

Chichester Local Plan Examination – Hearing Statement

Matter 6: Area Policies and Allocations

Questions 180 – 268

Document reference:
CDC14/Matter 6

September 2024

Matter 6: Area Policies and Allocations

This hearing statement has been produced as part of the examination of the Chichester Local Plan. It answers the Inspectors' questions 180 - 268, relating to **Matter 6: Area Policies and Allocations**.

Any queries about the report should be sent to the Programme Officer:

Address: Kerry Trueman
Programme Officer Solutions Ltd.
Pendragon House
1 Bertram Drive
Meols
Wirral CH47 0LG

Telephone: 07582 310364

Email: programmeofficer@chichester.gov.uk

Matter 6: Area Policies and Allocations

Issue: Are the proposed policies and allocations justified, effective and consistent with national policy?

Policy A1 Chichester City Development Principles

Q.180 Policy A1 includes that the Council may prepare a supplementary planning document(s) or development plan document(s) which will set out a coordinated planning framework covering Chichester City Centre and other areas of change in the City.

What is the purpose of this policy element? Is Policy A1 positively prepared and would it be effective in this regard?

- 1.1 This element of the policy gives the council the flexibility to decide whether future 'daughter' documents, or planning guidance, should be prepared to cover the city centre. These documents may include a masterplan (like that which was prepared for Southern Gateway), or a design code. If a neighbourhood plan for Chichester is prepared, then these documents may not be required, however this policy enables the ability for the council to do so in the absence of a neighbourhood plan.
- 1.2 The policy is positively prepared and would be effective as it allows flexibility for a neighbourhood plan for the area to come forward, as well as ensuring the council have the ability to plan positively for development in the city centre.

Policy A2 Chichester City – Strategic Housing Allocation

Q.181 What is the justification for the site capacity of a minimum of 270 dwellings?

- 1.3 It should be noted that the application of Policy A2 Chichester City through the neighbourhood plan could result in the allocation of multiple sites rather than a single site. Therefore, references in the questions to a singular site have been answered on this basis.
- 1.4 The supporting evidence that led to the proposed housing number in Policy A2 is summarised in the Housing Distribution Background Paper (July 2024, BP05) paras 3.6 – 3.11. The BP sets out the consultations on the Plan and how the distribution of housing evolved as a result. It then details (paras 4.23 – 4.38) the justification for the changes made between the Preferred Approach (Reg. 18) Plan and the Proposed Submission Local Plan (Reg. 19).
- 1.5 The Sustainability Appraisal (Appendix V: Parish Scenarios pages 88 – 89) provides an assessment of the suitability of the HELAA sites within Chichester parish, which has informed the number selected for Chichester parish. This showed a conflict between a number of the greenfield HELAA sites to the west of Chichester (beyond A6 Land West of Chichester) and the proposed Strategic Wildlife Corridor. This

impacts on HCC038 (land north of New Bridge Farm), HCC039 (Salthill Park) and HCC057 (North of Brandy Hole Lane). The number is therefore based on the remaining available HELAA sites which have the potential to meet the strategic parish housing number of 270 dwellings, although it should be noted that the site allocation process would be through either the neighbourhood plan or future Site Allocation DPD, and there may be other opportunities available at that time, given the urban nature of the majority of the City area.

Q.182 Is there clear evidence that the site is neither deliverable or developable in terms of the NPPF?

1.6 This policy does not allocate a particular site or sites, as it is intended that the housing requirement is met through the neighbourhood planning process, or through a Site Allocations DPD. For both documents, a site assessment process would need to be undertaken to establish the most suitable, available, achievable and deliverable site(s).

Q.183 Are the development requirements as set out in the Policy justified, and will they be effective in achieving sustainable development on the site?

1.7 The development requirements are justified and will be effective in achieving sustainable development on this site. The housing requirement (and any allocation of specialised accommodation) are and will be justified by the level of need, as summarised in the council's responses on Matter 4C, and as referred to in criterion 2, through a local assessment of need.

1.8 Other requirements in the policy are to ensure that the site is environmentally sustainable and provides a high-quality natural environment and meets biodiversity and green infrastructure aims, and addresses site specific water issues (drainage, wastewater disposal, water quality). Requirements in relation to minerals safeguarding are to ensure compliance with the adopted West Sussex Joint Minerals Local Plan and Minerals and Waste Safeguarding Guidance.

1.9 Social sustainability is to be achieved through the provision of homes and well-designed places. The requirements to provide community and infrastructure in accordance with the latest Infrastructure Delivery Plan (IDP) and to provide sustainable travel modes and cycle and pedestrian improvements also contribute to social sustainability.

Q.184 Is Policy A2 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals when it requires development to accord with various documents which are not part of the development plan?

1.10 The National Design Guide forms part of the Government's collection of planning practice guidance and is aimed at creating high quality buildings and places, which is the intent of the policy clause. Following consideration of the question, the council

has suggested an additional modification (see Council's suggested modification schedule, Version 2, CDC15.01, ref CAM424). This removes the reference to the National Design Guide and any other design guidance from the policy, as any adopted or approved design guidance and the National Design Guide would be considered through the development management process. The modification also applies to Policies A3, A4, A5, A8, A10, A11, A12 and A15.

Additional modification CAM424:

Amend criterion 1 to read as follows:

~~"To be masterplanned and designed to provide for a high quality form of development; in accordance with the National Design Guide and any design code or guidance adopted or approved which is relevant to the site;"~~

Q.185 Is criterion 2 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

1.11 Criterion 2 is written to allow for any local evidence of need for specialist housing identified through the process of producing the neighbourhood plan to be considered. As this criterion is to inform the production of the neighbourhood plan, rather than to be interpreted directly by a decision maker for a specific planning application, it is considered to be clearly written for that purpose.

1.12 However, following consideration of the question, the council has suggested an additional modification to make the policy clearer (see Council's suggested modification schedule, Version 2, CDC15.01, ref CAM425 – also applies to Policies A12 and A15):

Additional modification

~~Subject to local evidence of need, p~~**Provide appropriate specialist housing needs (such as for older people or self/custom build) either in accordance with local evidence of need needs already established or those identified as part of the process of producing a Neighbourhood Plan.**

Q.186 Are the suggested MMs necessary for soundness?

1.13 Yes, CM267,CM268,CM269 and CM270 are necessary for consistency and in response to representations from West Sussex County Council (Rep 5090) and the Sussex Wildlife Trust (Rep 5060).

Policy A3 Southern Gateway Development Principles

Q.187 Is Policy A3 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals when it requires development to accord with the National Design Guide which is not part of the development plan?

1.14 See response to Q184 above.

Q.188 Are the suggested MMs necessary for soundness?

1.15 Yes, CM271 and 272 are main modifications for consistency and to clarify the transport hub approach of the WSCC Bus Service Improvement Plan.

1.16 No, CM273 is a clarification to strengthen the wording and responds to Rep 5594 from Stagecoach South. CM274 is proposed to address WSCC concerns and for consistency between policies. These are minor modifications.

Policy A4 Southern Gateway – Bus Station, Bus Depot and Basin Road Car Park

Q.189 What is the justification for the site capacity of a minimum of 110 dwellings?

1.17 As this is a central, highly accessible, brownfield site a higher density than is typical across the plan area is appropriate. Such an approach is consistent with national policy and the design led approach to density set out in Policy P3 of this plan.

1.18 Para 6.8 of the Housing Density Evidence Study 2024 (PH01.01) notes that a high average net density of 96dph has been achieved for recently approved developments within 400m of the Plan Area's stations, 110 dwellings on 1.2ha represents a similar density of 92dph. The figure has also been informed by ongoing discussions with the council's Directorate of Growth and Place as landowner for this site.

Q.190 Is there clear evidence that the site is neither deliverable or developable in terms of the NPPF?

1.19 The council has undertaken regular, on-going communication with the council's Directorate of Growth and Place as landowner, regarding the suitability, availability, achievability and deliverability and also viability of the site. This has been used to alongside other evidence to inform the timescale set out in the updated trajectory with the site identified as developable, estimated to start delivery in years 11 – 15 of the plan period following adoption. The council's response to Matter 4C Q68 provides clarity on the council's housing supply. The evidence supporting the status of this site is set out in the Five Year Housing Land Supply Paper (PS/CD08).

Q.191 Are the site-specific development requirements as set out in the Policy justified, and will they be effective in achieving sustainable development on the site?

1.20 The site specific requirements are justified and will be effective in achieving sustainable development on this site. The housing and specialist accommodation

requirements in the policy are justified by the level of need, as summarised council's responses on Matter 4C, with other active uses at the ground floor due to the site's central location.

1.21 Other requirements in the policy are to ensure that the site is environmentally sustainable and provides a high quality natural environment and meets biodiversity and green infrastructure aims, and addresses site specific water issues (drainage, wastewater disposal, water quality). Requirements in relation to minerals safeguarding are to ensure compliance with the adopted West Sussex Joint Minerals Local Plan and Minerals and Waste Safeguarding Guidance. The Council's suggested modifications schedule (SD10.01) suggests some rewording of these requirements to ensure consistency between policies (CM 279). Archaeological assessment and noise mitigation is needed due to the central location of this site. There are additional site specific requirements in relation to providing bus stops and layover facilities, and improving connections between the site, the railway station and the city centre and cycle routes to deliver an integrated transport hub in line with the West Sussex Bus Service Improvement Plan.

1.22 Social sustainability is to be achieved through the provision of homes and well-designed places. The requirements to provide community and infrastructure in accordance with the latest Infrastructure Delivery Plan (IDP) and to provide sustainable travel modes and cycle and pedestrian improvements also contribute to social sustainability.

Q.192 Policy A4 involves the redevelopment of the existing bus station and depot, and car park. Would Policy A4 be effective in promoting walking, cycling and public transport use?

1.23 Point 3 of the policy sets out that the scheme will help to deliver the West Sussex Bus Service Improvement Plan as well as enhancing connections to the railway station and city centre for those walking, cycling or using public transport. The bus station will be replaced by a transport hub with railway station, bus stops, toilets, electric vehicle charging points (EVCP), bike racks, café and car parking in close proximity. The Council's suggested modifications schedule (SD10.01) proposes additional wording in paragraph 10.13 to clarify this (CM271)

Q.193 Is Policy A4 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals when it requires development to accord with the National Design Guide which is not part of the development plan?

1.24 See response to Q184.

Q.194 Are the suggested MMs necessary for soundness?

1.25 Yes, modification CM275 is made for consistency with other policies.

- 1.26 Yes, the modifications CM277 and CM279 are necessary for soundness. Modification ref C277 is necessary as a technical clarification in response to a representation from Southern Water (Rep ID 4469). CM279 is needed for clarity and consistency with other policies in response to concerns from West Sussex County Council.
- 1.27 CM276 is a minor modification to reflect a change to the National Cycle Route number. CM278 is a minor modification to improve clarity.

Policy A5 Southern Gateway – Police Field, Kingsham Road

Q.195 What is the justification for the site capacity of a minimum of 70 dwellings?

- 1.28 The capacity estimate is based on discussions with the site promoter as well as density assumptions. 70 dwellings represents a density of 48dph which is reasonable for a highly accessible location in an urban area. Para 6.8 of the Housing Density Evidence Study (PH01.01) notes that recently approved developments have typical net densities of 96dpa within 400m of a rail station and 51 within 800m. The overall site density is broadly in line with this.

Q.196 Is there clear evidence that the site is neither deliverable or developable in terms of the NPPF?

- 1.29 The council has undertaken regular, on-going communication with the site promoter, regarding the suitability, availability, achievability and deliverability and also viability of the site. This has been used to alongside other evidence to inform the timescale set out in the updated trajectory with the site identified as developable, estimated to start delivery in years 6-10 of the plan period following adoption. The council's response to Matter 4C Q68 provides clarity on the council's housing supply. The evidence supporting the status of this site is set out in the Five Year Housing Land Supply Paper (PS/CD08).

Q.197 Are the site-specific development requirements as set out in the Policy justified, and will they be effective in achieving sustainable development on the site?

- 1.30 The site specific requirements are justified and will be effective in achieving sustainable development on this site. The housing requirements are justified by the level of need, as summarised council's responses on Matter 4C.
- 1.31 Open space requirements, including the need for reprovision of the former playing field, are in accordance with Policy P15 of the Plan (as modified by CM225), which is informed by the latest Open Space, Sport Facilities, Recreation Study and Playing Pitch Strategy (May 2024, PH02).
- 1.32 Other requirements in the policy are to ensure that the site is environmentally sustainable and provides a high quality natural environment and meets biodiversity

and green infrastructure aims, and addresses site specific water issues (drainage, wastewater disposal, water quality, flood risk). Requirements in relation to minerals safeguarding are to ensure compliance with the adopted West Sussex Joint Minerals Local Plan and Minerals and Waste Safeguarding Guidance.

1.33 Social sustainability is to be achieved through the provision of homes and well-designed places. The requirements to provide community and infrastructure in accordance with the latest Infrastructure Delivery Plan (IDP) and to provide sustainable travel modes and cycle and pedestrian improvements also contribute to social sustainability.

Q.198 What is the evidence that the proposed allocation meets the requirements of the sequential and exceptions tests?

1.34 The Sequential Test (April 2024, CC.04) has been carried out by the council, (informed by the Level 1 and Level 2 SFRA (CC06 and CC07 plus appendices)) and demonstrates that the site meets the requirements of the sequential and exceptions tests. The site is sustainably located, close to Chichester city centre and key public transport hubs and is important in supporting wider regeneration objectives of the Southern Gateway area. Paragraph 5.3 of CC.04 notes that there are no reasonably available alternative sites for allocation in this plan within Chichester City, where smaller sites will be allocated through a neighbourhood plan.

Q.199 Is Policy A5 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals when it requires development to accord with the National Design Guide which is not part of the development plan?

1.35 See response to Q184.

Q.200 Are the suggested MMs necessary for soundness?

1.36 Yes, modification CM280 is made for consistency with other policies and is needed for soundness.

1.37 Yes, the modifications CM282, and 284 are necessary for soundness. CM284 is needed for clarity and consistency with other policies in response to concerns from West Sussex County Council.

1.38 CM281 is a minor modification to reflect a change to the National Cycle Route number. CM283 is a minor modification to add reference to the Infrastructure Business Plan.

Policy A6 Land West of Chichester

Q.201 What is the justification for the specific development requirements at the proposed allocation?

- 1.39 The site specific requirements are justified and will be effective in achieving sustainable development on this site. The housing requirements in the policy are justified by the level of need, as summarised in the council's responses on Matter 4C. The employment requirements in the policy are justified by the level of need, as summarised in the council's responses on Matter 4B.
- 1.40 The requirements for the education provision is on the basis of consultation with West Sussex County Council as the education provider, who have calculated the need for the education provision to serve the pupil numbers generated by the development.
- 1.41 Open space and play provision requirements are in accordance with Policy P15 of the Plan (as modified by CM222), which is informed by the latest Open Space, Sport Facilities, Recreation Study and Playing Pitch Strategy (May 2024, PH02).
- 1.42 Other requirements in the policy are to ensure that the site is environmentally sustainable and provides a high quality natural environment and meets biodiversity and green infrastructure aims, and addresses site specific water issues (drainage, wastewater disposal, water quality). Requirements in relation to minerals safeguarding are to ensure compliance with the adopted West Sussex Minerals Plan and associated guidance (see modification CM298).
- 1.43 Social sustainability is to be achieved through the provision of homes and well-designed places. The requirements to provide community and infrastructure in accordance with the latest Infrastructure Delivery Plan (IDP) and to provide sustainable travel modes and cycle and pedestrian improvements also contribute to social sustainability.

Q.202 Is there clear evidence that the site is neither deliverable or developable in terms of the NPPF?

1.44 Phase 1 has already obtained planning permission as set out at paragraph 10.19 of the Plan (SD01, page 221) and the second phase was granted outline planning permission at the end of July 2024. Construction has already begun with a large number of dwellings completed. Delivery of the second phase is planned for between years 1-10 of the plan period. The evidence supporting the status of this site is set out in the Five Year Housing Land Supply Paper (PS/CD08).

Q.203 Are the site-specific development requirements as set out in the Policy justified, and will they be effective in achieving sustainable development on the site?

1.45 See response to Q201 above.

Q.204 Are the suggested MMs necessary for soundness?

1.46 Modifications CM285, CM286, CM288, CM289, CM290, CM291, CM293, CM294, CM296 and CM297 are necessary for soundness. Modifications CM285 and CM286 are necessary as they clarify the policy in relation to the education provision and relate to representations made by West Sussex County Council and Miller Homes & Vistry Group.

1.47 Modifications CM287, CM292, CM295 and CM298 are minor modifications to correct errors/make factual amendments.

Policy A7 Land at Shopwyke (Oving Parish)

Q.205 What is the justification for the specific development requirements at the proposed allocation?

1.48 The site specific requirements are justified and will be effective in achieving sustainable development on this site. The housing requirements in the policy are justified by the level of need, as summarised council's responses on Matter 4C. The employment requirements in the policy are justified by the level of need, as summarised in the council's responses on Matter 4B.

1.49 Open space and play provision requirements are in accordance with Policy P15 of the Plan (as modified by CM222), which is informed by the latest Open Space, Sport Facilities, Recreation Study and Playing Pitch Strategy (May 2024, PH02).

1.50 Other requirements in the policy are to ensure that the site is environmentally sustainable and provides a high quality natural environment and meets biodiversity and green infrastructure aims, and addresses site specific water issues (drainage and wastewater disposal). Requirements in relation to minerals and waste safeguarding are to ensure compliance with the adopted West Sussex Joint Minerals Local Plan, Waste Local Plan and associated guidance (see modification CM299).

1.51 Social sustainability is to be achieved through the provision of homes and well-designed places. The requirements to provide community and infrastructure in accordance with the latest Infrastructure Delivery Plan (IDP) and to provide sustainable travel modes and cycle and pedestrian improvements also contribute to social sustainability.

Q.206 Is there clear evidence that the site is neither deliverable or developable in terms of the NPPF?

1.52 Planning permission has been granted for the full strategic allocation as detailed at paragraph 10.25 of the Chichester Local Plan 2021-2039 Proposed Submission (SD01, page 225). Most of the allocation has either been built or is currently under construction.

Q.207 Are the site-specific development requirements as set out in the Policy justified, and will they be effective in achieving sustainable development on the site?

1.53 Yes, see response to Q.205 above.

Q.208 Are the suggested MMs necessary for soundness?

1.54 Yes, the modifications CM299 and CM300 are necessary for soundness because they provide clarification on the issue of minerals and waste and respond to the representation made by West Sussex County Council.

Policy A8 Land East of Chichester

Q.209 What is the justification for the specific development requirements at the proposed allocation?

1.55 The site-specific requirements are justified and will be effective in achieving sustainable development on this site. The housing and specialist accommodation requirements (self/custom build plots, accommodation for older persons, and gypsy and traveller pitches) in the policy are justified by the level of need, as summarised in the council's responses on Matter 4C.

1.56 The requirement for the two-form entry primary school is on the basis of consultation with WSCC as the education provider, who have calculated the need for a new school to serve the pupil numbers generated by the development.

1.57 Open space and play provision requirements are in accordance with Policy P15 of the Plan (as modified by CM222), which is informed by the latest Open Space, Sport Facilities, Recreation Study and Playing Pitch Strategy (May 2024, PH02).

1.58 Other requirements in the policy are to ensure that the site is environmentally sustainable and provides a high-quality natural environment and meets biodiversity and green infrastructure aims, and addresses site specific water issues (drainage and wastewater disposal). Requirements in relation to minerals and waste safeguarding are to ensure compliance with the adopted West Sussex Joint Minerals Local Plan and Minerals and Waste Safeguarding Guidance, and the West Sussex Waste Plan.

1.59 Social sustainability is to be achieved through the provision of homes and well-designed places. The requirements to provide community infrastructure in accordance with the latest Infrastructure Delivery Plan (IDP) and to provide sustainable travel modes and cycle and pedestrian improvements also contribute to social sustainability.

Q.210 Is there clear evidence that the site is neither deliverable or developable in terms of the NPPF?

1.60 The council has undertaken regular, on-going communication with the site promoter/s/ developers regarding the suitability, availability, achievability, and deliverability and also viability of the site. This has been used to alongside other evidence to inform the timescale set out in the updated trajectory with the site identified as deliverable in the first 5 years. The council's response to Matter 4C Q68 provides clarity on the council's housing supply. The evidence supporting the status of this site is set out in the Five Year Housing Land Supply Paper (PS/CD08).

Q.211 Are the site-specific development requirements as set out in the Policy justified, and will they be effective in achieving sustainable development on the site?

1.61 See response to question 209 above.

Q.212 With particular regard to biodiversity and protected species, what is the justification for the proposed site boundary?

1.62 The proposed site boundary takes account of the adjacent proposed Westhampnett to Pagham Strategic Wildlife Corridor, with its associated high-quality habitat and protected species, which is to be protected under proposed Policy NE4, with the justification set out in the Strategic Wildlife Corridors Background Paper (BP09). The proposed boundary reflects the need to balance the requirement to deliver new housing development in a sustainable location alongside the requirement to protect biodiversity and the environment.

Q.213 Is Policy A8 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals when it requires development to accord with the National Design Guide which is not part of the development plan?

1.63 See response to Q184.

Q.214 Are the suggested MMs necessary for soundness?

1.64 Yes CM301,CM303,CM305,CM306, CM307, CM308, CM309 are clarifications and updates which are required for soundness.

1.65 No CM3020 is not needed for soundness.

Policy A9 Land at Westhampnett/North East Chichester

Q.215 What is the justification for the specific development requirements at the proposed allocation?

1.66 The site specific requirements are justified and will be effective in achieving sustainable development on this site. The housing requirements in the policy are justified by the level of need, as summarised Council's responses on Matter 4C.

1.67 Open space and play provision requirements are in accordance with Policy P15 of the Plan (as modified by CM222), which is informed by the latest Open Space, Sport Facilities, Recreation Study and Playing Pitch Strategy (May 2024, PH02).

1.68 Other requirements in the policy are to ensure that the site is environmentally sustainable and provides a high quality natural environment and meets green infrastructure aims, and addresses site specific water issues (drainage and wastewater disposal). Requirements in relation to minerals safeguarding are to ensure compliance with the adopted West Sussex Minerals Plan and associated guidance (see modification CM311).

1.69 Social sustainability is to be achieved through the provision of homes and well-designed places. The requirements to provide community and infrastructure in accordance with the latest Infrastructure Delivery Plan (IDP) and to provide sustainable travel modes and cycle and pedestrian improvements also contribute to social sustainability.

Q.216 Is there clear evidence that the site is neither deliverable or developable in terms of the NPPF?

1.70 Planning permission has been granted for the full strategic allocation as detailed at paragraphs 10.37 and 10.38 of the Chichester Local Plan 2021-2039 Proposed Submission (Document SD01, page 235). Most of the allocation has either been built or is currently under construction.

Q.217 Are the site-specific development requirements as set out in the Policy justified, and will they be effective in achieving sustainable development on the site?

1.71 Yes, see response to Q.215 above.

Q.218 Are the suggested MMs necessary for soundness?

1.72 No, modifications CM310 and CM311 are minor modifications to correct an error and provide consistency of wording in relation to minerals safeguarding.

Policy A10 Land at Maudlin Farm

Q.219 What is the justification for the specific development requirements at the proposed allocation?

1.73 The site specific requirements are justified and will be effective in achieving sustainable development on this site. The housing and specialist accommodation requirements (self/custom build plots, accommodation for older persons, gypsy and traveller pitches) in the policy are justified by the level of need, as summarised council's responses on Matter 4C.

1.74 Open space and play provision requirements are in accordance with Policy P15 of the Plan (as modified by CM225), which is informed by the latest Open Space, Sport Facilities, Recreation Study and Playing Pitch Strategy (May 2024, PH02).

1.75 Other requirements in the policy are to ensure that the site is environmentally sustainable and provides a high quality natural environment and meets biodiversity and green infrastructure aims, and addresses site specific water issues (drainage, wastewater disposal, water quality). Noise mitigation requirements are necessary due to the site's proximity to both the A27 and the Goodwood Motor Circuit. Requirements in relation to minerals safeguarding are to ensure compliance with the adopted West Sussex Joint Minerals Local Plan and Minerals and Waste Safeguarding Guidance.

1.76 Social sustainability is to be achieved through the provision of homes and well-designed places. The requirements to provide community and infrastructure in accordance with the latest Infrastructure Delivery Plan (IDP) and to provide sustainable travel modes and cycle and pedestrian improvements also contribute to social sustainability.

Q.220 Is there clear evidence that the site is neither deliverable or developable in terms of the NPPF?

1.77 The council has undertaken regular, on-going communication with the site promoter, regarding the suitability, availability, achievability and deliverability and also viability of the site. This has been used to alongside other evidence to inform the timescale set out in the updated trajectory with the site identified as deliverable in the first 5 years. The council's response to Matter 4C Q68 provides clarity on the council's housing supply. The evidence supporting the status of this site is set out in the Five Year Housing Land Supply Paper (PS/CD08).

1.78 Latest information from the site promoter (September 2024) suggests that a planning application could be submitted later this year, with construction commencing in 2027/8. Hearing statements from the site promoter will provide more detail about the work that has been done to date.

Q.221 Are the site-specific development requirements as set out in the Policy justified, and will they be effective in achieving sustainable development on the site?

1.79 See response to question 219.

Q.222 Is Policy A10 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals when it requires development to accord with the National Design Guide which is not part of the development plan?

1.80 See response to Q184.

Q.223 What is the evidence that the proposed allocation meets the requirements of the sequential and exceptions tests?

1.81 The Sequential Test (April 2024, CC04) has been carried out by the council, (informed by the Level 1 and Level 2 SFRA (CC06 and CC07 plus appendices)) and demonstrates that the site meets the requirements of the sequential and exceptions tests. The location is considered to be sustainable, with good access to employment, a primary school and into Chichester, with fewer concerns about A27 junction capacity, nutrient neutrality and wastewater treatment than sites further west. Flood risk here is related to groundwater and surface water, which affects a small area of the site, and measures can be implemented to address this – as set out in the SFRA Level 2.

Q.224 Are the suggested MMs necessary for soundness?

1.82 No CM312 is not needed for soundness as it is a minor correction.

1.83 CM313 and CM314 are main modifications needed for consistency with other policies. CM315 is a main modification needed to update the custom and self build requirement. CM316 is necessary to clarify that transport improvements are not all highway improvements – this responds to representation 5600 from Stagecoach South. CM317 is a clarification and 318 and 20 are main modifications needed for consistency with other policies.

1.84 CM319 is a minor modification to add reference to the Infrastructure Business Plan.

Policy A11 Highgrove Farm, Bosham

Q.225 What is the justification for the specific development requirements at the proposed allocation?

1.85 The site-specific requirements are justified and will be effective in achieving sustainable development on this site. This site has full permission (ref 21/00571/FUL) and is therefore considered to be sustainable development on the site.

1.86 Should the permission lapse or be unimplemented, then the housing and specialist accommodation requirements (self/custom build, specialist accommodation for older persons and gypsy and traveller pitches) in the policy are justified by the level of need, as summarised in the council's responses on Matter 4C.

1.87 Open space and play provision requirements within the policy are in accordance with Policy P15 of the Plan (as modified by CM222), which is informed by the latest Open Space, Sport Facilities, Recreation Study and Playing Pitch Strategy (May 2024, PH02), although it should be noted that open space provision set out within the full permission will depart from those specified in modification CM222.

1.88 Other requirements in the policy are to ensure that the site is environmentally sustainable and provides a high quality natural environment and meets biodiversity and green infrastructure aims, and addresses site specific water issues (drainage, wastewater disposal, water quality).

1.89 Social sustainability is to be achieved through the provision of homes and well-designed places. The requirements to provide community and infrastructure in accordance with the latest Infrastructure Delivery Plan (IDP) and to provide sustainable travel modes and cycle and pedestrian improvements also contribute to social sustainability.

Q.226 Is there clear evidence that the site is neither deliverable or developable in terms of the NPPF?

1.90 Planning permission has been granted for the full strategic allocation as detailed at paragraph 3.21 of the Housing Supply Background Paper (BP07). Delivery of the site is planned for between years 1-10 of the plan period. The council's response to Matter 4C Q68 provides clarity on the council's housing supply. The evidence supporting the status of this site is set out in the Five Year Housing Land Supply Paper (PS/CD08).

Q.227 Are the site-specific development requirements as set out in the Policy justified, and will they be effective in achieving sustainable development on the site?

1.91 See response to question 225 above.

Q.228 Is Policy A11 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals when it requires development to accord with the National Design Guide which is not part of the development plan?

1.92 See response to Q184.

Q.229 What is the evidence that the proposed allocation meets the requirements of the sequential and exceptions tests?

1.93 The Sequential Test (April, 2024, CC04) has been carried out by the council, (informed by the Level 1 and Level 2 SFRA (CC06 and CC07 plus appendices)) and demonstrates that the site meets the requirements of the sequential and exceptions tests. The site is located within Flood Zone 1 and has a 0% risk of being affected by flood risk in any form. Flood risk is also considered through the development management process, and this site would not receive planning permission should there be flood risk concerns.

Q.230 Would Policy A11 be effective in conserving the landscape and scenic beauty of the Chichester Harbour National Landscape (AONB)?

1.94 The policy (criterion 3) requires that key views, particularly of the wider landscape and the South Downs National Park are identified (through masterplanning process, Landscape and Visual Impact Appraisal or the council's Landscape Capacity Study) and protected, and that views are considered as part of the design and layout of the proposed development. This process would ensure that the policy is effective in conserving the landscape and scenic beauty of the Chichester Harbour National Landscape.

Q.231 Are the suggested MMs necessary for soundness?

1.95 Yes modifications CM321, CM322 and CM323 are required for consistency or to update figures and are main modifications necessary for soundness.

1.96 CM324 is a minor modification not necessary for soundness.

Policy A12 Chidham and Hambrook

Q.232 What is the justification for the proposed housing capacity?

1.97 The supporting evidence that led to the proposed housing number in Policy A12 is summarised in the Housing Distribution Background Paper (July 2024, BP05) paras 3.6 – 3.11. The BP sets out the consultations on the Plan and how the distribution of housing evolved as a result. It then details (paras 4.23 – 4.38) the justification for the changes made between the Preferred Approach (Reg. 18) Plan and the Proposed Submission Local Plan (Reg. 19). Para. 4.37 refers to the Chidham and Hambrook parish number and Policy A12, including how the figure has been exceeded by the number of units consented in that parish via speculative applications. Para 5.1 of the BP explains that there were 374 dwelling within the housing land supply (at the time of writing the BP) which exceeds the 300 allocated to the parish in the Plan.

Q.233 Is there clear evidence that the site would not be developable in terms of the NPPF?

1.98 This policy does not allocate a particular site or sites, as it is intended that the housing requirement is met through the neighbourhood planning process, or through a Site Allocations DPD. For both documents, a site assessment process would need to be undertaken to establish the most suitable, available, achievable and deliverable site(s).

Q.234 Would the requirements to be addressed in the allocation of the site as set out in the Policy be effective in achieving sustainable development on the site?

1.99 The requirements set out in the policy are justified and will be effective in achieving sustainable development on any sites that are allocated through the neighbourhood plan.

1.100 The housing requirements in the policy are justified by the level of need, as summarised council's responses on Matter 4C. The policy also allows for any local evidence of need identified through the process of producing the neighbourhood plan to be considered, particularly in relation to specialist housing.

1.101 Other requirements in the policy are to ensure that any site allocations are environmentally sustainable and provide a high-quality natural environment and meet biodiversity and green infrastructure aims, and addresses specific water issues (drainage, wastewater disposal, water quality).

1.102 Social sustainability is to be achieved through the provision of homes and well-designed places. The requirements to provide community and infrastructure in accordance with the latest Infrastructure Delivery Plan (IDP) and to provide improved sustainable travel modes, including improvements to bus services, and cycle and pedestrian improvements, also contribute to social sustainability.

1.103 An amendment is proposed (see Council's suggested modifications schedule, May 2024, CM328) to add reference to the Infrastructure Business Plan (IBP) which is the council's established mechanism for updating the Infrastructure Delivery Plan post adoption of the Plan.

Q.235 Is Policy A12 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals when it requires development to accord with the National Design Guide which is not part of the development plan?

1.104 See response to Q184.

Q.236 Would Policy A12 be effective in conserving the landscape and scenic beauty of the Chichester Harbour National Landscape (AONB)?

1.105 Criterion 4 of Policy A12 makes reference to the need to ensure that development is well integrated with its surroundings and successfully mitigates the impacts on the wider landscape character, protects existing important landscape features and key views...'. However, it is considered, in answer to this question and also Question 234, that clarification is required in relation to the expectations of the criterion to protect key views to both the Chichester Area of Outstanding Beauty and the South Downs National Park. The council has therefore suggested an additional modification as set out below and shown as CAM396 in the Council's suggested modification schedule, Version 2 CDC15.01.

Additional suggested modification CAM396:

Criterion 4: Ensure the development is well integrated with its surroundings and successfully mitigates the impacts on the wider landscape character, protects existing important landscape features and key views **to the Chichester Harbour**

Area of Outstanding Beauty and the South Downs National Park. ~~including any determined through the process of preparing the revised Neighbourhood Plan;~~

Q.237 Is criterion 2 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

1.106 See response to Q185 above.

Q.238 Is the reference to the possible outcomes of the Neighbourhood Plan in criterion 4 effective?

1.107 The policy could be more precisely worded in terms of the expectations of criterion 4 to protect key views to both the Chichester Area of Outstanding Beauty and the South Downs National Park. A minor modification is therefore suggested to clarify the position and to remove reference to the neighbourhood plan process to provide precision. Any review of the Neighbourhood Plan will be developed and considered in the normal way according to the relevant procedures and process prior to potentially becoming part of the development plan. The Council has therefore suggested an additional modification as set out below and shown as CAM396 in the Council's suggested modification schedule, Version 2 (CDC15.01),

Additional suggested modification CAM396:

Criterion 4: Ensure the development is well integrated with its surroundings and successfully mitigates the impacts on the wider landscape character, protects existing important landscape features and key views **to the Chichester Harbour Area of Outstanding Beauty and the South Downs National Park.** ~~including any determined through the process of preparing the revised Neighbourhood Plan;~~

Q.239 Are the suggested MMs necessary for soundness?

1.108 CAM396 is required for soundness to make the policy effective and provide clarification and accuracy. CM327 is required to better reflect the mitigation hierarchy and respond to Natural England's representation (6010). CM329 is needed to provide consistency of wording in relation to safeguarding of mineral resources and respond to representation made by West Sussex County Council (WSSCC) (5090); CM330 for consistency in relation to safeguarded waste management sites and respond to comments made by WSSCC. CM326 and CM328 are not required for soundness but CM326 provides consistency across the allocation policies and CM328 provides consistency and accuracy.

Q.240 What would happen if the site were not allocated through the Neighbourhood Plan?

1.109 If draft neighbourhood plans making provision for at least the minimum housing numbers for the relevant area have not made demonstrable progress, the council will allocate sites within a development plan document in order to meet the

requirements of the Local Plan (as set out at the end of Policy H2). This is the same process in place with the previously adopted local plan.

Policy A13 Southbourne Broad Location for Development

Q.241 What is the justification for the proposed 1,050 dwellings, local employment opportunities and supporting community facilities and uses at the proposed broad location for development?

1.110 Development options for Southbourne have been tested continuously throughout the SA process. At issues and options stage Southbourne was considered in general terms as a potential location for strategic development, while at Regulation 18 (Reg.18) stage various different quanta of development were appraised. The different figures appraised are summarised in table 3 on page 15 of the Reg.18 SA (CN06.02), and the matrices in section 4.5 consider the implications of those different options in sustainability terms. The Reg.18 SA sets out in paragraphs 4.6.4 and 4.7.3 that the housing distribution option which includes a 1250 allocation option for Southbourne is the recommended approach.

1.111 The Regulation 19 (Reg.19) SA also considered the appropriate quantum of development for Southbourne. This was predicated on a lower figure for the parish namely 1050 dwellings, as specified in policy A13 within the submission Local Plan. The Reg. 19 SA considered the 1050 figure alongside a higher growth scenario of 1500 dwellings. While the Reg.19 SA recognises the potential of the higher growth scenario for Southbourne to have some benefits, there were also certain disbenefits in relation to environmental factors and infrastructure capacity.

1.112 There are various landowners and/or site promoters within the area encompassed by the Broad Local for Development (BLD). When the responses to the Reg.19 consultation are synthesised there is considered to clearly be scope to provide at least 1050 dwellings within the BLD area along with employment and community uses, which is supported by a range of vision, high level masterplan or other technical documents submitted by landowners and/or site promoters. The council has also progressed the Southbourne Allocation DPD in order to establish a specific allocation within the BLD area. This has involved considerable analysis of site capacity with respect to housing and associated uses.

Q.242 Is there clear evidence that the site would not be developable in terms of the NPPF?

1.113 The council considers that the 1050 dwellings encompassed by the policy are developable. This is supported by the considerable work the council has done in preparing the Southbourne Site Allocation DPD. Furthermore, the Reg.19 submissions by landowners/site promoters further demonstrate the likelihood of the number of units proposed being developable.

Q.243 Would the establishment of the site extent and boundary through a future Development Plan Document or a revised Southbourne Neighbourhood Plan be effective?

1.114 The council has proactively progressed the future Development Plan Document referred to, which will ensure that the policy is effective. This has involved commissioning expert consultants Tibbalds to produce the DPD, which has involved sophisticated site assessment and high level masterplanning. There has also been constructive engagement with key landowners/site promoters and the parish council. The Reg. 18 consultation version of the emerging Southbourne Allocation DPD has been produced and will be presented to Cabinet and Council on 30th September and 1st of October respectively.

Q.244 Would the requirements to be addressed in the allocation of the site as set out in the Policy be effective in achieving sustainable development on the site?

1.115 Yes, the policy and work the council has done on progressing the site allocation DPD is focused on achieving sustainable development, both in relation to the development of the site(s) allocated and how this would be integrated with its surroundings. For example, both the policy and emerging DPD emphasise the opportunities available to utilise the Southbourne railway station and new and existing pedestrian and cycle routes in order to achieve a highly sustainable development.

Q.245 What is the justification for the serviced self/custom build plots, Gypsy and Traveller pitches and Travelling Showpersons' plots in criterion 1, 2 and 3?

1.116 This is set out in the council's Gypsy and Traveller Background Paper. The most relevant sections are paragraphs 5.25 – 5.29 and 6.10 – 6.15. The self/custom build plots in the policy are justified by the level of need, as summarised in the council's responses on Matter 4C.

Q.246 Would the policy be effective in regard to any effects on the transport network with particular regard to railway crossings?

1.117 The impact on the main level crossing within Southbourne (Stein Road) has been addressed in detail via two Stantec reports, one in 2020, which was then updated in 2023 (TA01 and TA02). The impact on the Inlands Road vehicular level crossing, would depend largely on which side of Southbourne is considered most suitable for allocation as part of the Southbourne Allocation DPD process referred to above. In their representations at Reg.19 stage it is noted that Network Rail raise particular concerns with respect to the informal crossings at Penny Lane and Church, which are both on the western side of Southbourne. The consideration of how to address the impacts in relation to those informal crossings has been considered in detail as part of the process of progressing the Southbourne Allocation DPD. The process of considering those issues has included discussions with Network Rail

representatives and various bridge options are set out in the Reg.18 Southbourne Allocation DPD. This will all be covered in the material published ahead of the Cabinet and Council meetings on 30th September and 1st October respectively.

Q.247 Are the suggested MMs necessary for soundness?

1.118 In relation to CM333, it is considered that yes, this is necessary for soundness in order to ensure that a decision maker knows how to respond to development proposals as per paragraph 16 (d) of the NPPF 2023 i.e. otherwise a decision maker may consider that they need to refuse a scheme for any other number than 1050. With regard to CM334, this is also considered necessary for soundness in order to ensure that the plan is positively prepared in terms of meeting needs, in this case the need for self/custom build housing. The other MMs pertaining to this policy are not considered necessary for soundness, rather they are proposed for clarification and consistency purposes.

Policy A14 Land West of Tangmere

Q.248 What is the justification for the extent of housing development proposed, 1,300 dwellings?

1.119 The provision of 1,300 dwellings on the site can be justified through the extensive site investigations that have taken place to inform the masterplanning process, and outline application. The site has an endorsed masterplan for 1,300 homes (reference 19/02836/MAS) and a resolution to permit at outline application stage (reference 20/02893/OUT) subject to completion of the Section 106 agreement. The masterplan has informed the evolution of the outline planning application, which clearly demonstrates the capacity of the site to deliver the amount of housing development proposed alongside the requisite infrastructure.

Q.249 Is there clear evidence that the site is neither deliverable or developable in terms of the NPPF?

1.120 The council has undertaken regular, on-going communication with the developer regarding the suitability, availability, achievability, deliverability and viability of the site. This has been used alongside other evidence to inform the timescale set out in the updated trajectory with the site identified as developable, estimated to start delivery in years 6-10 of the plan period following adoption. The council's response to Matter 4C Q68 provides clarity on the council's housing supply. The evidence supporting the status of this site is set out in the Five Year Housing Land Supply Paper (PS/CD08).

Q.250 Are the site-specific development requirements as set out in the Policy justified, and will they be effective in achieving sustainable development on the site?

1.121 The site-specific requirements are justified and will be effective in achieving sustainable development on this site. The housing and specialist accommodation

requirements (accommodation for older persons) in the policy are justified by the level of need, as summarised in the council's responses on Matter 4C.

1.122 The requirement for the two-form entry school (expandable to three-form) and provision for early years setting and special support centre is on the basis of consultation with WSCC as the education provider, who have calculated the need for a new school to serve the pupil numbers generated by the development.

1.123 Other requirements in the policy are to ensure that the site is environmentally sustainable and provides a high-quality natural environment and meets biodiversity and green infrastructure aims, and addresses site specific water issues (including drainage and wastewater disposal). Requirements in relation to minerals safeguarding are to ensure compliance with the adopted West Sussex Joint Minerals Local Plan and Minerals and Waste Safeguarding Guidance.

1.124 Social sustainability is to be achieved through the provision of homes and well-designed places. The requirements to provide community infrastructure in accordance with the latest Infrastructure Delivery Plan and to provide sustainable travel modes and cycle and pedestrian improvements also contribute to social sustainability.

Q.251 Would Policy A14 be effective in integrating the proposed development with Tangmere village/Saxon Meadow?

1.125 Yes. Policy A14 requires that development of the site is planned to be an extension to Tangmere village, that is well integrated with the existing village. Examples of how this will be delivered include the criterion requiring the expanding and enhancing of the existing village centre into a new local centre, including new amenities for both existing and new residents. This follows the principles of the Tangmere Neighbourhood Plan (made in 2016) which identifies the site for strategic development, and places significant emphasis on achieving a 'one village' approach.

1.126 Proposed criterion 10 requires the development to conserve or enhance the setting of the site, particularly that of the Conservation Area (which Saxon Meadow is part of).

1.127 The site has outline resolution to grant subject to the completion of the Section 106 agreement, and the extensive masterplanning process that took place prior to the submission of the outline application, as well as the work that has continued subsequently has ensured that the development will successfully integrate with the existing village.

Q.252 Are the suggested MMs necessary for soundness?

1.128 Yes, CM340 and CM341 are necessary corrections and clarifications. CM340 responds to representation 5655 from Countryside Properties.

Policy A15 Loxwood

Q.253 What is the justification for the proposed site housing capacity?

1.129 It should be noted that the application of Policy A15 Loxwood through the neighbourhood plan could result in the allocation of multiple sites or one single site. Therefore, references in the questions to a singular site have been answered on this basis.

1.130 The supporting evidence that led to the proposed housing number in Policy A15 is summarised in the Housing Distribution Background Paper (July 2024, BP05) paras 3.6 – 3.11. The BP sets out the consultations on the Plan and how the distribution of housing evolved as a result. It then details (paras 4.23 – 4.38) the justification for the changes made between the Preferred Approach (Reg. 18) Plan and the Proposed Submission Local Plan (Reg. 19). Paragraphs 4.28 and 4.29 set the work undertaken to re-visit the housing distribution after the Advisory Visit with a Planning Inspector in July 2021 where the council was advised to reassess the spatial strategy and distribution in other parts of the local plan area to see if the full housing need could be met in another way. As set out in para. 4.29 of the BP this process was undertaken on the basis of scenario testing and appraisal through the SA as well as technical work and consultation with technical consultees in relation to key issues such as transport, water neutrality, infrastructure and environmental impacts. The statement from officers set out in para 7.3.1 of the SA summarises the reasoning for the council's chosen scenario for the north-east plan area, including for Loxwood.

1.131 An amendment is proposed (see Council's suggested modifications schedule, May 2024, CM345) to replace 'a minimum of 220 dwellings' with 'approximately' for consistency across the Strategic Site Location policies.

Q.254 Would Policy A15 be effective in seeking to allocate the site via the revised Loxwood Neighbourhood Plan? What would happen if it is not?

1.132 The use of neighbourhood plans to allocate sites is a well established and effective mechanism already in use in the plan area to bring forward site allocations. Loxwood Parish Council undertook extensive work to compile their first Neighbourhood Plan that was 'made' in July 2105. Subsequently, they took on the challenge of revising the neighbourhood plan early on in the Local Plan process to address the Preferred Approach Local Plan parish housing figure of 125 dwellings. The Parish Council submitted a revised version of the neighbourhood plan to the council in 2020 but, unfortunately, this could not be progressed as a result of the wider issue raised by Natural England relating to water neutrality and the need for a

strategic mitigation strategy to address the requirements of the Habitats Regulations.

1.133 This position is reflected in the parish council response to the Plan (rep ID 3917) where the Parish Council has then raised concerns relating to infrastructure constraints in relation to the now proposed strategic figure of 220 dwellings in the Plan. The council appreciate that if the Plan is adopted, the parish need to undertake further work to increase the number planned for to 220. The council is aware this further work is underway and the Parish Council has appointed a consultant to help provide support with the process and now includes a call for sites in July 2024, in order to address the requirements of Policy A15.

1.134 If draft neighbourhood plans making provision for at least the minimum housing numbers for the relevant area have not made demonstrable progress, the council will allocate sites within a development plan document in order to meet the requirements of the Local Plan (as set out at the end of Policy H2). This is the same process in place with the previously adopted local plan.

Q.255 Is there clear evidence that the site would not be developable in terms of the NPPF?

1.135 The council's response to Matter 4C Q68 provides clarity on the council's housing supply. The council's trajectory shows the phasing of sites to come forward through the NP in Loxwood in years 11-15 of the plan period following adoption. This phasing allows for the preparation of the neighbourhood plan before applications come forward to start delivery of the numbers.

Q.256 Would the requirements to be addressed in the allocation of the site as set out in the Policy be effective in achieving sustainable development on the site?

1.136 The requirements set out in the policy are justified and will be effective in achieving sustainable development on any sites that are allocated through the neighbourhood plan.

1.137 The housing requirements in the policy are justified by the level of need, as summarised council's responses on Matter 4C. The policy also allows for any local evidence of need identified through the process of producing the neighbourhood plan to be considered, particularly in relation to specialist housing.

1.138 Other requirements in the policy are to ensure that any site allocations are environmentally sustainable and provide a high-quality natural environment and meet biodiversity and green infrastructure aims, and addresses specific water issues (drainage, wastewater disposal, water quality).

1.139 An amendment is proposed (see Council's suggested modifications schedule, May 2024, CM347) to add a criterion to ensure that the policy accords with the requirements in the adopted West Sussex Joint Minerals Local Plan and Minerals and Waste Safeguarding Guidance to safeguard brick clay in the area.

1.140 Social sustainability is to be achieved through the provision of homes and well-designed places. The requirements to provide community and infrastructure in accordance with the latest Infrastructure Delivery Plan (IDP) and to provide improved sustainable travel modes, including improvements to bus services, and cycle and pedestrian improvements, also contribute to social sustainability.

1.141 An amendment is proposed (see Council's suggested modifications schedule, May 2024, CM346) to add reference to the Infrastructure Business Plan (IBP) which is the council's established mechanism for updating the Infrastructure Delivery Plan post adoption of the Plan.

Q.257 Is Policy A15 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals when it requires development to accord with the National Design Guide which is not part of the development plan?

1.142 See response to Q184.

Q.258 Is criterion 2 clearly written and unambiguous, so it is evident how specialist needs housing is dealt with through the site allocation?

1.143 See response to Q185 above.

Q.259 Are the suggested MMs necessary for soundness?

1.144 Modifications CM343 – CM347 are required for consistency and accuracy.

Policy A16 Goodwood Motor Circuit and Airfield

Q.260 Are the suggested MMs necessary for soundness?

1.145 Yes, CM348 and 349 are main modifications needed to address soundness concerns from The Goodwood Estate

1.146 CM350 and 351 are minor modifications.

1.147 CM352 is needed to improve clarity, remove repetition and in response to representations from the Goodwood Estate (Rep IDs 4313.4314)

Policy A17 Development within the vicinity of Goodwood Motor Circuit and Airfield

Q.261 What is the justification for the general presumption against development proposals for noise-sensitive development within 400m of Goodwood Motor Circuit and Airfield?

1.148 As set out in paragraph 10.75 of the Plan, The Goodwood Noise Study (RTA4) concludes that a 400m buffer should be maintained in order to protect the amenity of new residential or other noise sensitive development. The buffer also protects the ongoing operation of existing commercial uses at the motor circuit and airfield from noise complaints, in line with the agent of change principle, given the difficulty of providing mitigation at receiver level. These conclusions are summarised in section 1.1 to 1.4 of the Noise Study, commencing on page 2.

Q.262 Are the suggested MMs necessary for soundness?

1.149 No CM353 is a minor modification, not needed for soundness.

1.150 CM354, CM355 and CM356 improve clarity and respond to representations from and discussions with The Goodwood Estate.

Policy A18 Thorney Island

Q.263 Is Policy A18 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals when it requires development to accord with the AONB Management Plan which is not part of the development plan?

1.151 As set out in response to Q.135, whilst the Chichester Harbour Management Plan is not a development plan document it is a document prepared on behalf of the District Council (and other relevant councils) and (with the exception of the planning principles written for the use of Chichester Harbour Conservancy) was adopted by the council on 5th March 2019. However, following consideration of the question, the council have suggested an additional modification (see Council's suggested modification schedule, Version 2, CDC15.01, ref CAM426 and below). This modification would address the issue by removing the reference from the policy as the Management Plan is a material consideration and is already referred to in 10.78 of the supporting text.

Additional suggested modification CAM426

Amend the third sentence of the third paragraph of Policy A18: "Proposals must avoid adverse impacts on the Chichester Harbour AONB/SAC/SPA and Ramsar designations. ~~and comply with Policy NE13 (Chichester Harbour AONB) and associated AONB Management Plan and SPD."~~

Q.264 Are the suggested MMs necessary for soundness?

1.152 Yes, the modifications CM357 and CM358 are necessary for soundness because they clarify the policy and background text in relation to habitat creation schemes/managed retreat and respond to representations made by the Environment Agency, Sussex Wildlife Trust and Mayday! Action Group.

Policy A20 land South of Bognor Road

Q.265 What is the justification for the specific development requirements at the proposed allocation?

- 1.153 The site specific requirements are justified and will be effective in achieving sustainable development on this site. The employment and specialist accommodation requirements (travelling showpeople pitches with storage) in the policy are justified by the level of need, as summarised council's responses on Matters 4B and 4C.
- 1.154 Other requirements in the policy are to ensure that the site is environmentally sustainable and provides a high quality natural environment and meets biodiversity and green infrastructure aims, and addresses site specific water issues (drainage, wastewater disposal, water quality). Requirements in relation to minerals safeguarding are to ensure compliance with the adopted West Sussex Joint Minerals Local Plan and Minerals and Waste Safeguarding Guidance.
- 1.155 Social sustainability is to be achieved through the provision of well-designed places. The requirements to provide community and infrastructure in accordance with the latest Infrastructure Delivery Plan (IDP) and to provide sustainable travel modes and cycle and pedestrian improvements also contribute to social sustainability.
- 1.156 Safeguarding land for a bus lane on Bognor Road will contribute to delivery of the West Sussex Bus Service Improvement Plan and the closure of Vinnetrow Road may be required as part of the monitor and manage approach to managing transport impacts of the Local Plan – this will be determined through the Transport Infrastructure Management Group.

Q.266 Are the site-specific development requirements as set out in the Policy justified, and will they be effective in achieving sustainable development on the site?

1.157 Yes. See answer to Question 265

Q.267 Are the suggested MMs necessary for soundness?

1.158 Yes, CM361 is a main modification necessary for consistency with other allocations and responds to Rep 5630 from West Sussex County Council as landowner. CM360 and CM363 are needed for consistency and in response to concerns from West Sussex County Council as Minerals Planning Authority.

1.159 CM 359, and 362 are minor modifications – a technical correction

Policy A21 Land east of Rolls Royce

Q.268 Are the suggested MMs necessary for soundness?

1.160 Yes CM365-367 are main modifications to provide additional and updated information. CM374 is needed for soundness for additional clarity about parking arrangements and CM375 is needed for consistency and in response to West Sussex County Council Rep ID 3093

1.161 No, CM364, and CM368 – 373 are minor wording improvements, not related to soundness.