Objection noted. It is accepted that new development may affect existing infrastructure and local services and may require new or enhanced provision to meet needs. Therefore, all relevant service providers are consulted to identify if the services they provide have existing capacity or if additional capacity is needed to accommodate the proposed development. This is outlined in the Infrastructure Delivery Plan (IDP) that supports the Local Plan. It is the responsibility of service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver infrastructure by requiring developers to make financial contributions through the developer obligation process (as set out in Policy I1) or by the phasing of development in line with the expected delivery of required infrastructure. The Council will continue to work with service providers to understand the Plan Area's infrastructure needs and to regularly update the IDP.

### Action:

No change to plan.

3946

Object

**Document Element:** Policy A11 Highgrove Farm, Bosham

**Respondent:** Mr Roger Weymouth

## Object

### Summary of representations:

Support in principle.

Object: allocation does not accord with NPPF paragraph 176, and policies NE2, NE3, NE10, NE13, NE16, NE19, NE20, P2, I1 and T1.

### Summary of representation changes to plan:

Delete Policy A11 and identify alternative less sensitive, policy compliant site.

### Response:

Objection noted. The policy as drafted includes a number of criteria which are intended to ensure the development comes forward in the most sustainable way, including ensuring protection of the natural environment and landscape, the delivery of infrastructure in line with the IDP and Policy I1 and to ensure any highways issues and sustainable transport options are dealt with as part of a planning application.

### Action:

No change to plan.

4071

Object

**Document Element:** Policy A11 Highgrove Farm, Bosham**Respondent:** Bosham Parish Council

Object

**Summary of representations:**

Object: no recognition of Landscape Capacity Study in policy. There are other sites with lesser landscape and visual impact which should be selected first.

**Summary of representation changes to plan:**

Proposed allocations should avoid areas of medium/ low capacity.

**Response:**

Comment noted. Criterion 3 references the Council's Landscape Capacity Study. It is acknowledged that the east-west corridor may have landscape sensitivities and this criterion is intended to protect key views and landscape from impact.

**Action:**

No change to plan.

4132

Object

**Document Element:** Policy A11 Highgrove Farm, Bosham**Respondent:** Bosham Parish Council

Object

**Summary of representations:**

Object: inappropriate location for scale of development. Conflicts with policies on climate change, environment, agricultural land, AONB and its setting, wildlife habitat, and protecting views, open countryside and settlement gaps.

**Summary of representation changes to plan:**

Delete Policy A11.

**Response:**

Objection noted. The spatial strategy seeks to locate development in locations which have access to a range of services and facilities, informed by the settlement hierarchy evidence. This has also been influenced by site availability and suitability, environmental and other constraints. The policy as drafted includes a number of criteria which are intended to ensure the development comes forward in the most sustainable way, including ensuring protection of the natural environment and landscape.

**Action:**

No change to plan.

4168

Object

**Document Element:** Policy A11 Highgrove Farm, Bosham**Respondent:** Chidham and Hambrook Parish Council

## Object

### Summary of representations:

Object: allocations in East-West corridor do not comply with Policy NE13.

### Summary of representation changes to plan:

Proposed allocations adjacent to AONB and impacting on its setting and views into/from the SDNP should be removed.

### Response:

Comment noted. It is acknowledged that this area has potential landscape and visual sensitivities, being adjacent to the AONB and the SDNP, however it is not considered that these are insurmountable. It is considered that this point is covered through criterion 3 and 4, in conjunction with other landscape related policies in the plan, which will require development proposals to protect views and landscape.

### Action:

No change to plan.

## 4234

## Object

**Document Element:** Policy A11 Highgrove Farm, Bosham

**Respondent:** Bosham Parish Council

## Object

### Summary of representations:

There is absolutely no certainty that the Waste Water Treatment Plant will have capacity or that there will be funding for sufficient upgrades. There are already hours of outages into Chichester Harbour. To satisfy the housing numbers by putting homes on this site in a semi-rural village so close to the AONB is completely wrong.

### Summary of representation changes to plan:

N/A

### Response:

Objection noted. In relation to wastewater infrastructure the current position is set out in the Statement of Common Ground with Southern Water and the Environment Agency.

### Action:

No change in response to representation.

## 4483

## Object

**Document Element:** Policy A11 Highgrove Farm, Bosham

**Respondent:** Mrs Jane Towers



## Object

### Summary of representations:

Object: allocation conflicts with policies in chapter 4 on natural environment.

### Summary of representation changes to plan:

Delete Policy A11.

### Response:

Objection noted. The policy as drafted include a number of criteria which are intended to ensure the development comes forward in the most sustainable way, including ensuring protection of the natural environment and landscape.

### Action:

No change to plan.

## 4611

## Object

**Document Element:** Policy A11 Highgrove Farm, Bosham

**Respondent:** Chichester Harbour Trust

## Object

### Summary of representations:

Object: wastewater, roads and transport, pollution, flood risk, settlement boundaries, character of village, local voice and consultee reservations, lack of amenities, loss of agricultural land, loss of biodiversity.

### Summary of representation changes to plan:

Delete Policy A11.

### Response:

Objection noted. It is accepted that new development may affect existing infrastructure and local services and may require new or enhanced provision to meet needs. Therefore, all relevant service providers are consulted to identify if the services they provide have existing capacity or if additional capacity is needed to accommodate the proposed development. This is outlined in the Infrastructure Delivery Plan (IDP) that supports the Local Plan. It is the responsibility of service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver infrastructure by requiring developers to make financial contributions through the developer obligation process (as set out in Policy I1) or by the phasing of development in line with the expected delivery of required infrastructure. The Council will continue to work with service providers to understand the Plan Area's infrastructure needs and to regularly update the IDP. In relation to wastewater infrastructure the current position is set out in the Statement of Common Ground with Southern Water. In relation to the highway network, CDC have worked with both National Highways and WSCC to assess the impact of development, and the potential for cumulative effects, on the highway network. Where site specific mitigation is required, this is identified in the site specific policies and IDP. As part of a planning application, developers will be required to submit a Transport Assessment and/or Travel Plan to detail any highway issues and sustainable travel options, which will need to address issues identified in the Local Plan policies and the IDP.

The policy criteria, in combination with other policies in the Natural Environment chapter of the plan, is intended to ensure the development proposals come forward in a way that are sustainable and suitable.

### Action:

No change to plan.

4822

Object

**Document Element:** Policy A11 Highgrove Farm, Bosham**Respondent:** Ms Annie Marchant

Support

**Summary of representations:**

Support: support requirement for phasing to ensure capacity for wastewater treatment.

**Summary of representation changes to plan:**

None suggested.

**Response:**

Support noted.

**Action:**

No change to plan.

4881

Support

**Document Element:** Policy A11 Highgrove Farm, Bosham**Respondent:** Environment Agency

Object

**Summary of representations:**

I object to the sole allocation of an addiotnal 245 houses at highgrove. It ignores existing neighbourhood plan (adopted), it does not give due regard to residents opinions, it was not properly consulted, no site visits to other sites took place, HBO0003 has been unfairly disregarded..

**Summary of representation changes to plan:**

25-30 units should be allocated to HBO0003

**Response:**

Promotion of alternative site noted.

**Action:**

No change in response to representation.

4923

Object

**Document Element:** Policy A11 Highgrove Farm, Bosham**Respondent:** Willowfield Farm

## Object

### Summary of representations:

Object: further urbanisation of boundary of AONB would significantly adversely impact AONB designation. Development would question principle of a 'protected' landscape and allow further degradation.

### Summary of representation changes to plan:

Delete Policy A11 and create a wildlife corridor instead.

### Response:

Comment noted. There is a lack of justification and evidence for the creation of a strategic wildlife corridor in this area, therefore the proposal of one would not be appropriate.

Development on this site will be subject to the requirements of Policy NE13 which assesses the impacts of proposals and their cumulative effects on the AONB. Policy NE2 (Natural Landscape) will also be applicable. Criterion 5 of this policy seeks to protect the setting of the AONB.

### Action:

No change to plan.

4955

Object

**Document Element:** Policy A11 Highgrove Farm, Bosham

**Respondent:** Chichester Harbour Conservancy

## Object

### Summary of representations:

Object: policy could provide more clarity regarding levels of biodiversity net gain.

### Summary of representation changes to plan:

Include reference to requirement for minimum 10% biodiversity net gain. Or if seeking higher, then specify this target.

### Response:

Comment noted. The Local Plan contains the proposed policy NE5 Biodiversity and Biodiversity Net Gain, and is intended to be read in the round. Policy NE5 sets out the requirement for development proposals to deliver a minimum of 10% net gain in biodiversity.

### Action:

No change to plan.

5069

Object

**Document Element:** Policy A11 Highgrove Farm, Bosham

**Respondent:** Sussex Wildlife Trust

## Support

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Noting the need for a master plan and to collaborate]. Support and reinforce masterplanning process as opportunity to develop appropriate transport strategy.

### Summary of representation changes to plan:

None suggested.

### Response:

Support noted.

### Action:

No change to plan.

5326

Support

**Document Element:** Policy A11 Highgrove Farm, Bosham

**Respondent:** National Highways

## Object

### Summary of representations:

Object: site in high sensitivity area for landscape and visual amenity. Policy fails to address how intervisibility between AONB and SDNP will be protected. Facilities at capacity, and additional development will adversely impact without infrastructure investment.

### Summary of representation changes to plan:

None suggested.

### Response:

Comment noted. It is acknowledged that this area has potential landscape and visual sensitivities, however it is not considered that these are insurmountable. It is considered that this point is covered through criterion 3 and 4, in conjunction with other landscape related policies in the plan, which will require development proposals to protect views and landscape.

It is accepted that new development may affect existing infrastructure and local services and may require new or enhanced provision to meet needs. Therefore, all relevant service providers are consulted to identify if the services they provide have existing capacity or if additional capacity is needed to accommodate the proposed development. This is outlined in the Infrastructure Delivery Plan (IDP) that supports the Local Plan. It is the responsibility of service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver infrastructure by requiring developers to make financial contributions through the developer obligation process (as set out in Policy I1) or by the phasing of development in line with the expected delivery of required infrastructure. The Council will continue to work with service providers to understand the Plan Area's infrastructure needs and to regularly update the IDP.

### Action:

No change to plan.

**5488****Object****Document Element:** Policy A11 Highgrove Farm, Bosham**Respondent:** Mayday! Action Group**Object****Summary of representations:**

Object: support identification of site and consolidation of development on an existing high quality public transport route. Policy is not clear about measures to support damping of car trips – highways improvements from developer funding does not accommodate growth from additional sites over those in the 2015 Local Plan.

**Summary of representation changes to plan:**

Amend criterion 8:

Provide safe and suitable access points for all users, including a main vehicle access from the A259. The development should make the requisite contributions for off-site improvements to transport infrastructure and services with an emphasis on maximising the attractiveness of sustainable modes, in conformity with the Policy T1 (Transport Infrastructure) and T2 (Transport and Development) which will include high quality pedestrian, cycling and public transport routes, and providing substantial peak journey time advantage for sustainable modes on journeys crossing the A27 at Fishbourne;

**Response:**

Objection noted. Criterion 8 already refers to the pedestrian and cycle network and given the breadth of Policies T1 and T2, as referred to above, the further amendments to the wording sought by the respondent are considered unnecessary.

**Action:**

No change to plan.

**5601****Object****Document Element:** Policy A11 Highgrove Farm, Bosham**Respondent:** Stagecoach South

## Object

### Summary of representations:

Object: request further consideration of requirements for older persons accommodation and allocation of gypsy and traveller pitches. Consider inappropriate to include gypsy and traveller pitches until further evidence has been provided on suitability of approach, need in this location, and suitability as part of housing allocation,

### Summary of representation changes to plan:

Policy should be more flexibly worded to allow for all forms of elderly care.

Seek clarification around allocation of gypsy and traveller pitches.

### Response:

Objection noted.

The Council has an identified need for housing for older people (as set out in the Housing and Economic Development Needs Assessment 2022). Strategic sites of over 200 dwellings are required to provide accommodation for older people. Discussions can be held with the relevant Council departments regarding provision.

As set out in the Gypsy and Traveller and Travelling Showpeople Background Paper, the Council have explored a number of options for pitch delivery. This has included a 'Call for Sites' and an assessment of the potential for intensification on existing Gypsy and Traveller sites but the likely provision arising from these sources does not meet the assessed level of pitch need, requiring provision to be made on the proposed strategic housing sites. The Planning Policy for Traveller Sites indicates that pitches should be well integrated into the local community thereby providing good access to essential services. The good practice guidance for designing Gypsy and Traveller sites (2008), although withdrawn still provides useful guidance for the design of Gypsy and Traveller sites, stated that where possible sites should be developed near to the settled community as part of mainstream residential developments.

### Action:

No change to plan.

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**5683****Object**

**Document Element:** Policy A11 Highgrove Farm, Bosham

**Respondent:** Barratt David Wilson Homes

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

Object: number of dwellings proposed insufficient to justify increasing train services at Nutbourne. Development should not be considered here until maximum number achieved at Southbourne.

### Summary of representation changes to plan:

Amend criterion 8:

Provide safe and suitable access points for all users. Provide or fund improved and new walking and cycle routes that are continuous, direct, safe, attractive and comfortable to bus stops, local community facilities and railway station

### Response:

Comment noted. The spatial strategy already proposes to allocate a significant number of dwellings at Southbourne. This site is considered to be a suitable, available and sustainable location for further growth in Bosham.

It is considered the criterion as drafted and the cross reference to Policies T1 and T2, as well as Policy P4, which are not solely concerned with 'highway' improvements but transport infrastructure more widely, including sustainable modes of travel provides an appropriate approach and level of detail.

### Action:

No change to plan.

5936

Object

**Document Element:** Policy A11 Highgrove Farm, Bosham

**Respondent:** GoVia Thameslink Railway

## Support

### Summary of representations:

Does not support or object. Support requirement for bolster planting, suggest requiring bolster planting to west of site.

### Summary of representation changes to plan:

Include requirement for bolster planting on western boundary of site.

### Response:

Comment noted. Criterion 4 can include bolster planting to west of site.

### Action:

See Council's suggested Modification CM323.

6002

Support

**Document Element:** Policy A11 Highgrove Farm, Bosham

**Respondent:** Forestry Commission

## Support

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### Summary of representations:

Support in principle.

### Summary of representation changes to plan:

None suggested.

### Response:

Support noted.

### Action:

No change to plan.

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## 6031

## Support

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**Document Element:** Policy A11 Highgrove Farm, Bosham

**Respondent:** Barratt David Wilson Homes

**Agent:** Henry Adams LLP

## Policy A12 Chidham and Hambrook

## Object

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### Summary of representations:

Grounds of: i) nitrate neutrality; ii) wastewater pollution and treatment; iii) congestion and road network; iv) air pollution; v) loss of greenfield/agricultural land; vi) lack of infrastructure. See full submission and attachments

### Summary of representation changes to plan:

Removal from plan

### Response:

The issues raised have been considered and the evidence base and proposed development strategy continues to support this strategic allocation. See also response to rep 3932

### Action:

No change to plan

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## 3933

## Object

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**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Mrs Donna-Maria Thomas



## Object

### Summary of representations:

Grounds of: i) non-compliance with NE16 (insufficient waste water capacity); ii) lack of road capacity; iii) lack of primary education capacity; iv) inappropriate proposed community facilities and existing amenities; v) significant opposition. See full submission

### Summary of representation changes to plan:

Removal from plan. Moratorium on development until wastewater treatment and A27 junctions can be guaranteed

### Response:

The issues raised have been considered and the evidence base and proposed development strategy continues to support this strategic allocation. See also response to rep 3928

### Action:

No change to plan

## 3971

## Object

**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** The Bosham Association

## Object

### Summary of representations:

Objection and proposal to limit allocation of houses to number currently permitted to this date i.e. 144

### Summary of representation changes to plan:

Limit allocation of houses to number currently permitted to this date i.e. 144

### Response:

The issues raised have been considered and the evidence base and proposed development strategy continues to support this strategic allocation

### Action:

No change to plan

## 4169

## Object

**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Chidham and Hambrook Parish Council

## Object

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### Summary of representations:

Grounds allocation would not comply with NE13 and would damage the visual relief to the built up areas and views between the AONB and the SDNP

### Summary of representation changes to plan:

Removal from the plan

### Response:

The issues raised have been considered and the evidence base and proposed development strategy continues to support this strategic allocation

### Action:

No change to plan

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4235

Object

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**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Bosham Parish Council

## Object

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### Summary of representations:

Grounds: i) The figure should be 500 and there are no sound reasons to reduce to 300; ii) Key views should be identified at plan stage and not left to subjective judgement at a later date.

### Summary of representation changes to plan:

Increase allocation to 500

### Response:

The issues raised have been considered and the evidence base and proposed development strategy continues to support this strategic allocation

### Action:

No change to plan

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4389

Object

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**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Mr Stephen Jupp

## Object

### Summary of representations:

Grounds: i) site is too far from facilities to expect people to walk/cycle; ii) Thornham WWTP has limited capacity and no certainty of upgrades; iii) semi-rural area has had far in excess of 25 houses identified in previous LP – combined total of 600 (with Bosham) is wrong

### Summary of representation changes to plan:

Reduction in no. to those that already have permission i.e. 144

### Response:

The issues raised have been considered and the evidence base and proposed development strategy continues to support this strategic allocation

### Action:

No change to plan

4490

Object

**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Mrs Jane Towers

## Object

### Summary of representations:

Broad site allocation lacks specific detail on environmental impact and therefore unable to support or object.

### Summary of representation changes to plan:

Requests future allocation requires a site survey for ancient woodland and ancient and veteran trees, and that appropriate buffers are applied, before no. of dwellings and layout is agreed

### Response:

Details of the specific site allocations are due to be addressed by way of the neighbourhood plan review by the Parish Council. This request can be passed on to the Parish Council for their more detailed work relating to site selectin and layout

### Action:

No change to plan

4540

Object

**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** The Woodland Trust

## Object

### Summary of representations:

Objection in principle on grounds represents a major development adjacent to the AONB and is disproportionate to size and facilities of existing settlement

### Summary of representation changes to plan:

Require further detail on location of proposed development and request substantial reduction in allocation.

### Response:

The issues raised have been considered and the evidence base and proposed development strategy continues to support this strategic allocation. Specific site allocations are due to be addressed by way of the neighbourhood plan review by the Parish Council

### Action:

No change to plan

## 4615

## Object

**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Chichester Harbour Trust

## Support

### Summary of representations:

Strongly support allocation of minimum 300 dwellings in addition to sites already committed. Offers opportunities to deliver homes in core growth area and to benefit future residents from local services and facilities, reducing vehicle pressure on A27

### Summary of representation changes to plan:

N/A

### Response:

Support and comments noted

### Action:

No change to plan

## 4682

## Support

**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Merrow Wood

**Agent:** Intelligent Land

## Support

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### Summary of representations:

Supportive; esp. for policy requirement 10(sequential approach to flood risk) and 11 (phasing to ensure adequate wastewater treatment capacity)

### Summary of representation changes to plan:

N/A

### Response:

Support and comments noted

### Action:

No change to plan

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4883

Support

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**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Environment Agency

## Object

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### Summary of representations:

Grounds allocation should be increased to 500 in view of Parish shortfall

### Summary of representation changes to plan:

Increase to 500 dwellings; add 'significant' to biodiversity harm within clause 5

### Response:

The issues raised have been considered and the evidence base and proposed development strategy continues to support this strategic allocation

### Action:

No change to plan

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4907

Object

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**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Gleeson Land

## Object

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### Summary of representations:

Grounds insufficient detail on location and mitigation measures to determine impact on AONB

### Summary of representation changes to plan:

More detail required

### Response:

The issues raised have been considered and the evidence base and proposed development strategy continues to support this strategic allocation. Specific site allocations are due to be addressed by way of the neighbourhood plan review by the Parish Council

### Action:

No change to plan

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4971

Object

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**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Chichester Harbour Conservancy

## Object

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### Summary of representations:

Grounds insufficient detail on location to determine impact on biodiversity. Highlight that broad location has biodiversity opportunities areas within it, likely to be key to nature recover networks and emerging LNRS

### Summary of representation changes to plan:

Coastal policies should be highlighted to demonstrate commitment to these requirements

### Response:

The issues raised have been considered and the evidence base and proposed development strategy continues to support this strategic allocation. Policy A12 criterion 5 addresses biodiversity requirements. Specific site allocations are due to be addressed by way of the neighbourhood plan review by the Parish Council

### Action:

No change to plan

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5070

Object

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**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Sussex Wildlife Trust

## Object

### Summary of representations:

Request further information on 300 dwelling to confirm minimum figure that will not be affected by pending application and appeals. Proposed amendment "land will be allocation for development in the revised Chidham and Hambrook Neighbourhood Plan or Site Allocations DPD...." to provide flexibility.

### Summary of representation changes to plan:

Request further information on 300 dwellings to confirm minimum figure that will not be affected by pending application and appeals. Proposed amendment "land will be allocation for development in the revised Chidham and Hambrook Neighbourhood Plan or Site Allocations DPD...." to provide flexibility.

### Response:

Flexibility of provision by way of the neighbourhood plan review or a Site Allocations DPD is provided in Policy H3

### Action:

No change to plan

5108

Object

**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Seaward Properties Ltd

**Agent:** Smith Simmons Partners

## Support

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Noting the need for a master plan and to collaborate]. Supports, reinforcing that a master planning process presents an opportunity for the Council to consider traffic, viable alternatives to the private car, future infrastructure requirements, mitigation measures (with costings and collection of fundings); and travel plan monitoring strategies through phased development/

### Summary of representation changes to plan:

N/A

### Response:

Support and comments noted

### Action:

No change to plan

5327

Support

**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** National Highways

## Object

### Summary of representations:

Grounds: i) limited local services and facilities including schools; ii) interrupting views of SDNP and AONB; iii) impact on historic trees and hedgerows; iv) more information required on flood risk assessment and mitigations; v) insufficient capacity at Thornham WWTP; vi) lack of consideration of 200 new dwellings already absorbed.

### Summary of representation changes to plan:

N/A

### Response:

The issues raised have been considered and the evidence base and proposed development strategy continues to support this strategic allocation

### Action:

No change to plan

5489

Object

**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

Grounds policy insufficiently clear on traffic mitigations and means of securing modal shift. Transport strategy does not accommodate growth addition to adopted LP allocations and requires updating

### Summary of representation changes to plan:

Clause 7. Development should make the requisite contributions for off-site improvements to transport infrastructure and services, with an emphasis on maximising the attractiveness of sustainable modes, in conformity with the Policy T1 (Transport Infrastructure) and T2 (Transport and Development), which will include high quality pedestrian, cycling and public transport routes, and providing substantial peak journey time advantage for sustainable modes on journeys along the A259, crossing the A27 at Fishbourne and where necessary on the approaches to Emsworth

### Response:

It is considered the policy as drafted and the cross reference in criterion 4 to Policies T1 and T2, which are not solely concerned with 'highway' improvements but transport infrastructure more widely, including sustainable modes of travel provides an appropriate approach and level of detail.

### Action:

No change to plan

5603

Object

**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Stagecoach South



## Support

### Summary of representations:

- Policy confirms land will be allocated for development in the revised Chidham and Hambrook Neighbourhood Plan for a minimum of 300 dwellings and supporting facilities and infrastructure;
- Parish is a logical position for the strategic expansion given its sustainable transportation link and lack of constraints in comparison to other locations;

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No change in response to representation.

## 5732

## Support

**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Dandara Southern Limited

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

Grounds of i) inadequate existing road network and requirement for safe walking/cycling routes. li) Protection of heritage asset (Ham Brook and Hairspring Watercress Farm) required

### Summary of representation changes to plan:

N/A

### Response:

The issues raised have been considered and the evidence base and proposed development strategy continues to support this strategic allocation. Criteria 7 and 8 look to address safe means of access and provision of improved cycle and pedestrian routes.

More details on specific site allocations are due to be addressed by way of the neighbourhood plan review by the Parish Council

### Action:

No change to plan

## 5875

## Object

**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Alan and Susan Green

## Object

### Summary of representations:

Number of additional dwellings will not generate enough demand to increase current train service. Southbourne more sustainable location

### Summary of representation changes to plan:

Clause 7 "Provide safe and suitable access for all users. Provide or fund improved and new walking and cycle routes that are continuous, direct, safe, attractive and comfortable to bus stops, local community facilities and railway station."

### Response:

Comment noted. The spatial strategy already proposes to allocate a significant number of dwellings at Southbourne. This site is considered to be a suitable, available and sustainable location for further growth in Bosham.

It is considered the criterion as drafted and the cross reference to Policies T1 and T2, as well as Policy P4, which are not solely concerned with 'highway' improvements but transport infrastructure more widely, including sustainable modes of travel provides an appropriate approach and level of detail.

### Action:

No change

5937

Object

**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** GoVia Thameslink Railway

## Support

### Summary of representations:

Does not support or object. Notes more detailed proposals will emerge as part of neighbourhood plans. Advises area contains parcels of ancient woodland. Welcomes requirement to ensure development does not have adverse impact on SWC

### Summary of representation changes to plan:

N/A

### Response:

Comments and advice noted

### Action:

N/A

6003

Support

**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Forestry Commission

## Object

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### Summary of representations:

Advises wording of clause 6 strengthened to better reflect mitigation hierarchy and to ensure consistency with other policies

### Summary of representation changes to plan:

Proposed change to clause 6 to "avoid, and if necessary, mitigate, any adverse effects..."

### Response:

Agree amend wording of criterion 6

### Action:

See council suggested modification CM327

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6010

Object

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**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Natural England

## Object

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### Summary of representations:

Policy could be strengthened

### Summary of representation changes to plan:

Proposes changes to: i) highlight importance and high priority of ancient woodland as part of efforts to enhance wider ecological network and SWC; ii) strengthen requirement for development to contribute to SWC enhancement, expansion and connectivity including with GI provision

### Response:

The Local Plan contains the proposed policy NE8 Trees, Woodlands and Hedgerows and is intended to be read in the round, Policy NE8 requires the conservation and enhancement of existing trees and hedgerows

### Action:

No change

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6107

Object

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**Document Element:** Policy A12 Chidham and Hambrook

**Respondent:** Forestry Commission

## Southbourne, 10.52

## Object

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**Summary of representations:**

Object. Clarification needed of what supporting facilities will consist of.

**Summary of representation changes to plan:**

N/A

**Response:**

This is referenced in the supporting text (paragraph 10.56), Policy A13 and the IDP.

**Action:**

No change in response to this representation

## 4055

## Object

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**Document Element:** Southbourne, 10.52

**Respondent:** Southbourne Parish Council

## Southbourne, 10.52

### Object

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**Summary of representations:**

Object. Parish Council has not been consulted on increase in Gypsies and Travellers and Travelling Showpeople accommodation within development.

**Summary of representation changes to plan:**

Parish Council has not been consulted on increase in Gypsies and Travellers and Travelling Showpeople accommodation within development.

**Response:**

Comments noted. See also respondent's representation to Policies H11 (5247), H12 (5248) and A13 (5241).

**Action:**

No change in response to this representation

## 4057

### Object

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**Document Element:** Southbourne, 10.52

**Respondent:** Southbourne Parish Council

### Support

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**Summary of representations:**

Support. Good location for development - within active travel of Southbourne rail station, which has good train service and consistent with strategy for West Coastway to be consulted on later in 2023.

Would be good location for development before others in Plan where access more challenging, distant from good public transport links, likely to be car dominated or development proposed not sufficient to justify increasing train service.

**Summary of representation changes to plan:**

N/A

**Response:**

Comments noted.

**Action:**

No change in response to this representation.

## 5938

### Support

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**Document Element:** Southbourne, 10.52

**Respondent:** GoVia Thameslink Railway

## Support

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### Summary of representations:

Support in principle.

### Summary of representation changes to plan:

N/A

### Response:

Comments noted.

### Action:

No change in response to this representation

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6263

Support

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**Document Element:** Southbourne, 10.52

**Respondent:** Southbourne Parish Council

### Southbourne, 10.54

## Support

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### Summary of representations:

Support. Parish Council support endeavours to maintain and enhance the work of Chichester Harbour Conservancy in the AONB. Areas outside the AONB which are used for bird feeding etc could also be affected by development.

### Summary of representation changes to plan:

N/A

### Response:

Comments noted. Criterion 10 of Policy A13 requires the provision of mitigation to ensure any adverse effects, including the loss of functionally linked supporting habitat, are avoided.

### Action:

No change in response to this representation

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4059

Support

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**Document Element:** Southbourne, 10.54

**Respondent:** Southbourne Parish Council

## Southbourne, 10.55

### Support

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**Summary of representations:**

Support. Maintenance of landscape gaps between settlements are crucial.

**Summary of representation changes to plan:**

N/A

**Response:**

Comments noted.

**Action:**

No change in response to this representation

## 4061

### Support

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**Document Element:** Southbourne, 10.55

**Respondent:** Southbourne Parish Council

## Southbourne, 10.56

### Support

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**Summary of representations:**

Support bullet point 2. Currently insufficient infrastructure which needs addressing in addition to new facilities. Provision of improved transport links to mitigate delays at level crossings are crucial

**Summary of representation changes to plan:**

N/A

**Response:**

Comments noted.

**Action:**

No change in response to this representation

## 4062

### Support

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**Document Element:** Southbourne, 10.56

**Respondent:** Southbourne Parish Council

## Support

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**Summary of representations:**

Support bullet point 3. Reference should be made to the ChEm route and pedestrian bridge over the railway.

**Summary of representation changes to plan:**

N/A

**Response:**

Agree that it would be useful to add reference to the proposed ChEm route.

**Action:**

See council suggested modification CM331

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4064

Support

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**Document Element:** Southbourne, 10.56

**Respondent:** Southbourne Parish Council

## Support

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**Summary of representations:**

Support bullet point 5. Two wildlife corridors and proposed Green Ring crucial to aspirations of this paragraph

**Summary of representation changes to plan:**

N/A

**Response:**

Comments noted.

**Action:**

No change in response to this representation

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4065

Support

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**Document Element:** Southbourne, 10.56

**Respondent:** Southbourne Parish Council



## Southbourne, 10.57

Support

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### Summary of representations:

Support. Important statement that Parish Council support. Parish Council will object to any piecemeal applications until strategic allocation is decided.

### Summary of representation changes to plan:

N/A

### Response:

Comments noted.

### Action:

No change in response to this representation

4066

Support

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Document Element: Southbourne, 10.57

Respondent: Southbourne Parish Council

## Policy A13 Southbourne Broad Location for Development

## Object

### Summary of representations:

Object to level of housing proposed, inadequate supporting infrastructure, particularly roads and public transport provision.

### Summary of representation changes to plan:

Plan should show details of sites proposed within BLD.

### Response:

The overall spatial strategy seeks to locate the majority of development in locations which have access to a range of services and facilities, informed by the settlement hierarchy evidence. This has also been influenced by site availability and suitability, environmental and other constraints.

In terms of infrastructure, it is accepted that new development may affect existing infrastructure and local services and may require new or enhanced provision to meet needs. Therefore, all relevant service providers are consulted to identify if the services they provide have existing capacity or if additional capacity is needed to accommodate the proposed development. This is outlined in the Infrastructure Delivery Plan (IDP) that supports the Local Plan. It is the responsibility of service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver infrastructure by requiring developers to make financial contributions through the developer obligation process (as set out in policy I1) or by the phasing of development in line with the expected delivery of required infrastructure. CDC will continue to work with service providers to understand the Plan Area's infrastructure needs and to regularly update the IDP.

In relation to wastewater infrastructure the current position is set out in the Statement of Common Ground with Southern Water and the Environment Agency. In relation to the highway network, CDC have worked with both National Highways and WSCC to assess the impact of development, and the potential for cumulative effects, on the highway network. Where site specific mitigation is required, this is identified in the site specific policies and IDP. As part of a planning application, developers will be required to submit a Transport Assessment and/or Travel Plan to detail any highway issues and sustainable travel options, which will need to address issues identified in the Local Plan policies and the IDP.

### Action:

No change in response to this representation

3808

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Reverend D A Hider

## Object

### Summary of representations:

Object. Building 84% (8717 houses) of allocated housing along east-west corridor is not justifiable. No guaranteed upgrades to the sewage network or the strategic road network in this area and areas proposed rely on wastewater treatment facilities already over capacity. Nothing in Plan to guarantee improvements to Fishbourne roundabout which has been over-capacity since 2014 and where modelled peak time delays of 29 minutes if development goes ahead.

### Summary of representation changes to plan:

Policy A13 should be limited to 300 houses.

### Response:

The overall spatial strategy seeks to locate the majority of development in locations which have access to a range of services and facilities, informed by the settlement hierarchy evidence. This has also been influenced by site availability and suitability, environmental and other constraints.

In terms of infrastructure, it is accepted that new development may affect existing infrastructure and local services and may require new or enhanced provision to meet needs. Therefore, all relevant service providers are consulted to identify if the services they provide have existing capacity or if additional capacity is needed to accommodate the proposed development. This is outlined in the Infrastructure Delivery Plan (IDP) that supports the Local Plan. It is the responsibility of service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver infrastructure by requiring developers to make financial contributions through the developer obligation process (as set out in policy I1) or by the phasing of development in line with the expected delivery of required infrastructure. CDC will continue to work with service providers to understand the Plan Area's infrastructure needs and to regularly update the IDP.

In relation to wastewater infrastructure the current position is set out in the Statement of Common Ground with Southern Water and the Environment Agency (April 2024). In relation to the highway network, CDC have worked with both National Highways and WSCC to assess the impact of development, and the potential for cumulative effects, on the highway network. Where site specific mitigation is required, this is identified in the site specific policies and IDP. As part of a planning application, developers will be required to submit a Transport Assessment and/or Travel Plan to detail any highway issues and sustainable travel options, which will need to address issues identified in the Local Plan policies and the IDP.

### Action:

No change in response to this representation

3905

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** The Bosham Association

## Support

### Summary of representations:

Support in principle the BLD.

Southbourne has been identified as a settlement hub due to the facilities it offers, even though a number of these are currently inadequate. Paragraph 6.89 of this Local Plan states that the proposed development provides the opportunity to make good the existing shortfalls (eg open space, para. 6.85) and to provide well-serviced new development.

This development must be achieved through comprehensive masterplanning. There has been, and continues to be, pressure for piecemeal proposals. These must be rejected to secure a properly planned expansion which maximises the provision of timely accompanying infrastructure.

### Summary of representation changes to plan:

N/A

### Response:

Comments noted. For clarification it should be noted that underlying infrastructure deficits cannot be addressed unless these are also required to support the new development.

### Action:

No change in response to this representation

3948

Support

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Southbourne Parish Council

## Object

### Summary of representations:

Object. Assessment of need for Southbourne NP demonstrated more than 16 self-build plots likely to be required in future. CDC register may be unreliable as source. As development not expected to commence until 2028 too early to be so specific about number of plots required.

### Summary of representation changes to plan:

Delete '16' from criterion 1

### Response:

The number of self-build/custom plots is based on the current evidence of demand from entries on the Council's Custom and Self-Build Register. The Council have recently undergone a process of updating the Register and this, combined with additional data on the level of self/custom build need in the Plan Area, has indicated a strong demand for self-build/custom plots. To address this, the Council are proposing to increase the level of self-build/custom provision on strategic sites. In the case of Southbourne BLD the number of plots required is proposed to be increased to 53.

### Action:

No change in response to this representation

4028

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** Southbourne Parish Council

Object

**Summary of representations:**

Object. There is no reference to the ChEm route, which will provide a safe route alongside the A259 to encourage cycling as a sustainable means of travel. It will eventually form part of the local network of cycle routes to which proposed new allocation will be connected. As Local Plan gives weight to sustainable forms of transport including new cycle networks it would be appropriate to include this initiative by name.

**Summary of representation changes to plan:**

At the end of criterion 4 add “....sustainable transport options (including ChEm route)”

**Response:**

A reference to the ChEm routes is proposed to be added to paragraph 10.56.

**Action:**

See council suggested modification CM331

4030

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** Southbourne Parish Council

Object

**Summary of representations:**

Object. Shortfall and quality of local infrastructure is major issue. Policy not just supporting text should be clear about type of facilities will be required. Local employment opportunities are mentioned in para. 10.52 but not in the policy, so has less weight. Work on the Neighbourhood Plan has shown potential for an enterprise hub with flexible working space.

**Summary of representation changes to plan:**

Amend criterion 6 to read: ‘.... community facilities, medical/health facilities, retail, employment and transport in accordance with ...’

**Response:**

Paragraph 10.56 refers to provision of flexible space and in the policy itself local employment opportunities are referenced in the first paragraph. Other uses are encompassed by phrase ‘community facilities’ (which is defined in the Local Plan Glossary) and it is considered that reference to the IDP is more appropriate as specific requirements may change over time.

**Action:**

No change in response to this representation

4032

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** Southbourne Parish Council

Object

**Summary of representations:**

Object. Wording of criteria 4 and 5 is vague and unclear what is meant by criteria 5. Delays caused by rail crossings already major issue. Allocation will require at least provision of footbridge over rail line to east to facilitate Green Ring access and road bridge required to facilitate traffic from allocation.

**Summary of representation changes to plan:**

At end of criterion 4 add new sentence: A pedestrian footbridge over the railway line will be required as part of the Green Ring and provision of a separate road bridge will be considered.

**Response:**

The findings of the Council's evidence in respect of the need for a railway bridge is that there is no conclusive requirement in transport terms for a bridge. The modelling undertaken indicates that beyond a certain amount of development a new rail bridge is likely to be of some benefit if the forecast traffic conditions cannot otherwise be mitigated by other traffic management measures.

**Action:**

No changes in response to this representation

4042

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** Southbourne Parish Council

Object

**Summary of representations:**

Object. Shortfall and quality of local infrastructure is major issue. Policy not just supporting text should be clear about type of facilities will be required. Local employment opportunities are mentioned in para. 10.52 but not in the policy, so has less weight. Work on the Neighbourhood Plan has shown potential for an enterprise hub with flexible working space.

**Summary of representation changes to plan:**

Amend criterion 6 to read: '.... community facilities, medical/health facilities, retail, employment and transport in accordance with ...'

**Response:**

Paragraph 10.56 refers to provision of flexible space and in the policy itself local employment opportunities are referenced in the first paragraph. Other uses are encompassed by phrase 'community facilities' (which is defined in the Local Plan Glossary) and it is considered that reference to the IDP is more appropriate as specific requirements may change over time.

**Action:**

No change in response to this representation

4043

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** Southbourne Parish Council

Object

**Summary of representations:**

Object. Evidence that Green Infrastructure is well below amount required. Policy should refer to this to ensure new development provides for this to be made good as well as providing for residents of new development.

**Summary of representation changes to plan:**

At end of criterion 8 add: '... countryside and surroundings. Currently there is a shortfall in Green Infrastructure available to existing local residents which needs to be addressed within the Broad Location for Development.'

**Response:**

Green infrastructure and open space provision should be made in accordance with Policies P14 and P15. Underlying infrastructure deficits cannot be addressed unless these are also required to support the new development.

**Action:**

No changes in response to this representation.

4048

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** Southbourne Parish Council

Support

**Summary of representations:**

Support criterion 13. Provision of appropriate waste water services is fundamental. Lack of capacity at Thornham WwTW is subject to considerable concern and storm water discharges into Chichester Harbour has contributed to declining water quality. Parish Council will expect appropriate infrastructure to be available in good time to serve development.

**Summary of representation changes to plan:**

N/A

**Response:**

Comments noted. The current position on wastewater infrastructure is set out in the Statement of Common Ground with Southern Water and the Environment Agency (April 2024).

**Action:**

No changes in response to this representation.

4052

Support

**Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** Southbourne Parish Council

Support

**Summary of representations:**

Support policy criteria 7, 10, 11, 12, 14, 15 and 16 as being consistent with objectives and policies in the Southbourne Neighbourhood Plan, currently at Regulation 16 stage.

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted.

**Action:**

No changes as result of this representation.

4053

Support

**Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** Southbourne Parish Council

Object

**Summary of representations:**

Object. Allocations in East/West corridor would not comply with Policy NE13 and would damage the visual relief to the built up areas and views between the AONB and the SDNP

**Summary of representation changes to plan:**

Allocations adjacent to the AONB and impacting on its setting, including views into and from the SDNP should be removed.

**Response:**

With the exception of the western extent of the BLD, the Landscape Capacity Study (2019) assessed the sub-areas that cover the BLD as having medium capacity for landscape change and with the potential to accommodate development.

Development within the BLD will be subject to the requirements of Policy NE2 (Natural Landscape) and the specific requirements set out in the Policy criteria particularly, in respect of the Chichester Harbour AONB, SDNP and wider landscape impacts, criterion 7.

**Action:**

No changes as result of this representation.



**4233****Object****Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** Bosham Parish Council**Object****Summary of representations:**

Object [Comment]. The broad site allocation lacks specific detail on its environmental impact, therefore we are unable to either support or object at this stage. Welcome criterion 9 requiring habitat protection.

**Summary of representation changes to plan:**

Request any future allocation requires site survey for ancient woodland/ancient/veteran trees and appropriate buffers applied before number/layout of dwellings is agreed.

**Response:**

Comments noted. Policies NE2 (Biodiversity and Biodiversity Net Gain) and NE8 (Trees, Hedgerows and Woodlands), which would be applicable to any development proposal, seek to ensure that such trees are protected. Policy NE8 also requires that a minimum buffer of 15 metres is applied.

**Action:**

No changes as result of this representation.

**4543****Object****Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** The Woodland Trust

## Object

### Summary of representations:

Object. This is major development adjacent AONB and disproportionate to size and facilities of existing settlement. It is within the 5.6km zone of influence for Chichester Harbour SSSI. Allocation represents conflict with policies of Plan.

### Summary of representation changes to plan:

Need clear idea of housing location to comment in more depth but wish to see reduction in allocation at this location.

### Response:

Southbourne is one of the larger settlements in the Plan Area and combined with the broad range of existing services and facilities, it scores highly in the Local Plan settlement hierarchy and is identified as a Settlement Hub.

With the exception of the western extent of the BLD, the Landscape Capacity Study (2019) assessed the sub-areas that cover the BLD as having medium capacity for landscape change and with the potential to accommodate development.

Development within the BLD will be subject to the requirements of Policy NE2 (Natural Landscape) and the specific requirements set out in the Policy criteria particularly, in respect of the AONB setting, criterion 7.

In accordance with Policy NE7 there would a requirement for a financial contribution to mitigate the impact of development on the SPA.

### Action:

No changes as result of this representation.

4621

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Chichester Harbour Trust

## Object

### Summary of representations:

Object. Policy requires comprehensive and coordinated approach to development. As Council cannot demonstrate five year housing supply the 'Interim Position Statement for Housing' has been activated. This steers development towards individually assessed "sustainable locations" which conflicts with the masterplanning intended in Policy A13.

The Interim Statement should be withdrawn immediately in respect of Southbourne.

### Summary of representation changes to plan:

Policy A13 include the following "Due to the circumstances which require a BLD to be proposed for Southbourne, the provisions of the Council's 'Interim Position Statement for Housing April 2022' will not be applied in Southbourne parish".

This should also be reflected in the Statement for consistency.

### Response:

Although at an advanced stage of preparation as there are unresolved objections to relevant Local Plan policies, they can only be given limited weight and it would be premature, therefore, to withdraw the IPS at this stage.

### Action:

No changes in response to this representation

4744

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** Mrs Sue Talbot

Object

**Summary of representations:**

Object.

1. Whilst support allocation, policy wording predetermines how emerging Neighbourhood Plan or future Site Allocations DPD should distribute the identified local housing need and associated development. Requirement for development to address all 16 criteria within the BLD assumes single site will come forward, as opposed to number of sites which collectively could meet the 16 requirements, if planned for in advance. Contribution from small/medium size sites recognised in NPPF para 69. Number of smaller sites can collectively bring benefits of a single major large-scale development, with added benefit of early delivery, provided a strategic approach to infrastructure delivery is taken and coordinated through the emerging Plan and Infrastructure Delivery Plan. Land at Cooks Lane is identified in HELAA as being deliverable during years 0-5 of the Plan period has benefit of proximity to Southbourne rail station, support from Network Rail in relation to Southbourne level crossing and could contribute to Green Infrastructure/recreation opportunities.
2. Not all of extent of BLD shown on Key Diagram is considered to offer a suitable location for development within context of NPPF. Land to the north of Southbourne and within landscape gap with Hermitage to the west does not present a suitable location for a single major residential-led development. More likely to lead to coalescence of two settlements and have a greater impact on the setting of the AONB and National Park than a development to the east, or a series of smaller sites delivering incremental growth and new infrastructure to the urban area.

**Summary of representation changes to plan:**

N/A

**Response:**

1. The policy wording does not predetermine how development within the BLD will come forward and nor does it imply that this should be through a single site. Rather it requires a comprehensive masterplan process whether this is across a single or several sites, which will be determined through the preparation of the Southbourne Allocation DPD.
2. As set out in Policy NE3 (Landscape Gaps) the definition of the precise boundaries of landscape gaps between settlements will be undertaken either through a subsequent DPD or neighbourhood plan.

Criterion 15 of Policy A13 makes clear that development within the BLD will need to provide clear separation between new development including through the definition and protection of landscape gaps.

**Action:**

No changes in response to this representation.

4774

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** Seaward Strategic Land Ltd and Owners of Land on Cooks Lane, Southbourne**Agent:** Luken Beck MDP Ltd

## Object

### Summary of representations:

Object. Broadly supportive of development requirements but:

1. Council should explore more appropriate areas for new sites Gypsy and Traveller pitches and travelling showpeople plots or intensification of nearby sites
2. Most effective way of securing on- and off-site improvements is to place the onus on the developer to ensure their delivery and integration with the local community. Propose development is CIL exempt to avoid the village's infrastructure funding being stagnated within a larger and district-wide funding mechanism

### Summary of representation changes to plan:

Support an amendment to be made to Policy H2 to allow for the provision of circa (or a minimum of) 1,250 dwellings at Southbourne';

Propose removal of need for contributions to CIL and undertake direct commitment to ensure infrastructure improvements to Southbourne.

### Response:

1. As set out in the Gypsy and Traveller and Travelling Showpeople Background Paper (May 2024), the Council have explored a number of options for pitch/plot delivery. This has included a 'Call for Sites' and an assessment of the potential for intensification on existing Gypsy and Traveller sites but the likely provision arising from these sources does not meet the assessed level of pitch or plot need, requiring provision to be made on the proposed strategic housing sites. Specifically, in terms of Travelling Showpeople, the majority of the plot need arising is from the Priors Leaze Lane site at Southbourne and, as such, it is considered appropriate for the need to be met within the same locality.
2. Disagree with comment regarding CIL as there is no evidence to suggest this is the case. In any event, as identified in the current IDP, only secondary school/6th form education and library provision are expected to be CIL funded.

### Action:

No change in response to this representation

4782

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Wates Developments and Seaward Properties

**Agent:** Barton Willmore now Stantec

Object

**Summary of representations:****Object.**

1. Whilst support allocation, policy wording predetermines how emerging Neighbourhood Plan or future Site Allocations DPD should distribute the identified local housing need and associated development. Requirement for development to address all 16 criteria within the BLD assumes single site will come forward, as opposed to number of sites which collectively could meet the 16 requirements, if planned for in advance. Contribution from small/medium size sites recognised in NPPF para 69. Number of smaller sites can collectively bring benefits of a single major large-scale development, with added benefit of early delivery, provided a strategic approach to infrastructure delivery is taken and coordinated through the emerging Plan and Infrastructure Delivery Plan. Land north of Penny Lane, Hermitage is identified in HELAA as being deliverable. Welcome inclusion of site in BLD and recently submitted planning application on site for up to 84 dwellings. Smaller sites can also play important role in sustaining key services and facilities within Hermitage, Southbourne and Emsworth, which have been in decline in recent years. Allowing such sites to come forward could also facilitate new community infrastructure through the IDP and funded through CIL and / or S106 Legal Agreements.

2. Not all of extent of BLD shown on Key Diagram is considered to offer a suitable location for development within context of NPPF. Land to the north of Southbourne and within landscape gap with Hermitage to the west does not present a suitable location for a single major residential-led development. More likely to lead to coalescence of two settlements and have a greater impact on the setting of the AONB and National Park than a development to the east, or a series of smaller sites delivering incremental growth and new infrastructure to the urban area.

**Summary of representation changes to plan:**

Revise approach toward BLD and pursue strategy of allowing some limited dispersal of development in suitable locations as the most sustainable strategy for the distribution of housing in Southbourne Parish over plan period.

**Response:**

1. The policy wording does not predetermine how development within the BLD will come forward and nor does it imply that this should be through a single site. Rather it requires a comprehensive masterplan process whether this is across a single or several sites, which will be determined through the preparation of the Southbourne Allocation DPD.

2. As set out in Policy NE3 (Landscape Gaps) the definition of the precise boundaries of landscape gaps between settlements will be undertaken either through a subsequent DPD or neighbourhood plan.

Criterion 15 of Policy A13 makes clear that development within the BLD will need to provide clear separation between new development including through the definition and protection of landscape gaps.

**Action:**

No changes in response to this representation.

**4785****Object**

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Seaward Strategic Land Ltd and Owners of Land on Penny Lane, Hermitage

**Agent:** Luken Beck MDP Ltd

## Support

### Summary of representations:

Support. As site not allocated, supportive of policy criteria 12 to take sequential approach to flood risk.

Also support policy criteria 13 and requirement for suitable phasing to ensure adequate wastewater treatment capacity is available.

### Summary of representation changes to plan:

N/A

### Response:

Support noted.

### Action:

No changes as result of this representation.

## 4885

## Support

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Environment Agency

## Object

### Summary of representations:

Object. Concerned about allocation. NPPF states scale and extent of development in designated areas should be limited and within their setting sensitively located and designed to avoid or minimise adverse impacts on the designated areas. Further urbanising of boundary would have a disastrous impact on AONB designation.

### Summary of representation changes to plan:

Cannot support allocation without further detail of location of development, mitigation measures, etc.

### Response:

With the exception of the western extent of the BLD, the Landscape Capacity Study (2019) assessed the sub-areas that cover the BLD as having medium capacity for landscape change and with the potential to accommodate development.

Development within the BLD will be subject to the requirements of Policy NE2 (Natural Landscape) and the specific requirements set out in the Policy criteria particularly, in respect of the AONB, SDNP and wider landscape impacts, criterion 7.

### Action:

No change as result of this representation

## 4982

## Object

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Chichester Harbour Conservancy

## Object

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### Summary of representations:

Object. Policy is inconsistent with other policies in the draft Plan. While bullet point 9 references no adverse impacts to wildlife, it fails to acknowledge the requirement to leave biodiversity in a better state via the delivery of BNG.

### Summary of representation changes to plan:

To ensure consistency with NPPF para 179b add to end of criterion 9 'Deliver biodiversity net gain that facilitates habitat connectivity'

### Response:

It is agreed that reference to BNG would be helpful but for consistency the wording should follow that used in the other housing site related policies.

### Action:

See council suggested modification CM336

5071

Object

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**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Sussex Wildlife Trust

## Object

### Summary of representations:

Scale of development at Southbourne BLD will be partially dependent on capacity of transport network to accommodate associated traffic. As BLD spans railway line, many traffic movements would need to cross here. Concerned insufficient capacity at existing level crossings (Stein Road) to accommodate additional traffic. Could mean cumulative impact of development on traffic network is severe which is inconsistent with Paragraph 111 of the NPPF.

Transport evidence does not provide sufficient assurance that proposed scale of development can be accommodated. Base level of traffic flow has not been compared to local traffic counts, either in initial validation of strategic model or through a new count which WSCC previously requested, assumptions about level crossing downtimes have not been validated against observed data. Concerned that assessment of capacity of local road network to accommodate the quantum of dwellings proposed for BLD may be over-optimistic by underestimating existing flow levels and duration of level crossing downtime. As a consequence, proposed quantum may not be deliverable without unacceptable impacts to conditions on Stein Road and to level of traffic seeking to use rural lanes to the north of village to avoid level crossing.

### Summary of representation changes to plan:

Either additional transport evidence is provided prior to the examination to demonstrate that the proposed scale of development is deliverable, or Policy changed to remove the proposed scale of development until such evidence is provided.

### Response:

The findings of the Council's evidence indicates that there would be modest increases in journey times and only above 1,000 dwellings would travel time in a southbound direction be considered a material change. In terms of queue lengths, in the case of northbound traffic the results indicate that across all scenarios queue lengths would not extend to the A259/Stein Road junction. In respect of southbound traffic there would be some increase in queue lengths and the modelling undertaken indicates that beyond a certain amount of development a new rail bridge is likely to be of some benefit if the forecast traffic conditions cannot otherwise be mitigated by other traffic management measures i.e. additional road markings to help vehicles emerge from side roads onto Stein Road.

In addition, as required by Policy T2 (Transport and Development) development at Southbourne will need to be supported by an appropriate Transport Assessment to look at the impacts in more detail. There will also be consideration through the Monitor and Manage process to consider any potential mitigation in the future.

### Action:

No change in response to this representation

5087

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** West Sussex County Council



## Object

### Summary of representations:

Object.

Whilst support principle of allocation, amendments should be made to policy wording to reflect the approach to flexibility, inclusion of small and medium scale sites, and dispersion of development to both the west and east of Southbourne.

1. Removal of 'minimum' conflicts with flexibility referenced earlier in Plan and reduces potential for making effective use of the land for housing.
2. Policy should allow for delivery of small/medium sub-areas of land at early stage to enable timely delivery of housing whilst infrastructure upgrades commenced. Plan should allocate these sites to ensure can come forward early in plan period. Land north of Gosden Green should be allocated or identified as key component of BLD.
3. Key Diagram appears to suggest new development is to be located to west and east of Southbourne and to south of railway line, facilitating development north of railway line.

### Summary of representation changes to plan:

New criterion should be added: To identify land for early delivery on small to medium scale sites which are not constrained by the need for a new railway crossing.

Policy wording should be amended to reflect Key Diagram to: Provision will be made for a mixed use development within the broad location for development to the west and east of at Southbourne, as shown on the Key Diagram

### Response:

1. The justification for not meeting the housing needs in full is set out in the Housing Need (July 2024) and Transport (July 2024) Background Papers.
2. The need for a new rail bridge is not an issue to delivery as the Council's evidence indicates that only beyond a certain amount of development is a new rail bridge likely to be of some benefit if the forecast traffic conditions cannot otherwise be mitigated by other traffic management measures.
3. The Key Diagram does not, and should not, be taken to imply development will take place in any particular direction around Southbourne. The location and extent of the site allocation(s) will be determined through the preparation of the Southbourne Allocation DPD.

### Action:

No changes in response to this representation.

5239

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Hallam Land Management Limited

**Agent:** LRM Planning

## Object

### Summary of representations:

#### Bullet Point 9

The Wildlife Corridor area shown around the Ham Brook differs between the Local Plan and the Neighbourhood Plan. The Wildlife Corridor should be larger as shown on Plan D of the Southbourne Parish Neighbourhood Plan (Regulation 16). This is confirmed by results of surveys commissioned by CDC and more thorough surveys commissioned by the Parish Council and validated by the Sussex Biodiversity Record Centre.

Local Plan (Policy NE4, Map NE4a and para. 4.16) appears to confirm that the boundaries in Local Plan are definitive. However, from notes of officer meeting between CDC and SDNPA (Duty to Cooperate Statement of Compliance Jan 2023, page 38) it appears that that it was agreed that details would be agreed through Neighbourhood Plans. This conflict requires rectification.

Wildlife corridor should be extended to include area shown in Neighbourhood Plan.

### Summary of representation changes to plan:

Policy NE4 should state which plans confirm the boundaries of the Wildlife Corridors. Local Plan Map 4a needs amending to show a larger area for the Nutbourne to Hambrook Wildlife Corridor.

### Response:

The Strategic Wildlife Corridors Background Paper (June 2024) sets out details of the methodology used to identify the location and extent of the corridors.

### Action:

No change in response to this representation.

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**5240****Object**

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Southbourne Parish Council

## Object

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**Summary of representations:**

Parish Council was not previously consulted about this part of Policy A13 or relevant policies in housing section. Number of pitches and plots proposed is considerable given number of pitches/plots already occupied in the Parish. Object, unless Council can provide assurances about location and management of sites.

**Summary of representation changes to plan:**

N/A

**Response:**

As set out in the Gypsy and Traveller and Travelling Showpeople Background Paper (May 2024), the Council have explored a number of options for pitch/plot delivery. This has included a 'Call for Sites' and an assessment of the potential for intensification on existing Gypsy and Traveller sites but the likely provision arising from these sources does not meet the assessed level of pitch or plot need, requiring provision to be made on the proposed strategic housing sites. Specifically, in terms of Travelling Showpeople, the majority of the plot need arising is from the Priors Leaze Lane site at Southbourne and, as such, it is considered appropriate for the need to be met within the same locality.

**Action:**

No changes in response to this representation.

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**5241****Object**

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**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Southbourne Parish Council

## Object

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**Summary of representations:**

The evidence explaining why there has been a reduction from 1250 to 1050 dwellings as set out in Background Paper (paragraph 2.5) is incorrect and should state that it has been reduced due to an exception made by the District Council to take account of the Cooks Lane planning permission for 199 dwellings granted in 2020.

Should the housing numbers be increased across the parishes for any reason, important that they are not increased in Southbourne as CDC has acknowledged that 1050 additional dwellings are the most that should be accommodated in the period to 2039. Parish Council considers more than this number would be likely to compromise other policies in the Local Plan, probably give rise to market saturation locally and also pose problems integrating new residents with those already living in the village.

**Summary of representation changes to plan:**

Para 2.5 should be amended to read ".....been reduced to 1050 dwellings due to an exception made by the District Council to take account of a planning permission for 199 dwellings at Cooks Lane granted in 2020

**Response:**

Planning permission for the 199 dwellings north of Cooks Lane was granted prior to the base date of the Local Plan.

Comments regarding an increase in the housing figure for Southbourne is noted. A higher housing number was considered but it was determined that there was no certainty of a higher quantum of development being delivered during the plan period due to infrastructure capacity constraints (Sustainability Appraisal - Section 7).

**Action:**

No changes in response to this representation.

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**5245****Object**

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**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Southbourne Parish Council

## Object

### Summary of representations:

#### Bullet Point 2

Parish Council was not previously consulted about this part of Policy A13 or relevant policies in housing section. Number of pitches and plots proposed is considerable given number of pitches/plots already occupied in the Parish. Object unless Council can provide assurances about location and management of sites.

### Summary of representation changes to plan:

N/A

### Response:

As set out in the Gypsy and Traveller and Travelling Showpeople Background Paper (May 2024), the Council have explored a number of options for pitch/plot delivery. This has included a 'Call for Sites' and an assessment of the potential for intensification on existing Gypsy and Traveller sites but the likely provision arising from these sources does not meet the assessed level of pitch or plot need, requiring provision to be made on the proposed strategic housing sites. Specifically, in terms of Travelling Showpeople, the majority of the plot need arising is from the Priors Leaze Lane site at Southbourne and, as such, it is considered appropriate for the need to be met within the same locality

### Action:

No changes in response to this representation.

5246

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Southbourne Parish Council

## Support

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment – noting the need for a master plan and to collaborate]. Support. Reinforce that Masterplanning process presents opportunity to consider traffic associated with developments using/accessing/exiting A27; viable alternatives to private car; understand future infrastructure requirements; develop mitigation measures; utilise Travel Plan monitoring strategies; collect appropriate mitigation funding

### Summary of representation changes to plan:

N/A

### Response:

Comments noted.

### Action:

No changes in response to this representation

5328

Support

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** National Highways

## Object

### Summary of representations:

Object. Policy is too vague in its current form. Housing numbers significantly increased since current Local Plan policy, impossible to deduce how figure of 1,050 dwellings is arrived at. No guarantee sites within broad allocation will come forward, should be reasonable prospect that site is available and could be viably developed. If development comes forward in a piecemeal way could impact on affordable housing provision.

### Summary of representation changes to plan:

Council should be less reliant on major strategic allocations and look to allocate a range of additional small, medium, and large sites to provide a more flexible, responsive, and deliverable range of allocations.

Will bolster housing land supply and through allocation of more sustainable sites in service villages, will provide support for the rural, northern area of the district.

### Response:

Sites within the BLD have been submitted through the HELAA and assessed as being deliverable and/or are the subject of planning applications. As set out in the Southbourne BLD Background Paper (May 2024) landowners within the BLD were also contacted to confirm the availability of their sites.

The Local Plan provides for a range of sites to come forward either through the making of allocations in the Local Plan or subsequent Neighbourhood Plans, including the north of the plan area.

### Action:

No change in response to this representation.

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**5409****Object**

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Landowner at Champions Farm, Wisborough Green

**Agent:** Southern Planning Practice

## Object

### Summary of representations:

Object. Number of dwellings proposed equates to current number of homes in Chidham and Hambrook Parish. Will have detrimental impact on local services and ability of residents in surrounding villages to access them. Scale of building proposed together with houses under construction/permitted will have detrimental impact on character of the area.

### Summary of representation changes to plan:

N/A

### Response:

The overall spatial strategy seeks to locate the majority of development in locations which have access to a range of services and facilities, informed by the settlement hierarchy evidence. This has also been influenced by site availability and suitability, environmental and other constraints.

In terms of infrastructure, it is accepted that new development may affect existing infrastructure and local services and may require new or enhanced provision to meet needs. Therefore, all relevant service providers are consulted to identify if the services they provide have existing capacity or if additional capacity is needed to accommodate the proposed development. This is outlined in the Infrastructure Delivery Plan (IDP) that supports the Local Plan. It is the responsibility of service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver infrastructure by requiring developers to make financial contributions through the developer obligation process (as set out in policy I1) or by the phasing of development in line with the expected delivery of required infrastructure. CDC will continue to work with service providers to understand the Plan Area's infrastructure needs and to regularly update the IDP.

In relation to wastewater infrastructure the current position is set out in the Statement of Common Ground with Southern Water and the Environment Agency (April 2024). In relation to the highway network, CDC have worked with both National Highways and WSCC to assess the impact of development, and the potential for cumulative effects, on the highway network. Where site specific mitigation is required, this is identified in the site specific policies and IDP. As part of a planning application, developers will be required to submit a Transport Assessment and/or Travel Plan to detail any highway issues and sustainable travel options, which will need to address issues identified in the Local Plan policies and the IDP.

### Action:

No changes in response to this representation.

5490

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Mayday! Action Group

**Summary of representations:**

Transport studies do not state how highway impact of the proposed Southbourne settlement hub was assessed and whether this included an assessment of the A259 corridor into Hampshire. HCC's view transport evidence does not, at this stage, provide an adequate consideration of impact on the local highway network in Hampshire, and specifically on the A259.

Transport Assessment will be required at planning application stage to fully identify local and cross-boundary impacts on the A259 route which crosses into Hampshire. Masterplanning would also be beneficial to prevent high levels of car dependency and to ensure that site has connections to public transport and new facilities and services can be accessed by walking and cycling trips both by new residents and those from adjacent residential areas.

**Summary of representation changes to plan:**

N/A

**Response:**

The impact of the Chichester Local Plan and the Southbourne BLD on the A259 and relevant junctions in Hampshire is set out in a Technical Note (January 2024) prepared by the Council's highway consultants Stantec.

The Technical Note considers the impact of the Local Plan, both with and without mitigation, on the A259 and the A259/North Street junction in Emsworth and A27 Warblington Interchange. Using the Chichester Area Transport Model (CATM) the analysis indicates that both junctions operate within capacity under all scenarios.

The Technical Note also addresses comments subsequently raised by Hampshire County Council that junction capacity assessments for a proposed development in Southbourne had identified that sections of the Warblington Interchange were operating over capacity. The Technical Note makes clear that there is a difference between the Local Plan modelling that provides a strategic view of the cumulative impacts of development within the study area, particularly Chichester district, and the modelling undertaken for a standalone development using specific junction modelling software. Developers would in any case be required to undertake their own Transport Assessment to identify local impacts and measures to mitigate them appropriately prior to planning consent.

Notwithstanding this, the Technical Note provides some comparative analysis and identifies that there is the potential for the Local Plan to exacerbate the existing capacity issues at the Warblington Interchange and for substantial flows to be added to the A259 Emsworth roundabout (if mitigation provided by the Fishbourne roundabout improvements is not implemented). However, as required by Policy T2 (Transport and Development) development at Southbourne will need to be supported by an appropriate Transport Assessment to look at the impacts on these junctions in more detail. There will also be consideration through the Monitor and Manage process to consider any potential mitigation in the future.

CDC are preparing a Statement of Common Ground with HCC

**Action:**

No changes in response to this representation.

5589

Support

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Hampshire County Council



## Object

### Summary of representations:

Object. Policy not sufficiently clear and robust on measures to support reducing car trips without having unacceptable impact on traffic conditions, congestion and reliability of bus services on approaches to A27 and over wider corridor to the west. Only reference is to funding highways capacity improvements but as set out in Chichester Transport Strategy these improvements do not accommodate growth from sites additional to those in adopted Local Plan. Will not secure modal shift from car use.

### Summary of representation changes to plan:

Third paragraph of policy should be amended to read: '...for pedestrians and cyclists, and provides the highest possible quality of access to facilities and improved public transport services.

Amend criterion 4 to read: 'Provide a suitable means of access to the site(s), and secure necessary off-site ) transport infrastructure and service improvements (in particular to the A259 corridor between Emsworth and Chichester) in conformity with the Policy T1 (Transport Infrastructure) and T2 (Transport and Development) to prioritising delivery of high quality pedestrian, cycling and public transport routes, and providing substantial peak journey time advantage for sustainable modes;'

### Response:

It is considered the policy as drafted and the cross reference in criterion 4 to Policies T1 and T2, which are not solely concerned with 'highway' improvements but transport infrastructure more widely, including sustainable modes of travel provides an appropriate approach and level of detail.

### Action:

No changes as result of this representation.

5609

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Stagecoach South

## Support

### Summary of representations:

Support. Have significant landholdings around Southbourne, which is suitable, available and developable. Adjoins existing settlement and provides opportunity for a sustainable extension with potential to deliver c. 1,200 homes as well as employment, community uses and a significant amount of new public space and green open space.

### Summary of representation changes to plan:

Policy A13 sets several policy objectives for development. Bearing in mind NPPF paragraph 58 policy objectives outlined within Policy A13 will require viability testing to be undertaken to ensure a policy compliant scheme is both viable and deliverable. This is necessary to ensure that the policy is sound.

### Response:

Comments noted.

The proposed BLD has been subject to viability testing (Stage 2 Viability Testing – January 2023) albeit, as the exact site area is not currently known, on the basis of high level typology testing. This found that there was a reasonable prospect of viability with the Local Plan policies.

### Action:

No change in response to this representation.

5710

Support

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Church Commissioners for England

**Agent:** Lichfields

## Object

### Summary of representations:

Support in principle but unrealistic to suggest delivery as early as 2028 so cannot demonstrate delivery of 1,050 dwellings over plan period. Could address by bringing forward development within BLD earlier without undermining BLD objectives – promoting two land sub-areas known as Land at 'Harris Scrapyrd & Oaks Farm' and 'Land East of Inlands Road'.

Extent of BLD should be expanded to include wildlife corridors - delivery and management of the corridors can only be secured if they become an integral part of the BLD alongside planned development.

**Summary of representation changes to plan:**

Amend first paragraph of policy to read: '... as shown on the Key Diagram. Development proposals for within the broad location will ensure that the comprehensive development of the area and the delivery of 1,050 dwellings, local employment opportunities and supporting community uses and facilities is not prejudiced.'

Amend third paragraph to read: 'Development should ensure that comprehensive development is achieved, including high-quality design and layout that .... '

Amend criterion 6 to read: 'Ensure adequate the provision of supporting infrastructure made necessary by development within the broad location, including education provision, community facilities and transport in accordance with the most up to date evidence of need.

Amend criterion 9 to read: '... identified sites and habitats including, where possible, the delivery of strategic wildlife corridors and provision for long-term management to maximise wildlife protection and enhancement'

Amend final paragraph of policy to read: Development proposals which are likely to prejudice its delivery including the infrastructure required for the area will not be permitted.'

**Response:**

The housing trajectory has been reviewed and delivery is now expected to commence from 2030/31 onwards.

To be consistent with Policy NE4 (Strategic Wildlife Corridors) regarding development proposals within the corridors, it is considered appropriate that land that falls within the boundaries of the identified corridors should be excluded from the extent of the BLD.

It is considered the policy criterion as drafted provide an appropriate approach and level of detail.

It should be noted that planning permission for the development of the site being promoted was granted on appeal (18 September 2023) for 103 dwellings and associated infrastructure.

**Action:**

No change in response to this representation.

**5726****Object**

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Metis Homes

**Agent:** Nova Planning

## Support

### Summary of representations:

Object. Reword criterion 4 to give more emphasis to active travel and public transport.

### Summary of representation changes to plan:

Reword criterion 4 to read: Provide a suitable means of access to the site(s) focused with active travel links to Southbourne Railway station that must be continuous, direct, safe, attractive, comfortable securing necessary off-site improvements to ensure this is available before first occupation, together with improvements to facilitate service and delivery access if required ) in conformity with the Policy T1 (Transport Infrastructure) and T2 (Transport and Development) to ensure where access to available locally sustainable transport is used

### Response:

It is considered the criterion as drafted and the cross reference to Policies T1 and T2, which are not solely concerned with 'highway' improvements but transport infrastructure more widely, including sustainable modes of travel provides an appropriate approach and level of detail. Policy P4 also includes criteria relating to active travel and integration with public transport.

### Action:

No changes in response to this representation.

5939

Support

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** GoVia Thameslink Railway

## Object

### Summary of representations:

Object. Important to safeguard character of community and adjoining villages along the A259. Strategic gaps either side of expanded settlement should be defined.

### Summary of representation changes to plan:

Plan should include new interchange with A27 so housing from new development directed to A27 and not the A259.

### Response:

As set out in Policy NE3 (Landscape Gaps) the definition of the precise boundaries of landscape gaps between settlements will be undertaken either through a Site Allocations DPD or neighbourhood plan.

Criterion 15 of Policy A13 makes clear that development within the BLD will need to provide clear separation between new development including through the definition and protection of landscape gaps.

There are no proposals for an interchange on to the A27.

### Action:

No changes in response to this representation.

5948

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** The Chichester Society

Object

**Summary of representations:**

Object. Significant upturn in use of Penny Lane and Church Lane level crossings, currently public footpath crossings with high risk factors – could warrant closure or installation of footbridge.

Costly projects and would require funding. Network Rail currently completing risk assessment of affected crossings. Recently reviewed Copse level crossing where 112 home development resulted in 300% use increase

**Summary of representation changes to plan:**

N/A

**Response:**

It is recognised that there are a number of rail level crossings and a material increase or significant change in the character of traffic using these crossings can impact on the safety and operation of the level crossings. Where relevant, transport assessments (as required by Policy T2) should consider the potential for such impacts and, if required, identify appropriate mitigation measures.

**Action:**

No change in response to this representation.

5964

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** Network Rail

Object

**Summary of representations:**

Object. Concern made Southbourne Neighbourhood Plan will make allocation of additional housing less likely. Council should have tested allocation of alternative sites (e.g. Main Road, Hermitage) as part of proposed approach and not discounted because in the AONB. Delivery from broad area is overly ambitious and approach is not rational, sufficiently specific, effective or justified.

**Summary of representation changes to plan:**

N/A

**Response:**

As set out in the Southbourne Background Paper (May 2024), the starting point for considering individual site options is the HELAA. Under the HELAA methodology sites within the AONB have been discounted and, as such, it would not be appropriate to consider such sites.

**Action:**

No changes in response to this representation.

**5970****Object****Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** Obsidian Strategic**Agent:** Andrew Black Consulting**Object****Summary of representations:**

Area contains sub-areas of ancient woodland and policy could be improved by highlighting its importance and high priority as part of wider ecological network and strategic wildlife corridor connectivity. Developments within area could contribute pockets of woodland/linear planting as part of mosaic of habitats.

**Summary of representation changes to plan:**

Criterion could be strengthened by requiring developments to significantly contribute to SWC enhancement, expansion and connectivity including with green infrastructure provided by development

**Response:**

As set out in the Southbourne Background Paper, the starting point for considering individual site options is the HELAA. Under the HELAA methodology sites within the AONB have been discounted and, as such, it would not be appropriate to consider such sites.

In response to a representation from the Sussex Wildlife Trust (5071) it is proposed to amend criterion 9 to refer to habitat connectivity within the site and to the wider green network and wildlife corridors. It is considered this will go some way to addressing the issues raised by this representation.

**Action:**

No changes in response to this representation.

**6004****Object****Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** Forestry Commission

## Object

### Summary of representations:

Requirement 6 in policy A12 (Chidham and Hambrook) currently goes straight to “successfully mitigate” while requirement 10 in policy A13 (Southbourne) states “Provide mitigation to ensure the avoidance of adverse effects on the SPA, SAC and Ramsar site at Chichester Harbour.” Policy A18 (Thorney Island) is better as it states “Proposals must avoid adverse impacts on the Chichester Harbour AONB/SAC/SPA and Ramsar designations.” We would suggest that all policies require development proposals to ‘avoid, and if necessary mitigate, any adverse effects...’

### Summary of representation changes to plan:

To better reflect the mitigation hierarchy, recommend wording of criterion 10 be amended to read: Avoid, and if necessary, mitigate any adverse effects on the SPA, SAC and Ramsar site at Chichester Harbour .... ‘

### Response:

It is agreed that the wording of the criterion should be clarified as suggested.

### Action:

See council suggested modification CM337

6011

Object

**Document Element:** Policy A13 Southbourne Broad Location for Development

**Respondent:** Natural England

## Object

### Summary of representations:

Policy should allocate 1,250 dwellings at Southbourne.

Land to east of Southbourne should be a specific allocation. No rationale is presented as to why development should be delayed until the adoption of a subsequent DPD or Neighbourhood Plan. The long-term assessment and findings of the Neighbourhood Plan group and the plan examiner remain sound and should be respected in identifying a specific housing allocation.

### Summary of representation changes to plan:

Policy is rewritten to allocate 1,250 dwellings on land east of Southbourne and to align with the comprehensive masterplanning exercise that has been completed to-date.

### Response:

The Neighbourhood Plan Review 2019-2037 (NP2) that proposed an allocation to the east of Southbourne for 1,250 dwellings was withdrawn by the Parish Council in April 2022. As the Examiner considered that the Neighbourhood Plan had not met the Basic Conditions, he did not go on to consider the merits of the proposed allocation.

The Southbourne Background Paper (2024) sets out the justification for the approach taken in the Local Plan of identifying a Broad Location for Development.

### Action:

No change in response to this representation.

**6076****Object****Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** Wates Developments and Seaward Properties**Agent:** Barton Willmore now Stantec**Object****Summary of representations:**

SA has not considered adequate reasonable alternatives to growth at Southbourne which would include allocation of sites elsewhere in the village including within the AONB that can deliver in the early part of the plan period.

**Summary of representation changes to plan:**

N/A

**Response:**

As set out in the Southbourne Background Paper (May 2024), the starting point for considering individual site options is the HELAA. Under the HELAA methodology sites within the AONB have been discounted and, as such, it would not be appropriate to consider such sites. See also respondent's comments on SA (Rep 5976).

**Action:**

No change in response to this representation

**6253****Object****Document Element:** Policy A13 Southbourne Broad Location for Development**Respondent:** Tanglewood Residences Limited**Agent:** Andrew Black Consulting



## Land West of Tangmere, 10.59

### Object

**Summary of representations:**

does not provide information needed to understand how number of dwellings compares to current size of village. Cannot use references to A27 without acknowledging congestion. Does not acknowledge 20ha of unmet need for horticultural land

**Summary of representation changes to plan:**

Amend wording to read

Tangmere is the largest village in the area to the east of Chichester city, with a range of local facilities including small shops has 1,156 dwellings, one convenience store, a shop that sells wedding dresses, fuel station, primary school, GP surgery and village hall, and good road accessibility via the congested A27. There are extensive site-specific constraints at this site with land being used currently for viable agriculture, and there is unmet demand for 20ha of horticulture land in Tangmere

**Response:**

Comment noted. Through the planning application process, the site specific constraints have been identified, and the development has been planned with regard to overcoming these constraints.

Policy E3 addresses the requirement for horticultural development and how these needs will be met over the plan period

**Action:**

No change to plan

## 4133

### Object

**Document Element:** Land West of Tangmere, 10.59

**Respondent:** Mr Matthew Rees

### Object

**Summary of representations:**

not justified to increase village of 1100 houses by another 1300

**Summary of representation changes to plan:**

Reduce number of houses by two-thirds

**Response:**

Comment noted. The Local Plan is required to plan for meeting housing needs, or a housing figure that has been derived through evidence which supports the local plan preparation. In this regard, suitable site allocations must be made, and this development site has been assessed as being suitable for accommodating 1,300 dwellings, as evidenced through the masterplanning process. There is no evidence to suggest that the housing number for this site should be reduced

**Action:**

No change to plan.

**4414****Object****Document Element:** Land West of Tangmere, 10.59**Respondent:** Mrs Coleen Ayton**Object****Summary of representations:**

: village does not have sufficient facilities

**Summary of representation changes to plan:**

Make provision for more and improved facilities

**Response:**

Comment noted. In addition to the number of dwellings proposed, the site allocation at Tangmere requires the delivery of new and enhanced facilities, including provision for a new two-form entry primary school, expanded community facilities and open space. Without this development coming forward, and the requisite developer contributions to fund and provide such facilities, it is highly unlikely that new facilities would be delivered in isolation

**Action:**

No change to plan

**4417****Object****Document Element:** Land West of Tangmere, 10.59**Respondent:** Mr John Wolfenden**Object****Summary of representations:**

does not set out impact of additional 1300 houses on A27

**Summary of representation changes to plan:**

Amend monitor and manage strategy to predict and provide future infrastructure to improve congestion on A27 and surrounding roads

**Response:**

Comment noted. The 'monitor and manage' strategy is the approach required by National Highways to identify and mitigate impacts on the highway network. The approach is based on identifying a package of potential highway improvements, including active travel, which, alongside schemes identified through the development management process, may be implemented following a monitoring process that will monitor the actual demand on the network and the requirement for the schemes

**Action:**

No change to plan.

**4433****Object****Document Element:** Land West of Tangmere, 10.59**Respondent:** Mr Brian Ayton**Object****Summary of representations:**

■ unsound as increased traffic will impact T junction at Tangmere Road (with Church Lane).

**Summary of representation changes to plan:**

■ An assessment of improving road safety at this T junction should be undertaken

**Response:**

■ Comment noted. As part of the outline planning application a full transport assessment has been undertaken

**Action:**

■ No change to plan

**4538****Object****Document Element:** Land West of Tangmere, 10.59**Respondent:** Mr John Newsom**Object****Summary of representations:**

■ does not consider burden of additional houses on infrastructure

**Summary of representation changes to plan:**

■ Reduce density of building and number of homes proposed. Invest in road infrastructure and undertake survey of impact on existing infrastructure

**Response:**

■ Comment noted. This development site has been assessed as being suitable for accommodating 1,300 dwellings, as evidenced through the masterplanning process

**Action:**

■ No change to plan

**5574****Object****Document Element:** Land West of Tangmere, 10.59**Respondent:** Morag Mills

## Land West of Tangmere, 10.60

### Object

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**Summary of representations:**

does not make provision for infrastructure

**Summary of representation changes to plan:**

Amend paragraph wording as follows:

The Local Plan identifies Tangmere as being capable of accommodating further sustainable growth to enhance and develop its role as a settlement hub, through the provision of new housing and infrastructure to support the new development and the existing village but this would need to be consistent with sustainable development, as defined by NPPF. The council will work to ensure that there is timely delivery of road and train services to provide a genuine choice of transport modes to support growth.

**Response:**

Comment noted. it is considered that criteria 8 and 9 of the policy, along with Policies T1 and T2 adequately cover the provision of transport infrastructure, including new sustainable modes of travel

**Action:**

No change to plan

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**4136****Object**

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**Document Element:** Land West of Tangmere, 10.60

**Respondent:** Mr Matthew Rees

### Object

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**Summary of representations:**

assumption of adequate infrastructure is inaccurate.

**Summary of representation changes to plan:**

Undertake proper consultation with various professionals to create strategies for coping

**Response:**

Comment noted

**Action:**

No change to plan

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**4418****Object**

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**Document Element:** Land West of Tangmere, 10.60

**Respondent:** Mr John Wolfenden

## Land West of Tangmere, 10.61

### Object

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**Summary of representations:**

changes in housing market have not been reflected in the plan. Does not apply Statement of Community Involvement principles to explain why plan proposes 30% more housing than the Tangmere Neighbourhood Plan. CDC should have done more to consult with residents of Saxon Meadow

**Summary of representation changes to plan:**

Amend paragraph to read:

The Chichester Local Plan Key Policies allocated the Tangmere strategic development location for comprehensive development of 1,000 dwellings and supporting infrastructure. Detailed subsequent site investigations and the masterplan process have demonstrated that the site can satisfactorily accommodate an additional 300 dwellings to achieve an allocation of 1,300 dwellings together with the required community facilities, open space, recreation and supporting infrastructure.

The Tangmere Neighbourhood plan in 2016 stated that there were 1,156 dwellings in the parish of Tangmere and a plan for 1,000 additional homes.

**Response:**

Comment noted

**Action:**

No change to plan

**4138****Object**

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**Document Element:** Land West of Tangmere, 10.61

**Respondent:** Mr Matthew Rees

### Object

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**Summary of representations:**

Plan does not demonstrate capability to increase size of new development in Tangmere

**Summary of representation changes to plan:**

Remove additional 300 dwellings.

Develop amenities and infrastructure plan to set out how Tangmere will accommodate new development

**Response:**

Comment noted. In addition to the number of dwellings proposed, the site allocation at Tangmere requires the delivery of new and enhanced facilities, including provision for a new two-form entry primary school, expanded community facilities and open space. Without this development coming forward, and the requisite developer contributions to fund and provide such facilities, it is highly unlikely that new facilities would be delivered in isolation.

**Action:**

No change to plan

**4421****Object****Document Element:** Land West of Tangmere, 10.61**Respondent:** Mr John Wolfenden**Object****Summary of representations:**

1300 new houses will negatively affect Saxon Meadow and the protection of the Conservation Area

**Summary of representation changes to plan:**

None suggested

**Response:**

Comment noted

**Action:**

No change to plan

**4427****Object****Document Element:** Land West of Tangmere, 10.61**Respondent:** Mrs Coleen Ayton**Object****Summary of representations:**

: Inconsistent with the Sustainability Appraisal as it does not protect the natural environment. Concerns over extent and proximity to Saxon Meadow

**Summary of representation changes to plan:**

Reduce number of dwellings proposed and increase separation distance from Saxon Meadow

**Response:**

Comment noted. The development site has been assessed as suitable for accommodating 1,300 dwellings. The layout has been considered through an extensive masterplanning exercise. With the exception of the land to the south, the majority of dwellings are to be located away from Saxon Meadow

**Action:**

No change to plan

**4435****Object****Document Element:** Land West of Tangmere, 10.61**Respondent:** Mr Brian Ayton

## Object

### Summary of representations:

Object: to loss of views to and from Saxon Meadow. Plan does not take into account protection of conservation area, and negatively impacts upon residential amenity.

### Summary of representation changes to plan:

Reduce number of homes or move them elsewhere. Maintain open space between Saxon Meadow and new development.

### Response:

Comment noted. An amendment to the outline planning application (20/02893/OUT) has been approved (resolution to grant subject to signing of the Section 106) for the removal of the meadow to the west of Saxon Meadow such that this land can be retained by the residents for open space.

### Action:

See Council's suggested Modification CM342.

5570

Object

Document Element: Land West of Tangmere, 10.61

Respondent: Mr John Newsom

## Land West of Tangmere, 10.62

## Object

### Summary of representations:

spine road incompatible with policies NE20, 22 and 23.

### Summary of representation changes to plan:

Amend wording to:

The development location is situated around the western and southern edges of the village, south of the A27 and north of Tangmere Road. The site comprises approximately 73 hectares of land predominantly used for agriculture. If housing development were to take place on this site it will be accessed from either The site will have primary access from the A27/A285 grade separated junction, with a spine road linking to or Tangmere Road to the south, but there will be no direct link between the A27/A285 and Tangmere Road to respect policies NE20, P16, NE23 and avoid this being used as a short cut, and every effort possible will be made to reduce the residual harm.

### Response:

Comment noted. The policy principle for the north-south link road (or spine road) has been established through Policy 18 of the adopted Local Plan and Policy 2 of the made Tangmere Neighbourhood Plan. The policy principle should be reflected in the corresponding policy in the emerging Local Plan.

### Action:

No change to plan

4140

Object

Document Element: Land West of Tangmere, 10.62

Respondent: Mr Matthew Rees

## Object

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### Summary of representations:

spine road would cause congestion

### Summary of representation changes to plan:

Direct route for development should be made from development to A27/A285

### Response:

Comment noted. The proposed spine road will run through the development, connecting the A27 with Tangmere Road to the south. The policy principle for the spine road has been established in Policy 18 of the adopted Local Plan and Policy 2 of the made Tangmere Neighbourhood Plan

### Action:

No change to plan

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4420

Object

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**Document Element:** Land West of Tangmere, 10.62

**Respondent:** Mrs Coleen Ayton

## Object

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### Summary of representations:

to loss of agricultural land, increased risk of flooding and loss of wildlife, impact on conservation area

### Summary of representation changes to plan:

Move development to the old airfield and the other side of Tangmere Road.

### Response:

Comment noted. The development site has been assessed as the most suitable location in Tangmere parish for the development

### Action:

No change to plan

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4429

Object

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**Document Element:** Land West of Tangmere, 10.62

**Respondent:** Mr John Wolfenden



**Land West of Tangmere, 10.63****Object****Summary of representations:**

to 30% increase in number of dwellings and impact on residents of Saxon Meadow and conservation area.

**Summary of representation changes to plan:**

Amend wording to:

The Tangmere Neighbourhood Plan (made in July 2016) identifies the site for strategic development and provides design guidance and several policy aspirations to inform the masterplanning process. In particular, the Neighbourhood Plan places significant emphasis on achieving a 'one village' approach where the new development will be integrated within the existing village but the lack of a train station at Tangmere is an important consideration (Sustainability appraisal, page 89) and the road network is 'operating at or close to designed capacity' (para 8.23) with no funding or upgrade plan confirmed address existing congestion and cannot be met through developer contributions alone (8.4). Strategic infrastructure will be required on a timely basis to deliver sustainable housing development at this location. But the local conditions, including the conservation area and heritage value of the area mean that development on the land to the west of Tangmere should avoid damaging what features that make it so attractive.

**Response:**

Comment noted. The development is required to contribute funding towards the A27 as part of the Section 106 agreement that accompanies the outline planning application. Criterion 8 of the policy, in conjunction with Policies T1 and T2, are considered sufficient to cover transport provision. Policy T1 in particular sets out how development impacts on the strategic road network will be mitigated

**Action:**

No change to plan

**4317****Object**

**Document Element:** Land West of Tangmere, 10.63

**Respondent:** Mr Matthew Rees

## Object

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### Summary of representations:

proposing to double the population of the village which will effectively make it two distinct and unintegrated settlements

### Summary of representation changes to plan:

Provide a plan that integrates with the existing community, accounts for lack of infrastructure, preserves local heritage

### Response:

Comment noted. Criterion 1 of the policy requires that the development be planned to be well integrated to the existing village. This is also a guiding principle of the Tangmere Neighbourhood Plan. The masterplan has been established through an extensive exercise to accommodate all of the policy requirements of the local plan and neighbourhood plan, as well as to protect the existing village including the Conservation Area. In addition to the number of dwellings proposed, the site allocation at Tangmere requires the delivery of new and enhanced facilities, including provision for a new two-form entry primary school, expanded community facilities and open space. Without this development coming forward, and the requisite developer contributions to fund and provide such facilities, it is highly unlikely that new facilities would be delivered in isolation.

### Action:

No change to plan

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## 4438

## Object

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**Document Element:** Land West of Tangmere, 10.63

**Respondent:** Mr John Wolfenden

### Land West of Tangmere, 10.64

## Object

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### Summary of representations:

object to use of CPO powers, and unjustified harm to Saxon Meadow residents.

**Summary of representation changes to plan:**

Stop use of CPO powers to acquire any land owned by Saxon Meadow.

Amend paragraph wording:

The site has an endorsed Masterplan (reference 19/02836/MAS) which was developed in accordance with the Chichester Local Plan, emerging Local Plan Review but is +30% more than the 1,000 homes identified in the and the Tangmere Neighbourhood Plan and demonstrates how the policy aspirations of the development plan will be achieved but will need to be changed to maintain the existing rights and benefits at Saxon Meadow, Tangmere to preserve and respect their right of way to and from Church Lane, customary rights over this land, and their retention of the full meadow that is part of their estate and provides important amenity value because none of the properties have their own garden. The site also benefits from outline resolution to grant Permission (reference 20/02893/OUT) but this may not be sustainable development consistent with the National Planning Policy Framework given that is a large development that lacks 2 viable modes of transport given the lack of road capacity and lack of rail services at Tangere. CDC regrets that so far it has fallen short in the application of the principles set out in its statement of community involvement and will commit to reset the relationship with the residents of Saxon Meadow. CDC will cease the CPO and any other attempt to acquire, by any means, land owned by Saxon Meadow Tangmere Ltd or land that is used for the access to Saxon Meadow properties via Church Lane Tangmere or for other amenities, given that none of this land is needed for housing. CDC will engage with Saxon Meadow Tangmere Ltd, its representatives and residents to seek to respond positively to the requests that have been made to reset relationships and work constructively with them to reach a position of common ground that has the support of the residents.

**Response:**

Comment noted. The Compulsory Purchase Order process is independent of the local planning process.

An amendment to the outline planning application (20/02893/OUT) has been approved (resolution to grant subject to signing of the Section 106) for the removal of the meadow to the west of Saxon Meadow such that this land can be retained by the residents for open space.

**Action:**

See Council's suggested modification CM342.

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**4318**
**Object**

**Document Element:** Land West of Tangmere, 10.64

**Respondent:** Mr Matthew Rees

## Object

**Summary of representations:**

Saxon Meadow is not required for the development.

**Summary of representation changes to plan:**

Remove Saxon Meadow land from proposed site.

**Response:**

Comment noted. An amendment to the outline planning application (20/02893/OUT) has been approved (resolution to grant subject to signing of the Section 106) for the removal of the meadow to the west of Saxon Meadow such that this land can be retained by the residents for open space.

**Action:**

See Council's suggested modification CM342.

**4448****Object**

**Document Element:** Land West of Tangmere, 10.64

**Respondent:** Mr John Wolfenden

## Object

**Summary of representations:**

proposal to build a sports pavilion will block views from Saxon Meadows

**Summary of representation changes to plan:**

Modify plan to reduce or cancel the development

**Response:**

Comment noted. The site has outline permission (subject to signing of the Section 106).

**Action:**

No change to plan.

**5585****Object**

**Document Element:** Land West of Tangmere, 10.64

**Respondent:** Mr Oliver Gale

**Land West of Tangmere, 10.65**

## Object

**Summary of representations:**

this list does not take account of important matters.

**Summary of representation changes to plan:**

Amend policy wording:

There are a number of site-specific issues which should be considered when planning the development and site layout in this location, including:

Taking account of the Tangmere Neighbourhood Plan including the 'One Village' aspiration to integrate the new development with the existing village, and the other design considerations contained in the Neighbourhood Plan; Local community aspirations for new/improved facilities serving the village, including transforming the existing village centre into a local centre focused around a village main street, primary education, and enhanced recreation; The need to addressing requirements of existing dwellings in relation to strategic infrastructure prior to development, including addressing the flooding on Church Lane, and the need for the developer to provide surface water run-off infrastructure at Saxon Meadow given that these existing dwellings rely on soak-away on the surrounding agricultural land; The need for Southern Water to fully adopted waste water infrastructure; and the requirement for full fibre internet and modern telecommunication services to be available to residents of Saxon Meadow; Potential physical constraints such as landscape sensitivities, particularly external views from the surrounding area including the Tangmere conservation area itself, Oving, the South Downs National Park; High groundwater levels, particularly in the southern part of the site and Church Lane, and the need for noise mitigation measures for residential properties on the A27, for example through the use of acoustic screening; Conserving, enhancing and better revealing the known archaeological assets within the site, to advance understanding of the significance of the assets; Conserving and enhancing the setting of the historic village, particularly the Conservation Area and the views from within it looking out; Appropriate separation distances from new properties, and need to avoid segmenting existing open spaces into small plots that reduce amenity value; The archaeological and heritage assets within the surrounding area, and preserving the heritage of the World War II airfield, Commonwealth War Graves, including provision for the relocation of existing allotment space that could facilitate the expansion or relocation of the Tangmere Military Aviation Museum; The opportunity to provide off-site green links with existing and planned development at Tangmere, and with the South Downs National Park and Chichester city, and the potential to develop strategic green infrastructure in conjunction with other planned development to the east of Chichester City; Opportunities, in partnership with relevant authorities, to provide improved sustainable public transport routes linking the village with Chichester city, to improve cycle routes to the city, and better transport links to Barnham rail station and the 'Five Villages' area in Arun District and the reinstatement of a train stop between Oving and Tangmere on the existing train line; and The availability of minerals in the vicinity and the need to take account of the Minerals Safeguarding Area.

**Response:**

Comment noted. New development will be required to provide new, or enhance existing, infrastructure, as well as mitigate risks of flooding. It is not within the remit of the Local Plan to require developers to provide broadband to existing dwellings. The bullet points listed already include reference to the Tangmere Conservation Area. Appropriate separation distances are set out in Policy P6.

A significant additional number of dwellings would need to be provided in Tangmere in order to justify the provision of a train station, therefore it is not considered appropriate at this time to require this in policy.

**Action:**

No change to plan

4319

Object

Document Element: Land West of Tangmere, 10.65

Respondent: Mr Matthew Rees

## Object

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### Summary of representations:

lack of infrastructure, concern of relocation of allotments, impact on Conservation Area.

### Summary of representation changes to plan:

Reduce number of dwellings from 1300 to more sustainable and realistic number

### Response:

Comment noted. The Local Plan is required to plan for meeting housing needs, or a housing figure that has been derived through evidence which supports the local plan preparation. In this regard, suitable site allocations must be made, and this development site has been assessed as being suitable for accommodating 1,300 dwellings, as evidenced through the masterplanning process. There is no evidence to suggest that the housing number for this site should be reduced

### Action:

No change to plan

4452

Object

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Document Element: Land West of Tangmere, 10.65

Respondent: Mr John Wolfenden

## Policy A14 Land West of Tangmere

## Object

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### Summary of representations:

criterion 5 (specifically community orchard) will negatively impact residents of Saxon Meadow. Policy does not reference P11 and protection of views and setting and separation distances.

**Summary of representation changes to plan:**

Amend policy wording:

Subject to an evaluation of the economic, social and environmental benefits of safeguarding Approximately 73 hectares of land to the west of Tangmere to provide agriculture and / or viticulture / horticulture, the residual parcel of land to the west of Tangmere is allocated for residential development of 1,300 not more than 1,000 dwellings, community facilities and open space. If development were to proceed in this location it Development in this location will be expected to address the following site-specific requirements:

3. Incorporate new or expanded community facilities, including transforming the existing village centre into a new local centre providing new village centre amenities and not reduce any of the existing amenities enjoyed by existing residents including the right of way to their properties and their meadow;
5. Incorporate open space and green infrastructure, including parks, playing pitches, sports pavilion and new allotments and community orchard located adjacent to the allotments and, for the avoidance of doubt, not on the land owned by Saxon Meadow Tangmere Ltd, enabling the relocation of the existing allotments at the Tangmere Military Aviation Museum.
7. Respect important existing views of Chichester Cathedral spire and reduce any impact on views from within the South Downs National Park, particularly sensitive locations such as the Tangmere conservation area itself, views of St Andrews Church Oving from Saxon Meadow, the Trundle and Halnaker Hill and protect the setting, including views into and out of the Tangmere conservation area, consistent with policy P11.
9. Make provision for improved sustainable travel modes between Tangmere and Chichester city, in partnership with relevant authorities, including improved and additional cycle routes linking Tangmere with Chichester city, Shopwhyke and Westhampnett. Opportunities should also be explored for improving transport links with the 'Five Villages' area and Barnham rail station in Arun District; and CDC work with relevant authorities to deliver the reinstatement of a train stop to serve Tangmere and Oving on the existing rail line.
10. Conserve or enhance the heritage and archaeological interest of the site, the historic village and its setting (particularly that of the Conservation Area which includes a meadow that will not be divided into smaller lots) and the World War II airfield, Commonwealth War Graves and other commemorative structures, including making provision for the relocation of existing allotment space to facilitate the potential expansion or relocation of the Tangmere Military Aviation Museum;
11. Occupation of development will be phased to address the existing issues of flooding at Church Lane, and requirements of existing dwellings, particularly in relation to drainage infrastructure at Saxon Meadow which must be improved by the developer given that these dwellings rely on soakaway across agricultural land for run-off. Strategic infrastructure will also include full adoption by Southern Water of the wastewater infrastructure at Saxon Meadow, and align with the delivery of infrastructure for adequate wastewater conveyance and treatment to meet strict environmental standards;

**Response:**

Comment noted. The site has been assessed as suitable for residential development of 1,300 dwellings. An amendment to the outline planning application (20/02893/OUT) has been approved which relocates the community orchard from its original location on land immediately to the west of Saxon Meadow. Criterion 10 considers the conservation of the heritage of the area, including the Tangmere Conservation Area, therefore there is no need to duplicate this in criterion 7.

New development will be required to provide new, or enhance existing, infrastructure.

A significant additional number of dwellings would need to be provided in Tangmere in order to justify the provision of a train station, therefore it is not considered appropriate to require this in policy.

**Action:**

See Council's suggested modification CM342.

4321

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mr Matthew Rees

Object

**Summary of representations:**

amend to include a paragraph and key diagram that identifies the former Tangmere Airfield as a broad location for future housing growth.

**Summary of representation changes to plan:**

Add paragraph and key diagram including former Tangmere Airfield as a broad location for future housing growth

**Response:**

Comment noted. Tangmere Airfield is, and will continue to be, included in the Council's Housing and Economic Land Availability Assessment. This document will be updated in future to provide the Council with information of potential future available land for housing growth for the next Local Plan

**Action:**

No change to plan

4326

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Heaver Homes

**Agent:** Quod



## Object

### Summary of representations:

predictions relating to housing market has not been taken into account. Development proposed is 46x larger than Saxon Meadow and would negatively impact the area

### Summary of representation changes to plan:

Reduce density. Build houses further away from Saxon Meadow. Give consideration to heritage site and conservation area

### Response:

Comment noted. The development site has been assessed as suitable for accommodating 1,300 dwellings. The layout has been considered through an extensive masterplanning exercise in conjunction with the local planning authority (including the conservation and design officers), statutory consultation with Historic England, parish council and local residents. Except for the land to the south, the majority of dwellings are to be located away from Saxon Meadow. Criterion 10 requires consideration of the Conservation Area and historic environment.

### Action:

No change to plan

4446

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mrs A Cobby

## Object

### Summary of representations:

inadequate infrastructure to accommodate new development

### Summary of representation changes to plan:

Provide new infrastructure to accommodate development

### Response:

Comment noted. In addition to the number of dwellings proposed, the site allocation at Tangmere requires the delivery of new and enhanced facilities, including provision for a new two-form entry primary school, expanded community facilities and open space. Without this development coming forward, and the requisite developer contributions to fund and provide such facilities, it is highly unlikely that new facilities would be delivered in isolation

### Action:

No change to plan

4451

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mr Terence Pickering

## Object

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**Summary of representations:**

■ Housing around Saxon Meadow will cause loss of view from window. Will affect the character of the village.

**Summary of representation changes to plan:**

■ Reduce number of houses

**Response:**

■ Comment noted. The development site has been assessed as suitable for accommodating 1,300 dwellings

**Action:**

■ No change to plan

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4457

Object

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**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mrs Pauline Cook

## Object

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**Summary of representations:**

■ Infrastructure cannot accommodate additional 1300 homes

**Summary of representation changes to plan:**

■ Reduce number of dwellings

**Response:**

■ Comment noted. The development site has been assessed as suitable for accommodating 1,300 dwellings

**Action:**

■ No change to plan.

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4513

Object

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**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mr Michael Hornsey

## Object

### Summary of representations:

concern with additional development. Does not apply Statement of Community Involvement principles as to why plan is proposing 30% more housing than in the Tangmere Neighbourhood Plan.

### Summary of representation changes to plan:

Reduce number of dwellings. Move housing towards Tangmere Road. Increase separation distance between development and Saxon Meadow.

### Response:

Comment noted. The development site has been assessed as suitable for accommodating 1,300 dwellings. The layout has been considered through an extensive masterplanning exercise. Except for the land to the south, the majority of dwellings are to be located away from Saxon Meadow

### Action:

No change to plan.

4542

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mrs Patricia Tedman

## Object

### Summary of representations:

insufficient infrastructure to support additional houses

### Summary of representation changes to plan:

Build better infrastructure and reduce number of houses by at least half

### Response:

Comment noted. In addition to the number of dwellings proposed, the site allocation at Tangmere requires the delivery of new and enhanced facilities, including provision for a new two-form entry primary school, expanded community facilities and open space. Without this development coming forward, and the requisite developer contributions to fund and provide such facilities, it is highly unlikely that new facilities would be delivered in isolation

### Action:

No change to plan.

4545

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mrs Kathleen Tiernan

## Object

### Summary of representations:

to allocations that include ancient and veteran trees unless adequate protection is specified. This site includes two notable trees. Policy does not make reference to irreplaceable habitats or protected trees

### Summary of representation changes to plan:

Add wording:

Deliver a measurable net gain to biodiversity in accordance with Policy NE5 (Biodiversity and Biodiversity Net Gain), and protect and enhance the setting of existing important trees and hedgerows in accordance with Policies NE8 and P5

### Response:

Comment noted. The Local Plan contains individual policies relating to biodiversity net gain and trees and hedgerows, and is intended to be read in the round. Policy NE5 sets out the requirement for development proposals to deliver a minimum of 10% net gain in biodiversity.

Policy NE8 covers protection of trees and hedgerows. It is not considered appropriate to duplicate policy wording.

The development benefits from outline planning permission (resolution subject to completion of the Section 106) (ref 20/02783/OUT). The application has assessed the net gain of this development as at 12.97%. Conditions placed upon the application also require the protection of existing trees and hedgerows.

### Action:

No change to plan.

4547

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** The Woodland Trust

## Support

### Summary of representations:

committed to work with the Council to ensure that any cumulative impact is assessed appropriately, and any required mitigation reasonably and proportionately shared

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan

4696

Support

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates

## Support

### Summary of representations:

support criterion 11.

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan

4886

Support

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Environment Agency

## Object

### Summary of representations:

fails to acknowledge requirement to leave biodiversity in a better state via delivery of BNG

### Summary of representation changes to plan:

Amend policy to include additional criteria:

Ensure that development avoids harm to protected species and existing important habitat features; facilitates the achievement of a minimum of 10% biodiversity net gain; and facilitates the creation of high levels of habitat connectivity within the site and to the wider green infrastructure network and identified strategic wildlife corridors. This includes the provision of appropriate buffers as necessary in relation to important habitats which are being retained and/or created.

### Response:

Comment noted. The Local Plan contains the proposed policy NE5 Biodiversity and Biodiversity Net Gain, and is intended to be read in the round. Policy NE5 sets out the requirement for development proposals to deliver a minimum of 10% net gain in biodiversity

The development benefits from outline planning permission (resolution subject to completion of the Section 106) (ref 20/02783/OUT). The application has assessed the net gain of this development as at 12.97%.

### Action:

No change to plan

5072

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Sussex Wildlife Trust

## Support

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### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Noting the need for master-planning and collaboration]. Support: reinforce that masterplanning process and early consultation can provide opportunity to discuss and provide resolutions to highways matters

### Summary of representation changes to plan:

None suggested

### Response:

Support noted

### Action:

No change to plan

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5329

Support

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** National Highways

## Object

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### Summary of representations:

: loss of Grade 1 and 2 farmland

### Summary of representation changes to plan:

None suggested

### Response:

Comment noted

### Action:

No change to plan

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5491

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

inconsistent with the Sustainability Appraisal. Does not protect or enhance Tangmere and Saxon Meadow, and number of houses out of keeping with conservation area

### Summary of representation changes to plan:

Relocate dwellings to more appropriate non rural/non conservation area. Designate Tangmere and Oving as part of the South Downs National Park

### Response:

Comment noted. The development site has been assessed as suitable for accommodating dwellings. The layout of the site has been considered extensively through a masterplanning exercise, which has located dwellings away from the Tangmere Conservation Area .

It is not within the Local Plan's ability to designate land as part of a national park

### Action:

No change to plan

5564

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mr Gary Axon

## Object

### Summary of representations:

sports pavilion should be positioned further from the church which has war graves and would be impacted by noise and light pollution.

### Summary of representation changes to plan:

Move sports pavilion to the west nearer the lake.

### Response:

Comment noted. The location of the sports pavilion has been planned through extensive consultation with the local planning authority, the parish council and residents of Tangmere through the masterplanning exercise and subsequent outline planning application which has resolution to grant

### Action:

No change to plan

5566

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mr Brian Ayton

## Object

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### Summary of representations:

concerns over building on agricultural land. Would impact upon strategic wildlife corridors. The proposed route of the cycle path would mean removing the pond and its associated pondlife and trees

### Summary of representation changes to plan:

Reduce the number of dwellings and reroute the cycle path

### Response:

Comment noted. The development site has been assessed as suitable for accommodating dwellings. The route of the cycle path is in accordance with local policy

### Action:

No change to plan

5567

Object

---

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Matthew Davies

## Object

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### Summary of representations:

to loss of views from property. Sports pavilion should not be near the church as it is disrespectful to war graves

### Summary of representation changes to plan:

Move sports pavilion nearer to Shopwyke

### Response:

Comment noted. The location of the sports pavilion has been planned through extensive consultation with the local planning authority, the parish council and residents of Tangmere through the masterplanning exercise and subsequent outline planning application which has resolution to grant

### Action:

No change to plan

5568

Object

---

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mrs Kathleen Tiernan



## Object

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**Summary of representations:**

Impact on Saxon Meadow, particularly surface water issues

**Summary of representation changes to plan:**

Amend masterplan giving greater separation between existing buildings and new development

**Response:**

Comment noted. The layout of the site has been considered extensively through a masterplanning exercise

**Action:**

No change to plan

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5569

Object

---

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** John Will

## Object

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**Summary of representations:**

inconsistent with protecting setting of Conservation Area

**Summary of representation changes to plan:**

Reduce size of development, or cancel development

**Response:**

Comment noted. The site has outline permission (subject to signing of the Section 106).

**Action:**

No change to plan

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5573

Object

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**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mr Oliver Gale

## Object

### Summary of representations:

to size of development which is not supported by necessary infrastructure. Policy does not include commitment to investigating delivery of a train station at Tangmere. Concerns over lack of funded plan to address congestion on A27. Concerns over loss of agricultural land. Concerns over lack of consultation and correspondence with residents of Saxon Meadow

### Summary of representation changes to plan:

Include a statement in the plan setting out that CDC will meet Saxon Meadow residents to identify common ground.

Suggest changes to the policy:

1. Amend masterplan to provide greater separation distances between Saxon Meadow and the new development.
2. Developer should provide and fund upgrades to infrastructure for Saxon Meadow.
3. Amend masterplan to exclude land which provides access between Saxon Meadow and Church Lane.
4. Amend masterplan to exclude land west of Saxon Meadow.
5. Relocate community orchard next to proposed allotments.
6. Spine road should not provide direct link from A27 and Tangmere Road.

### Response:

Comment noted.

1. The masterplan has been established through an extensive exercise to accommodate all of the policy requirements of the local plan and neighbourhood plan, as well as to protect the existing village including the Conservation Area. Except land to the south, dwellings are to be located away from Saxon Meadow.
2. New development will be required to provide new, or enhance existing, infrastructure.
3. This land is required for the provision of a cycle route in accordance with national and local policy.
4. An amendment to the outline planning application (20/02893/OUT) has been approved (resolution to grant subject to signing of the Section 106) for the removal of the meadow to the west of Saxon Meadow.
5. An amendment to the outline planning application (20/02893/OUT) has been approved which relocates the allotments.
6. The spine road is a requirement of adopted local plan policy and policies within the made Tangmere Neighbourhood Plan.

### Action:

See Council's suggested Modification CM342.

5575

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Saxon Meadow Tangmere Ltd

## Object

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### Summary of representations:

to 30% additional housing which would compromise the space around Saxon Meadow and the church.

### Summary of representation changes to plan:

No development on land owned by residents of Saxon Meadow. Increased consultation with residents of Saxon Meadow.

### Response:

Comment noted. An amendment to the outline planning application (20/02893/OUT) has been approved (resolution to grant subject to signing of the Section 106) for the removal of the meadow to the west of Saxon Meadow such that this land can be retained by the residents for open space.

### Action:

See Council's suggested Modification CM342.

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5576

Object

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**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mr Roger Downham

## Object

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### Summary of representations:

30% more housing will impact upon infrastructure

### Summary of representation changes to plan:

Prevention of proposed housing, or an adequate increase considering insufficient infrastructure.

### Response:

Comment noted. In addition to the number of dwellings proposed, the site allocation at Tangmere requires the delivery of new and enhanced facilities, including provision for a new two-form entry primary school, expanded community facilities and open space. Without this development coming forward, and the requisite developer contributions to fund and provide such facilities, it is highly unlikely that new facilities would be delivered in isolation

### Action:

No change to plan.

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5577

Object

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**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mr Roger Downham

## Object

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**Summary of representations:**

policy inconsistent with P11 relating to Conservation Areas

**Summary of representation changes to plan:**

Delete policy

**Response:**

Comment noted

**Action:**

No change to plan

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5579

Object

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**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Susan Johns

## Object

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**Summary of representations:**

to use of CPO powers particularly over acquirement of land to the west of Saxon Meadow.

**Summary of representation changes to plan:**

Amend policy to remove land west of Saxon Meadow.

**Response:**

Comment noted. An amendment to the outline planning application (20/02893/OUT) has been approved (resolution to grant subject to signing of the Section 106) for the removal of the meadow to the west of Saxon Meadow such that this land can be retained by the residents for open space.

**Action:**

See Council's suggested Modification CM342.

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5583

Object

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**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mr Oliver Gale

## Object

### Summary of representations:

to deprives residents of Saxon Meadow of their field.

### Summary of representation changes to plan:

Amend policy to remove land west of Saxon Meadow. Relocate community orchard to adjacent to proposed allotments.

### Response:

Comment noted. An amendment to the outline planning application (20/02893/OUT) has been approved (resolution to grant subject to signing of the Section 106) for the removal of the meadow to the west of Saxon Meadow such that this land can be retained by the residents for open space.

### Action:

See Council's suggested Modification CM342.

5586

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mr Oliver Gale

## Object

### Summary of representations:

Support principle of intensifying development at SDL.

New bus route to serve A14, A7 and A8 will be funded by DfT largely and it is crucial that service is sustainable and can be scalable. This requires measures in the city centre to ensure safe and swift operation of the service – none of which are proposed in the plan. Plan does not propose specific measures to provide/improve public transport so out of conformity with NPPF

### Summary of representation changes to plan:

Amend policy wording:

8. Subject to detailed transport assessment, provide primary road access to the site from the slip-road roundabout at the A27/A285 junction to the west of Tangmere providing a spine road link with secondary access from Tangmere Road.

Development will be required to provide or fund mitigation for potential off-site traffic impacts through a package of measures in conformity with Policy T1 (Transport Infrastructure) and T2 (Transport and Development) and DfT Circular 01/2022 that maximise the relevance and use of sustainable travel modes, in particular bus services;

9. Make provision for improved sustainable travel modes between Tangmere and Chichester city, in partnership with relevant authorities, including direct, seamless safe and reliable bus and cycle routes linking Tangmere with Chichester city, Shopwhyke and Westhampnett. In conjunction with measures in support of Allocation A19, contributions shall also be sought for providing high quality cycling and bus service Opportunities should also be explored for improving transport links with the 'Five Villages' area and Barnham rail station in Arun District; and..."

### Response:

Comment noted. Criterion 8 already refers to the pedestrian and cycle network and given the breadth of Policies T1 and T2, as referred to above, the further amendments to the wording sought by the respondent are considered unnecessary

### Action:

No change to plan

5612

Object

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**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Stagecoach South

## Policy A14 Land West of Tangmere

### Object

#### Summary of representations:

: Pavilion and houses will block views to South Downs National Park. Inconsistent with policies P11 and NE24. Impact on tranquillity

#### Summary of representation changes to plan:

Relocate pavilion to where there are existing parking facilities, reduce height of pavilion. Reduce number of houses and relocate to more urban area. Extend National Park to include Tangmere and Oving.

#### Response:

Comment noted. The location of the sports pavilion has been planned through extensive consultation with the local planning authority, the parish council and residents of Tangmere through the masterplanning exercise and subsequent outline planning application which has resolution to grant. The height of the pavilion has been subject to consideration through the planning application process

#### Action:

No change to plan

5631

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mrs Elspeth Rendall

### Object

#### Summary of representations:

Does not comply with Policy P11

#### Summary of representation changes to plan:

Protect views of Chichester cathedral spire, Oving church spire and South Downs National Park.

#### Response:

Comment noted. Criterion 7 of the policy requires the development to respect important views of Chichester cathedral spire, and to reduce impact on views from and within the South Downs National Park.

#### Action:

No change to plan

5632

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mrs Elspeth Rendall

## Object

### Summary of representations:

CPO flawed and will deprive residents of Saxon Meadow their community land.

### Summary of representation changes to plan:

Remove access road into Saxon Meadow, and Saxon Meadow land to the west of houses from CPO.

### Response:

Comment noted. The Compulsory Purchase Order process is independent of the local planning process.

An amendment to the outline planning application (20/02893/OUT) has been approved (resolution to grant subject to signing of the Section 106) for the removal of the meadow to the west of Saxon Meadow such that this land can be retained by the residents for open space.

The access road will remain within the plan boundary as a cycle path will be delivered along this road as part of the pedestrian and cycle strategy.

### Action:

See Council's suggested Modification CM342.

5633

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mrs Elspeth Rendall

## Object

### Summary of representations:

to disregard for Character Appraisal for Tangmere. Impact on Conservation Area

### Summary of representation changes to plan:

Relocate development away from Conservation Area

### Response:

Comment noted. The location of development has been carefully planned through an extensive masterplanning exercise.

The masterplan has been established through an extensive exercise to accommodate all of the policy requirements of the local plan and neighbourhood plan, as well as to protect the existing village including the Conservation Area. Except land to the south, dwellings are to be located away from Saxon Meadow

### Action:

No change to plan.

5635

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mrs Elspeth Rendall



## Object

### Summary of representations:

location of cycle route poses threat to wildlife, and there is potential for noise disturbance

### Summary of representation changes to plan:

Relocate cycle path and highway outside of conservation area, for example along Malcolm Road

### Response:

Comment noted. The access road will remain within the plan boundary as a cycle path will be delivered along this road as part of the pedestrian and cycle strategy

### Action:

No change to plan.

5636

Object

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mrs Elspeth Rendall

## Object

### Summary of representations:

Confirm site remains suitable with no overriding constraints. Suggest clarification of policy criteria. Recommend check of black line extent of plan corresponds with that in planning application

### Summary of representation changes to plan:

(i) Amend criterion 2:

A range of types, sizes and tenures of residential accommodation to include specific provision to meet specialised housing needs within Use Class C3, including accommodation for older people.

(ii) Amend criterion 3 to

Expanding and enhancing the existing local centre Incorporate new or expanded community facilities, including transforming the existing village centre into a new local centre providing new village centre amenities.

(iii) Criterion 10: Delete reference to conserving or enhancing the WWII airfield, and delete reference to relocation of allotment space.

### Response:

Support noted.

(i) Suggested amendment to criterion 2 may be unduly restrictive in ruling out other forms of older persons housing. The HEDNA identifies a very broad level of need, therefore being too specific has the potential to reduce the range of provision which may come forward.

(ii) Accept amendment to criterion 3, and the extent of the plan to accord with outline planning application.

(iii) The provision of overall allotment space as approved under the outline permission provides for the relocation of allotment space. It would not seem necessary therefore to remove this from the criterion. Agree to deletion of reference to World War II airfield.

### Action:

See Council's suggested Modifications CM340 and CM341.

5655

Object

**Document Element:** Policy A14 Land West of Tangmere**Respondent:** Countryside Properties**Agent:** Turley

Support

**Summary of representations:**

Support

**Summary of representation changes to plan:**

None suggested

**Response:**

Support noted

**Action:**

No change to plan

5711

Support

**Document Element:** Policy A14 Land West of Tangmere**Respondent:** Church Commissioners for England**Agent:** Lichfields

Object

**Summary of representations:**

critical that Tangmere that is serviced with amenities and employment opportunities to minimise need for travel, and high frequency affordable bus services are provided

**Summary of representation changes to plan:**

Include wording:

"The development will be required to provide or fund access to all the residents needs by providing continuous, direct, safe, attractive, comfortable walking and cycle route within Tangmere and direct to Chichester City Centre, Chichester and Barnham railway stations and neighbouring communities. The development will also be required to provide or fund high frequency, reliable bus services, if necessary, including dedicated bus lanes and bus priority direct to Chichester city centre, Chichester and Barnham railway stations and neighbouring communities.

**Response:**

Comment noted. It is considered the criterion as drafted and the cross reference to Policies T1 and T2, which are not solely concerned with 'highway' improvements but transport infrastructure more widely, including sustainable modes of travel provides an appropriate approach and level of detail.

**Action:**

No change to plan

**5940****Object****Document Element:** Policy A14 Land West of Tangmere**Respondent:** GoVia Thameslink Railway**Object****Summary of representations:**

Does not support or object, but supports requirement for significant levels of green infrastructure

**Summary of representation changes to plan:**

Include requirement for development to retain and bolster existing hedgerows and trees where possible

**Response:**

Comment noted. Policy NE8 requires the conservation and enhancement of existing trees and hedgerows. It is not considered appropriate to duplicate policy wording.

The development benefits from outline planning permission (subject to completion of the Section 106 agreement). The permission includes conditions relating to the protection and retention of existing trees and hedgerows

**Action:**

No change to plan

**6005****Object****Document Element:** Policy A14 Land West of Tangmere**Respondent:** Forestry Commission**Support****Summary of representations:**

site remains suitable for mixed-use with no known constraints to delivery.

**Summary of representation changes to plan:**

None suggested

**Response:**

Support noted

**Action:**

No change to plan.

**6096****Support****Document Element:** Policy A14 Land West of Tangmere**Respondent:** Countryside Properties**Agent:** Turley

## Object

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**Summary of representations:**

█ : site constitutes overdevelopment and is not in keeping with conservation area.

**Summary of representation changes to plan:**

█ Reduce number of dwellings so density is lowered and not concentrated near Saxon Meadow

**Response:**

█ Comment noted

**Action:**

█ No change to plan

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**6163****Object**

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**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Richard Hedgecock

## Object

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**Summary of representations:**

█ : Proposal does not allow a 15m buffer zone from veteran trees. Would also require removal of a pond.

**Summary of representation changes to plan:**

█ Modify proposal to remove land west of Saxon Meadow.

**Response:**

█ Comment noted. An amendment to the outline planning application (20/02893/OUT) has been approved (resolution to grant subject to signing of the Section 106) for the removal of the meadow to the west of Saxon Meadow such that this land can be retained by the residents for open space.

**Action:**

█ See Council's suggested Modification CM342.

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**6187****Object**

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**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mr Oliver Gale

## Object

**Summary of representations:**

does not reference HRA findings in relation to foraging distances of barbastelle bats. Site within the foraging distance of barbastelle bats from Singleton Tunnels

**Summary of representation changes to plan:**

Amend paragraph 4.32

**Response:**

This representation is a duplication of representation 4104. See response made to representation 4104 (NE6 Chichester's Internationally and Nationally Designated Habitats).

**Action:**

No change to plan

**6257****Object**

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Mr Matthew Rees

## Object

**Summary of representations:**

21 metre minimum separation distance as per Policy P6 would impact health and wellbeing, property value, conservation area and biodiversity.

**Summary of representation changes to plan:**

Reduce and or alter the housing density of the propose plan in the south/south east area of the [Tangmere] development so to enable more green space to be created.  
- Shift the proposed housing in the south/south-east area further south towards the Tangmere Road and this increase the greenspace border between the housing and Saxon Meadow.

The above would all help to reduce the detrimental amenity impact and help redress the damage to outlook and views to and from Saxon Meadow residences, health and well being and sense of enclosure. It would extend and expand the greenspace/corridors around the Conservation Area this help reducing the negative effects to wildlife/biodiversity.

**Response:**

The layout has been considered through an extensive masterplanning exercise. With the exception of the land to the south, the majority of dwellings are to be located away from Saxon Meadow.

**Action:**

No change in response to representation.

**6310****Object**

**Document Element:** Policy A14 Land West of Tangmere

**Respondent:** Ms Lindsay Davey

## Loxwood, 10.66

## Object

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### Summary of representations:

The bus service is not worth of note -it goes 2 days a week and doesn't give you time to do anything at the final destination.

The plan notes the issues of the A27 however does not considered the impact on the A281 which is the main route to employment in Guildford/London which has the added pressure of the development of Dunsfold which will be over 10000 dwellings

### Summary of representation changes to plan:

The plan needs to recognize there is no viable bus service and people will use cars on roads which are under pressure from other developments so until there is a viable public transport system the area needs to remain as rural development with a low level of growth

### Response:

The limited public transport in the area reflects the rural nature of the north-east of the plan area as a whole, however, Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

The updated Transport Assessment (2024) has reviewed the transport evidence produced for the Waverley Local Plan and concludes that the small number of additional trips from the proposed development in the north is unlikely to cause capacity issues on the A281 Guildford/Horsham Road or the A2133 Loxwood Road Junction, Alford.

### Action:

No change in response to representation

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## 4082

## Object

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**Document Element:** Loxwood, 10.66

**Respondent:** Mr Tim Swann

## Object

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**Summary of representations:**

The plan does not comply with all relevant requirements of the Planning & compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended. It doesn't meet the CDC's Sustainability Appraisal Report when judged against other reasonable options due to both the lack of infrastructure (Extremely limited bus service and Loxwood no longer meets the criteria of a service village as it has no shop) and lack of sustainability. It also fails to meet environmental requirements. There are numerous other points but can't be made in 100 words

**Summary of representation changes to plan:**

The number of 220 additional new houses allocated to Loxwood should be removed from the plan and the figure previously allocated with sites democratically chosen by residents remaining. Loxwood should not be described as a Service Village due to the lack of village shop and extremely limited public transport

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development

**Action:**

No change in response to representation

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**4626****Object**

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**Document Element:** Loxwood, 10.66

**Respondent:** Mr Antony Loader

## Loxwood, 10.67

## Object

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### Summary of representations:

The Village already has a new neighbourhood plan which has been ignored due to water neutrality issues

### Summary of representation changes to plan:

The most recent neighbourhood plan to be reviewed and incorporated into the local plan.

### Response:

The selection of sites will be through a review of the Neighbourhood Plan and the council is committed to working with neighbourhood plan groups to achieve this

### Action:

No change in response to representation

4083

Object

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Document Element: Loxwood, 10.67

Respondent: Mr Tim Swann

## Policy A15 Loxwood



# Object

## Summary of representations:

LPC have produced a revised NP with allocated 125 houses in accordance with CDC Preferred approach Local Plan. Submitted to CDC for regulation 14 consultation in Jan 2021. Held due to Water Neutrality. Letter to parish Jan 2022. 5 growth scenarios. Study completion easter 2022 with consultation. Did not happen.

Actual housing numbers 220 + 91= 311 due cut off date of 1/4/21 and unmet allocation in Made NP.

Parish is rural, very poor transport provision and major sewerage issues. Southern Water will not allow any new connections. Loxwood has no post office and shop thus not a Service village

## Summary of representation changes to plan:

Policy A15 should be scrapped and Policies H2 and H3 amended to reflect an allocation of 125 houses

The most efficient way forward would be for the housing allocation for Loxwood to be changed back to the Preferred Approach Local Plan allocation of 125 houses and let the Loxwood Neighbourhood Plan proceed to the next stage of the process. A difference of 94 houses between the two allocations will not make much difference to the overall housing allocation for the district.

## Response:

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is a classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

## Action:

No change in response to representation

**3827****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Loxwood Society

## Object

### Summary of representations:

Consider the amount of houses allocated to Loxwood is made on an unsound basis. The bus service is extremely limited and not suitable for seeking or maintaining employment without a car. The sewage infrastructure is beyond breaking point and new developments are already having to use temporary inadequate solutions. The environmental constraints have worsened since last assessed and doubling the size of Loxwood with new houses won't deliver biodiversity net gain. The issue of water neutrality has not been resolved. There is no shop and the village infrastructure is under huge pressure

### Summary of representation changes to plan:

Remove Loxwood from Strategic Location status. Respect the agreed Loxwood Local Plan which identified through local consultation and referendum the extra houses the village could sustain

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

All new development will have to comply with Policy NE15 which ensures that any surface water increases are mitigated, for example using sustainable Drainage Systems (SuDS), so that there will not be any increase (over greenfield rates) in the rate of surface waste run-off leaving a site. The Policy also requires that new development does not increase the risk of flooding elsewhere.

All development proposals will need to comply with Policy NE17 Water Neutrality to avoid any increase in water extraction and therefore avoid any adverse impact on the environmental designations in the Arun Valley.

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments. Policy NE16 (d) (under Water Quality and Wastewater) also requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

### Action:

No change in response to representation

3850

Object

Document Element: Policy A15 Loxwood

Respondent: Mrs Deborah Speirs

## Object

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**Summary of representations:**

A policy to mitigate the adverse consequences in Loxwood of failing to provide a commutable bus service whilst still building additional housing leads to attempting to control the car when it is the only means of transport available to residents. The substantial developments planned by Waverley will seriously congest the A281 and the junction with it at Alford for Loxwood residents for whom this is the main transport link for employment shopping and leisure

**Summary of representation changes to plan:**

To make any additional housing in Loxwood conditional on a commutable bus service

**Response:**

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

The updated Transport Assessment (2024) has reviewed the transport evidence produced for the Waverley Local Plan and concludes that the small number of additional trips from the proposed development in the north is unlikely to cause capacity issues on the A281 Guildford/Horsham Road or the A2133 Loxwood Road Junction, Alford

**Action:**

No change in response to representation

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**3873****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Mr James Jewell

## Object

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### Summary of representations:

As has been discussed across these Draft Local Plan Representations, we support the proposed growth of Loxwood. However, we wish to object to Policy A15, highlighting that the proposed figure of 220 dwellings will not sufficiently meet the objectively assessed need for housing within the Chichester District.

This figure should be increased to allow greater housing provision in the North of the Plan Area. In line with our comments on Policy H1 – Meeting Housing Needs, we propose a greater allocation of dwellings to the sustainable settlement of Loxwood, with a minimum of 300 dwellings, based on the findings of the Sustainability Appraisal (Jan 2023).

### Summary of representation changes to plan:

N/A

### Response:

See response to representations under H1 in relation to overall level of housing.

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate

### Action:

No change

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**3916****Object**

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**Document Element:** Policy A15 Loxwood

**Respondent:** Loxwood (Mellow) Ltd

**Agent:** Ms Megan Smith

# Object

## Summary of representations:

At Examination the 220 allocation should be looked at in detail and the Inspector should be satisfied that the allocation is sustainable due to not only water neutrality constraints but also lack of capacity in the sewerage infrastructure within the Parish and surrounding area. Inundation of the system releases sewerage into gardens. The speculative development which has arisen uses a cesspit solution for the removal of sewerage from new homes. The traffic to be generated feeding onto the B2133 running through the village is a concern for a road which is already dangerous for pedestrians walking on narrow pavements.

LPC have already produced a Revised Neighbourhood Plan which allocates 126 houses plus 17 carried forward from the Made Neighbourhood Plan giving 143 houses. It has reached Regulation 14 consultation stage and is based upon the Preferred Approach Local Plan consultation. The residents of the Parish and Loxwood Parish Council have satisfied themselves through evidence gathered that 126 homes is a sustainable allocation given the constraints that exist.

This approach will conserve all the hard work put in by Loxwood Parish Council in producing its Revised Neighbourhood Plan and restore the confidence that Loxwood residents have in the Neighbourhood Planning Process

## Summary of representation changes to plan:

Policy A15 should be removed and Policies H2 and H3 amended to reflect an allocation of 125 houses

## Response:

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

Policy A15 criteria 9 requires that development is phased to ensure that sufficient wastewater disposal capacity is available to accommodate the requirements arising from new development. Southern Water are supportive of the policy wording and the Statement of Common Ground on Wastewater has been updated to reflect the latest position. Storm overflow performance improvements and infiltration reduction are planned for the 2020 – 2025 period and Loxwood WTW is included in PR24 for a growth scheme for AMP8 (2025 – 2030) which means that works are programmed to increase capacity at the works. The trajectory phases development in Loxwood towards the later part of the Plan period to allow for these works to take place.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood and that the traffic impacts were acceptable.

## Action:

No change in response to representation

**3917****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Loxwood Parish Council

## Object

### Summary of representations:

As has been discussed across these Draft Local Plan Representations, we support the proposed growth of Loxwood. However, we wish to object to Policy A15, highlighting that the proposed figure of 220 dwellings will not sufficiently meet the objectively assessed need for housing within the Chichester District.

This figure should be increased to allow greater housing provision in the North of the Plan Area. In line with our comments on Policy H1 – Meeting Housing Needs, we propose a greater allocation of dwellings to the sustainable settlement of Loxwood, with a minimum of 300 dwellings, based on the findings of the Sustainability Appraisal (Jan 2023).

### Summary of representation changes to plan:

This figure should be increased to allow greater housing provision in the North of the Plan Area. In line with our comments on Policy H1 – Meeting Housing Needs, we propose a greater allocation of dwellings to the sustainable settlement of Loxwood, with a minimum of 300 dwellings, based on the findings of the Sustainability Appraisal (Jan 2023).

We ask that these policies be reworded to increase the housing provision for the 'Service Village' of Loxwood, and remove the reliance on Neighbourhood Plan making, with sites allocated at a District level to ensure the appropriate uptake of sites and settlement boundaries, and help Chichester Council achieve the objectively assessed housing need of the District.

### Response:

See response to representations under H1 in relation to overall level of housing.

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

### Action:

No change in response to representation

**3927****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Loxwood (Mellow) Ltd

**Agent:** Ms Megan Smith

# Object

**Summary of representations:**

against development in Loxwood. Reasons including:

- lack of consideration of impact of development in village in neighbouring district (Dunsfold);
- lack of existing infrastructure - shops and amenities;
- lack of public transport, dependency on cars;
- lack of capacity within education facilities;
- limitation of utilities infrastructure;
- environmental impact

**Summary of representation changes to plan:**

N/A

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood and that the traffic impacts were acceptable. The updated Transport Assessment (2024) has reviewed the transport evidence produced for the Waverley Local Plan and concludes that the small number of additional trips from the proposed development in the north is unlikely to cause capacity issues on the A281 Guildford/Horsham Road or the A2133 Loxwood Road Junction, Alford.

**Action:**

No change in response to representation

**3930****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Mr & Mrs William and Susan Cantello

## Object

### Summary of representations:

I object to 220 new houses to be built in Loxwood. It does not take into account the number of houses that have already been given planning permission. So it will be more than 220 and this Plan is not being honest. There will be too many houses that will be built on green fields. They will totally overwhelm the village which has a very limited bus service and no amenities. What about the Crouchlands development? No mention of the 600 houses and new primary school which is only a short distance from Loxwood

### Summary of representation changes to plan:

I think brown field sites should be found. Development should take place on the outskirts of larger settlements not in small villages that do not have the infrastructure and capacity to cope. North of Chichester council is being unfairly targeted. You have to take into account the problem of sewage disposal and the impact of water usage which will damage the RSPB nature reserves and the rivers. Therefore south of the A27 would be the obvious choice for development/re-development

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

All development proposals will need to comply with Policy NE17 Water Neutrality to avoid any increase in water extraction and therefore avoid any adverse impact on the environmental designations in the Arun Valley.

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments. Policy NE16 (d) (under Water Quality and Wastewater) also requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

The site at Crouchlands has been promoted to the council and assessed through the Housing and Economic Land Availability Assessment (HELAA) 2021. It then formed part of the consideration of reasonable alternatives as part of the Sustainability Appraisal. However, it was not considered suitable as a new settlement.

### Action:

No change in response to representation

4020

Object

Document Element: Policy A15 Loxwood

Respondent: Mrs Charlotte Smith



# Object

## Summary of representations:

Shop and post office closed in September 2022 we have been promised a new shop at Nursery Green but still no sign?

Surgery frequently struggling for staff and very difficult to get appointments.

School is at capacity.

Sewage, water issues still not resolved.

Current bus timetable inadequate despite a lot of new developments in recent years.

I do not believe there is a further housing need in Loxwood & there is very little employment.

2021 census shows Loxwood had a population of 1597.

Are we still a village or is CDC making us into a town?

## Summary of representation changes to plan:

All of this part of the plan needs to be changed to consider reducing the allocation of dwellings. It should be noted that despite the recent developments here in recent years, the infrastructure and water/drainage issues have not been resolved or improved. Indeed, one new development is now having a cesspit emptied daily. CDC must realise that Loxwood does not have the infrastructure in place for mass development and should not be considered as a service village

## Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Criteria 1 of Policy A15 requires masterplanning and design for high quality development. Chapter 6 of the Local Plan includes a suite of design policies which will be used for considering applications and they aim to secure high quality design which respects the local vernacular.

## Action:

No change in response to representation

**4023****Object****Document Element:** Policy A15 Loxwood**Respondent:** Mrs ALISON REDFORD**Object****Summary of representations:**

Loxwood has no adequate sewerage to satisfy current housing

Medical centre is full

NO buses

No employment

Neighbour has been waiting 9 months for school place

Your plan will increase the number of NEW houses by 400+ in effect an extra 50% over 10 years

**Summary of representation changes to plan:**

No more houses to be built until Southern Water can supply and instal a fit for purpose sewerage system

We already have a NP for 125 houses which should be the limit

No new houses until additional school places can be provided

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

**Action:**

No change in response to representation

**4037****Object****Document Element:** Policy A15 Loxwood**Respondent:** Mr Howard Barnes

# Object

## Summary of representations:

The level of 220 houses was announced with no consultation as required. The latest Neighbourhood Plan took a huge amount of work and allocated 125 houses. Since then more have been granted planning permission. Loxwood has no real alternative to cars for transportation. It has no village shop or post office and limited employment: issues with water supply and the disposal of waste water and sewage. As a rural village 220 houses would represent a 50% + increase which cannot fail to change the nature of the village. This allocation appears disproportionate when compared with other areas with better facilities.

Loxwood Parish Council have already produced a Revised Neighbourhood Plan which allocates 126 houses plus 17 carried forward from the Made Neighbourhood Plan giving 143 houses. It has reached Regulation 14 consultation stage and is based upon the Preferred Approach Local Plan consultation. The residents of the Parish and Loxwood Parish Council have satisfied themselves through evidence gathered that 126 homes is a sustainable allocation given the constraints that exist

## Summary of representation changes to plan:

Policy A15 should be removed and Policies H2 and H3 amended to reflect an allocation of 125 houses

## Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The council is committed to working with neighbourhood plan groups to take forward housing numbers and allocate sites through the NP process.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Policy NE16 (d) (under Water Quality and Wastewater) also requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criteria 1 requires masterplanning and design for high quality development. Chapter 6 of the Local Plan includes a suite of design policies which will be used for considering applications and they aim to secure high quality design which respects the local vernacular.

## Action:

No change in response to representation

**4074****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Mrs Sarah Lane

## Object

### Summary of representations:

CDC have not consulted on revised housing numbers in North of the district-it quotes the restrictions of the A27 which prevents the southern development however the A281 is a bigger constraint which will also have Dunsfold adding pressure.

Allocation of 220 houses plus a further 91 houses on already allocated sites is not sustainable in rural Loxwood-it a huge percentage increase and will destroy the village. CDC Sustainability Appraisal is weak in its justification for allocation of 220 houses

There is no viable bus, sewerage capacity, school capacity or useful shops to support large increase in housing.

LPC have spent time and effort to create a Revised Neighbourhood Plan which allocates 126 houses plus 17 carried forward from the Made Neighbourhood Plan giving 143 houses. It has reached Regulation 14 consultation stage and is based upon the Preferred Approach Local Plan consultation. The residents of the Parish and Loxwood Parish Council have satisfied themselves through evidence gathered that 126 homes is a sustainable allocation given the constraints that exist-it should not be ignored due to water neutrality issues.

### Summary of representation changes to plan:

Policy A15 should be removed and Policies H2 and H3 amended to reflect a realistic allocation of 125 houses which is still generous compared to other local area with better services.

Loxwood should not be deemed to be a strategic location-it is a small rural village

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is a classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The council is committed to working with neighbourhood plan groups to take forward housing numbers and allocate sites through the NP process.

The updated Transport Assessment (2024) has reviewed the transport evidence produced for the Waverley Local Plan and concludes that the small number of additional trips from the proposed development in the north is unlikely to cause capacity issues on the A281 Guildford/Horsham Road or the A2133 Loxwood Road Junction, Alford.

### Action:

No change in response to representation

4081

Object

Document Element: Policy A15 Loxwood

Respondent: Mr Tim Swann

## Object

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**Summary of representations:**

The number of houses allocated to Loxwood should be revised to reflect an allocation of 125 houses as per the NP.

Whatever numbers are allocated no building work should commence until the required infrastructure work is scheduled with guaranteed delivery before any occupation of the homes

**Summary of representation changes to plan:**

The number of houses allocated to Loxwood should be revised to reflect an allocation of 125 houses as per the NP.

Whatever numbers are allocated no building work should commence until the required infrastructure work is scheduled with guaranteed delivery before any occupation of the homes

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

**Action:**

No change in response to representation

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**4127****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Mr Keith Woods

## Object

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**Summary of representations:**

There has to be very careful consideration given to the allocation of 220 houses, with regard to the overwhelmed sewerage and the need for careful usage of water in the area

**Summary of representation changes to plan:**

Reduce the number of house allocation to 125.

Take account of 17 houses carried forward from the previous Made Neighbourhood Plan.

Recognise that the community believes that 126 houses is possible given the issues relating to sewerage and Water neutrality

**Response:**

Policy NE16 (d) (under Water Quality and Wastewater) also requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

All development proposals will need to comply with Policy NE17 Water Neutrality to avoid any increase in water extraction and therefore avoid any adverse impact on the environmental designations in the Arun Valley

**Action:**

No change in response to representation

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**4222****Object**

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**Document Element:** Policy A15 Loxwood

**Respondent:** Mrs Valerie Woods

## Object

### Summary of representations:

Allocating 220 houses in addition to those on already allocated sites is not sustainable in rural Loxwood.

Transport infrastructure is poor to non-existent; there is no sewerage capacity; insufficient schooling and healthcare facilities for the increased population; currently only one shop (a butcher's).

This housing allocation is significantly higher than the 143 housing sites allocated in the Made / Revised Neighbourhood Plans submitted by the LPC. Villagers need to have confidence that our approved Village Plan is not meaningless and will deliver what we have voted for.

### Summary of representation changes to plan:

CDC must firmly reject the total housing target that has been imposed on it and not build further in the North area of the plan

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The council is committed to working with neighbourhood plan groups to take forward housing numbers and allocate sites through the NP process.

### Action:

No change in response to representation

4285

Object

Document Element: Policy A15 Loxwood

Respondent: Mr Richard Keates

Object

**Summary of representations:**

How are families without their own transport able to get to and from Horsham or Guildford for work? There are no employment opportunities, the surgery is at capacity, flooding is already an issue, power cuts are increasing and there is a lack of water capacity and waste water plans.

This is a beautiful rural area, full of wildlife and green space - this needs protecting rather than building on. The families who have recently moved in with children have voiced feeling cut off and isolated with no access to the facilities they need as they do not have cars.

LPC have spent time and effort to create a Revised Neighbourhood Plan which allocates 126 houses plus 17 carried forward from the Made Neighbourhood Plan giving 143 houses. It has reached Regulation 14 consultation stage and is based upon the Preferred Approach Local Plan consultation. The residents of the Parish and Loxwood Parish Council have satisfied themselves through evidence gathered that 126 homes is a sustainable allocation given the constraints that exist and it should not be ignored due to water neutrality issues, let alone the transport and services issues.

This protects the village and the community and reflects the importance of Neighbourhood plans for Loxwood and the rest of the country - Loxwood is a historic small village with limited services and it should be understood and respected as such

**Summary of representation changes to plan:**

Policy A15 should be removed and Policies H2 and H3 amended to reflect a realistic allocation of 125 houses which is still generous compared to other local area with better services.

Loxwood should not be deemed to be a strategic location as it is a small rural village

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The council is committed to working with neighbourhood plan groups to take forward housing numbers and allocate sites through the NP process.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Policy NE16 (d) (under Water Quality and Wastewater) also requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

All development proposals will need to comply with Policy NE17 Water Neutrality to avoid any increase in water extraction and therefore avoid any adverse impact on the environmental designations in the Arun Valley.

**Action:**

No change in response to representation



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**4315****Object**

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**Document Element:** Policy A15 Loxwood**Respondent:** Mrs T P Swann

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**Object**

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**Summary of representations:**

The village of Loxwood does not currently support residents with the current lack of infrastructure. Therefore the proposed 220 plus homes are not justified without a local shop, transport links and for schools and doctors to provide the service. Both schools and doctors are over subscribed. The drainage is an issue. To add to this with additional homes would not benefit current residents or new

**Summary of representation changes to plan:**

For the proposals to be dropped. Strengthen the infrastructure first

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

All new development will have to comply with Policy NE15 which ensures that any surface water increases are mitigated, for example using sustainable Drainage Systems (SuDS), so that there will not be any increase (over greenfield rates) in the rate of surface water run-off leaving a site. The Policy also requires that new development does not increase the risk of flooding elsewhere.

**Action:**

No change in response to representation

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**4325****Object**

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**Document Element:** Policy A15 Loxwood**Respondent:** Mrs Claire Hume

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**Object**

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**Summary of representations:**

Numbers of houses proposed for the Loxwood area is inappropriate due to:

- major lack of infrastructure
- lack of employment opportunities
- lack of transport links
- the environmental impact

and would be highly detrimental to the village leading to overdevelopment

- CDC have failed to consult with LPC

**Summary of representation changes to plan:**

The numbers of proposed houses for Loxwood needs to be heavily reduced and LPC need to be consulted

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Criteria 1 of Policy A15 requires masterplanning and design for high quality development. Chapter 6 of the Local Plan includes a suite of design policies which will be used for considering applications and they aim to secure high quality design which respects the local vernacular.

Consultation with Loxwood Parish Council has taken place both at formal plan making stages and informally as part of exploring growth options for the area.

**Action:**

No change in response to representation

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**4331**
**Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Mrs Alexandra Holloway

## Object

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**Summary of representations:**

Not a sustainable location for such a substantial amount of housing when it is clear that just about everyone with out migrate for work and secondary schools and college

**Summary of representation changes to plan:**

Remove Loxwood as a strategic location

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is a classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

**Action:**

No change in response to representation

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**4390****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Mr Stephen Jupp

## Object

### Summary of representations:

Loxwood is not suitable for a further escalation of development on this scale, due to the many sustainability issues. The village is not ideally located and is totally car dependent. All Infrastructure in the village is historically weak and continues to be so. Development on this planned scale would destroy the villages character and vernacular, without a meaningful benefit to the area as a whole

### Summary of representation changes to plan:

The group of so called "North villages" once formed part of the Petworth district. Petworth has enormous potential to offer easily all of this housing requirement in a sensitive development to the South-west of the current town. The town, could be regenerated and provide all including the aging population of the area, with a great place to live, that absorbs most of the outlined pressures of a balanced solution

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is a classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criteria 1 requires masterplanning and design for high quality development. Chapter 6 of the Local Plan includes a suite of design policies which will be used for considering applications and they aim to secure high quality design which respects the local vernacular.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The council has to find suitable locations for housing growth within the plan area, which excludes the part of the district within the South Downs National Park. As Petworth is within the South Downs National Park, we are not able to consider it as an alternative to growth within the plan area.

### Action:

No change in response to representation

4510

Object

Document Element: Policy A15 Loxwood

Respondent: Mr Glyn Woodage

## Object

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### Summary of representations:

The broad site allocation lacks specific detail on its environmental impact, therefore we are unable to either support or object at this stage. We welcome point 5 requiring habitat protection

### Summary of representation changes to plan:

We request that any future allocation requires a site survey for ancient woodland and ancient & veteran trees, and that appropriate buffers are applied, before the number and layout of dwellings is agreed

### Response:

Comment noted. Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife and require delivery of BNG which will all need to be considered as part of the Neighbourhood Plan site selection process.

Policy A15 does not allocate specific sites, as this will be done through the Neighbourhood Plan process which will need to consider the impact on ancient woodland and veteran trees as part of any site assessment and selection process.

### Action:

No change in response to representation

4548

Object

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**Document Element:** Policy A15 Loxwood

**Respondent:** The Woodland Trust

Object

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**Summary of representations:**

Lack of consultation.

Overriding the local neighbourhood plan, contrary to the devolving of powers to local areas (Localism Act 2011)

Minimal public transport

No village shop and indefinite delay on planned village shop

Sewage system does not support existing housing

Increased risk of flooding

Water neutrality issue exacerbated

Increased traffic on narrow country lanes

Existing social housing remaining unsold

Detrimental impact on rural nature of the village, scale of proposed development is not proportionate to the size of the village

Negative environmental impact on the countryside - ancient hedgerows, woodland borders, footpaths, bridleways and protected species at risk.

LPC have already produced a Revised Neighbourhood Plan which allocates 126 houses plus 17 carried forward from the Made Neighbourhood Plan giving 143 houses. It has reached Regulation 14 consultation stage and is based upon the Preferred Approach Local Plan consultation. The residents of the Parish and Loxwood Parish Council have satisfied themselves through evidence gathered that 126 homes is a sustainable allocation given the constraints that exist.

**Summary of representation changes to plan:**

Policy A15 should be removed and Policies H2 and H3 amended to reflect an allocation of 125 houses

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Criteria 1 of Policy A15 requires masterplanning and design for high quality development. Chapter 6 of the Local Plan includes a suite of design policies which will be used for considering applications and they aim to secure high quality design which respects the local vernacular.

All development proposals will need to comply with Policy NE17 Water Neutrality to avoid any increase in water extraction and therefore avoid any adverse impact on the environmental designations in the Arun Valley.

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments. The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood and that the traffic impacts were acceptable.

The council is committed to working with neighbourhood plan groups to take forward housing numbers and allocate sites through the NP process.

**Action:**

No change in response to representation

**4558****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Mrs Anne Keates

## Object

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**Summary of representations:**

The policy approach does not reflect an understanding and appreciation of the particular potential of the area. It leaves it vulnerable to inappropriate homogeneous large scale housing estate development that does little to broaden local housing choice and support economic / social life

**Summary of representation changes to plan:**

A revised approach for Loxwood and the north of the plan area with a focus on self build and small - medium sized sites that embraces and reflects available local insights and information

**Response:**

Criteria 1 of Policy A15 requires masterplanning and design for high quality development. Chapter 6 of the Local Plan includes a suite of design policies which will be used for considering applications and they aim to secure high quality design which respects the local vernacular.

Criteria 2 of Policy A15 supports the provision of specialist housing, which could include custom/self-build units if there is local evidence of need.

Policy A15 does not allocate specific sites, as this will be done through the Neighbourhood Plan process, therefore it is not possible to say what scale of site will come forward.

**Action:**

No change in response to representation

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**4595****Object**

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**Document Element:** Policy A15 Loxwood

**Respondent:** Mr William MacGeagh



## Object

### Summary of representations:

1 bus a day on 4 days of the week at very inconvenient times for workers. No general shop and no post office. Access to the village is via 1 B road and country lanes. Sewage is a major problem with houses having to have non return valves fitted. Southern water said no more capacity in the system and not planning to upgrade. On 2 new sites sewage tanks - cesspits - overflow causing a severe biohazard - running down the road into drains which flow into the river. The local school is small. The local Doctors surgery is full

### Summary of representation changes to plan:

Do not plan for more houses in Loxwood

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Policy A15 criteria 9 requires that development is phased to ensure that sufficient wastewater disposal capacity is available to accommodate the requirements arising from new development. Southern Water are supportive of the policy wording and the Statement of Common Ground on Wastewater has been updated to reflect the latest position. Storm overflow performance improvements and infiltration reduction are planned for the 2020 – 2025 period and Loxwood WTW is included in PR24 for a growth scheme for AMP8 (2025 – 2030) which means that works are programmed to increase capacity at the works. The trajectory phases development in Loxwood towards the later part of the Plan period to allow for these works to take place.

### Action:

No change

4653

Object

**Document Element:** Policy A15 Loxwood

**Respondent:** Ms Caroline Spencer

## Object

### Summary of representations:

Loxwood does not have the infrastructure to support an increased population, already increased beyond the targets for housing agreed in the previous Neighbourhood Plan by recent additional developments. We no longer have a village shop or post office so infrastructure has deteriorated since that Plan was approved by the village.

Loxwood Parish Council has not been consulted.

The village looks North for most work shopping and recreation but congestion will significantly worsen as a consequence of Waverley Plans.

There is reason to be very concerned about the capacity of sewerage and surface water management contrary to statements by CDC

### Summary of representation changes to plan:

Specific budget provision needs to be made to rectify infrastructure weaknesses before development is considered

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood and that the traffic impacts were acceptable.

Policy NE16 (d) (under Water Quality and Wastewater) also requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

All new development will have to comply with Policy NE15 which ensures that any surface water increases are mitigated, for example using sustainable Drainage Systems (SuDS), so that there will not be any increase (over greenfield rates) in the rate of surface waste run-off leaving a site. The Policy also requires that new development does not increase the risk of flooding elsewhere.

Consultation with Loxwood Parish Council has taken place both at formal plan making stages and informally as part of exploring growth options for the area.

### Action:

No change in response to representation

**4659****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Mrs Helen Jewell

## Object

### Summary of representations:

Approved development on Loxwood's boundary areas including Dunsfold new village of 2600 new homes and the ongoing development of the village of Billingshurst will put further pressure on Loxwood's limited infrastructure which is already failing to cope with current levels including surface water run off from the surrounding water catchment area, sewage water and increasingly heavy and fast through traffic on a rural B road which in the centre of our village is one car wide.

The plan mis-represents the functional size of Loxwood referring to it as a 'service town'. How can a rural village with no daily public transport/bus route, no village shop, no capacity for further employment other than the limited existing employers, no services beyond a church, small primary school and GP surgery which services all local villages (including patients from Rudgwick who are moving to Loxwood Surgery because their GP now lives in Cornwall and works from home so is not available for a face-to-face consultation) be called a service town

### Summary of representation changes to plan:

There needs to be an honest, transparent and fair assessment of the current and future demands on Loxwood in respect to environmental impact. They have worsened in recent years so it is unrealistic to place greater demand by further development in the village itself

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

All new development will have to comply with Policy NE15 which ensures that any surface water increases are mitigated, for example using sustainable Drainage Systems (SuDS), so that there will not be any increase (over greenfield rates) in the volume or rate of surface waste run-off leaving a site. The Policy also requires that new development does not increase the risk of flooding elsewhere.

Policy NE16 (d) (under Water Quality and Wastewater) also requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood. The updated Transport Assessment (2024) has reviewed the transport evidence produced for the Waverley Local Plan and concludes that the small number of additional trips from the proposed development in the north is unlikely to cause capacity issues on the A281 Guildford/Horsham Road or the A2133 Loxwood Road Junction, Alford.

### Action:

No change in response to representation

4669

Object

Document Element: Policy A15 Loxwood

Respondent: Alison Laker

# Object

**Summary of representations:**

Policy A15 is misleading/incorrect - Loxwood is no longer a service village by your own definition.

The bus service is merely a box-ticking exercise, the time table ensures it is of no use for main employment areas of Horsham or Guildford.

There is nothing in A15 to increase capacity of school and health centre, which are both currently full.

Existing sewage and waste water problems have been ignored by CDC on recent Loxwood developments and the wording in A15 is nowhere near strong enough to ensure this is not glossed over again going forward

**Summary of representation changes to plan:**

The plan needs to recognise that Loxwood is not a suitable neighbourhood for an additional 220 dwellings.

The plan needs to recognise the wishes of the 2020 Loxwood Neighbourhood plan

The plan needs to recognise that resolving the EXISTING serious capacity problems of sewage and waste water MUST be a pre-cursor to ANY further development. The current statements in A15 are far too "wishy-washy".

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Policy A15 criteria 9 requires that development is phased to ensure that sufficient wastewater disposal capacity is available to accommodate the requirements arising from new development. Southern Water are supportive of the policy wording and the Statement of Common Ground on Wastewater has been updated to reflect the latest position. Storm overflow performance improvements and infiltration reduction are planned for the 2020 – 2025 period and Loxwood WTW is included in PR24 for a growth scheme for AMP8 (2025 – 2030) which means that works are programmed to increase capacity at the works. The trajectory phases development in Loxwood towards the later part of the Plan period to allow for these works to take place

**Action:**

No change in response to representation

**4673****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Mr Graham Tarrant

## Object

### Summary of representations:

The village has already been over developed with lots of new housing without the necessary infrastructure. We were promised a local shop with Nursery Green, this never happened. The school hasn't been improved - there is limited public transport. The road through our village is getting more and more busy with regular accidents at the junction of station road. Our precious wildlife and ancient woodland will be put at even more risk and I can't see any benefit to the local community especially as the plan contradicts the localist Act 2011 devolving power to local areas

### Summary of representation changes to plan:

Loxwood has already has 91 houses currently in development and any further development would have a huge negative impact on the village which doesn't have the necessary infrastructure

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is a classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments. The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood and that the traffic impacts were acceptable.

### Action:

No change in response to representation

4676

Object

Document Element: Policy A15 Loxwood

Respondent: Mrs Diana Vettese

## Object

### Summary of representations:

The CDC did not consult the LPC on revised housing numbers and the allocation of 220 houses plus a further 91 houses on already allocated sites is not sustainable in rural Loxwood for the following reasons:

- we don't have the transport infrastructure; the sewerage system is already at capacity; our local PO office has recently closed and we have no shops; the school is not big enough to support the number of houses proposed; this is a rural community and the development will put our wildlife at risk and destroy ancient woodlands and affect our bridleways and footpaths.

### Summary of representation changes to plan:

N/A

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments. The council is committed to working with neighbourhood plan groups to take forward housing numbers and allocate sites through the NP process.

### Action:

No change in response to representation

4677

Object

Document Element: Policy A15 Loxwood

Respondent: Mr Marco Vettese

# Object

**Summary of representations:**

The plan as it relates to Loxwood is not sound due to the following reasons:

- lack of transport, only one bus a day and that is not at a convenient time
- the plan would result in a massive increase in vehicles on local roads which can only just cope now. Bear in mind that on the road into Guildford there are plans to build 1700+ house at Dunsfold
- currently no village shop
- primary school and doctors surgery not able to cope with additional users

**Summary of representation changes to plan:**

Much smaller increase in proposed new houses, bear in mind that recently planning permission has already been granted for 100 +/- new houses which are not included in plans proposals

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood and that the traffic impacts were acceptable. The updated Transport Assessment (2024) has reviewed the transport evidence produced for the Waverley Local Plan and concludes that the small number of additional trips from the proposed development in the north is unlikely to cause capacity issues on the A281 Guildford/Horsham Road or the A2133 Loxwood Road Junction, Alford.

**Action:**

No change in response to representation

**4702****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Richard Badman

## Object

### Summary of representations:

Loxwood is not a service village. It does not have a village shop or public transport links to the surrounding villages/towns unless you count the one bus per day for 4 days of the week!

CDC did not consult on revised housing numbers in North of the district which shows the Chichester locals are trying to pass the problem up the road.

Allocation of 220 houses plus a further 91 houses on already allocated sites is not sustainable in rural Loxwood

Transport infrastructure non existent, lack of sewerage capacity, school, doctors, shops do not have capacity

### Summary of representation changes to plan:

Upgrades to the waste water and sewage need to occur before more houses are even considered.

A well stocked village shop needs to exist.

Public transport needs to be available and practical

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area.

Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

### Action:

No change in response to representation

4723

Object

Document Element: Policy A15 Loxwood

Respondent: Mr Paul Hounsham



## Object

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### Summary of representations:

The proposed scale on top of the existing commitments (both completed and in progress) will ruin the village and create a dormitory car dependent settlement. The village is not equipped or enabled to facilitate these additional houses and lacks scalable infrastructure to cope with the ensuing demands such scale will bring. Loxwood is comparatively a remote location and is totally unsuitable for this huge increase.

Other locations would better absorb these numbers without the environmental consequences and associated climate emergency, which is much highlighted in your plan! Valuable and productive farmland loss, should also be considered here as an issue.

### Summary of representation changes to plan:

Look at a scheme which minimises car use and maximizes the available of employment, infrastructure, amenities and proximity to other major conurbations. Consider although outside your remit, Petworth, as a huge historically underdeveloped opportunity which cannot be ignored when reviewing this area

### Response:

The council has to find suitable locations for housing growth within the plan area, which excludes the part of the district within the South Downs National Park. As Petworth is within the South Downs National Park, we are not able to consider it as an alternative to growth within the plan area.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is a classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

### Action:

No change in response to representation

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**4767****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Mrs Shelley Woodage

# Object

## Summary of representations:

This proposal for additional housing in Loxwood is obscene. Adding this number of houses to an otherwise quiet, rural country village will desecrate our local community

- Lack of infrastructure will not support this level of development
- Roads, sewerage, water, power supply are all insufficient as they are currently
- There is no public transport. 1 bus per day, on only 4 days per week is NOT a "service"
- Flood risk. My house was flooded due to excess run off caused by over development

## Summary of representation changes to plan:

Stop targeting of Loxwood by WSCC and CDC. It seems like the village is constantly under siege at the moment from developers

## Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

All new development will have to comply with Policy NE15 which ensures that any surface water increases are mitigated, for example using sustainable Drainage Systems (SuDS), so that there will not be any increase (over greenfield rates) in the rate of surface water run-off leaving a site. The Policy also requires that new development does not increase the risk of flooding elsewhere.

## Action:

No change in response to representation

4788

Object

Document Element: Policy A15 Loxwood

Respondent: Mr Tim Bennett

## Policy A15 Loxwood

## Object

### Summary of representations:

Plan does not comply with current planning regulations; meet CDC's own Sustainability Appraisal report in respect of infrastructure or environmental considerations; enable delivery of sustainable development; and was not based on any consultation with LPC

### Summary of representation changes to plan:

No further building of houses in Loxwood with out appropriate consideration of the impact on the local community, availability of appropriate infrastructure, shopping facilities, public transport, road traffic volumes, impact on flood risk with in the village, sewer capacity, views of the majority of Loxwood residents

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is a classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood and that the traffic impacts were acceptable.

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

All new development will have to comply with Policy NE15 which ensures that any surface water increases are mitigated, for example using sustainable Drainage Systems (SuDS), so that there will not be any increase (over greenfield rates) in the rate of surface waste run-off leaving a site. The Policy also requires that new development does not increase the risk of flooding elsewhere.

### Action:

No change in response to representation

4808

Object

**Document Element:** Policy A15 Loxwood

**Respondent:** Mr John Seymour

## Object

### Summary of representations:

CDC did not consult with LPC on revised housing numbers in the North of the district and although Government encourages parish councils to develop NP's, CDC ignored the NP submitted by LPC in 2018 and the revised NP in 2020 has not been able to progress due to water neutrality issues

### Summary of representation changes to plan:

This policy needs to be removed as it is not workable and if it were to proceed the damage to the historic village of Loxwood would be irreversible and terrible for the local residents both mentally and physically

### Response:

The council is committed to working with neighbourhood plan groups to take forward housing numbers and allocate sites through the NP process

### Action:

No change in response to representation

4828

Object

**Document Element:** Policy A15 Loxwood

**Respondent:** Mr William CRofts

## Object

### Summary of representations:

The Environment Agency are due to complete a property level resilience scheme for Loxwood in late 2023. This is a community that have suffered property flooding several times in the last 20 years. Policy requirement 8 is therefore of particular importance.

We are supportive of the policy requirement for suitable phasing to ensure adequate wastewater treatment capacity is available

### Summary of representation changes to plan:

Addition to requirement 8 "...and that development will be safe for its lifetime and not increase flood risk elsewhere, taking account of risks from all sources of flooding and climate change impacts, as per..."

### Response:

Add as bullet point and cross reference to NE15

### Action:

See council suggested modification CM344

4918

Object

**Document Element:** Policy A15 Loxwood

**Respondent:** Environment Agency

## Object

### Summary of representations:

I concur fully with all the concerns about policy A15 that have been raised by Loxwood Parish Council.

In particular, given that Loxwood already has 2 housing developments relying on holding tanks for the discharge of sewage, and also that Southern Water have no plans to upgrade the sewerage system serving Loxwood, no further new housing should be planned for Loxwood until the matter is resolved. Additional housing would only exacerbate what is already an unsustainable situation

### Summary of representation changes to plan:

No further housing should be allocated to Loxwood until Southern Water have sufficiently upgraded the sewerage capacity

### Response:

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Policy A15 criteria 9 requires that development is phased to ensure that sufficient wastewater disposal capacity is available to accommodate the requirements arising from new development. Southern Water are supportive of the policy wording and the Statement of Common Ground on Wastewater has been updated to reflect the latest position. Storm overflow performance improvements and infiltration reduction are planned for the 2020 – 2025 period and Loxwood WTW is included in PR24 for a growth scheme for AMP8 (2025 – 2030) which means that works are programmed to increase capacity at the works. The trajectory phases development in Loxwood towards the later part of the Plan period to allow for these works to take place.

### Action:

No change in response to representation

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**5002****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Mr Adrian Morris

## Object

### Summary of representations:

Policy A15 is not therefore considered precise and does not provide any clear timetable for delivery in housing within Loxwood within the Plan period. It is therefore recommended that the allocation of housing sites in Loxwood should be based on a higher growth scenario of at least 825 homes which should be delivered either through a Local Plan policy allocation or within an SPD, with a clear timetable of when the SPD will be produced by the Council. Site proposed.

### Summary of representation changes to plan:

It is therefore recommended that the allocation of housing sites in Loxwood should be based on a higher growth scenario of at least 825 homes which should be delivered either through a Local Plan policy allocation or within an SPD, with a clear timetable of when the SPD will be produced by the Council. Site proposed

### Response:

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

### Action:

No change in response to representation

5041

Object

**Document Element:** Policy A15 Loxwood

**Respondent:** Crownhall Estates Limited & Martin Grant Homes

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

The information available in the consultation documents does not seem to define the area and as such, does not enable SWT to give effective feedback on the impacts on biodiversity from development at this scale in this broad location. We do note that that supporting policy wording requires impacts to biodiversity and protected sites to be avoided, and the delivery of Biodiversity Net Gain, in line with section 174 on the NPPF 2021.

However, we highlight that such a broad allocation policy does not enable important features that maybe present to be captured, and as such attention to this should be considered when the DPD allocation document is produced

### Summary of representation changes to plan:

N/A

### Response:

Comment noted. Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife and require delivery of BNG which will all need to be considered as part of the Neighbourhood Plan site selection process

### Action:

No change in response to representation

5073

Object

**Document Element:** Policy A15 Loxwood**Respondent:** Sussex Wildlife Trust

Object

**Summary of representations:**

The references to safeguarding minerals is inconsistent and it is suggested that the wording in the email sent to CDC (attached) in relation to Policy AL3 should be used in the policies for the other sites for consistency. Reference to safeguarding minerals and waste infrastructure should also be included in some other policies as previously indicated

**Summary of representation changes to plan:**

- Policy A15 (Loxwood) – needs to include reference to minerals safeguarding as within the clay MSA

**Response:**

Proposed modification to include reference to mineral safeguarding within the policy.

**Action:**

See council suggested modifications CM343 and 347

5092

Object

**Document Element:** Policy A15 Loxwood**Respondent:** West Sussex County Council

Object

**Summary of representations:**

We request further clarification of the 220 dwelling allocation at Loxwood in policy A15 to confirm the allocation is fixed as a minimum figure and will not be affected by any pending applications and appeals for the post January 2023 period

**Summary of representation changes to plan:**

The text should be amended to state 'Land will be allocated for development in the revised Loxwood Neighbourhood Plan or Site Allocations DPD for a minimum of 220 dwellings and supporting facilities and infrastructure. This would provide the plan with more flexibility in the event the parish decides not to proceed with a Neighbourhood Plan review

**Response:**

Any applications which are granted permission since the start of the Plan period (1 April 2021) will be counted towards the 220 dwelling requirement, unless they are on sites which are already counted as commitments, for example, sites which are within the made Loxwood Neighbourhood Plan. Policy H2 covers the eventuality that the parish decides not to proceed with a Neighbourhood Plan review as it refers to the council allocating sites through a development plan document

**Action:**

No change

5109

Object

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**Document Element:** Policy A15 Loxwood

**Respondent:** Seaward Properties Ltd

**Agent:** Smith Simmons Partners



# Object

## Summary of representations:

to 220 new dwellings in Loxwood :

Environmental depletion through loss of habitat for wildlife including Skylarks and other ground-nesting birds, Barn & Tawney Owls & bats that hunt over the fields, the area where a Cuckoo is active each year;

Very limited public transport;

Inadequate parking at nearest station: Billingshurst;

Inadequate roads;

Increasing volume of traffic from any significant housing development;

Lack of fresh water capacity & ability of public sewer to cope with additional capacity;

Create suburban development that would change the character of the village;

Loss of footpaths/public rights of way

## Summary of representation changes to plan:

Keep to existing building line to west of main road through village of Loxwood. Therefore no development on fields - HL X0016

## Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

All new development will have to comply with Policy NE15 which ensures that any surface water increases are mitigated, for example using sustainable Drainage Systems (SuDS), so that there will not be any increase (over greenfield rates) in the rate of surface waste run-off leaving a site. The Policy also requires that new development does not increase the risk of flooding elsewhere.

Criteria 1 requires masterplanning and design for high quality development. Chapter 6 of the Local Plan includes a suite of design policies which will be used for considering applications and they aim to secure high quality design which respects the local vernacular.

Policy A15 does not allocate specific sites, as this will be done through the Neighbourhood Plan process, therefore it is not possible to determine any impacts on PROW.

All development proposals will need to comply with Policy NE17 Water Neutrality to avoid any increase in water extraction and therefore avoid any adverse impact on the environmental designations in the Arun Valley.

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments.

## Action:

No change

**5155****Object****Document Element:** Policy A15 Loxwood**Respondent:** Revd John Bundock**Object****Summary of representations:**

Future development unsustainable due to lack of infrastructure including shops, bus service, schools, GP surgeries; lack of employment opportunities; hazardous roads; sewage spills; and threats to wildlife.

**Summary of representation changes to plan:**

N/A

**Response:**

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments. The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

All development proposals will need to comply with Policy NE17 Water Neutrality to avoid any increase in water extraction and therefore avoid any adverse impact on the environmental designations in the Arun Valley.

Policy NE16 (d) (under Water Quality and Wastewater) also requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood.

**Action:**

No change in response to representation

**5231****Object****Document Element:** Policy A15 Loxwood**Respondent:** Alison Anderson

## Object

### Summary of representations:

Policy not justified as stands, effectiveness could be improved. Given limited facilities available / to be provided as part of Loxwood allocation, it is considered new residents are likely to be reliant on at least some key facilities in Billingshurst (GP surgery, railway station (and car park), The Weald secondary school and sixth form, library and retail and community facilities, including leisure centre). Within Horsham District, there are potential proposals for strategic scale extensions to Billingshurst/new settlements relatively close to Billingshurst. Whilst no decisions made with respect to local plan, housing growth delivered through own local plan will create potential impacts on existing infrastructure already under significant pressure. Require clear evidence that potential cumulative impacts on settlements in HDC have been considered as part of proposed allocations. Would ask that CDC works collaboratively with HDC and other stakeholders to ensure future pressures on infrastructure in Horsham District is appropriately addressed

### Summary of representation changes to plan:

Seek further clarification in Policy A15: Loxwood to emphasise importance of collaborative working between stakeholders to mitigate against the potential cumulative impact of development

### Response:

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Schools, sixth form and libraries are cross boundary matters which have been considered by WSCC and incorporated into the IDP to ensure that the infrastructure demands of the Plan are met. CIL projects, including leisure projects, can include funding pro-rata from both Chichester and Horsham and would be kept under review through the Infrastructure Business Plan (IBP) process

### Action:

No change

5267

Object

**Document Element:** Policy A15 Loxwood

**Respondent:** Horsham District Council

## Object

### Summary of representations:

The policy does not achieve CDC's environmental, economic and social objectives due to lack of infrastructure (amenities, sewage capacity, road network) and environmental issues (emissions, loss of hedgerows/ancient woodlands, destruction of habitats and impact on protected species).

I object to any further development in the Loxwood area because it would ruin the nature of the village with detriment to residents already living in the village because there is inadequate infrastructure to support the development, and the negative impact on the natural environment

### Summary of representation changes to plan:

N/A

### Response:

Criteria 1 requires masterplanning and design for high quality development. Chapter 6 of the Local Plan includes a suite of design policies which will be used for considering applications and they aim to secure high quality design which respects the local vernacular.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood and that the traffic impacts were acceptable.

The impact on air quality from traffic generated by Local Plan growth (in terms of impact on people and ecology) has been considered through the Transport Assessment (Annex D: Air Quality Assessment, Sept 2022). It concludes that the Local Plan growth does not result in unacceptable risk to human health from air pollution and is therefore in accordance with the requirements of national policy and guidance. Following representations on the HRA submitted by Natural England, further work has been undertaken relating to the impact of growth in the north east of the plan area in relation to atmospheric pollution and its potential impact on various SACs. This work is to assist Natural England in their assessment and remains on-going.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments. Policy NE16 (d) (under Water Quality and Wastewater) also requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

### Action:

No change

5424

Object

Document Element: Policy A15 Loxwood

Respondent: Irene Aspinall

## Object

### Summary of representations:

Yet another example of a village being called a Service Village, when actually the services available to the general populace are minimal

### Summary of representation changes to plan:

N/A

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper)

### Action:

No change in response to representation

5492

Object

**Document Element:** Policy A15 Loxwood

**Respondent:** Mayday! Action Group

## Object

### Summary of representations:

- Loxwood has developed its own plan which has been approved.
- Over-developing the countryside will not improve low biodiversity scores.
- Does not comply with various regulations.
- Infrastructure will not be able to cope with the significant increase of houses and residents.
- The sewage network will not be able to cope.
- The flood risk associated with over-development should not be underestimated.
- Water already an issue and unless proposed properties have a rainwater collection tank, will see greater pressure on our water infrastructure.
- Traffic calming insufficient.
- There is no meaningful public transport.
- Instead of building more houses on the proposed sites should be putting up solar panels.
- Local footpaths and bridleways will be affected to the detriment of frequent users

**Summary of representation changes to plan:**

Reduce allocation at Loxwood. Reg 14 NP uses numbers from Preferred Approach Plan.

Chichester should look at converting the significant number of vacant retail and office properties in town and city centres into accommodation to serve an aging population

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

All development proposals will need to comply with Policy NE17 Water Neutrality to avoid any increase in water extraction and therefore avoid any adverse impact on the environmental designations in the Arun Valley.

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments. The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood and that the traffic impacts were acceptable.

Policy A15 does not allocate specific sites, as this will be done through the Neighbourhood Plan process, therefore it is not possible to determine any impacts on PROW.

The council is committed to working with neighbourhood plan groups to take forward housing numbers and allocate sites through the NP process. The made Neighbourhood Plan remains in place.

Any schemes for renewable energy would be considered against Policy NE1 Stand-alone Renewable Energy.

**Action:**

No change in response to representation

**5549****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Mrs Bente Salt

## Object

**Summary of representations:**

on grounds of lack of infrastructure and local services; sewage spills and lack of capacity in network; high levels of traffic which would increase with further development; increased emissions from additional traffic; potential loss of hedgerows and ancient woodlands; wildlife habitats would be destroyed; detriment caused to current residents' amenity

**Summary of representation changes to plan:**

N/A

**Response:**

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

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The impact on air quality from traffic generated by Local Plan growth (in terms of impact on people and ecology) has been considered through the Transport Assessment (Annex D: Air Quality Assessment, Sept 2022). It concludes that the Local Plan growth does not result in unacceptable risk to human health from air pollution and is therefore in accordance with the requirements of national policy and guidance. Following representations on the HRA submitted by Natural England, further work has been undertaken relating to the impact of growth in the north east of the plan area in relation to atmospheric pollution and its potential impact on various SACs. This work is to assist Natural England in their assessment and remains on-going.

**Action:**

No change in response to representation

**5556****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Jonathan Gayner

## Object

### Summary of representations:

to further development - current developments are not able to be built because of considerable ongoing and yet to be remedied issues with sewage, water supply, wastewater, (as previously highlighted by Southern Water and Natural England) lack of facilities, risk of flooding, lack of sensitivity of the history of the village and its surrounding natural environment, no transport infrastructure, total lack of consideration to wildlife, school and doctor surgery at maximum capacity, to name just a few

### Summary of representation changes to plan:

N/A

### Response:

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

All development proposals will need to comply with Policy NE17 Water Neutrality to avoid any increase in water extraction and therefore avoid any adverse impact on the environmental designations in the Arun Valley.

All new development will have to comply with Policy NE15 which ensures that any surface water increases are mitigated, for example using sustainable Drainage Systems (SuDS), so that there will not be any increase (over greenfield rates) in the volume or rate of surface waste run-off leaving a site. The Policy also requires that new development does not increase the risk of flooding elsewhere.

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Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments. Policy NE16 (d) (under Water Quality and Wastewater) also requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Criteria 1 requires masterplanning and design for high quality development. Chapter 6 of the Local Plan includes a suite of design policies which will be used for considering applications and they aim to secure high quality design which respects the local vernacular.

### Action:

No change in response to representation

5557

Object

Document Element: Policy A15 Loxwood

Respondent: Julia Blackstone



## Object

### Summary of representations:

I wish to add my objection to this housing development that was recommended by CDC.

CDC was supposed to carry out a study on growth scenarios for housing in Loxwood and to share their findings in a consultation back in 2022. The above to date didn't take place, despite LPC continuously chasing for the above study.

Loxwood as a village cannot sustain such a development this is due to the poor infrastructure already in place, there are no shops, no public transport, no street lighting, extremely basic services I.e., sewage system, wastewater collection, fresh water supply. The national grid already struggling, we are also surrounded by country lane and not main roads. The local school and surgery are running over their capacities.

I think CDC are conducting the business in reverse and putting their interests before the people of Loxwood

### Summary of representation changes to plan:

N/A

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood and that the traffic impacts were acceptable.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

### Action:

No change in response to representation

5558

Object

Document Element: Policy A15 Loxwood

Respondent: Ziad Natour

Object

**Summary of representations:**

Loxwood is NOT a service village.

- Village shop closed.
- Public transport very limited and often cancelled.
- Doctor's surgery at capacity.
- Surrounding roads cannot cope with additional traffic.
- No additional capacity for sewage.
- Lack of water capacity.
- Too many new builds which are stretching resources.
- Risk of flooding if further building work is carried out.
- Further housing for low income families and the elderly is short sighted as they will need their own transport to carry out their daily lives.
- No cycle routes.
- Footpaths would be reduced.
- Wildlife habitats will be destroyed

**Summary of representation changes to plan:**

N/A

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

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The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criteria 1 requires masterplanning and design for high quality development. Chapter 6 of the Local Plan includes a suite of design policies which will be used for considering applications and they aim to secure high quality design which respects the local vernacular.

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments.

**Action:**

No change in response to representation

5559

Object

Document Element: Policy A15 Loxwood

Respondent: Linda Mott

# Object

**Summary of representations:**

Allocation of 220 houses plus a further 91 houses on already allocated sites is not sustainable in rural Loxwood-it a huge Percentage increase and will destroy the village.

Loxwood should not be deemed to be a strategic location-it is a small rural village.

LPC have spent time and effort to create a Revised Neighbourhood Plan which allocates 126 houses plus 17 carried forward from the Made Neighbourhood Plan giving 143 houses. It has reached Regulation 14 consultation stage and is based upon the Preferred Approach Local Plan consultation. The residents of the Parish and Loxwood Parish Council have satisfied themselves through evidence gathered that 126 homes is a sustainable allocation given the constraints that exist-it should not be ignored due to water neutrality issues

This protects the village and the community and reflects the importance of Neighbourhood plans for Loxwood and the rest of the country -there is a process and it should be respected otherwise it makes a mockery of the whole planning system and developers win every time.

**Summary of representation changes to plan:**

Policy A15 should be removed and Policies H2 and H3 amended to reflect a realistic allocation of 125 houses which is still generous compared to other local area with better services.

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is a classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The council is committed to working with neighbourhood plan groups to take forward housing numbers and allocate sites through the NP process.

**Action:**

No change in response to representation

**5560****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Tim Swann

## Object

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### Summary of representations:

Concerned Loxwood Neighbourhood Plan currently being delayed due to water neutrality and if Plan continues to be delayed, there will be knock-on delay in provision of housing in north of the District - suggest CDC allocate sites to ensure delivery.

Question legality of Policy placing responsibility on developers for Southern Water's short comings in ensuring sufficient capacity for new development

### Summary of representation changes to plan:

Plan should allocate sites

### Response:

The council is committed to working with neighbourhood plan groups to take forward housing numbers and allocate sites through the NP process. The Plan, at Policy H2, includes a commitment by the council to allocate sites through a subsequent development plan document in the eventuality that demonstrable progress is not made towards making provision for the housing numbers through NPs.

We recognise SW's role and responsibilities but cannot grant permissions or allocate sites that would contravene HRA requirements

### Action:

No change in response to representation

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**5614****Object**

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**Document Element:** Policy A15 Loxwood

**Respondent:** Thakeham Homes

# Object

**Summary of representations:**

The village infrastructure is already lacking shops, transport links, development of sewage and wastewater facilities by Southern Water, as well as current pressures on the school and medical centre.

These all need to be improved BEFORE any new developments are approved and the proposed infrastructure delivery plan in the A15 policy and 10.70 of Chichester's proposed plan is not at all specific and lacking in areas I have mentioned above.

New housing in Loxwood will have a negative effect our local and the wider environment and will fall outside of current government legislation for hedgerow regulations, conservation of species and habitat, as well as the much discussed requirement for water neutrality.

There is so much wrong with these proposals, as I have highlighted that it makes a further 220 houses in Loxwood totally unworkable

**Summary of representation changes to plan:**

N/A

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is a classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife.

All development proposals will need to comply with Policy NE17 Water Neutrality to avoid any increase in water extraction and therefore avoid any adverse impact on the environmental designations in the Arun Valley

**Action:**

No change in response to representation

**5637****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Mr Vivian Diggins

## Object

### Summary of representations:

Objection to Loxwood figure due to infrastructure:

1. No shops.
2. No bus service.
3. School capacity.
4. Water and sewage.
5. GP capacity.
6. Road condition and congestion

### Summary of representation changes to plan:

N/A

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Policy NE16 (d) (under Water Quality and Wastewater) also requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood and that the traffic impacts were acceptable.

### Action:

No change in response to representation

5681

Object

Document Element: Policy A15 Loxwood

Respondent: Mrs Jean Lightman

## Object

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**Summary of representations:**

Loxwood Ward is an under-funded, under-serviced rural area. I fail to understand how the housing numbers mentioned in this Local Plan can be seriously considered for this rural area where there are so many ongoing issues waiting to be addressed. These problems have been created by the recent expansion of housing in the ward. It is irresponsible planning to propose further expansion until existing infrastructure is improved to cope with the current level of housing and population

**Summary of representation changes to plan:**

N/A

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

**Action:**

No change in response to representation

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**5687****Object**

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**Document Element:** Policy A15 Loxwood

**Respondent:** Sandra Imrie

## Object

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**Summary of representations:**

Loxwood has been identified as a Strategic Development Location in favour of other more sustainable locations in Southern Plan Area on the basis of capacity issues on the A27 which are not supported by evidence. This results in a less sustainable distribution of housing than would otherwise be the case had the transport evidence been properly applied to the housing distribution strategy. Loxwood is sequentially less sustainable than a number of other Service Villages in the South, including Westbourne where suitable land has been promoted and considered 'developable'

**Summary of representation changes to plan:**

Allocation should be removed in favour of allocations elsewhere in the Southern Plan Area

**Response:**

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

**Action:**

No change

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**5730****Object**

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**Document Element:** Policy A15 Loxwood

**Respondent:** Metis Homes

**Agent:** Nova Planning



# Object

## Summary of representations:

Objection to Loxwood number due to:

- We are on a junction of two B-roads, not big enough for big housing development
- The school is full, with a waiting list and no room to expand
- The doctors surgery is full to bursting
- Loxwood floods badly
- The sewers are too small to cope with the village as it now is
- We have ongoing water neutrality issue that do not fit with plans to bring more houses to the village
- Fresh water supplies are stretched to the maximum as it now is
- There is no gas
- There is no shop
- There is no public transport
- We are entirely car-dependant, and more homes bring more cars and air pollution

## Summary of representation changes to plan:

N/A

## Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Policy NE16 (d) (under Water Quality and Wastewater) also requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood and that the traffic impacts were acceptable.

All development proposals will need to comply with Policy NE17 Water Neutrality to avoid any increase in water extraction and therefore avoid any adverse impact on the environmental designations in the Arun Valley.

All new development will have to comply with Policy NE15 which ensures that any surface water increases are mitigated, for example using sustainable Drainage Systems (SuDS), so that there will not be any increase (over greenfield rates) in the rate of surface waste run-off leaving a site. The Policy also requires that new development does not increase the risk of flooding elsewhere.

The impact on air quality from traffic generated by Local Plan growth (in terms of impact on people and ecology) has been considered through the Transport Assessment (Annex D: Air Quality Assessment, Sept 2022). It concludes that the Local Plan growth does not result in unacceptable risk to human health from air pollution and is therefore in accordance with the requirements of national policy and guidance. Following representations on the HRA submitted by Natural England, further work has been undertaken relating to the impact of growth in the north east of the plan area in relation to atmospheric pollution and its potential impact on various SACs. This work is to assist Natural England in their assessment and remains on-going.

## Action:

No change in response to representation

**5766****Object****Document Element:** Policy A15 Loxwood**Respondent:** Mrs Joanna Wright**Object****Summary of representations:**

Objection to Loxwood figure due to:

Lack of shop  
 No bus service  
 Water neutrality and sewage  
 School capacity  
 GP capacity  
 Lack of local employment

**Summary of representation changes to plan:**

N/A

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Policy NE16 (d) (under Water Quality and Wastewater) also requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

All development proposals will need to comply with Policy NE17 Water Neutrality to avoid any increase in water extraction and therefore avoid any adverse impact on the environmental designations in the Arun Valley.

**Action:**

No change in response to representation

**5769****Object****Document Element:** Policy A15 Loxwood**Respondent:** Mrs Margaret Carr

## Object

### Summary of representations:

This is a small development in an area with poor sustainable access and transport and therefore dominated by cars. Any development in Loxwood should only go ahead if there is a focus on providing what people need in their local communities and providing sustainable transport links to larger communities and railway stations.

If a development increases car use it is conflicting with Chichester District Council Climate Emergency and should not go ahead, with development focused on areas where people can access their needs without cars, therefore remove requirement for off-site highway improvements and replace with, "Provide safe and suitable access points for all users, including provision of local amenities to reduce the need to travel, provide or fund frequent, reliable affordable bus services, including provision of bus, priority and bus lanes direct to Horsham, Billingshurst and neighbouring communities.

Provide Continuous, direct, safe, attractive, comfortable walking and cycling routes between the development and neighbouring communities with cycle route linking Horsham, Billingshurst and Guildford via Cranleigh and Downslink.

If these requirements are unaffordable, development at Loxwood is not sustainable and should not proceed.

### Summary of representation changes to plan:

N/A

### Response:

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development

### Action:

No change in response to representation

5941

Object

**Document Element:** Policy A15 Loxwood

**Respondent:** GoVia Thameslink Railway

## Object

### Summary of representations:

Policy is unsound due to there being evidence (set out in the Council's own evidence base and within this representation) demonstrating that additional housing could be delivered in the North of the Plan Area to meet future needs, particularly in the parish of Plaistow and Ifold at Crouchlands Farm.

Furthermore, policy is unsound as not justified or effective, but overly reliant on the delivery of additional homes in the North of the Plan Area on sites allocated in neighbourhood plans for the respective parishes when there is no evidence to demonstrate that any sites are likely to be allocated, nor even that neighbourhood plans will be prepared by each of the parishes in the plan period

### Summary of representation changes to plan:

See attached written representation

### Response:

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate. The site at Crouchlands has been promoted to the council and assessed through the Housing and Economic Land Availability Assessment (HELAA) 2021. It then formed part of the consideration of reasonable alternatives as part of the Sustainability Appraisal. However, it was not considered suitable as a new settlement. On adoption, this will need to form the basis of the Neighbourhood Plan going forward.

The council is committed to working with neighbourhood plan groups to take forward housing numbers and allocate sites through the NP process. The Plan, at Policy H2, includes a commitment by the council to allocate sites through a subsequent development plan document in the eventuality that demonstrable progress is not made towards making provision for the housing numbers through NPs.

### Action:

No change in response to representation

5978

Object

**Document Element:** Policy A15 Loxwood

**Respondent:** Artemis Land and Agriculture Limited

**Agent:** DLBP

## Object

**Summary of representations:**

to Loxwood figure due to insufficient infrastructure.

The problem in Loxwood is that the infrastructure has been neglected.

- Waste and sewage inadequate.
- Public transport non existent. We have to rely on cars or kindly neighbours giving lifts.
- we were promised a local shop to replace the old post-office store.
- the road network is insufficient. Recently we had heavy lorries racing down Spy Lane for a whole week

**Summary of representation changes to plan:**

N/A

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood and that the traffic impacts were acceptable

**Action:**

No change in response to representation

**5984****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Lars Mansson

## Object

### Summary of representations:

[RECEIVED LATE]

Raises alleged inaccuracies within Local Plan regarding:

1. Adequacy of transport links in Loxwood;
2. Capacity of waste water treatment facilities;
3. Existence of cycle routes.

Also raises issues regarding capacity of local infrastructure, water supply, and legislative requirements according to the Localism Act 2011

### Summary of representation changes to plan:

N/A

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments.

### Action:

No change in response to representation

5988

Object

**Document Element:** Policy A15 Loxwood

**Respondent:** Mr Patrick McGuinness-Smith

Object

**Summary of representations:**

Considers that the provision of additional housing in Loxwood is unacceptable for a variety of reasons:

- Justification for additional housing is inadequate and tenuous; no need for affordable housing;
- Loxwood ceases to qualify as a service village -inadequate local infrastructure to support sustainable development;
- Inadequate utilities including sewerage, wastewater and water capacity.
- Transport Statement is inaccurate - inadequate transport links, limited capacity of minor road network, and no cycle routes currently;
- Lack of consultation shows inability to cooperate with the village;
- Detrimental impact on village character and surrounding landscape including heritage assets and ancient woodland;
- Detrimental ecological impact;
- Lack of due process/compliance with planning legislation and NPPF

**Summary of representation changes to plan:**

Removal of policy A15

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood and that the traffic impacts were acceptable.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criteria 1 requires masterplanning and design for high quality development. Chapter 6 of the Local Plan includes a suite of design policies which will be used for considering applications and they aim to secure high quality design which respects the local vernacular.

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments.

**Action:**

No change in response to representation

5989

Object

Document Element: Policy A15 Loxwood

Respondent: Laura Crofts

Object

**Summary of representations:**

RECEIVED LATE]

Objecting on the grounds of:

- Lack of supporting infrastructure in village including school, shop and GP;
- Lack of transport links including limited bus service and no train station;
- Adverse impact of proposed housing development in terms of congestion and pollution;
- Lack of sewage capacity
- Potential consequential impact of flooding
- Destruction of wildlife habitats

**Summary of representation changes to plan:**

N/A

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments. Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

All new development will have to comply with Policy NE15 which ensures that any surface water increases are mitigated, for example using sustainable Drainage Systems (SuDS), so that there will not be any increase (over greenfield rates) in the volume or rate of surface water run-off leaving a site. The Policy also requires that new development does not increase the risk of flooding elsewhere.

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

**Action:**

No change in response to representation



5990

Object

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**Document Element:** Policy A15 Loxwood

**Respondent:** Miss Kelly Heath

# Object

## Summary of representations:

[RECEIVED LATE]

Objection on the grounds of:

- Limited supporting infrastructure and transport links in the village;
- Lack of shop promising in previous developments has not materialised;
- Issue with classification as service village;
- Limited access to employment in rural community;
- Consequential impact of proposed housing on flooding;
- Limited capacity of sewage system;
- Poor power and broadband connections, likely overloaded by proposed development;
- Limited education facilities;
- Disregard for Neighbourhood Plan;
- Concern regarding impact on environment and surrounding landscape
- Concern regarding overdevelopment / lack of benefit to local community

## Summary of representation changes to plan:

N/A

## Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

All new development will have to comply with Policy NE15 which ensures that any surface water increases are mitigated, for example using sustainable Drainage Systems (SuDS), so that there will not be any increase (over greenfield rates) in the rate of surface waste run-off leaving a site. The Policy also requires that new development does not increase the risk of flooding elsewhere.

Criteria 1 requires masterplanning and design for high quality development. Chapter 6 of the Local Plan includes a suite of design policies which will be used for considering applications and they aim to secure high quality design which respects the local vernacular.

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments. The council is committed to working with neighbourhood plan groups to take forward housing numbers and allocate sites through the NP process.

## Action:

No change

**5991****Object****Document Element:** Policy A15 Loxwood**Respondent:** Sue Bennett**Object****Summary of representations:**

[RECEIVED LATE]

Objection on the ground of:

- Lack of supporting infrastructure
- Poor transport links
- Increased flood risk
- Limited sewage capacity
- Detrimental impact on wildlife
- Overdevelopment

**Summary of representation changes to plan:**

N/A

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Policy NE16 (d) (under Water Quality and Wastewater) also requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments. The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

**Action:**

No change

**5992****Object****Document Element:** Policy A15 Loxwood**Respondent:** Mrs S Burchett

## Object

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### Summary of representations:

[RECEIVED LATE]

Our sewerage system is not suitable and will not accommodate more dwellings, our infrastructure is not adequate to sustain a larger population.

We do not have a shop or post office, there are no buses running regularly, our bus stop is being used as a car park.

It is impossible to get an appointment at our doctor's surgery.

I am objecting to all developments which has been tabled for Loxwood and any future development which may be applied for

### Summary of representation changes to plan:

N/A

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is a classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

### Action:

No change in response to representation

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5993

Object

**Document Element:** Policy A15 Loxwood

**Respondent:** Pauline Hammett

## Object

### Summary of representations:

We would like to add our concerns regarding the additional housing which has been allocated to this area. Enlarging these beautiful villages will significantly alter the character of the local area. There is almost no public transport to these villages and the surgery at Loxwood is already under pressure. The environmental impact of building more houses in an area of natural beauty would also be significant. It is not clear how much consideration has been given to infrastructure requirements - schools, employment, transport.

Once these beautiful villages are expanded and developed there is no going back and they are lost forever along with the attendant reduction in quality of life for the people who live there

### Summary of representation changes to plan:

N/A

### Response:

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

Criteria 1 requires masterplanning and design for high quality development. Chapter 6 of the Local Plan includes a suite of design policies which will be used for considering applications and they aim to secure high quality design which respects the local vernacular.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood and that the traffic impacts were acceptable.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

### Action:

No change in response to representation

5994

Object

Document Element: Policy A15 Loxwood

Respondent: Dr and Mrs P Longthorne

## Object

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**Summary of representations:**

- ecological impact;
- traffic / limited transport links
- limited existing supporting infrastructure
- water supply and neutrality issue

**Summary of representation changes to plan:**

N/A

**Response:**

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments. The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

All development proposals will need to comply with Policy NE17 Water Neutrality to avoid any increase in water extraction and therefore avoid any adverse impact on the environmental designations in the Arun Valley.

**Action:**

No change in response to representation

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**5996****Object**

**Document Element:** Policy A15 Loxwood

**Respondent:** Aaron Beadle

# Object

## Summary of representations:

Objection to proposed development on grounds of:

- overdevelopment
- impact on agricultural land / food availability
- inappropriate definition as service village
- lack of supporting infrastructure
- limited transport links
- lack of sewage capacity
- lack of grid capacity
- impact on important habitats
- impact on landscape and public rights of way
- inconsistent with national policy

## Summary of representation changes to plan:

N/A

## Response:

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

Policy A15 does not allocate specific sites, as this will be done through the Neighbourhood Plan process, therefore it is not possible to say, at this stage whether meeting the strategic number will result in the loss of best and most versatile farmland and to determine any impacts on PROW.

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments. The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Policy NE16 (d) (under Water Quality and Wastewater) also requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

The Transport Assessment concluded that there would be an insignificant impact on safety arising from development numbers at Loxwood.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

## Action:

No change in response to representation

5999

Object

**Document Element:** Policy A15 Loxwood**Respondent:** Diane and Paul Chandler

Object

**Summary of representations:**

[RECEIVED LATE]

Objection of grounds of:

- insufficient supporting infrastructure including:

- i) water and sewage;
- ii) services including shop, school and medical practice;
- ii) issue of power supply

- Impact on landscape and flood risk

- Impact on natural environment

- Lack of consideration of Neighbourhood Plan

**Summary of representation changes to plan:**

N/A

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

All new development will have to comply with Policy NE15 which ensures that any surface water increases are mitigated, for example using sustainable Drainage Systems (SuDS), so that there will not be any increase (over greenfield rates) in the rate of surface waste run-off leaving a site. The Policy also requires that new development does not increase the risk of flooding elsewhere.

The council is committed to working with neighbourhood plan groups to take forward housing numbers and allocate sites through the NP process.

**Action:**

No change in response to representation



**6000****Object****Document Element:** Policy A15 Loxwood**Respondent:** Peter Tait**Object****Summary of representations:**

My wife and I strongly object to the building of 220 more houses in Loxwood due to the incapacity of the drainage system in the village which would be totally inadequate to cope with any more building houses. We have had numerous drainage problems since the existing new houses have been built in Loxwood.

We are currently dealing with a serious raw sewage situation which flowed and covered our garden, causing yet more distress.

Please check if you need to with Southern Water who constantly tell us that the sewers and drainage are not fit for any more housing

**Summary of representation changes to plan:**

N/A

**Response:**

Policy I1 requires infrastructure and its timing to be secured by way of condition or legal requirement. It is those conditions or legal agreements that will set out the detailed phasing and housing triggers.

Policy A15 criteria 9 requires that development is phased to ensure that sufficient wastewater disposal capacity is available to accommodate the requirements arising from new development. Southern Water are supportive of the policy wording and the Statement of Common Ground on Wastewater has been updated to reflect the latest position. Storm overflow performance improvements and infiltration reduction are planned for the 2020 – 2025 period and Loxwood WTW is included in PR24 for a growth scheme for AMP8 (2025 – 2030) which means that works are programmed to increase capacity at the works. The trajectory phases development in Loxwood towards the later part of the Plan period to allow for these works to take place.

**Action:**

No change in response to representation

**6033****Object****Document Element:** Policy A15 Loxwood**Respondent:** Bruce Frost

## Object

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**Summary of representations:**

The number of proposed additional houses for Loxwood is incredible! The village has already taken it's overloaded unfair share already and to want to add and develop a further 220 is abhorrent. There are NO facilities to support this influx of houses/people and is detrimental to the current residents

**Summary of representation changes to plan:**

It needs to be revisited and this madness stop!

**Response:**

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is a classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

**Action:**

No change in response to representation

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**6047****Object**

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**Document Element:** Policy A15 Loxwood

**Respondent:** Miss Karin Jones

## Object

### Summary of representations:

Adding an additional 220 homes to Loxwood is not sustainable. This is a rural location with absolutely nothing by way of public transport. The village does not even have a shop at the moment.

The village has dutifully supported enlargement through its now 2 Neighbourhood Plans, and now you want to turn the village in to a small town by making the village take an additional 220 dwellings. The sewage system cannot cope at the moment let alone adding hundreds more

### Summary of representation changes to plan:

These additional homes need to be cited close or in an urban area where there are sustainable transport options available and a functioning sewage system which overflows whenever there is heavy rain. If additional houses are required the total should be massively [reduced]. Also the date from which new applications count towards numbers should include the 50 council/housing association properties built off Pond Copse Lane. Scandalous that these have not been included in any housing numbers

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Policy A15 criteria 9 requires that development is phased to ensure that sufficient wastewater disposal capacity is available to accommodate the requirements arising from new development. Southern Water are supportive of the policy wording and the Statement of Common Ground on Wastewater has been updated to reflect the latest position. Storm overflow performance improvements and infiltration reduction are planned for the 2020 – 2025 period and Loxwood WTW is included in PR24 for a growth scheme for AMP8 (2025 – 2030) which means that works are programmed to increase capacity at the works. The trajectory phases development in Loxwood towards the later part of the Plan period to allow for these works to take place.

### Action:

No change

6060

Object

Document Element: Policy A15 Loxwood

Respondent: Mr Daniel Kuszel

# Object

## Summary of representations:

We are on a junction of two B-roads, not big enough for big housing development

The school is full, with a waiting list and no room to expand

Loxwood floods badly

The sewers are too small to cope with the village as it now is

Fresh water supplies are stretched to the maximum as it now is

Water neutrality is an ongoing issue in Loxwood

There is no gas

There is no shop

There is no public transport

We are car-dependent and building 220 new homes would bring huge air and traffic pollution

## Summary of representation changes to plan:

It would be better to build near to major roads. Our little B roads are not suitable and it would render the current village unsafe to add more new traffic, with cars, delivery vans and supply vehicles.

## Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Policy A15 criteria 9 requires that development is phased to ensure that sufficient wastewater disposal capacity is available to accommodate the requirements arising from new development. Southern Water are supportive of the policy wording and the Statement of Common Ground on Wastewater has been updated to reflect the latest position. Storm overflow performance improvements and infiltration reduction are planned for the 2020 – 2025 period and Loxwood WTW is included in PR24 for a growth scheme for AMP8 (2025 – 2030) which means that works are programmed to increase capacity at the works. The trajectory phases development in Loxwood towards the later part of the Plan period to allow for these works to take place.

All development proposals will need to comply with Policy NE17 Water Neutrality to avoid any increase in water extraction and therefore avoid any adverse impact on the environmental designations in the Arun Valley.

Following representations on the HRA submitted by Natural England, further work has been undertaken relating to the impact of growth in the north east of the plan area in relation to atmospheric pollution and its potential impact on various SACs. This work is to assist Natural England in their assessment and remains on-going.

## Action:

No change in response to representation

6062

Object

**Document Element:** Policy A15 Loxwood**Respondent:** Mr David Amey

## Object

### Summary of representations:

Plan totally ignores CDC's own comments re Loxwood with reference to impact on area if housing is increased including infrastructure, environment and site. Fails to address very limited - transport links, no shops/PO, employment opportunities requiring increased travel by car putting extra pressure upon one B road; 1 primary school with no room for expansion, as with a full Medical Practice. Serious current problems include no capacity for disposal of sewage and waste water for new housing. Totally ignores government legislation re preservation and development of environment for nature, wildlife and benefit to community and visitors

### Summary of representation changes to plan:

Loxwood Plans need to return to and adopt those proposed by the Parish Council. CDC should be working with the Parish Council to develop Loxwood in context to its current setting as an attraction and of benefit to the future not only for residents but in national and world terms for nature and wildlife. Currently has a wide range of wildlife covering the proposed area including bird life such as kites, buzzards, gold crest to protected species such as bats, badgers, dormice, amphibians to name but a few. CDC should be working with recognised groups such as CPRE, Woodland Trust, Wildlife Trusts, the Wey and Arun Canal to ensure the historical, physical and mental benefits can be appreciated and valued by residents and visitors alike for the future, not destroyed. the footpaths and bridleways are well used by individuals, walking groups, dog walkers, cyclists on a strong daily basis. The proposed housing would destroy this completely

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Policy A15 criteria 9 requires that development is phased to ensure that sufficient wastewater disposal capacity is available to accommodate the requirements arising from new development. Southern Water are supportive of the policy wording and the Statement of Common Ground on Wastewater has been updated to reflect the latest position. Storm overflow performance improvements and infiltration reduction are planned for the 2020 – 2025 period and Loxwood WTW is included in PR24 for a growth scheme for AMP8 (2025 – 2030) which means that works are programmed to increase capacity at the works. The trajectory phases development in Loxwood towards the later part of the Plan period to allow for these works to take place.

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments.

### Action:

No change in response to representation

**6063****Object****Document Element:** Policy A15 Loxwood**Respondent:** Mr David Carter**Object****Summary of representations:**

Concerns regarding transparency in relation to preparation of the Local Plan in relation to proposed site allocation with Loxwood. Specific concerns include: merging with surrounding villages and loss of character; severe lack of infrastructure; limited sustainable transport and dependency on cars; limited capacities of utilities

**Summary of representation changes to plan:**

N/A

**Response:**

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

Criteria 1 requires masterplanning and design for high quality development. Chapter 6 of the Local Plan includes a suite of design policies which will be used for considering applications and they aim to secure high quality design which respects the local vernacular.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

**Action:**

No change in response to representation

**6102****Object****Document Element:** Policy A15 Loxwood**Respondent:** Dr Hema Borde

## Object

### Summary of representations:

The proposed allocation of dwellings for the Loxwood Ward are disproportionate in scale to the other larger areas mentioned. ie: 220 dwellings for Loxwood and 270 for Chichester City ??

The infrastructure here in the Loxwood ward is barely able to cope with the existing houses requirements in relation to public transport, schools places, doctors surgeries etc... Further development in the area is unsustainable and therefore should be reconsidered. There are other applications too for large scale housing developments at Crouchlands Farm with 600 dwellings

### Summary of representation changes to plan:

Reduce the allocated numbers of proposed dwellings in this rural, isolated area to prevent permanent disfigurement of the area

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

### Action:

No change in response to representation

6294

Object

Document Element: Policy A15 Loxwood

Respondent: Mr Stuart Lockwood

## Object

### Summary of representations:

I object to the significant allocation of housing to Loxwood as development is in an area remote from employment and services, not well served by public transport, not within cycling distance of services and employment and will increase pressure on already overloaded utilities, particularly sewage

### Summary of representation changes to plan:

The housing allocation for Loxwood should be moved to locations better served by services, employment, public transport and available utilities

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

### Action:

No change in response to representation

6296

Object

**Document Element:** Policy A15 Loxwood

**Respondent:** Mr Richard Moseley



## Object

### Summary of representations:

Looking at Loxwood. There is insufficient infrastructure for drainage, sewage, transport, retail, roads, schools, doctors etc.

Southern Water is already spilling sewage into the river Lox.

This area simply cannot support more housing

### Summary of representation changes to plan:

The number of houses needs to be reduced

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

### Action:

No change in response to representation

6297

Object

**Document Element:** Policy A15 Loxwood

**Respondent:** Mr Roger Marshman

## Object

### Summary of representations:

The plan for Loxwood is unsustainable given the local lack of employment, public transport and waste water disposal. There will be a total reliance on car journeys for work, leisure and living needs. For these reasons the increase of 220 houses is fundamentally flawed and unsustainable. This local plan demonstrates a lack of understanding of the environment in the far north of the district and needs revisiting for Loxwood and surrounding villages

### Summary of representation changes to plan:

There needs to be reduction in the number of houses required in Loxwood back to the numbers stated in the neighbourhood plan which is currently held up in CDC

### Response:

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in the more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Work has had to be undertaken to look at the capacity of the north-east of the plan area to accommodate more dwellings, due to the constraints on growth in the south of the plan area (to demonstrate that the council has left 'no stone unturned' in seeking to reach the full local housing need figure). The outcome of this work, as set out in the Sustainability Appraisal (2023) and Housing Distribution Background Paper was that 220 is an appropriate figure for Loxwood parish to accommodate.

The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Policy NE16 (d) (under Water Quality and Wastewater) requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

### Action:

No change in response to representation

6298

Object

**Document Element:** Policy A15 Loxwood

**Respondent:** Mr Roger Newman

# Object

**Summary of representations:**

Plan does not comply with current and future government strategies, bear no relation to infrastructure of Loxwood ignoring lack of transport via public services, one bus per day, four days per week, limited employment, resulting in increase in car transport to work either to Guildford, Billingshurst, Horsham. 1 village school, GP practice at capacity no room for expansion. Lack of sewage capacity already resulting in private sewage for 2 new housing estates. Environment totally ignored, wildlife corridors destroyed, no protection of current wildlife habitats and degradation of existing bridleways and footpaths

**Summary of representation changes to plan:**

Plan is totally unsuitable for Loxwood and should not expand the existing planned sites in the LDP

**Response:**

The housing distribution seeks to reconcile a range of factors in order to achieve the most sustainable approach to the distribution of development. This is set out in more detail within the Sustainability Appraisal and Housing Distribution Background Paper. Loxwood is classed as a service village which is a suitable location for development (see Settlement Hierarchy Background Paper).

Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).

Policy NE16 (d) (under Water Quality and Wastewater) also requires that development is phased to align with the delivery of new or improved wastewater infrastructure where this is required.

Criteria 5 of Policy A15 requires that development avoids harm to protected species and important habitat features as well as facilitating biodiversity net gain and habitat connectivity. The Plan also includes specific policies to protect wildlife. Policies also ensure existing green spaces are protected and new open space provided as part of developments. The Plan acknowledges that the southern part of the plan area is generally more sustainable and better served by public transport. However, due to the constraints of the A27, the council has had to increase the supply of dwellings from the north of the plan area. Policies T1 and T2 set out how the council will work with partners to secure transport improvements as part of new development.

Policy A15 does not allocate specific sites, as this will be done through the Neighbourhood Plan process, therefore it is not possible to determine any impacts on PROW.

**Action:**

No change in response to representation

**6299****Object****Document Element:** Policy A15 Loxwood**Respondent:** Mrs Jan Carter

## Goodwood Motor Circuit and Airfield, 10.71

### Object

#### Summary of representations:

Support BUT

Plan should recognise motor circuit and airfield as distinct business areas and update footnote 51 with new evidence provided on economic contribution of Goodwood

#### Summary of representation changes to plan:

Not specified but rep refers to need to recognise motor circuit and airfield as distinct business areas and to update footnote 51 with new evidence provided

#### Response:

Following further discussions revised wording for the supporting text in paragraphs 10.71 and 10.72 has been agreed with the Goodwood Estate which includes reference to more up to date evidence on economic contribution

#### Action:

See council suggested modifications CM348 to 351

## 4313

### Object

**Document Element:** Goodwood Motor Circuit and Airfield, 10.71

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

### Object

#### Summary of representations:

The paragraph should emphasise, as raised in other representations, the true value of the Goodwood Estate to the local and National Economy

#### Summary of representation changes to plan:

The paragraph should emphasise, as raised in other representations, the true value of the Goodwood Estate to the local and National Economy.

#### Response:

Following further discussions revised wording for the supporting text in paragraphs 10.71 and 10.72 has been agreed with the Goodwood Estate which includes reference to more up to date evidence on economic contribution.

#### Action:

Replace paragraph 10.71 and 10.72 with agreed new wording and update footnote 51 to refer to the latest evidence. As per response to 4313.

## 4715

### Object

**Document Element:** Goodwood Motor Circuit and Airfield, 10.71

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

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### Summary of representations:

BUT

Para should recognise true value to the economy

### Summary of representation changes to plan:

None specified but full text refers to £435m for national economy, £125m tax, of which £315m and £100m benefit local economy

### Response:

Following further discussions revised wording for the supporting text in paragraphs 10.71 and 10.72 has been agreed with the Goodwood Estate which includes reference to more up to date evidence on economic contribution

### Action:

See suggested council modifications CM348 to 351

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6288

Support

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**Document Element:** Goodwood Motor Circuit and Airfield, 10.71

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Support

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### Summary of representations:

Support in principle.

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change

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6289

Support

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**Document Element:** Goodwood Motor Circuit and Airfield, 10.71

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Policy A16 Goodwood Motor Circuit and Airfield

### Object

#### Summary of representations:

Want a site specific policy for the motor circuit to allow flexibility as well as control. Want more flexibility on what is covered as an existing permitted activity to reduce need to apply for temporary planning permissions  
Airfield policy should refer to safeguarding of runways and operations

#### Summary of representation changes to plan:

Policies affecting the Motor Circuit should provide flexibility in operation and development, whilst retaining an appropriate level of control to protect local residential and other amenities. Policy affecting Goodwood Airfield should be expanded to include reference to the safeguarding in all forms of runways and their operation, and support the changing role of General Aviation airfields and their future operations as required by Government, including provision for new technologies and STEM-related activities. Refer to development parameters set by 2015 safeguarding agreement and to the NPRs

#### Response:

The NPRs are referred to in the supporting text and in Policy A17 .

Revised wording for the supporting text and the policy has been agreed in discussion with the Goodwood Estate to pick up the flexibility issue and for clarity..

#### Action:

See council suggested modifications CM352 and CM353

4314

Object

**Document Element:** Policy A16 Goodwood Motor Circuit and Airfield

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

### Support

#### Summary of representations:

Welcome reference to heritage

#### Summary of representation changes to plan:

None

#### Response:

Comment noted

#### Action:

No change in response to representation

4736

Support

**Document Element:** Policy A16 Goodwood Motor Circuit and Airfield

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

### Summary of representations:

Location is adjacent to SWC

Also note that location is not on Policies map

### Summary of representation changes to plan:

Add:

Ensure that development avoids harm to protected species and existing important habitat features; facilitates the achievement of a minimum of 10% biodiversity net gain; and facilitates the creation of high levels of habitat connectivity within the site and to the wider green infrastructure network and identified strategic wildlife corridors. This includes the provision of appropriate buffers as necessary in relation to important habitats which are being retained and/or created.

### Response:

Location is on policies map.

The Local Plan contains the proposed policy NE5 Biodiversity and Biodiversity Net Gain, and is intended to be read in the round. Policy NE5 sets out the requirement for development proposals to deliver a minimum of 10% net gain in biodiversity

### Action:

No change in response to representation

## 5074

## Object

**Document Element:** Policy A16 Goodwood Motor Circuit and Airfield

**Respondent:** Sussex Wildlife Trust

## Object

### Summary of representations:

Concerned about noise and air pollution

### Summary of representation changes to plan:

None specified

### Response:

The policy is written to ensure any significant noise impacts are avoided. Air quality is covered by policy NE22

### Action:

No change in response to representation

## 5228

## Object

**Document Element:** Policy A16 Goodwood Motor Circuit and Airfield

**Respondent:** John Newman

## Support

### Summary of representations:

BUT – want measures to facilitate reliable journey times by bus and coach, esp from local stations, such as free bus and coach travel paid for from parking fees.

### Summary of representation changes to plan:

None specified

### Response:

Point 4 of the policy covers this without specifying how it should be achieved. A Travel Plan would be required in line with Policy T2 for any significant proposals

### Action:

No change in response to representation

5942

Support

**Document Element:** Policy A16 Goodwood Motor Circuit and Airfield

**Respondent:** GoVia Thameslink Railway

## Object

### Summary of representations:

Suggest referring to sig amounts of ancient woodland and non ancient woodland to the North of the area

### Summary of representation changes to plan:

Not specified but text suggest development in the area should protect, enhance and expand the woodland in the area as part of delivering net gain

### Response:

The Local Plan contains the proposed policy NE5 Biodiversity and Biodiversity Net Gain, and is intended to be read in the round. Policy NE5 sets out the requirement for development proposals to deliver a minimum of 10% net gain in biodiversity. Trees Woodlands and Hedgerows are also covered more specifically by Policy NE8 Trees, Hedgerows and Woodlands

### Action:

No change in response to representations

6006

Object

**Document Element:** Policy A16 Goodwood Motor Circuit and Airfield

**Respondent:** Forestry Commission



## Development within the vicinity of Goodwood Motor Circuit and Airfield, 10.75

Support

### Summary of representations:

reiterate that land should remain open

### Summary of representation changes to plan:

None

### Response:

Support noted

### Action:

No change in response to representation

4713

Support

**Document Element:** Development within the vicinity of Goodwood Motor Circuit and Airfield, 10.75

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Policy A17 Development within the vicinity of Goodwood Motor Circuit and Airfield

Object

### Summary of representations:

400m buffer is too simplistic

Land between S of airfield and river should remain open land

### Summary of representation changes to plan:

Need a more robust approach and to keep land that may be needed in case of aircraft emergency free of development

### Response:

It is clear that the buffer is just a starting point.

Additional wording has been agreed in discussion with the Goodwood estate to paragraphs 10.74 and 10.75 to improve clarity

Minor edits to A17 have been agreed in discussion with the Goodwood Estate.

### Action:

See council suggested modifications CM354 to 356

4316

Object

**Document Element:** Policy A17 Development within the vicinity of Goodwood Motor Circuit and Airfield

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

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**Summary of representations:**

to presumption against development in 400m buffer

**Summary of representation changes to plan:**

Suggest removing bullet point 2 and the end of the policy from "being mindful" onwards

**Response:**

As set out in paragraph 10.75 it is considered that the 400m buffer should be retained. This is not a fixed boundary as the policy sets out criteria for assessing development within this area

**Action:**

No change in response to representation

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4717

Object

---

**Document Element:** Policy A17 Development within the vicinity of Goodwood Motor Circuit and Airfield

**Respondent:** CEG and the Landowners (D C Heaver and Eurequity IC Limited)

**Agent:** CEG and the Landowners (D C Heaver and Eurequity IC Limited)

## Object

---

**Summary of representations:**

Land around the motor circuit and aerodrome needs to be kept open

**Summary of representation changes to plan:**

Amend map so that the policy boundary includes land used in conjunction with the airfield and circuit

**Response:**

The 400m buffer is measured from the boundary – consider the area defined is sufficient

**Action:**

No change in response to representation

---

4747

Object

---

**Document Element:** Policy A17 Development within the vicinity of Goodwood Motor Circuit and Airfield

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Object

### Summary of representations:

Land to the south of Madgwick Lane unreasonably excluded from suitability for housing due to NPRs because it was combined with a neighbouring site in the latest HELAA

OMISSION SITE - Land W of March C of E school ( part of HELAA site HWH0009a)

### Summary of representation changes to plan:

Correction to HELAA

### Response:

The concern relates to how the proposed site has been considered to in the HELAA rather than to this policy. Promotion of an alternative site is noted. The site can be considered separately in the next iteration of the HELAA

### Action:

No change to this policy in response to representation

5015

Object

**Document Element:** Policy A17 Development within the vicinity of Goodwood Motor Circuit and Airfield

**Respondent:** Pam Clingan

**Agent:** Eric Brandwood

## Object

### Summary of representations:

Location is adjacent to SWC

Also note that location is not on Policies map

### Summary of representation changes to plan:

Add:

Ensure that development avoids harm to protected species and existing important habitat features; facilitates the achievement of a minimum of 10% biodiversity net gain; and facilitates the creation of high levels of habitat connectivity within the site and to the wider green infrastructure network and identified strategic wildlife corridors. This includes the provision of appropriate buffers as necessary in relation to important habitats which are being retained and/or created.

### Response:

Location is on policies map.

This is not an allocation policy. Other policies offer protection to species and habitats and require biodiversity net gain including NE5 Biodiversity and Biodiversity Net Gain. NE4 protects the Strategic wildlife Corridors

### Action:

No change in response to representation

**5076****Object****Document Element:** Policy A17 Development within the vicinity of Goodwood Motor Circuit and Airfield**Respondent:** Sussex Wildlife Trust**Object****Summary of representations:**

to criterion 2

**Summary of representation changes to plan:**

Remove criterion 2

**Response:**

Comment noted – there is no soundness reason to remove criterion 2

**Action:**

No change in response to representation

**5340****Object****Document Element:** Policy A17 Development within the vicinity of Goodwood Motor Circuit and Airfield**Respondent:** CEG and the Landowners (D C Heaver and Eurequity IC Limited)**Agent:** CEG and the Landowners (D C Heaver and Eurequity IC Limited)**Object****Summary of representations:**

why ignore report recommendations

**Summary of representation changes to plan:**

None

**Response:**

Unclear what recommendations are being ignored. The policy sets criterion for acceptable development taking account of the Goodwood Noise Study

**Action:**

No change in response to representation

**5493****Object****Document Element:** Policy A17 Development within the vicinity of Goodwood Motor Circuit and Airfield**Respondent:** Mayday! Action Group

## Support

---

**Summary of representations:**

Support

**Summary of representation changes to plan:**

No change

**Response:**

Support noted

**Action:**

No change in response to this representation

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**5943****Support**

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**Document Element:** Policy A17 Development within the vicinity of Goodwood Motor Circuit and Airfield

**Respondent:** GoVia Thameslink Railway

## Object

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**Summary of representations:**

Policy could be improved by adding ref to ancient and non ancient woodland to the north

**Summary of representation changes to plan:**

Development should protect, enhance and expand woodland as part of delivering net gain

**Response:**

The Local Plan contains the proposed policy NE8 Trees, Woodlands and Hedgerows and is intended to be read in the round Policy NE8 requires the conservation and enhancement of existing trees and hedgerows

**Action:**

No change in response to representation

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**6007****Object**

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**Document Element:** Policy A17 Development within the vicinity of Goodwood Motor Circuit and Airfield

**Respondent:** Forestry Commission

## Object

### Summary of representations:

The changes proposed in this local plan review are welcomed in so far as they support the Estate's continued opposition to the development, but further changes are believed to be necessary in Chapter 10 to ensure policies safeguarding the airfield and circuit and local communities living around them are robust.

### Summary of representation changes to plan:

Wording to be more flexible - no specific wording suggested.

### Response:

Wording amendments were been agreed in discussion with Goodwood Estates

### Action:

See council suggested modification CM356

6283

Object

**Document Element:** Policy A17 Development within the vicinity of Goodwood Motor Circuit and Airfield

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

## Policy A18 Thorney Island

## Object

### Summary of representations:

Should be clear reference to development not hindering or impacting upon the Thorney Island Habitat Creation Scheme

### Summary of representation changes to plan:

Should be clear reference to development not hindering or impacting upon the Thorney Island Habitat Creation Scheme

### Response:

The Council acknowledges the importance of the habitat creation scheme and whilst there is already a requirement in the policy to support opportunities for habitat creation, the need to avoid impacting existing Habitat Creation Schemes has been inserted. A more detailed reference to the Environment Agency's Scheme now appears in the policy pre-text

### Action:

See suggested Council Modifications CM357 and CM358.

4921

Object

**Document Element:** Policy A18 Thorney Island

**Respondent:** Environment Agency

## Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

N/A

**Response:**

Support noted

**Action:**

No change

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4986

Support

**Document Element:** Policy A18 Thorney Island

**Respondent:** Chichester Harbour Conservancy

## Object

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**Summary of representations:**

Policy should acknowledge the potential for the area to deliver a habitat creation scheme. Reference should also be made to coastal policies

**Summary of representation changes to plan:**

No change

**Response:**

The policy and pre-text have been strengthened in relation to references to habitat creation schemes. With regard to reference to coastal policies, Paragraph 1.12 points out that the plan should be read as a 'whole' and policies will not be applied in isolation

**Action:**

No change

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5075

Object

**Document Element:** Policy A18 Thorney Island

**Respondent:** Sussex Wildlife Trust

## Object

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### Summary of representations:

Environmentally sensitive area identified for Managed Retreat; seawall and access unsuitable

### Summary of representation changes to plan:

No change

### Response:

The policy now has further reference to managed re-alignment in the pre-text. The characteristics of a proposed development site as well as access would be considered at the planning application stage

### Action:

No change

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5494

Object

---

**Document Element:** Policy A18 Thorney Island

**Respondent:** Mayday! Action Group

## Support

---

### Summary of representations:

Support

### Summary of representation changes to plan:

N/A

### Response:

Support noted

### Action:

No change

---

5944

Support

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**Document Element:** Policy A18 Thorney Island

**Respondent:** GoVia Thameslink Railway



## Policy A19 Land at Chichester Business Park, Tangmere

### Object

#### Summary of representations:

No information to support the suitability of this location for development in relation to impacts on biodiversity. No detail of requirements that would be sought if development proceeded in this location

#### Summary of representation changes to plan:

No change

#### Response:

Comments noted. Site under construction

#### Action:

No change to plan

5077

Object

**Document Element:** Policy A19 Land at Chichester Business Park, Tangmere

**Respondent:** Sussex Wildlife Trust

### Object

#### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Matter to be addressed].  
Concerned that proposed Class B8 floorspace provision could generate more 24/7 traffic than commercial warehouse.  
Trip rates should be submitted to National Highways for consideration and once agreed, fed into transport evidence base

#### Summary of representation changes to plan:

No change

#### Response:

Comments noted. Site under construction

#### Action:

No change to plan

5331

Object

**Document Element:** Policy A19 Land at Chichester Business Park, Tangmere

**Respondent:** National Highways

## Object

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### Summary of representations:

Development must be dependent on providing walking and cycling routes from policy A14, and must provide employee bus where needed from the most convenient railway stations.

### Summary of representation changes to plan:

No change

### Response:

Comments noted. Site under construction

### Action:

No change to plan

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## 5945

## Object

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**Document Element:** Policy A19 Land at Chichester Business Park, Tangmere

**Respondent:** GoVia Thameslink Railway

### Policy A20 Land South of Bognor Road

## Object

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### Summary of representations:

A20 site has constraints. Plan should allocate more, smaller sites. Promoting Land North of Drayton Waterside.

### Summary of representation changes to plan:

Allocate more, smaller sites.

### Response:

The Sustainability Appraisal sets out the alternative options which were considered. This plan focusses on strategic scale sites – if any smaller allocations are needed they will be allocated through neighbourhood plans and/or a site allocations DPD.

### Action:

No change in response to this representation.

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## 5013

## Object

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**Document Element:** Policy A20 Land South of Bognor Road

**Respondent:** Drayton Investments Limited

**Agent:** Drayton Investments Limited

## Object

### Summary of representations:

10.83 and bullet pt 7 – Chichester Gravel Pits is LWS.

### Summary of representation changes to plan:

Section 10.83: Chichester Gravel Pits and Leythorne Meadow is referenced as an SNCI. This needs to be amended to LWS (Local Wildlife Site).

Bullet point 7 in policy references Chichester Gravel Pits and Leythorne Meadow as a Local Nature Reserve - should also state that site is a Local Wildlife Site.

### Response:

Corrections will be made

### Action:

See council suggested modifications CM359 and CM362

5078

Object

**Document Element:** Policy A20 Land South of Bognor Road

**Respondent:** Sussex Wildlife Trust

## Object

### Summary of representations:

National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Seeking clarity]. Delivery is dependent on realignment of Vinnetrow Road and works to Bognor Rd roundabout.

### Summary of representation changes to plan:

None

### Response:

Discussions with National Highways are ongoing.

### Action:

No change in response to this representation.

5332

Object

**Document Element:** Policy A20 Land South of Bognor Road

**Respondent:** National Highways

**Summary of representations:**

Support but want more flexibility about the travelling showpeople's plots

**Summary of representation changes to plan:**

More flexibility to be written into policy: Provide up to 5 no. plots, with

- i) need to be determined at time of submission of planning application and
- ii) dependent on land required to satisfy biodiversity net gain and/or drainage requirements associated with commercial development;
- iii) More flexibility for amount of storage area associated with travelling showpeople plots.
- iv) Flexibility and requirement for an assessment in accordance with Policy H13 should be included in policy wording;
- v) A timescale for marketing of travelling showpeople plots following which it should revert to part of the commercial site.
- vi) Request more precise wording is included in criteria 10 and 11 so that expectations are clear.

**Response:**

With regard to point i) it is considered that the proposed amendment to only allow for 'up to' 5 plots would unduly weaken the policy requirement; the need for travelling showpeople plots is just as important as for employment land. However, an amendment is proposed to clarify that plots are only required to be provided if there remains an outstanding need for plots. This is necessary to ensure consistency with the other site allocation policies.

In terms of the relationship with biodiversity and drainage considerations as per point ii), it should not be automatically assumed that plots should be removed on the basis of the need to address those issues. All of the relevant land use needs should be considered equally.

With regard to the request for greater flexibility concerning storage areas as per points iii) and iv), it is reasonable to argue that the specification for 1 ha is overly prescriptive, as storage requirements often vary between different travelling showpeople sites. Consequently, the specific reference to 1 ha is proposed to be replaced with the word 'adequate'. That is considered to be a suitably flexible approach, and it is considered obviates the need for a reference to a specific assessment of this issue as per H13. However, the site promoter should be aware that storage areas are likely to be substantial and a suitable amount of space needs to be provided. Supporting text is proposed to be added in order to help clarify the position.

Turning to point v), in terms of the marketing period before the land reverts to another use, this is too detailed an issue to be fully covered in policy and will need to be established at the time of relevant planning applications via a legal agreement. vi) In 10 and 11 there is currently no more precise detail to include.

**Action:**

See council suggested modification CM361

5630

Support

**Document Element:** Policy A20 Land South of Bognor Road

**Respondent:** West Sussex County Council

**Agent:** Henry Adams LLP

## Object

### Summary of representations:

Active travel links to the rail station and residential areas of the city must be provided.

### Summary of representation changes to plan:

"Before first occupation, infrastructure must be provided to provide

- continuous, direct, safe, attractive, comfortable walking and cycle routes between this development, railway station, residential parts of the city
- The bridge over the A27 does not follow the desire line, people walking and cycling need to double back on themselves to gain height, therefore add a ramp following the desire line direct into this development.
- bus lanes reallocating road space between the railway station this development and along the A259 to Bognor Regis to improve bus reliability and journey times for connecting with trains and for journeys from Bognor Regis to facilitate increases of bus frequency and reduce car traffic.
- Subject to traffic flow analysis consider sharing the bus lanes with Larger Goods Vehicles on the A27 and A259 to ensure reliability of goods vehicles servicing this site, the remaining lanes for small vehicles could then be narrowed. Ensure design builds in bus priority at junctions, including roundabouts and where crossing the small vehicle lanes to gain access to the city residential areas and the railway station".

### Response:

Policies T1 and T2 require all development to include such enabling measures to avoid or reduce the need to travel by car. The other points are beyond the scope of what can be achieved within the local plan and are for West Sussex County Council as the highway authority.

### Action:

No change in response to representation.

5946

Object

**Document Element:** Policy A20 Land South of Bognor Road

**Respondent:** GoVia Thameslink Railway

Mixed

### Summary of representations:

Support but want more flexibility about the travelling showpeople's plots

**Summary of representation changes to plan:**

More flexibility to be written into policy: Provide up to 5 no. plots, with

- i) need to be determined at time of submission of planning application and
- ii) dependent on land required to satisfy biodiversity net gain and/or drainage requirements associated with commercial development;
- iii) More flexibility for amount of storage area associated with travelling showpeople plots.
- iv) Flexibility and requirement for an assessment in accordance with Policy H13 should be included in policy wording;
- v) A timescale for marketing of travelling showpeople plots following which it should revert to part of the commercial site.
- vi) Request more precise wording is included in criteria 10 and 11 so that expectations are clear.

**Response:**

With regard to point i) it is considered that the proposed amendment to only allow for 'up to' 5 plots would unduly weaken the policy requirement; the need for travelling showpeople plots is just as important as for employment land. However, an amendment is proposed to clarify that plots are only required to be provided if there remains an outstanding need for plots. This is necessary to ensure consistency with the other site allocation policies.

In terms of the relationship with biodiversity and drainage considerations as per point ii), it should not be automatically assumed that plots should be removed on the basis of the need to address those issues. All of the relevant land use needs should be considered equally.

With regard to the request for greater flexibility concerning storage areas as per points iii) and iv), it is reasonable to argue that the specification for 1 ha is overly prescriptive, as storage requirements often vary between different travelling showpeople sites. Consequently, the specific reference to 1 ha is proposed to be replaced with the word 'adequate'. That is considered to be a suitably flexible approach, and it is considered obviates the need for a reference to a specific assessment of this issue as per H13. However, the site promoter should be aware that storage areas are likely to be substantial and a suitable amount of space needs to be provided. Supporting text is proposed to be added in order to help clarify the position.

Turning to point v), in terms of the marketing period before the land reverts to another use, this is too detailed an issue to be fully covered in policy and will need to be established at the time of relevant planning applications via a legal agreement. vi) In 10 and 11 there is currently no more precise detail to include.

**Action:**

See council suggested modification CM361

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**6193**
**Object**

**Document Element:** Policy A20 Land South of Bognor Road

**Respondent:** West Sussex County Council

**Agent:** Henry Adams LLP

## Policy A21 Land east of Rolls Royce

Support

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**Summary of representations:**

Support

**Summary of representation changes to plan:**

None

**Response:**

Support noted

**Action:**

No change in response to representation

4219

Support

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**Document Element:** Policy A21 Land east of Rolls Royce

**Respondent:** The Goodwood Estates Company Limited

**Agent:** HMPC Ltd

Mixed

---

**Summary of representations:**

Should now be an allocation as there is more certainty around delivery timescales – within next 5 years

**Summary of representation changes to plan:**

Make this a full allocation

**Response:**

There is sufficient flexibility in proposed wording to consider an application.

**Action:**

No change in response to representation.

4691

Object

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**Document Element:** Policy A21 Land east of Rolls Royce

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates

## Object

### Summary of representations:

Site is functionally linked to SWC – clarify that biodiversity will be safeguarded

### Summary of representation changes to plan:

Additional bullet: Ensure that development avoids harm to protected species and existing important habitat features, facilitates the achievement of at least 10% biodiversity net gain: and facilitates the creation of high levels of habitat connectivity within the site and to the wider green infrastructure network and identified strategic wildlife corridors. This includes the provision of appropriate buffers as necessary in relation to important habitats which are being retained and/or created.

### Response:

This is a safeguarding policy rather than an allocation so does not have the same level of detail as full allocation policies. These requirements are covered by other policies (particularly NE4 Strategic Wildlife Corridors and NE5 Biodiversity and Biodiversity Net Gain) and do not need to be repeated.

### Action:

No change in response to representation.

5079

Object

**Document Element:** Policy A21 Land east of Rolls Royce

**Respondent:** Sussex Wildlife Trust

## Object

### Summary of representations:

Add/correct refs to minerals safeguarding

### Summary of representation changes to plan:

Add reference to minerals safeguarding and check refs are to “Minerals and Waste Safeguarding Guidance”.

### Response:

This is a safeguarding policy rather than an allocation so does not have the same level of detail as full allocation policies. The West Sussex Joint Minerals Plan forms part of the Development Plan so Policy M9 of that will be applicable in any case. .

### Action:

No change in response to representation..

5093

Object

**Document Element:** Policy A21 Land east of Rolls Royce

**Respondent:** West Sussex County Council



## Support

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Expect a fully funded Travel Plan]. Support requirement to minimise traffic generation – a fully funded travel plan would be required.

### Summary of representation changes to plan:

None

### Response:

Support noted. A Travel Plan is required under Policy T2

### Action:

No change in response to representation

## 5333

## Support

**Document Element:** Policy A21 Land east of Rolls Royce

**Respondent:** National Highways

## Support

### Summary of representations:

Support subject to continuous, direct, safe, attractive, comfortable walking and cycling routes to rail station and residential areas and Rolls Royce to share and expand staff bus scheme

### Summary of representation changes to plan:

None

### Response:

Policies T1 and T2 require all development to include enabling measures to avoid or reduce the need to travel by car.

### Action:

No change in response to representation.

## 5947

## Support

**Document Element:** Policy A21 Land east of Rolls Royce

**Respondent:** GoVia Thameslink Railway

## Support

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### Summary of representations:

Development should be sensitive to existing trees, hedgerows and woodland and provide additional planting where possible

### Summary of representation changes to plan:

None

### Response:

Policies T1 and T2 require all development to include enabling measures to avoid or reduce the need to travel by car.

### Action:

No change in response to representation.

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## 6008

## Support

---

**Document Element:** Policy A21 Land east of Rolls Royce

**Respondent:** Forestry Commission

## Mixed

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### Summary of representations:

Should now be an allocation as there is more certainty around delivery timescales – within next 5 years

### Summary of representation changes to plan:

Make this a full allocation

### Response:

There is sufficient flexibility in proposed wording to consider an application.

### Action:

No change in response to representation.

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## 6164

## Support

---

**Document Element:** Policy A21 Land east of Rolls Royce

**Respondent:** Rolls-Royce Motor Cars Limited

**Agent:** David Lock Associates

## Appendix C: Additional Guidance

### Object

#### Summary of representations:

No pre-requisite in NPPF to demonstrate previous uses were proven unviable prior to conversion of building in countryside to residential – NE10 should be omitted

#### Summary of representation changes to plan:

As such, to be in accordance with national policy, reference to Policy NE10 should be omitted from Appendix C

#### Response:

The criterion in Policy NE10 and its reference in the Appendix is carried forward from the adopted Local Plan and Regulation 18 Preferred Approach Local Plan. The Council maintains that reference to the countryside policy (which is as a result of its requirement that economic and community uses are considered before residential), reflects the aims of paragraph 84 in the NPPF "Supporting the rural economy

#### Action:

No change

5712

Object

**Document Element:** Appendix C: Additional Guidance

**Respondent:** Church Commissioners for England

**Agent:** Lichfields

## Appendix E: Housing trajectory

### Support

#### Summary of representations:

Securing allocation of new sites will help delivery of housing and relieve pressure from others where delays have occurred (Tangmere, West of Chichester).

#### Summary of representation changes to plan:

N/A

#### Response:

Support noted

#### Action:

No changes to be made

4784

Support

**Document Element:** Appendix E: Housing trajectory

**Respondent:** Wates Developments and Seaward Properties

**Agent:** Barton Willmore now Stantec

## Object

### Summary of representations:

Supply will change by examination and 5YLS will depend upon housing requirement found at examination. Trajectories for sites different to 5YHLS Position Statement - no evidence to explain why trajectories have been amended or new sites introduced. Contains sites which gained planning permission after base-date or have yet to gain planning permission.

### Summary of representation changes to plan:

Undertake 5YHLS prior to adoption to ensure it is up to date.

### Response:

Trajectory included at Reg 19 was based on up to date information at the time of consultation. Prior to submission the trajectory and 5YHLS will be updated to reflect the latest available data/evidence.

### Action:

See Council's suggested Modification CM378.

5784

Object

**Document Element:** Appendix E: Housing trajectory

**Respondent:** Beechcroft Developments Limited

**Agent:** Genesis Town Planning Ltd

## Appendix F: Monitoring framework

## Object

### Summary of representations:

Object: MF doesn't clearly indicate monitoring requirement for each policy. Propose monitoring indicator for planning apps delivering BNG in excess of 10%; change of responsible partner from SWT to Sussex Biodiversity Record Centre.

### Summary of representation changes to plan:

Propose an additional monitoring indicator of;

- Number of planning applications delivering a BNG in excess of 10%

### Response:

The framework layout reflects that many of the targets in the monitoring framework are applicable to several policies within each Chapter. However, an introduction has been inserted to the Monitoring Framework for clarity. The target for Policy NE5 Biodiversity and Biodiversity Net Gain policy is for all development proposals to provide a minimum of 10% net gain in biodiversity in order to be granted planning permission. The identification of the actual percentage of net gain achieved is not a target linked to the policy. The reference to Sussex Wildlife Trust will be changed to Sussex Biodiversity Record Centre.

### Action:

See suggested Council Modification CM381.

5274

Object

**Document Element:** Appendix F: Monitoring framework

**Respondent:** Sussex Wildlife Trust

## Object

### Summary of representations:

[National Highways letter dated 24/07/23 confirmed representation should be categorised as Comment - Agree 'in principle' reinforce need for monitoring processes/Seek further information]. Object: The monitoring should include how committed and completed schemes were funded, percentage of funding from developer contributions, government agencies and/or Council borrowing. It is critical how funding was gained can be tracked and recorded as part of updating the IDP.

### Summary of representation changes to plan:

n/a

### Response:

The IDP includes all information supplied to the Council and will be updated annually through the IBP process. The full breakdown regarding funding sources is unlikely to be known until the point of infrastructure delivery and even then, the Council may not be informed of the funding sources unless the Council is the infrastructure provider. The monitoring tool is the Infrastructure Funding Statement (IFS) which is produced annually and available on the Council's website. The Exacom Public Facing Module accessed on the Council's website provides an update each day in relation to what has been collected by the Council from S106 and CIL contributions.

### Action:

See suggested Council Modification CM385.

5334

Object

**Document Element:** Appendix F: Monitoring framework

**Respondent:** National Highways

## Object

### Summary of representations:

Object: No introduction to Framework – unclear layout; NE17 – should refer to joint mitigation strategy for water neutrality in WRZ. WRZ indicators insufficient.

### Summary of representation changes to plan:

Entire Monitoring Framework needs a complete rethink and redraft with a view to seriously monitoring the delivery of the Local Plan and genuinely working across administrative boundaries with neighbouring authorities and agencies.

### Response:

An introduction to the Monitoring Framework will be added. The framework layout reflects that many of the targets in the monitoring framework are applicable to several policies within each Chapter. The Sussex North Water Neutrality Mitigation Strategy will be added to the Delivery column for Chapter 4. The indicators for the Water Resource Zone are considered sufficient to measure the target of achieving water neutrality and will be part of the wider monitoring of the overall joint local planning authority mitigation strategy.

### Action:

See suggested Council Modifications CM379 and CM380.

5869

Object

**Document Element:** Appendix F: Monitoring framework

**Respondent:** Kirdford Parish Council

**Agent:** Troy Planning + Design

Object

**Summary of representations:**

RECEIVED LATE Object: This section requires a firm commitment to monitoring and reporting back, not just a paper one.

**Summary of representation changes to plan:**

N/A

**Response:**

The monitoring, to assess whether the policies of the new local plan are achieving the objectives and intended policy outcomes, will continue to be reported annually within the council's Authorities Monitoring Report which is published on the council's website.

**Action:**

No change to plan.

6506

Object

**Document Element:** Appendix F: Monitoring framework

**Respondent:** CPRE Sussex

**Agent:** CPRE Sussex