

MM1

6991

Support

Respondent: Sidlesham Parish Council (Ms Alison Colban, Parish Clerk) [1287]

Summary:

No comment to make.

Change suggested by respondent:

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Legally compliant: Not specified

Sound: Not specified

Attachments: None

7089

Comment

Respondent: West Sussex County Council (Tracey Flitcroft, Principal Planning Officer) [8119]

Summary:

Para. 1.31 of the Local Plan: In WSCC Regulation 19 'informal comments', CDC were asked to update the reference to the Mineral and Waste Safeguarding Guidance (currently referred to as 'Minerals Consultation Area guidance') which has not been made. For accuracy this should be amended and included throughout the Plan where relevant.

Change suggested by respondent:

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Legally compliant: Not specified

Sound: Not specified

Attachments:

CDC Local Plan Main Mods Consultation WSCC Reps FINAL.pdf - <https://chichester.oc2.uk/a/tdj>

MM2

6992

Support

Respondent: Sidlesham Parish Council (Ms Alison Colban, Parish Clerk) [1287]

Summary:

No Comment.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments: None

7004

Comment

Respondent: Chichester Harbour Conservancy (Mr Lawrence and Mrs Park Chichester Harbour Conservancy, Principal Planning Officers) [795]

Summary:

We note that the footnote explains that the Local Plan will refer to Area of Outstanding Natural Beauty (AONB) throughout despite this having been renamed 'National Landscape' in 2023. We would ask that the Council reconsiders this as we would like to see this the other way around, with National Landscape as the correct term used throughout, with the footnote explaining that this was formerly known as an AONB. This would be consistent with the NPPF and the Chichester Harbour Management Plan and would, we feel, avoid confusion for those using the Plan going forwards.

Change suggested by respondent:

Use the term "National Landscape" rather than "AONB"

Legally compliant: Not specified

Sound: Not specified

Attachments: None

7033

Support

Respondent: Natural England (Consultation Team) [1169]

Summary:

Natural England is pleased to see that clarification has been provided in relation to the use of the term Area of Outstanding Natural Beauty (AONB), as opposed to National Landscape, as this remains Chichester Harbour's legally designated status.

Change suggested by respondent:

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Legally compliant: Yes

Sound: Yes

Attachments:

Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tfq>

MM3

7035

Support

Respondent: Natural England (Consultation Team) [1169]

Summary:

We are pleased to see that our comments made at Regulation 19 (our ref. 420345, 17 March 2023) have been taken into consideration and reference has been made to 'water scarcity' within the Local Plan Vision.

Change suggested by respondent:

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Legally compliant: Yes

Sound: Yes

Attachments:

Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tfp>

7128

Support

Respondent: Southern Water [1388]**Agent:** Southern Water (Mr Ryan Lownds) [1306]**Summary:**

Chapter 2: Vision and Strategic Objectives

Southern Water welcomes addition of water scarcity as a consideration in The Vision for the plan area.

One of the key issues facing our environment is fresh water scarcity. The South East is classified as a seriously water stressed area by the Environment Agency as it has the lowest levels of rainfall and high population density.

Southern Water are currently investigating ways to tackle leakage, targeting households to save water and investigating new areas of investment to safeguard future water supplies, in a context of climate change which will increase demand and reduce supply.

The Local Plan has a key role in ensuring that new development is designed to be water efficient, to assist in reducing the impact of water scarcity.

Change suggested by respondent:

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Legally compliant: Not specified**Sound:** Not specified**Attachments:**Southern Water Rep. - <https://chichester.oc2.uk/a/tfc>

MM4

6993

Support

Respondent: Sidlesham Parish Council (Ms Alison Colban, Parish Clerk) [1287]**Summary:**

We support this additional wording.

Change suggested by respondent:

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Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

MM5**6994****Support****Respondent:** Sidlesham Parish Council (Ms Alison Colban, Parish Clerk) [1287]**Summary:**

We support this new wording as we feel it gives more depth.

Change suggested by respondent:

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Legally compliant: Not specified**Sound:** Not specified**Attachments:** None**6995****Support****Respondent:** Sidlesham Parish Council (Ms Alison Colban, Parish Clerk) [1287]**Summary:**

On the whole we support the new wording with only a question mark over "bespoke vehicle manufacturing" wondering what other industries this includes as we can only think of one.

Change suggested by respondent:

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Legally compliant: Not specified**Sound:** Not specified**Attachments:** None**6996****Comment****Respondent:** Merrow Wood [8390]**Agent:** Intelligent Land (Mr Simon Trueick) [8009]**Summary:**

Merrow Wood supports the additional wording of Objective 1 in respect of locating new development in accessible locations. Merrow Wood has promoted sites through the Local Plan process at Prospect Farm, Chidham & Hambrook, and Tawny Nurseries, Birdham. Both sites are well located for facilities and services and sustainable transport links to bus and train, as well as walking and cycling. This makes it all the more imperative that the Council allocates additional sites in the Plan now which are sustainable, in order to properly meet the Inspectors' increased housing requirement.

Change suggested by respondent:

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Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

7005

Support

Respondent: Chichester Harbour Conservancy (Mr Lawrence and Mrs Park Chichester Harbour Conservancy, Principal Planning Officers) [795]

Summary:

We support the addition of the wording at the end of the first paragraph of objective 2.

Change suggested by respondent:

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Legally compliant: Not specified

Sound: Not specified

Attachments: None

7014

Object

Respondent: Kirdford Parish Council [1875]

Agent: Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]

Summary:

Objective 1
The proposed additions are a step in the right direction in to promote sustainable transport modes and reduce car dependency.
However, aspirations are not realistically achievable in rural areas like Kirdford without significant infrastructure investment.

Change suggested by respondent:

Not specified

Legally compliant: Yes

Sound: No

Attachments: None

7018**Object****Respondent:** Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:**

Objective 2

MM has not addressed Reg 19 concerns about the clarity, effectiveness and measurability of Objective 2.

Objective needs to be clear that there are more designated sites than those listed and that Ebernoe SAC and The Mens SAC should be included, as important designated sites in the District.

Satisfied with the inclusion of a requirement to protect landscape character and conserving and enhancing the SDNP and its setting.

There is no supporting strategy or delivery framework included in MM5 to explain how Objective 2 will be achieved or funded. This undermines its effectiveness and, therefore, we consider it partly unsound.

Change suggested by respondent:

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Legally compliant: Yes**Sound:** No**Attachments:** None**7019****Object****Respondent:** Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:**

Objective 4 continues to present an urban-centric view of employment without recognising the constraints and opportunities in rural parishes.

Objective should state the amount of jobs / employment floorspace the Local Plan is seeking to achieve across the District and set measurable goals for employment and jobs in villages and rural areas.

There is no commitment to enhance digital infrastructure or improve transport connections for rural employment zones.

Objective 4 is partially sound and legally compliant, but it is undermined by a lack of delivery mechanisms for rural enterprises

Change suggested by respondent:

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Legally compliant: Yes**Sound:** No**Attachments:** None

7020**Object**

Respondent: Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:**

Objective 5

Objective should specify health indicators and set a target for increasing life expectancy.

Lacks an implementation plan to deliver infrastructure to support this objective this in the North of the Plan Area.

Objective 5 is not effective with regards to rural parishes, especially those in the North of the Plan Area, therefore the objective is still unsound.

Change suggested by respondent:

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Legally compliant: Yes**Sound:** No**Attachments:** None

7021**Object**

Respondent: Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:**

Objective 6

Satisfied that MM5 has introduced the special qualities of protected landscapes in the design objective.

However, Objective 6 fails to refer to heritage outside of designated landscapes.

Concerned that the National Design Code will be supplemented by local design codes, yet Local Plan Policy D1 (Design Principles) says nothing about Design Codes. This objective does not translate into policy and therefore it is not effective and unsound.

Change suggested by respondent:

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Legally compliant: Yes**Sound:** No**Attachments:** None

7024

Object

Respondent: Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:****Objective 7**

Although the language is improved, this objective still lacks clarity regarding the infrastructure delivery mechanisms for the North of the Plan Area. No measurable deliverables for infrastructure. Too focussed on Chichester/A27.

Considering the above, Objective 7 is not effective, especially with regards to the North of the Plan Area and would be unsound.

Change suggested by respondent:

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Legally compliant: Yes**Sound:** No**Attachments:** None

7036

Comment

Respondent: Natural England (Consultation Team) [1169]**Summary:**

We are pleased to see that our comments made at Regulation 19 stage (our ref. 420345, 17 March 2023) have been taken into consideration and the following additions have been made to the Plan objectives.

In addition, we support the inclusion of additional text prioritising active travel options within highways design (i.e. walking, cycling, public transport) but suggest that reference could be made here to green infrastructure provision as a method of encouraging their use as the 'obvious option'

Change suggested by respondent:

Suggest additional wording in Objective 7 : '*Highway improvement design should incorporate good quality green infrastructure where appropriate, to encourage pedestrian use*.'

Legally compliant: Yes**Sound:** Yes**Attachments:**Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tgr>

7064

Support

Respondent: Network Rail (Craig Hatton, Senior Town Planner) [8332]**Summary:**

MM5 – Objective 1

NR supports the proposed main modification to the second paragraph to include specific reference to rail stations. This will help to embed first and last mile principles for active travel to and from rail stations.

MM5 – Objective 7

NR notes the proposed main modifications in the second and third paragraphs. These are generally supported to increase opportunities to promote active travel links to public transport. It is considered fair and reasonable that new development contributes towards improving infrastructure, especially public transport, to promote an accessible network that can provide and sustain a modal shift away from the private car.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**

Network Rail response to Chichester Local Plan Main Modifications_March 2025.docx -
<https://chichester.oc2.uk/a/td4>

7077

Comment

Respondent: Sussex Wildlife Trust (Ms Helen Davies, Conservation Officer) [977]**Summary:**

objective 7. The reference to nature based solutions needs some context and explanation preferably with examples of how it might be deployed in relation to transport policy

Change suggested by respondent:

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Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

MM6

6972

Object

Respondent: Gleeson Land [7914]

Agent: Gleeson Land (Mr Joshua Mellor, Director) [8377]

Summary:

Lack of identification of Fishbourne as sustainable settlement.

Change suggested by respondent:

Further modification to add Fishbourne to the list of "larger and more sustainable settlements" in Policy S1.

Legally compliant: Not specified

Sound: Not specified

Attachments:

Written representation - <https://chichester.oc2.uk/a/tcm>

6997

Object

Respondent: Merrow Wood [8390]

Agent: Intelligent Land (Mr Simon Trueick) [8009]

Summary:

Merrow Wood considers that sites should be allocated to address the increase of 1,100 dwellings set out in the Modifications.

Change suggested by respondent:

Reference to further sites coming forward in a DPD or Local Plan Review should be deleted and replaced with further allocated sites.

Legally compliant: Yes

Sound: No

Attachments: None

7015

Object

Respondent: Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:**

The revised Policy S1 and supporting paragraphs attempt to clarify the approach to distributing development across the District. However, the policy remains unsound for the following reasons:

1. Unjustified spatial distribution (especially in the North East of the Plan Area) not supported by updated evidence to support level of growth.
2. Over-reliance on Neighbourhood Plans for delivery without support or evidence that the plans can or will deliver required allocations.
3. Lack of consideration for environmental constraints including Ebernoe Common SAC, The Mens SAC and Sussex North Water Resource Zone.
4. Lack of integration with transport and accessibility evidence, spatial strategy contrary to Objective 1 (sustainable transport).

Change suggested by respondent:

Final paragraph of the policy should refer to a maximum scale of new development to be allocated via a Site Allocation DPD as well as an identified area. Exclude North East from further allocations via the Site Allocation DPD.

Legally compliant: Yes**Sound:** No**Attachments:** None

7065

Support

Respondent: Network Rail (Craig Hatton, Senior Town Planner) [8332]**Summary:**

MM6 – Para 3.9

NR supports the proposed main modifications to remove reference to the neighbourhood plan and to afford the site allocations DPD primacy in site selection.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**

Network Rail response to Chichester Local Plan Main Modifications_March 2025.docx -
<https://chichester.oc2.uk/a/td5>

7069

Object

Respondent: Martin Grant Homes [1652]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

This modification is not effective and is not seen as positive planning. It will not identify when housing shortfall triggers have been reached and will not enable that shortfall to be quickly addressed. Furthermore, it indicates a lack of commitment to bringing much needed new sites forward either through a DPD or a Plan review. As such, the modifications and the Policy are considered unsound.

Change suggested by respondent:

To make the Plan and Policy S1 sound, MM6 should be amended to:

- Provide for a firm commitment to an immediate and urgent local plan review. The supporting text to the policy and the Local Development Scheme (LDS) should also be amended to reflect this commitment.
- Specify in the Policy S1 the triggers that would be used for assessing when the Plan was underdelivering and the firm timetable and mechanisms for addressing this shortfall.

Legally compliant: Not specified**Sound:** No**Attachments:**Chichester Main Modification response - Martin Grant Homes.pdf - <https://chichester.oc2.uk/a/td8>

7102

Object

Respondent: Barratt David Wilson Homes [7523]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

The commitment to bringing new sites forward either through DPD or Plan review is considered essential and is welcomed. However, this modification is considered vague, fails to provide certainty, is not positively prepared and effective. Consequentially, it is not considered sound.

Change suggested by respondent:

To make the Plan and Policy S1 sound, MM6 should be amended to:

- Provide for a firm commitment to an immediate and urgent local plan review. The supporting text to the policy and the Local Development Scheme (LDS) should also be amended to reflect this commitment.
- Specify in the Policy S1 the triggers that would be used for assessing when the Plan was underdelivering and the firm timetable and mechanisms for addressing this shortfall.

Legally compliant: Not specified**Sound:** No**Attachments:**Chichester Main Modifications response.BWD.May25.pdf - <https://chichester.oc2.uk/a/tw6>

7110

Comment

Respondent: Church Commissioners for England [1858]**Agent:** Lichfields (Amy Jones) [8352]**Summary:**

Proposed MM6 includes the addition of an additional sentence at the end of Policy S1 Spatial Development Strategy in relation to the delivery of the housing target. The MM deletes the approach of 'flexibly applying the distribution of development' to ensure that the council delivers its housing target. The additional sentence states "Additional housing allocations, if required, will be made through the Site Allocation DPD (or review of the Local Plan)". We comment further in relation to this point and the Sustainability Appraisal Addendum in our following comments/the attached letter.

Change suggested by respondent:

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Legally compliant: Not specified**Sound:** Not specified**Attachments:**Written representation - <https://chichester.oc2.uk/a/tfh>

7114

Support

Respondent: Landlink Estates Ltd [1764]**Agent:** Jackson Planning Ltd (Mrs Lisa Jackson, Managing Director) [8130]**Summary:**

Support the addition of text stating:

Additional housing allocations, if required, will be made through the Site Allocation DPD (or review of the Local Plan)

This is positive change to the plan to meet housing need and makes the policy sound

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** Yes**Attachments:**MM6 - Landlink Estates Ltd.pdf - <https://chichester.oc2.uk/a/twj>

MM7**7016****Object****Respondent:** Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:**

Key Diagram map refers to the "North East of Plan Area" but the Local Plan text refers to 'North of the Plan Area' (the area that includes Kirdford, Wisborough Green, Plaistow & Ifold, and Loxwood). This creates confusion for the reader when compared with paragraph 1.9 of the Local Plan ('How to Use the Plan'), which refers to the North of the Plan Area (the northeast of the District and Hammer / Camelsdale).

Change suggested by respondent:

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Legally compliant: Yes**Sound:** No**Attachments:** None**MM8****7006****Support****Respondent:** Chichester Harbour Conservancy (Mr Lawrence and Mrs Park Chichester Harbour Conservancy, Principal Planning Officers) [795]**Summary:**

We support the additional text to criteria 1 of Policy NE1.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None**7037****Support****Respondent:** Natural England (Consultation Team) [1169]**Summary:**

We strongly support the addition of wording to Policy NE1 requiring renewable energy schemes to demonstrate that there will be no significant impact upon views to and from the South Downs National Park and Chichester Harbour AONB, as well as meet Biodiversity Net Gain requirements.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** Yes**Attachments:**Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tgs>

7115

Support

Respondent: Landlink Estates Ltd [1764]**Agent:** Jackson Planning Ltd (Mrs Lisa Jackson, Managing Director) [8130]**Summary:**

The removal of the last part of the policy (shown below) is supported as this now brings the policy in line with the findings of the Supreme Court in relation to R (on the application of Wright) (Respondent) v Resilient Energy Severndale Ltd and Forest of Dean District Council (Appellants) [2019] UKSC 53 On appeal from: [2017] EWCA Civ 2102

"(deleted - The social and economic benefits of the development proposal will be taken into account, particularly the degree of community participation in or ownership of a scheme, as well as the potential benefits of the proposed development to host communities generally.)"

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** Yes**Attachments:**MM8 - Policy NE1 Landlink Estates Support (in part).pdf - <https://chichester.oc2.uk/a/twk>

7116

Object

Respondent: Landlink Estates Ltd [1764]**Agent:** Jackson Planning Ltd (Mrs Lisa Jackson, Managing Director) [8130]**Summary:**

MMs fail to meet statutory duty under Section 19(1A) of Planning and Compulsory Purchase Act 2004; policy must support proposals for all forms of renewable and low carbon energy; use of word "Stand-alone" renders policy inconsistent with legislation and revised NPPF.

Change suggested by respondent:

Change policy title to "All Forms of Renewable and Low Carbon Energy".

Change first line of policy as follows:

Planning permission will be granted for (add - *all Forms of Renewable and Low Carbon Energy Proposals* (delete - *stand-alone renewable energy schemes*), where it has been demonstrated that there is no significant adverse impact upon:

Legally compliant: Not specified**Sound:** No**Attachments:**MM8 - Policy NE1 Object (in part).pdf - <https://chichester.oc2.uk/a/twz>

MM9**7007****Object**

Respondent: Chichester Harbour Conservancy (Mr Lawrence and Mrs Park Chichester Harbour Conservancy, Principal Planning Officers) [795]

Summary:

Please reflect the strengthened duty to 'further the purpose' of the AONB/National Landscape rather than 'minimizing adverse impacts'.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments: None

7038**Object**

Respondent: Natural England (Consultation Team) [1169]

Summary:

We are concerned that the amendments made to policy requirement 5 may not comply with the enhanced landscape duty introduced by Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act (2023). In our opinion, the removal of the wording 'must comply with' and 'which are material planning considerations' weakens the policy and we therefore ask that this sentence is amended to:

'Development proposals should *take account of* the Chichester Harbour AONB Management Plan, the Chichester Harbour AONB Joint SPD and South Downs Partnership Management Plan and South Downs Local Plan *which are material planning considerations*.'

Once this amendment is made, we would be able to remove our objection to MM9 and would consider it sound/legally compliant.

Change suggested by respondent:

'Development proposals should *take account of* the Chichester Harbour AONB Management Plan, the Chichester Harbour AONB Joint SPD and South Downs Partnership Management Plan and South Downs Local Plan *which are material planning considerations*.'

Legally compliant: No

Sound: No

Attachments:

Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tgt>

MM10**6998****Support****Respondent:** Merrow Wood [8390]**Agent:** Intelligent Land (Mr Simon Trueick) [8009]**Summary:**

Merrow Wood supports the additional text proposed in Policy NE3 which requires proper reference to landscape character in any assessment of impact upon gaps between settlements. This is welcome as it creates a more evidence based approach, founded in landscape appraisal, rather than the previously more blunt approach.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None**7008****Object****Respondent:** Chichester Harbour Conservancy (Mr Lawrence and Mrs Park Chichester Harbour Conservancy, Principal Planning Officers) [795]**Summary:**

We are disappointed that the Council is not committing to confirming the landscape gaps identified in their 2019 study but is putting their formal identification off until a future site allocation DPD or neighbourhood plan – this produces uncertainty and makes these areas, which are under huge pressure for development, more vulnerable in the absence of firm policy and precise boundaries. We hope that the 2019 gaps study will still carry significant weight in decisions until such a future document identifies their precise boundaries.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

7017

Object

Respondent: Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:**

MM10 does not go far enough to make the policy sound and may be inapplicable unless and until landscape gaps are designated in future planning documents. The absence of defined landscape gaps, measurable criteria for assessing proposals, and supporting spatial evidence means that the policy is not effective and not justified. Therefore, this policy remains unsound. KPC considers that MM10 requires further strengthening and evidence before it can be found sound.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** No**Attachments:** None

7117

Object

Respondent: Landlink Estates Ltd [1764]**Agent:** Jackson Planning Ltd (Mrs Lisa Jackson, Managing Director) [8130]**Summary:**

This policy change introducing "landscape character" as a measure of the ability to designate a gap at a local level is not sound.

This policy cannot be effective as there is no control over consistency in terms of landscape character, as it is not defined in the policy or guidance and there has been no test regarding capacity in the landscape for all the development required to fulfil the plans' objectives and in particular all forms of large scale renewable and low carbon energy projects that are a requirement to meet net zero, a legal requirement of the plan.

Change suggested by respondent:

Request the following changes to the policy (additional text added at end of policy) to make it sound as follows:

"*In addition, proposals for renewable energy or low carbon development can be located within local landscape gaps where they are otherwise acceptable.*"

Legally compliant: Not specified**Sound:** No**Attachments:**MM10 -Polcicy NE3 Object -Landlink Estates.pdf - <https://chichester.oc2.uk/a/twm>

MM11**6973****Object****Respondent:** Gleeson Land [7914]**Agent:** Gleeson Land (Mr Joshua Mellor, Director) [8377]**Summary:**

Broadly, supportive of changes although further change proposed to policy.

Change suggested by respondent:

Insert word "significant" before "adverse impact" in policy.

Legally compliant: Not specified**Sound:** Not specified**Attachments:**

Written representation - <https://chichester.oc2.uk/a/tcm>

7009**Object****Respondent:** Chichester Harbour Conservancy (Mr Lawrence and Mrs Park Chichester Harbour Conservancy, Principal Planning Officers) [795]**Summary:**

Following the discussions at the Local Plan Examination and the evidence put forward by Southbourne Parish Council regarding the evidence base behind the Hambrook Chalk Stream Strategic Wildlife Corridor set out in the neighbourhood plan which is larger than that shown in the Local Plan Map, we are disappointed that the Council proposes to clarify any confusion by confirming that the smaller Local Plan boundary of the corridor will take precedence. We do not understand why the corridor cannot be widened to accord with the Neighbourhood Plan which is based on a detailed evidence base.

Change suggested by respondent:

The boundary of the Strategic Wildlife corridors should accord with those set out in the adopted Southbourne Neighbourhood Plan.

Legally compliant: Yes**Sound:** Yes**Attachments:** None

7022

Object

Respondent: Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:**

MM11 represents an improvement in structure and clarity but fails to address core concerns previously raised by KPC regarding the protection of strategic wildlife corridors in ecologically sensitive rural areas. The policy is not effective because it delegates too much responsibility to applicants without clear standards or enforcement tools. It is not justified as it leaves behind the North East of the Plan Area. As such, we consider MM11 to be unsound and in need of further revision, supported by ecological evidence and spatially defined corridor mapping, including the North East of the Plan Area, before it can be adopted.

Change suggested by respondent:

Further revision, supported by ecological evidence and spatially defined corridor mapping, including the North East of the Plan Area, before it can be adopted.

Legally compliant: Yes**Sound:** No**Attachments:** None

7039

Comment

Respondent: Natural England (Consultation Team) [1169]**Summary:**

It is our opinion that the amendments made to the Policy wording of NE4, in conjunction with the new paragraphs included in the supporting text, has resulted in less ambiguity around what is and is not acceptable either within or in close proximity to a Strategic Wildlife Corridor. We do however reiterate our comments made at Regulation 19 (our ref. 420345) that reference should be made to the emerging Local Nature Recovery Strategy in the final sentence.

Change suggested by respondent:

- Strengthen the requirement to *take account of* the protocol rather than 'regard should be had'
- Refer to the emerging Local Nature Recovery Strategy in the final sentence.

Legally compliant: Yes**Sound:** Yes**Attachments:**Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tg3>

7059

Object

Respondent: Obsidian Strategic, DC Heaver and Eurequity Limited [8396]**Agent:** DWD Ltd (Stephen Rose) [8288]**Summary:**

See attached.

- replace “an adverse effect” with “significant harm” in the first paragraph of draft Policy NE4; and
- remove the final paragraph of draft Policy NE4.

Change suggested by respondent:

- replace “an adverse effect” with “significant harm” in the first paragraph of draft Policy NE4; and
- remove the final paragraph of draft Policy NE4.

Legally compliant: No**Sound:** No**Attachments:**

250529 CDC Local Plan Main Modifications Representation - May 2025 Revised.pdf -
<https://chichester.oc2.uk/a/tfr>

7074

Object

Respondent: Martin Grant Homes [1652]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

MM11 is considered unclear and has the potential to add significant burdens for developers. As currently drafted it is considered unjustified, onerous and unsound.

Change suggested by respondent:

- To make the Plan and Policy NE4 sound, MM11 should be amended to:
- Provide clarity by including a clearly defined and limited geographic area where development proposals would need to assess impacts on the corridor and demonstrate no harm.
 - Provide certainty and avoid unnecessary burdens on development.

Legally compliant: Not specified**Sound:** No**Attachments:**

Chichester Main Modification response - Martin Grant Homes.pdf - <https://chichester.oc2.uk/a/tdd>

7097

Object

Respondent: West Sussex County Council [1416]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

MM11 is considered unclear and has the potential to add significant burdens for developers. As currently drafted it is considered unjustified, onerous and unsound.

Change suggested by respondent:

To make the Plan and Policy NE4 sound, MM11 should be amended to:

- Provide clarity by including a clearly defined and limited geographic area where development proposals would need to assess impacts on the corridor and demonstrate no harm.
- Provide certainty and avoid unnecessary burdens on development.

Legally compliant: Not specified**Sound:** No**Attachments:**

Chichester Main Modifications response.WSCC reps.May25.pdf - <https://chichester.oc2.uk/a/twr>

7107

Object

Respondent: Barratt David Wilson Homes [7523]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

MM11 is considered unclear and has the potential to add significant burdens for developers. As currently drafted it is considered unjustified, onerous and unsound.

Change suggested by respondent:

To make the Plan and Policy NE4 sound, MM11 should be amended to:

- Provide clarity by including a clearly defined and limited geographic area where development proposals would need to assess impacts on the corridor and demonstrate no harm.
- Provide certainty in relation to the strategic wildlife corridors.
- Update the viability work to test whether this potential proposed policy change is acceptable, both individually and in combination with other existing and proposed burdens.

Legally compliant: Not specified**Sound:** No**Attachments:**

Chichester Main Modifications response.BWD.May25.pdf - <https://chichester.oc2.uk/a/twb>

7118

Support

Respondent: Landlink Estates Ltd [1764]**Agent:** Jackson Planning Ltd (Mrs Lisa Jackson, Managing Director) [8130]**Summary:**

The removal of the 'sequential test' in the text with strikethrough is supported.

This modification is necessary to make the plan sound in particular with regard to the delivery of renewable energy proposals that may be delivered within strategic wildlife corridors.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** Yes**Attachments:**MM11 - Support -Landlink Estates Ltd.pdf - <https://chichester.oc2.uk/a/twn>

MM12

6977

Support

Respondent: Environment Agency (Miss Anna Rabone, Sustainable Places Technical Specialist) [7883]**Summary:**

We note the addition of the sentence "Regard will be had to the Local Nature Recovery Strategy to inform opportunities for nature recovery" which is excellent.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

7040

Comment

Respondent: Natural England (Consultation Team) [1169]**Summary:**

Natural England welcomes the inclusion of Protected Species under criterion 'e' of Policy NE5, as well as the addition of explicit reference to the emerging Local Nature Recovery Strategy under criterion '1e' as this is integral to the delivery of Biodiversity Net Gain.

We note that, despite our recommendations at Regulation 19 (our ref. 420345, 17 March 2023) that a Supplementary Planning Document (SPD) be produced to address how BNG will be effectively delivered, no reference has been made to the production of a BNG specific SPD. We therefore encourage your authority to reference relevant biodiversity strategies and guidance documents which will assist applicants.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** Yes**Attachments:**Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tg4>

MM13

7010

Support

Respondent: Chichester Harbour Conservancy (Mr Lawrence and Mrs Park Chichester Harbour Conservancy, Principal Planning Officers) [795]**Summary:**

We support the addition of criterion c) on coastal squeeze which is such a critical issue contributing to the depletion of nature and therefore must be seriously considered wherever relevant.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

7025

Object

Respondent: Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:**

MM13 amends Policy NE6, but it fails to address the issues raised by KPC with regards to effectiveness and justification of policy specifications for the Mens SAC, Ebernoe Common SAC and Singleton & Cocking Tunnels SAC.

KPC questions why this policy specifies 'greenfield' sites. Is there an assumption that previously developed land/brownfield land cannot support commuting and foraging habitats?

MM13 introduces a new paragraph to Policy NE6 stating that the scale of the buffer will need to be determined on a case-by-case basis and be informed by surveys. While this sets out some criteria on the scale of buffers, it is yet insufficient to be effective. Other sensitivities, such as noise, general activity, loss of habitat connectivity, etc., are not mentioned in the policy.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** No**Attachments:** None

7041

Support

Respondent: Natural England (Consultation Team) [1169]**Summary:**

Regarding the supporting text, we are pleased to see that reference has been added to the Solent Maritime Special Area of Conservation (SAC) though we highlight that reference still needs to be made to the Arun Valley Ramsar site in paragraph 4.27. We strongly support the inclusion of a third pressure (loss of intertidal habitat due to inappropriate coastal management) both within paragraph 4.28 and within the policy wording, where a requirement for avoidance or mitigation measures is clearly stated.

We acknowledge that Policy NE6 has been renamed to reflect the content of the policy, however we advise there is no need to include both internationally and European in the title as they effectively have the same meaning.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** Yes**Attachments:**Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tg5>

7078

Comment

Respondent: Sussex Wildlife Trust (Ms Helen Davies, Conservation Officer) [977]

Summary:

NE6 (b) Pagham Harbour SSSI, SPA, Ramsar site should also be listed in relation to nutrient neutrality

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments: None

7129

Comment

Respondent: Southern Water [1388]

Agent: Southern Water (Mr Ryan Lownds) [1306]

Summary:

We welcome and support the modification below to paragraph 4.31, to reflect that Sussex North Water Resource Zone is only partly served by groundwater abstracted near Pulborough.

As advised in our Regulation 19 consultation response to the Local Plan, the groundwater abstraction supply is near rather than at Pulborough (consultation response wording set out below for reference).

We recommend that paragraph 4.31 is modified further to reflect our consultation response, specifying that the groundwater abstraction supply is near rather than at Pulborough.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

Southern Water Rep. - <https://chichester.oc2.uk/a/tfd>

MM14

7026

Object

Respondent: Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:**

The policy focuses exclusively on vehicle emissions, without taking meaningful steps to promote modal shift.

Policy's language introduces a degree of uncertainty and ambiguity. Phrases such as "likely to result in additional vehicle movements" and "likely to have an adverse effect" are open to interpretation.

Policy remains limited in scope, overly reliant on monitoring and technological assumptions, and undermined by vague wording.

By removing the spatial clarity in Policy H1, the Plan compromises its ability to control the geographic distribution of emissions, which in turn could undermine the assumptions behind Policy NEXX and the conclusions of the HRA Addendum.

Without mechanisms in the Local Plan to steer growth away from car dependent areas, increased housing delivery will likely mean more vehicle trips, contributing directly to ammonia emissions near The Mens SAC.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** No**Attachments:** None

7042

Support

Respondent: Natural England (Consultation Team) [1169]**Summary:**

Natural England has been working with your authority with regard to air quality impacts (specifically ammonia (NH3)) upon The Mens Special Area of Conservation (SAC) since the issue was identified at Regulation 19. In an email dated 04 February 2025, we confirmed with your authority that we were satisfied that the proposed policy wording provided sufficient certainty that an adverse effect on integrity can be ruled out and note that this wording has not changed significantly since then. We are therefore supportive of this policy addition and will continue to work with your authority with regard to additional options for mitigation.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** Yes**Attachments:**Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tg6>

7062

Object

Respondent: Sussex Wildlife Trust (Ms Helen Davies, Conservation Officer) [977]**Summary:**

SWT welcomes this policy which recognises the impacts of increased traffic on sensitive sites such the Trust's Mens Reserve. Unfortunately, we do not consider the proposed mitigation to be sufficient to address the problem.

The lichen interest feature for the Mens SAC is classified as unfavourable and declining. The site is also assessed as 'threatened', specifically from 'air pollution'.

The mitigation being relied upon is not certain. EV uptake will mainly depend on a number of factors outside of the LPA's control and may not at the speed predicted. Existing vehicle ownership is not taken into account.

Change suggested by respondent:

The Horsham Local Plan predicts build out rates on land east of Billingshurst (closest to the Mens SAC) to be from 2023/24 (57 houses) and from 2027 (50 houses per year to 2034). It is not clear why the Council predicts that impacts will arise later in the plan period. Clarification is needed.

Given the sensitivity of the site's lichens and their unfavourable declining status, we believe a precautionary approach should be put in place with suitable measures taken now, rather than delaying action until a future date.

We would welcome the opportunity to work with the Council on developing a robust appropriate policy response.

Legally compliant: Yes**Sound:** No**Attachments:** None

7090

Comment

Respondent: West Sussex County Council (Tracey Flitcroft, Principal Planning Officer) [8119]**Summary:**

MM14: This policy includes provisions for using "Automatic Number Plate Recognition (ANPR) monitoring on the A272 to determine the uptake of ultra-low emission vehicles (ULEVs) over time" to warn against possible adverse effects "in relation to atmospheric pollution specifically the levels of ammonia". The text refers in three places to "petrol and hybrid vehicles" or "petrol and hybrid cars and vans". This seems to exclude diesel vehicles which can also contribute to production of emissions containing ammonia as modern catalytic converters for diesel engines produce ammonia as by product of reducing NOX. On this basis the county council suggests that references to "petrol" should be replaced by "ICE" (Internal Combustion Engine) so that emissions from diesel and petrol vehicles are considered together.

Change suggested by respondent:

Replace references to "petrol" with "ICE" (internal combustion engine).

Legally compliant: Not specified**Sound:** Not specified**Attachments:**CDC Local Plan Main Mods Consultation WSCC Reps FINAL.pdf - <https://chichester.oc2.uk/a/tdk>

7124

Comment

Respondent: Horsham District Council [1410]**Agent:** Horsham District Council (Norman Kwan, Senior Neighbourhood Planning Officer) [8126]**Summary:**

MM14 - New Policy NEXX: The Mens SAC and Air Quality

HDC notes the inclusion of a new policy, and supporting text, relating to mitigating atmospheric ammonia levels at The Mens Special Area of Conservation (SAC) as identified in respective HRAs. As set out in the Statement of Common

Ground (document SC07), the two authorities agreed to work collaboratively with relevant stakeholders (namely Natural England) to fully consider and resolve the outstanding matters regarding 'in combination' impact of ammonia levels on the Mens SAC. The outcome of this collaboration was for Horsham and Chichester Councils respectively to agree with Natural England that a jointly prepared new policy be included in both the emerging Horsham and emerging Chichester local plans committing to joint monitoring of vehicle types using the A272 at The Mens. The policy also included levers to curtail through mitigation any development-derived contribution to atmospheric ammonia should monitoring suggest a likely breach of the critical level. HDC confirms that MM14 is the policy that was agreed.

An important principle underlying this work was that the potential exceedance of the atmospheric ammonia critical level would only arise as a result of the combined impact of both the Chichester and Horsham local plan site allocations, combined also with other sources of atmospheric ammonia such as agriculture. As such, Natural England has consistently advised that the potential 'significant effect' on The Mens arises only from plan-led strategic development, as provided for across all local plan allocations for strategic development, and will not arise from any one development site individually. Furthermore, advice from Natural England, reflected in evidence set out in the Habitat Regulations Assessment: Pre-Submission Modifications (document SD11), is that the impacts arising from only the Chichester Local Plan are not likely to result in significant impacts on The Mens SAC.

Since this work took place, on 22 April 2025 HDC published its Local Plan Inspector's Interim Findings Letter¹. This recommended that the Horsham District Local Plan 2023-40 be withdrawn, due to his view that the Council has failed to satisfactorily comply with the Duty to Co-operate when preparing the Local Plan. Whilst no decision has yet been taken on whether to withdraw Horsham's Local Plan, given other concerns raised by the HDC Inspector on the level of housing contained in the plan, it is doubtful that the Horsham Plan as currently drafted would be adopted in its current form.

In any scenario, there is likely to be a considerable period before any strategic scale allocations are set out in an adopted plan over and above the sites allocated in the adopted Horsham District Planning Framework 2015. Whilst applications for further strategic development are anticipated, and notwithstanding the need for the merits of these applications to be considered on a case by case basis, in the event that these obtain planning permission they will not now be plan-led developments.

A further consideration is whether there is realistic prospect that ANPR monitoring of motorised vehicles using the A272 will now take place. At the current time, the clear time delays involved in plan making limit the requirement for HDC to undertake monitoring, given this would only have been necessary to support the allocations made in the emerging Local Plan.

¹ https://www.horsham.gov.uk/data/assets/pdf_file/0009/146565/ID08-Inspectors-Interim-Findings-Letter-040425.pdf

Given these circumstantial changes, the Chichester Local Plan Inspectors will need to consider whether the policy and supporting text set out in MM14 is still required, given HDC's understanding that in-combination impacts on The Mens arising from Chichester's site allocations will, according to the evidence, no longer be significant.

However, should the Inspectors be minded to retain MM14 in their final schedule of recommended modifications, HDC requests that amendments are made to the supporting text for the new 'Policy NEXX - The Mens and Air Quality'. The change would apply to the second new paragraph listed under MM14, as shown below (additional text underlined, deleted text crossed through):

"The Horsham and Chichester Local Plans Outline Air Quality Strategy (AECOM - September 2024) includes a number of specific measures to mitigate combined impacts arising from strategic local plan allocations in both districts, and sets out how they could be delivered to ensure that there would be no adverse effect on the integrity of The Mens SAC in relation to atmospheric pollution specifically the levels of ammonia. However, the Inspector Examining the Horsham Local Plan has recommended the plan be withdrawn and a new plan commence preparation. If deemed necessary, Chichester District Council and Horsham District Council will undertake Automatic Number Plate Recognition (ANPR) monitoring on the A272 to determine the uptake of ultra-low emission vehicles (ULEVs) over time. In the event that

Horsham District Council produces a Development Plan Document which allocates strategic development sites, and subject to evidence supporting this, such monitoring will be undertaken jointly. The outcome of this monitoring (if required) will determine whether and when Policy NEXX is engaged. The councils will also continue to work with Natural England and other stakeholders to explore additional options for mitigation."

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

Horsham DC CDC MMs response May 2025 - Redacted.pdf - <https://chichester.oc2.uk/a/tfb>

7127

Comment

Respondent: Association of Bedham Commoners on the Mens Ancient Woodland [8405]

Agent: Dr Jill Sutcliffe [6956]

Summary:

Suggest include Sussex Wildlife Trust which owns the Mens Ancient Woodland and the commoners who look out for the woodland; Explain the potential increase in EV vehicles not producing emissions; Avoid an in-combination effect of ammonia deposition on The Mens SAC and adopt monitoring to ensure ammonia is not recorded above the 1% critical level threshold from development which could damage the rare bryophytes and lichens in the AW.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments: None

MM15**7043****Support****Respondent:** Natural England (Consultation Team) [1169]**Summary:**

We are pleased to see that our comments made at Regulation 19 (our ref. 420345, 17 March 2023) have been taken into consideration and reference to the LNR Management Plan has been removed from the policy wording, given that it is not focused on mitigating recreational pressure. In addition, we support the removal of the reference to avoidance/mitigation measures and ruling out likely significant effect within the Pagham Harbour section as mitigation measures should not be considered at Stage 1: Screening.

We appreciate the addition of wording in paragraph 4.39 which makes clear that all development has the potential to impact land identified as functionally linked to the SPAs, as well as changes made to the supporting text to distinguish between recreational disturbance and loss/degradation of functionally linked land.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** Yes**Attachments:**Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tg7>**7079****Support****Respondent:** Sussex Wildlife Trust (Ms Helen Davies, Conservation Officer) [977]**Summary:**

SWT strongly supports policies which aim to reduce disturbance to wildlife.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None**MM16****7080****Support****Respondent:** Sussex Wildlife Trust (Ms Helen Davies, Conservation Officer) [977]**Summary:**

SWT welcomes this policy which acknowledges the value of trees, woodland and hedgerows.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

MM17**7044****Support****Respondent:** Natural England (Consultation Team) [1169]**Summary:**

We are pleased to see that the final sentence in paragraph 4.47 of Policy NE9 (Canals) has been removed, following our comments made at Regulation 19 (our ref. 420345,17 March 2023).

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** Yes**Attachments:**Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tg8>**MM18****6999****Support****Respondent:** Merrow Wood [8390]**Agent:** Intelligent Land (Mr Simon Trueick) [8009]**Summary:**

Merrow Wood supports the addition of the word "any" to the first clause of Policy NE10: The sustainability of the site is enhanced by improving or creating any opportunities to access the site by walking, cycling and public transport;.

Sites located outside existing settlement boundaries may not always benefit from the same opportunities for sustainable travel as those in larger settlements do. However where sites such as Prospect Farm, Chidham and Hambrook, can be located outside settlement boundaries but in locations offering reasonable opportunity for sustainable travel choices, this could be seen as a positive.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

7045

Comment

Respondent: Natural England (Consultation Team) [1169]

Summary:

We appreciate the addition of wording to criterion 3 of Policy NE10 requiring development in the countryside to avoid adverse impact upon Nature Recovery Networks.

We do however feel that criterion 1 could be further strengthened to make reference to green infrastructure, for example:

1)The sustainability of the site is enhanced by improving or creating any opportunities to access the site by walking, cycling and public transport, *and integrating these with good quality green infrastructure*.

Change suggested by respondent:

NE propose criterion 1 is changed as follows: The sustainability of the site is enhanced by improving or creating any opportunities to access the site by walking, cycling and public transport, *and integrating these with good quality green infrastructure*.

Legally compliant: Yes

Sound: Yes

Attachments:

Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tg9>

7081

Comment

Respondent: Sussex Wildlife Trust (Ms Helen Davies, Conservation Officer) [977]

Summary:

SWT welcomes the additional text which strengthens nature protection.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments: None

MM19

7046

Comment

Respondent: Natural England (Consultation Team) [1169]

Summary:

We note that no changes have been made to paragraph 4.66 and we therefore maintain our advice that reference should be made to the Chichester Harbour Conservancy as one of the partners we are working with and that, although some actions are outside of the scope of planning, many are related to development pressure and therefore the Plan can have significant influence.

In relation to paragraph 4.64, it is our opinion that the full, complete name of each designated site should be used (e.g. Chichester *and Langstone Harbour SPA/Ramsar site, Solent Maritime SAC and Chichester Harbour SSSI*) or alternatively, reference made to the actual name of the publication (Condition review of Chichester Harbour sites: intertidal, subtidal and bird features).

Change suggested by respondent:

1. Add Chichester Harbour Conservancy to para 4.66
2. Give the full names of the sites mentioned in para 4.64

Legally compliant: Yes

Sound: Yes

Attachments:

Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tgv>

7082

Support

Respondent: Sussex Wildlife Trust (Ms Helen Davies, Conservation Officer) [977]

Summary:

SWT welcomes the Council's commitment to support the 30 by 30 protected areas target.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments: None

MM20**6978****Support****Respondent:** Environment Agency (Miss Anna Rabone, Sustainable Places Technical Specialist) [7883]**Summary:**

The Environment Agency is satisfied with the amendments made in accordance with our comments to the Regulation 19 consultation.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None**7047****Comment****Respondent:** Natural England (Consultation Team) [1169]**Summary:**

We support the inclusion of a reference to the National Coastal Erosion Risk Management (NCERM) work in paragraph 4.76 and amendments made to the policy wording.

We appreciate the amendments made to policy paragraph 3 making it clear that new and replacement buildings should be setback in line with NCERM prediction, though we still maintain that it should be expanded further to prevent replacement dwellings where there is evidence of damage from the effect of wind/waves and where the replacement dwelling cannot be set back.

Finally, we reiterate our previous comments requesting an additional policy requirement be included stating:

Wherever possible development should secure opportunities for the enhancement, creation and/or restoration of coastal and wetland habitats (guided by the Local Nature Recovery Strategy) and contribute to Biodiversity Net Gain.

Change suggested by respondent:

Expand policy in relation to replacement dwellings.

Additional requirement:*Wherever possible development should secure opportunities for the enhancement, creation and/or restoration of coastal and wetland habitats (guided by the Local Nature Recovery Strategy) and contribute to Biodiversity Net Gain*.

Legally compliant: Yes**Sound:** Yes**Attachments:**Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tgb>

MM21

7013

Comment

Respondent: Chichester Harbour Conservancy (Mr Lawrence and Mrs Park Chichester Harbour Conservancy, Principal Planning Officers) [795]

Summary:

We appreciate that this consultation is on the main modifications only, however, Policy NE13 should refer to the new strengthened duty on all relevant authorities to 'seek to further the purpose' of the AONB / National Landscape. This is a key point from the legislation for any decision-taker. Attached is the the 'Applying the CRoW Act section 85 duty to 'seek to further the purpose' in National Landscapes (AONBs) briefing paper November 2024.

Change suggested by respondent:

Add reference to the strengthened duty to seek to further the purpose of the AONB/National Landscape

Legally compliant: Not specified

Sound: Not specified

Attachments:

CRoW-s.85-duty-guidance-for-LPAs_NLA-Briefing-Nov-24.pdf - <https://chichester.oc2.uk/a/tcy>

7048

Comment

Respondent: Natural England (Consultation Team) [1169]

Summary:

It is unclear to us why the reference to the Chichester Harbour AONB Management Plan has been removed from criterion 2 of Policy NE13, particularly as reference continues to be made to this document throughout the remainder of the policy. In our opinion, the reference should be reinstated to direct applicants to where they can find the special qualities of the National Landscape, to ensure they are robustly considered.

Change suggested by respondent:

Reinstate reference to the Chichester Harbour AONB Management Plan

Legally compliant: Yes

Sound: Yes

Attachments:

Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tgc>

MM22**7049****Support****Respondent:** Natural England (Consultation Team) [1169]**Summary:**

We are pleased to see that additional wording has been added to Policy Requirement 4 of Policy NE14 to highlight the potential for new development to contribute to nature recovery networks. We have no further comments to make on this modification.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** Yes**Attachments:**Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tgd>**7083****Comment****Respondent:** Sussex Wildlife Trust (Ms Helen Davies, Conservation Officer) [977]**Summary:**

The Trust welcomes the changes and the additional recognition given to the importance of nature recovery and the potential for nature recovery within land management and mitigation schemes.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None**MM23****6979****Support****Respondent:** Environment Agency (Miss Anna Rabone, Sustainable Places Technical Specialist) [7883]**Summary:**

The Environment Agency is satisfied with the amendments made in accordance with our comments to the Regulation 19 consultation.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

7075

Object

Respondent: Martin Grant Homes [1652]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

MM23 has the potential to add significant burdens for developers. As currently drafted it is considered unjustified, onerous and unsound.

Change suggested by respondent:

To make the Plan and Policy NE15 sound, MM23 should be amended to clarify that NE15 does not require an 8m setback for fluvial water courses when in culverts. Policy text would then read:

"Elsewhere, new development should be set back at least 8m from fluvial watercourses *(excluding when within culverts)*"

Legally compliant: Not specified**Sound:** No**Attachments:**

Chichester Main Modification response - Martin Grant Homes.pdf - <https://chichester.oc2.uk/a/tdw>

7098

Object

Respondent: West Sussex County Council [1416]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

MM23 has the potential to add significant burdens for developers. As currently drafted it is considered unjustified, onerous and unsound.

Change suggested by respondent:

To make the Plan and Policy NE15 sound, MM23 should be amended to clarify that NE15 does not require an 8m setback for fluvial water courses when in culverts. Policy text would then read:

Elsewhere, new development should be set back at least 8m from fluvial watercourses *(excluding when within culverts)*

Legally compliant: Not specified**Sound:** No**Attachments:**

Chichester Main Modifications response.WSCC reps.May25.pdf - <https://chichester.oc2.uk/a/tws>

7108

Object

Respondent: Barratt David Wilson Homes [7523]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

MM23 has the potential to add significant burdens for developers. As currently drafted it is considered unjustified, onerous and unsound.

Change suggested by respondent:

To make the Plan and Policy NE15 sound, MM23 should be amended to clarify that NE15 does not require an 8m setback for fluvial water courses when in culverts. Policy text would then read:

"Elsewhere, new development should be set back at least 8m from fluvial watercourses *(excluding when within culverts)*"

Update the viability work to test whether this proposed policy change is acceptable, both individually and in combination with other existing and proposed burdens.

Legally compliant: Not specified**Sound:** No**Attachments:**

Chichester Main Modifications response.BWD.May25.pdf - <https://chichester.oc2.uk/a/twc>

MM24

6969

Object

Respondent: Thames Water Utilities Ltd (Mr David Wilson, Town Planner) [7761]**Summary:**

Object to new criterion f) which contradicts drainage hierarchy, particularly in relation to surface water.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**

Written representation - <https://chichester.oc2.uk/a/tcj>

6980

Support

Respondent: Environment Agency (Miss Anna Rabone, Sustainable Places Technical Specialist) [7883]**Summary:**

We (the Environment Agency) understand that the addition of criteria f) needs some slight rewording to reflect that the connection to mains is preferred for foul water only. This is satisfactory to us.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

7050

Comment

Respondent: Natural England (Consultation Team) [1169]**Summary:**

Natural England supports the amendments made to Policy NE16 but wish to highlight a small error in paragraph 1 under the heading 'Water Efficiency' which refers to the Sussex North Water Resource Zone as 'Water Resource Zone Sussex North'. We recommend this is corrected to prevent confusion.

Change suggested by respondent:

Correct reference to Sussex North Water Resource Zone

Legally compliant: Yes**Sound:** Yes**Attachments:**

Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tgw>

7125

Support

Respondent: Horsham District Council [1410]**Agent:** Horsham District Council (Norman Kwan, Senior Neighbourhood Planning Officer) [8126]**Summary:**

Policy NE16 Water Management and Water Quality

Horsham District Council notes and supports MM24 which is clear in its encouragement of efficient use of water as part of good management framework across the district across Sussex Water Resource Zone North of which Horsham District belongs.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**

Written representation - <https://chichester.oc2.uk/a/tf8>

7130

Comment

Respondent: Southern Water [1388]**Agent:** Southern Water (Mr Ryan Lownds) [1306]**Summary:**

Welcome and support the modified wording pertaining to the Southern Water Drainage and Wastewater Management Plan (DWMP). Recommend one small amendment to paragraph 4.103 - the DWMP was published in May 2023 rather than in June 2023.

Change suggested by respondent:

Amend paragraph 4.103 - DWMP was published in May 2023 rather than in June 2023.

Legally compliant: Not specified**Sound:** Not specified**Attachments:**

Southern Water Rep. - <https://chichester.oc2.uk/a/tfw>

MM25**7027****Object****Respondent:** Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:**

While changes improve the clarity and technical structure of the policy, KPC's core concerns remain unresolved, particularly around enforceability, monitoring, and the assumed effectiveness of offsetting.

KPC has also highlighted a broader concern that allowing offsetting within the WRZ itself (MM25 still does) risks merely redistributing rather than eliminating demand pressure, thereby diluting the purpose of neutrality.

MM25 does not adequately address the soundness concerns raised by KPC. The policy's reliance on offsetting and its assumptions around monitoring and deliverability remain unproven and insufficiently robust, especially in the context of highly constrained areas like Kirdford. Consequently, Policy NE17 is unsound.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** No**Attachments:** None**7051****Comment****Respondent:** Natural England (Consultation Team) [1169]**Summary:**

We are pleased to see that Policy Requirement 6 (previously 4) has been updated to reflect our comments made at Regulation 19 (our ref. 420345, 17 March 2023) and support the addition of Policy Requirement 2 which clearly outlines what is expected from a water neutrality statement.

While we are supportive of the main modifications made, we suggest additional amendments to the supporting text.

Change suggested by respondent:

Several references are made to the 'Offsetting Implementation Scheme (OIS)' within the supporting text which your authority may want to update to refer to the Sussex North Offsetting Water Strategy (SNOWS), given that this solution is so close to being operational. If appropriate, it would be helpful to include a link to the SNOWS website to further assist applicants.

- Additional text has been added to paragraph 4.113 outlining what is expected of applicants proposing to use a private supply borehole or other water source to service their development. While we are supportive of the wording, we recommend that it is specified that applicants may need to seek a permit from the Environment Agency to implement this strategy.

Legally compliant: Yes**Sound:** Yes**Attachments:**Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tfn>

7126

Support

Respondent: Horsham District Council [1410]**Agent:** Horsham District Council (Norman Kwan, Senior Neighbourhood Planning Officer) [8126]**Summary:**

Policy NE17 Water Neutrality

Water neutrality is a significant issue affecting both our districts. Horsham District Council supports Policy NE17 which is derived from the joint water neutrality work undertaken by Chichester District Council, Horsham District Council and Crawley Borough Council. Horsham District Council welcomes the proposed amendment put forward by MM25 to Policy NE17 and supporting text. This will ensure all new development is in conformity with the Habitat Regulations and can demonstrate water neutrality across the entirety of the Sussex Water Resource Zone North.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**Written representation - <https://chichester.oc2.uk/a/tfv>

MM26

7052

Comment

Respondent: Natural England (Consultation Team) [1169]**Summary:**

It is our opinion that additional wording could be added to supporting paragraph 4.121 to clearly outline what is expected from applicants when their proposal falls within the nutrient neutrality catchment (i.e. provision of a nutrient budget using the latest calculator and a nutrient mitigation strategy in line with relevant guidance) similar to what has been given under Policy NE17 (Policy Requirement 2) for water scarcity.

In addition, we continue to recommend that reference is also made to other key guidance documents including:

- Combining environmental payments
- Constructed wetlands for the treatment of pollution

Change suggested by respondent:

Seek additional wording to set out what is expected from applicants.

Seek reference to additional guidance documents.

Legally compliant: Yes**Sound:** Yes**Attachments:**Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tgf>

MM28**7084****Comment****Respondent:** Sussex Wildlife Trust (Ms Helen Davies, Conservation Officer) [977]**Summary:**

The Trust would welcome further clarification of light impacts on wildlife even where bats have not been recorded. Light has been shown to affect migratory species and the feeding behaviour of resident birds and mammals as it can increase the risk of predation and can hinder navigation.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None**MM31****6974****Object****Respondent:** Gleeson Land [7914]**Agent:** Gleeson Land (Mr Joshua Mellor, Director) [8377]**Summary:**

Current approach lacks justification, housing requirement should be set at level at least that of minimum housing needs, higher growth figure should be tested. Greater quantum of development would have clear benefits. Proposed stepped trajectory justified although non-compliant with PPG as as no recognition of residual requirement (600 dwellings) or how it will be addressed through Plan/subsequent plan-making exercises. Should be explicitly referenced as part of Policy H1.

Change suggested by respondent:

Residual requirement should be explicitly referenced as part of Policy H1 making it clear it is in addition to the sources of supply already identified. Should be clear that the identification of sites to address residual requirement (whether through DPD or Local Plan review) may necessitate additional strategic locations and/or non-strategic requirements beyond that currently identified.

Legally compliant: Not specified**Sound:** Not specified**Attachments:**Written representation - <https://chichester.oc2.uk/a/tcm>

7000**Object**

Respondent: Merrow Wood [8390]**Agent:** Intelligent Land (Mr Simon Trueick) [8009]**Summary:**

The Modifications fail to reflect national policy in demonstrating how the full housing needs of the Plan will be met. The strategy is unsound in that it creates uncertainty of delivery and pushes decisions on this Plan's housing needs to subsequent plans.

Change suggested by respondent:

Policy H1 should be revised to include further site allocations, already submitted to the Local Plan process to date, including sites at Prospect Farm, Chidham and Hambrook, and Tawny Nurseries, Birdham to create a table indicating delivery of the additional 1,134 dwellings added to the Plan in the Modifications.

Legally compliant: No**Sound:** No**Attachments:** None

7028**Object**

Respondent: Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:**

MM31 introduces a more numerically precise housing requirement and a defined annual trajectory, but these technical improvements do not correct the fundamental weaknesses in the spatial logic and environmental integrity of Policy H1. The Parish Council maintains that the policy is unsound and not legally compliant. Fails to meet SEA Directive, Habitats Regulations and Duty to Cooperate. Lack of clarity on where housing will be delivered.

Change suggested by respondent:

Revise to reintroduce a transparent and evidence-based spatial housing strategy, supported by environmental constraints mapping and deliverability assessments for all parts of the District, including Kirdford.

Legally compliant: No**Sound:** No**Attachments:** None

7066

Support

Respondent: Network Rail (Craig Hatton, Senior Town Planner) [8332]**Summary:**

MM31 – Para 5.1

NR welcome the clarity provided proposed modification to clearly set out the annual housing requirement for the District alongside this being the starting point for objectively assessed need.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**

Network Rail response to Chichester Local Plan Main Modifications_March 2025.docx -
<https://chichester.oc2.uk/a/td6>

7070

Object

Respondent: Martin Grant Homes [1652]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

This modification is not effective and is not seen as positive planning. It will not identify when housing shortfall triggers have been reached and will not enable that shortfall to be quickly addressed. Furthermore, it indicates a lack of commitment to bringing much needed new sites forward either through a DPD or a Plan review. As such, the modifications and the Policy are considered unsound.

Change suggested by respondent:

To make the Plan and Policy H1 sound, MM31 should be amended to:

- Include the table as policy and not as explanatory text;
- Provide for a firm commitment to an immediate and urgent local plan review. The supporting text to the policy and the Local Development Scheme (LDS) should also be amended to reflect this commitment.
- Specify in the Policy H1 the triggers that would be used for assessing when the Plan was underdelivering and the firm timetable and mechanisms for addressing this shortfall.

Legally compliant: Not specified**Sound:** No**Attachments:**

Chichester Main Modification response - Martin Grant Homes.pdf - <https://chichester.oc2.uk/a/td9>

7085

Comment

Respondent: Wates Developments [7778]**Agent:** Turley (Donna Brearley, Associate Director) [8276]**Summary:**

We support the clarification provided through the proposed modifications in respect of the housing requirement to reflect the latest completions figures. Importantly the housing requirement continues to be expressed as a minimum figure, which provides appropriate flexibility to allow for a greater quantum to potentially come forwards should it be demonstrated that this can be appropriately mitigated.

The expression of a minimum figure should equally apply to the stepped delivery rates should it be possible to deliver greater growth in the early years of the Plan.

No non-implementation allowance for commitments failing to come forward appears to have been made, and it is important that sufficient flexibility is allowed to ensure the housing target of at least 11,484 homes is met.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**

27 May 2025 Local Plan Proposed Mods Reps - Wates.pdf - <https://chichester.oc2.uk/a/tdg>

7101

Object

Respondent: Home Builders Federation (Mr Mark Behrendt, Local Plans Manager SE and E) [7316]**Summary:**

HBF welcomes the amendment to H1 which established the housing requirement a 638 dwellings per annum (dpa). However, we do not consider the use of the step trajectory to be appropriate. The Council should have been planning for 638 dpa from the start of the plan being prepared and as such additional allocations are necessary in order to ensure that a step trajectory is not required and more homes are built at the start of the plan period. Pushing back delivery as is proposed in this modification is not consistent with paragraph 60 of the NPPF and the need to boost housing supply and HBF do not consider it to be justified.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** No**Attachments:**

HBF rep Chichester Main Mods May 2025.pdf - <https://chichester.oc2.uk/a/tw5>

7103

Object

Respondent: Barratt David Wilson Homes [7523]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

The commitment to bringing new sites forward either through DPD or Plan review is considered essential. However, this modification is considered vague, fails to provide certainty, is not positively prepared and effective. Consequentially, it is not considered sound.

Change suggested by respondent:

To make the Plan and Policy H1 sound, MM31 should be amended to:

- Include the table as policy and not as explanatory text;
- Provide for a firm commitment to an immediate and urgent local plan review. The supporting text to the policy and the Local Development Scheme (LDS) should also be amended to reflect this commitment.
- Specify in the Policy H1 the triggers that would be used for assessing when the Plan was underdelivering and the firm timetable and mechanisms for addressing this shortfall.

Legally compliant: Not specified**Sound:** No**Attachments:**

Chichester Main Modifications response.BWD.May25.pdf - <https://chichester.oc2.uk/a/tw7>

7111

Comment

Respondent: Church Commissioners for England [1858]**Agent:** Lichfields (Amy Jones) [8352]**Summary:**

The Sustainability Appraisal Addendum concludes the lack of an identified specific housing is a key consideration. The Commissioners agree given the increased overall housing requirement, and consider this must be addressed for the Plan to be found sound. The Commissioners consider there is scope to increase the quantum of development allocated for the Southbourne Allocation BLD to 1,200 dwellings (evidenced in previously provided Vision Document for their land to the west of Southbourne, Scenario 1 of DPD options). Leaving supply identification to a subsequent Site Allocations DPD is not an appropriate justifiable strategy considering evidence based options are available.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**

Written representation - <https://chichester.oc2.uk/a/tfx>

7131

Comment

Respondent: Southern Water [1388]**Agent:** Southern Water (Mr Ryan Lownds) [1306]**Summary:**

Chapter 5: Housing

5.1. The local Preferred Approach consultation on the Local Plan was based on meeting the identified objectively assessed housing needs of for the plan area is of 638 dwellings per annum(27) (dpa), which is a starting point for determining the housing requirement. This excludes any plus an allowance for accommodating unmet need arising from the Chichester District part of the South Downs National Park. The plan period is from 2021/22 - 2038/39 giving a total requirement of a minimum of 11,484 dwellings. From the start of the plan period (1 April 2021) to 31 March 2024 there have been 2,326 completions, leaving a residual need of 9,158 dwellings to be delivered.

As a Statutory Wastewater and Water Service Provider for the Chichester District, we welcome early engagement in relation to any increase in the number of dwellings to be delivered in the Local Plan.

'Made' Local Plans are a consideration for our investment plans to accommodate housing growth. Therefore, it is important that the projected number of dwellings to be delivered during the Local Plan period is understood and can be considered in relation to our infrastructure provisions.

As such, we welcome early engagement in relation to any additional housing allocations made through a Site Allocation DPD or review of the Local Plan.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**Southern Water Rep. - <https://chichester.oc2.uk/a/tff>

MM32

7067

Support

Respondent: Network Rail (Craig Hatton, Senior Town Planner) [8332]**Summary:**

MM32 – Policy H2

NR supports the modification to set out that the Southbourne Allocation DPD will come forward to provide clarity around the Broad Location for Development.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**Network Rail response to Chichester Local Plan Main Modifications_March 2025.docx - <https://chichester.oc2.uk/a/td6>

7071

Object

Respondent: Martin Grant Homes [1652]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

There are no specific triggers with timetables identified in the Policy for identifying neighbourhood plan under-delivery or robust mechanisms for addressing this type of under-delivery quickly. Furthermore, it is not how underdelivery occurring in the later parts of the plan will be addressed given the uncertainty over the timings of the SA DPD and Local plan review timetables.

As currently drafted, MM32 is considered weak, unable to achieve its delivery objectives and not considered to be robust or sound. The policy and supporting text should be amended to enable flexible amendments to housing numbers.

Change suggested by respondent:

To make the Plan and Policy H2 sound, MM32 should be amended to:

- Provide for a firm commitment to an immediate and urgent local plan review. The supporting text to the policy and the Local Development Scheme (LDS) should also be amended to reflect this commitment.
- Specify in the Policy H2 the triggers that would be used for assessing when neighbourhood planning was underdelivering and the firm timetable and mechanisms for addressing this shortfall.
- Amend the Policy to allow for minor amendments to housing numbers on strategic allocation sites which could be used during the development Management process.

Legally compliant: Not specified**Sound:** No**Attachments:**

Chichester Main Modification response - Martin Grant Homes.pdf - <https://chichester.oc2.uk/a/tdv>

7104

Object

Respondent: Barratt David Wilson Homes [7523]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

As drafted MM32 is considered vague, fails to provide certainty and is not positively prepared or effective in dealing with neighbourhood plan under-delivery. Consequentially, it is not considered sound.

Change suggested by respondent:

To make the Plan and Policy H2 sound, MM32 should be amended to:

- Provide for a firm commitment to an immediate and urgent local plan review. The supporting text to the policy and the Local Development Scheme (LDS) should also be amended to reflect this commitment.
- Specify in the Policy H2 the triggers that would be used for assessing when neighbourhood planning was underdelivering and the firm timetable and mechanisms for addressing this shortfall.
- Amend the Policy to allow for minor amendments to housing numbers on strategic allocation sites which could be used during the development Management process.

Legally compliant: Not specified**Sound:** No**Attachments:**

Chichester Main Modifications response.BWD.May25.pdf - <https://chichester.oc2.uk/a/tw8>

MM33**7003****Object****Respondent:** Wisborough Green Parish Council (Mrs Louise Davies, Parish Clerk) [1064]**Summary:**

At the inception of the Local Plan revision, Wisborough Green was allocated 25 dwellings (2018), this was subsequently increased to 40 dwellings (November 2020). This number was taken through the Regulation 14 consultation for the revised Wisborough Green Neighbourhood Plan, following which the process was paused. However, just prior to the commencement of the LP Regulation 19 consultation, WGPC was informed that the allocation had been further increased to 75 dwellings (January 2023). WGPC urges that the allocation for Wisborough Green be reduced to ensure the Local Plan is both evidence-based and sustainable.

Change suggested by respondent:

CDC justified this substantial increase (200% on the initial allocation) on the grounds that development in the southern part of the district was constrained by limitations associated with the A27 and that, in an effort to meet to the Local Plan Inspector's Summer 2021 directive to leave 'no stone unturned and to look again', CDC opted to increase Wisborough Green's housing allocation. In the event the Planning Inspector dismissed the A27 constraint as a valid justification for redistributing housing growth away from the south of the district. In light of this, WGPC maintains that retaining the allocation of 75 dwellings in Wisborough Green renders the Local Plan unsound, lacks logic, disproportionately adversely affects the controlled growth of Wisborough Green and fervently asks that the figure be reviewed, not least because 75 dwellings constitute 25% of the non-strategic allocation for the whole of the District. Further, the number is predicated on a flawed Housing and Economic Land Availability Assessment (HELAA) data and is inconsistent with the findings of CDC's own Landscape Capacity Study.

WGPC urges that the allocation for Wisborough Green be reduced to ensure the Local Plan is both evidence-based and sustainable.

Legally compliant: No**Sound:** No**Attachments:**

WGPC - Local Plan main modifications consultation response May 2025.pdf -

<https://chichester.oc2.uk/a/twx>

7029

Object

Respondent: Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:**

From the standpoint of soundness, the continued push for the use of housing allocations, and not other mechanisms available to Neighbourhood Plans, leads KPC to worry about the justification behind Policy H3. The site allocation path chosen by CDC for Policy H3 is not necessarily the most appropriate strategy when considered against the reasonable alternatives. KPC explained that there are other alternatives to make housing provision, and they do not necessarily require site allocations. The revised wording of Policy H3 is too prescriptive regarding how neighbourhood plans are expected to deliver housing figures. KPC considers this to not be effective and not justified, leading to Policy H3 being unsound.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** No**Attachments:** None

7058

Comment

Respondent: Welbeck Strategic Land IV LLP [7970]**Agent:** Boyer Planning (Ben Pope) [7292]**Summary:**

Whilst we are supportive of the policy, we note that there is no timeframe in place for a Neighbourhood Plan to be brought forward and adopted. Taking Kirdford Neighbourhood Plan as an example, there is no current timescale in place for this to be brought forward and for the 50 homes allocated for Kirdford, through the emerging local plan, to be delivered.

Change suggested by respondent:

We consider additional wording should be included to the supporting text for policy H3 to encourage Neighbourhood Plans to be brought forward in a timely manner. We consider that appropriate text could comprise:

"Should no progress on a Neighbourhood Plan take place within six months of adoption of the Local Plan, sites within those parishes which have been identified to deliver new homes, will be considered on a case-by-case basis, in order to deliver the number of homes allocated within that parish. Sites will be considered on their individual merit and on whether any adverse impacts from bringing forward the site, would significantly & demonstrably outweigh the benefits".

Legally compliant: Not specified**Sound:** Not specified**Attachments:**Welbeck Strategic Land IV LLP Representation Document - <https://chichester.oc2.uk/a/tdr>

7072

Object

Respondent: Martin Grant Homes [1652]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

MM33 is considered to be lacking clarity and fails to provide for housing delivery. As such it is not considered to be justified and effective.

Change suggested by respondent:

To make the Plan and Policy H3 sound, MM33 should be amended to:

- Clarify the ability to flexibly adjust housing numbers relates to all Parishes, or just those listed in the table
- Specify in the Policy H3 the triggers that would be used for assessing when the Plan was underdelivering in terms of neighbourhood plans and the firm timetable and mechanisms for addressing this shortfall.

Legally compliant: Not specified**Sound:** No**Attachments:**

Chichester Main Modification response - Martin Grant Homes.pdf - <https://chichester.oc2.uk/a/tdb>

7105

Object

Respondent: Barratt David Wilson Homes [7523]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

MM33 is considered to be lacking clarity and fails to provide for housing delivery. As such it is not considered to be justified and effective.

Change suggested by respondent:

To make the Plan and Policy H3 sound, MM33 should be amended to:

- Clarify the ability to flexibly adjust housing numbers relates to all Parishes, or just those listed in the table
- Specify in the Policy H3 the triggers that would be used for assessing when the Plan was underdelivering in terms of neighbourhood plans and the firm timetable and mechanisms for addressing this shortfall.

Legally compliant: Not specified**Sound:** No**Attachments:**

Chichester Main Modifications response.BWD.May25.pdf - <https://chichester.oc2.uk/a/tw9>

MM35**7095****Object****Respondent:** McCarthy and Stone and Churchill Living [8398]**Agent:** Planning Issues (Lauren Bishop) [8399]**Summary:**

A nil affordable housing rate could facilitate a step-change in the delivery of older person's housing in the Chichester helping to meet the diverse housing needs of the elderly as detailed in Policy H8: Specialist Housing. The benefits of specialist older persons' housing extend beyond the delivery of planning obligations as these forms of development contribute to the regeneration of town centres and assist Council's by making savings on health and social care.

Change suggested by respondent:

"Provision of affordable housing will be required as set out in criteria 1 to 4 below and in accordance with the type, mix and tenure requirements set out in Policy H5 (Housing Mix).

This excludes any application which is seeking to deliver specialist accommodation for older persons housing including retirement housing (Use Class C3) and extra care housing."

Legally compliant: Not specified**Sound:** No**Attachments:**Chichester DC (Main Mods) Rep - May25 - Planning Issues.pdf - <https://chichester.oc2.uk/a/tdp>**MM37****7030****Object****Respondent:** Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:**

MM37 does not address other concerns that continue to undermine the policy's soundness. In particular, the requirement that exception sites be located "adjacent or as close as possible to the settlement boundary" remains overly ambiguous and potentially counterproductive.

This should be altered to state that it must "adjoin the settlement boundary", which is an unambiguous term and in line with the spirit of the policy.

KPC also remains concerned about the continued lack of clarity in defining "local housing need" and "local connection". While the modified policy references the Development Plan allocations, it fails to incorporate any clear criteria into the policy text itself to define 'local need'.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** No**Attachments:** None

MM40**7053****Support****Respondent:** Natural England (Consultation Team) [1169]**Summary:**

We are pleased to see that the suggested wording proposed in our Regulation 19 (our ref. 420345, 17 March 2023) has been incorporated into Policy H11, making it clear that gypsy, traveller and travelling showpeople development is still required to comply with policies NE6 and NE7.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** Yes**Attachments:**Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tgg>**7073****Object****Respondent:** Martin Grant Homes [1652]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

MM40 is unclear and appears to be adding additional burdens which are unjustified. Consequentially, it is not considered sound.

Change suggested by respondent:

To make the Plan and Policy H11 sound, MM40 should be amended to:

- Clarify whether Gypsy & Traveller pitches on strategic sites applies to all strategic sites in excess of 200 units or just those in the southern area;
- Ensure that the explanatory text and policy are consistent;
- Deal with Gypsy & Traveller provision through a specific Traveller DPD.

Legally compliant: Not specified**Sound:** No**Attachments:**Chichester Main Modification response - Martin Grant Homes.pdf - <https://chichester.oc2.uk/a/tdc>

7106**Object****Respondent:** Barratt David Wilson Homes [7523]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

MM40 is unclear and appears to be adding additional burdens which are unjustified. Consequentially, it is not considered sound.

Change suggested by respondent:

To make the Plan and Policy H11 sound, MM40 should be amended to:

- Clarify whether Gypsy & Traveller pitches on strategic sites applies to all strategic sites in excess of 200 units or just those in the southern area;
- Ensure that the explanatory text and policy are consistent;
- Update the viability work to test whether this proposed policy change is acceptable, both individually and in combination with other existing and proposed burdens.
- Deal with Gypsy & Traveller provision through a specific Traveller DPD.

Legally compliant: Not specified**Sound:** No**Attachments:**

Chichester Main Modifications response.BWD.May25.pdf - <https://chichester.oc2.uk/a/twv>

MM44**7031****Object****Respondent:** Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:**

KPC supports the recognition of neighbourhood-specific design codes, although for clarity and completeness, the policy should explicitly reference neighbourhood plans, which often serve as the basis for design codes in rural areas such as Kirdford.

That said, we are disappointed that the policy does not go beyond what is already set out in national policy and guidance, particularly the National Design Guide and the National Model Design Code. The Local Plan misses an opportunity to provide stronger, locally-led design expectations that reflect the distinctive rural character and landscape setting of parishes like Kirdford.

In conclusion, while the policy is sound, it could be strengthened further by making clearer reference to the role of neighbourhood plans and embedding more ambitious local design expectations.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** No**Attachments:** None

MM47**6983****Support****Respondent:** Historic England [1394]**Agent:** Historic England (Alan Byrne, Historic Environment Planning Adviser) [1084]**Summary:**

MM47 - We support the modifications to Policy P9 The Historic Environment which will clarify the purpose of the policy.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**Historic England Rep - <https://chichester.oc2.uk/a/tcn>**7032****Object****Respondent:** Kirdford Parish Council [1875]**Agent:** Kirdford Parish Council (Mr Rafael Grosso Macpherson, Associate Planner) [8393]**Summary:**

To be sound, the policy should confirm that identification of non-designated assets will be carried out through clearly defined processes, including community-led mechanisms such as neighbourhood planning. It should also positively plan for the enhancement of non-designated heritage assets. Therefore, Policy P9, as modified, remains unsound.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** No**Attachments:** None**MM48****6984****Comment****Respondent:** Historic England [1394]**Agent:** Historic England (Alan Byrne, Historic Environment Planning Adviser) [1084]**Summary:**

MM48 - We agree with the inclusion of a new paragraph relating to Scheduled Monuments, and the changes to the text of Policy P10 Listed Buildings to clarify the purpose and scope of the policy and include specific reference to Scheduled Monuments.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**Historic England Rep - <https://chichester.oc2.uk/a/tcn>

MM49

6985

Support

Respondent: Historic England [1394]

Agent: Historic England (Alan Byrne, Historic Environment Planning Adviser) [1084]

Summary:

MM49 - We agree with the additional text to the supporting text of Policy P11 Conservation Areas, and support the revised wording of the policy.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

Historic England Rep - <https://chichester.oc2.uk/a/tcn>

MM50

6986

Support

Respondent: Historic England [1394]

Agent: Historic England (Alan Byrne, Historic Environment Planning Adviser) [1084]

Summary:

MM50 - Policy P12 Non-Designated Heritage Assets: we agree with the inclusion of a new paragraph describing the matters considered when dealing with non-designated heritage assets, and support the changes to the wording of the policy that better reflect the NPPF.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

Historic England Rep - <https://chichester.oc2.uk/a/tcn>

MM51

6987

Support

Respondent: Historic England [1394]

Agent: Historic England (Alan Byrne, Historic Environment Planning Adviser) [1084]

Summary:

MM51 - we support the revised and additional wording in Policy P13 Registered Parks and Gardens.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

Historic England Rep - <https://chichester.oc2.uk/a/tcn>

MM52

7054

Support

Respondent: Natural England (Consultation Team) [1169]

Summary:

We strongly support the main modifications made to Policy P14, in particular the references to blue as well as green infrastructure and the addition of wording linking GBI delivery to the Local Nature Recovery Strategy.

Change suggested by respondent:

-

Legally compliant: Yes

Sound: Yes

Attachments:

Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tgh>

MM56**7061****Object****Respondent:** Wates Developments [7778]**Agent:** Mr Ben Christian [8113]**Summary:**

The provision of employment space to meet current market needs in Chichester is lacking from Policy E1 and therefore under Main Modification 56 additional sites should be allocated, particularly in respect of the logistics sector – a requirement specifically referenced for policy making in the 2024 National Planning Policy Framework.

Should the Council maintain their current position, they are not considered to meeting current or future employment needs therefore contributing to making the draft plan unsound.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** No**Attachments:**

Representations - Consultation on Chichester Local Plan Main Modification 56 - Wates Developments Limited.pdf - <https://chichester.oc2.uk/a/tdt>

7096**Object****Respondent:** West Sussex County Council [1416]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

MM56 (especially when read with other policies and modifications in the emerging plan) is inconsistent, confusing and unjustified. Consequentially the amendments are considered to be unsound.

Change suggested by respondent:

To make the Plan and Policy E1 sound, MM56 should be amended to:

- Clarify the status of the table;
- Place the new table in Policy E1 and not in the explanatory text;
- Make the employment floorspace requirements for the Land South of Bognor Road in Policy E1 consistent with the minimum of 28,000 sqm found elsewhere in the plan.

Legally compliant: Not specified**Sound:** No**Attachments:**

Chichester Main Modifications response.WSCC reps.May25.pdf - <https://chichester.oc2.uk/a/tdq>

MM58**7055****Support****Respondent:** Natural England (Consultation Team) [1169]**Summary:**

In our Regulation 19 comments (our ref. 420345, 17 March 2023) we highlighted an overlap between the Runcton Horticultural Development Area (HDA) and one of the strategic wildlife corridors set out in Policy NE4. We therefore strongly support the modification to the proposed HDA extension shown in Map E3a (MO2) which no longer crosses into the strategic wildlife corridor. We have no further comment to make on this modification.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** Yes**Attachments:**Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tfy>**MM59****7056****Comment****Respondent:** Natural England (Consultation Team) [1169]**Summary:**

Natural England supports the inclusion of additional text within Policy E4 ensuring that the scale of development will not have a significant effect upon the South Downs National Park (SDNP) and its setting (requirement 7) and requiring development to enhance and protect Strategic Wildlife Corridors (requirement 11). We do however feel the policy could be strengthened by requiring large-scale proposals to assess their impact on the national park via a Landscape and Visual Impact Assessment (LVIA), or by making reference to Policy NE2.

Change suggested by respondent:

Require large scale proposals to assess impact on the park via an LVIA - or cross refer to Policy NE2.

Legally compliant: Yes**Sound:** Yes**Attachments:**Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tgx>

7113

Comment

Respondent: Church Commissioners for England [1858]**Agent:** Lichfields (Amy Jones) [8352]**Summary:**

The Commissioners has significant landholdings that are suitable for horticultural development. MM59 allows for 'functionally-linked' development to come forward alongside horticultural development, to ensure that the Policy assists the national and international competitiveness of the district's horticultural industry. The SAA confirms that the MM58 and MM59 have modest overall implications, and serve to provide greater clarity for the horticultural industry regarding what types of development will be supported within HDAs. The Commissioners are supportive of this approach and continue to welcome the opportunity for continued dialogue on supporting the delivery of horticultural development at additional locations to those already identified

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**Written representation - <https://chichester.oc2.uk/a/tf5>

MM61

6988

Support

Respondent: Historic England [1394]**Agent:** Historic England (Alan Byrne, Historic Environment Planning Adviser) [1084]**Summary:**

MM61 - We support the additional text in Policy E9 Caravans and Camping Sites in relation to its reference to "not compromising" historic environment designations in bullet point 6.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**Historic England Rep - <https://chichester.oc2.uk/a/tcn>

7057

Support

Respondent: Natural England (Consultation Team) [1169]**Summary:**

We are pleased to see that our comments made at Regulation 19 (our ref. 420345, 17 March 2023) stage have been taken into consideration and policy requirement 9 has been brought in line with Policy E8, requiring all new caravan and camping sites to be located where they will not compromise essential features of internationally and nationally designated landscape and nature conservation sites. We have no further comments to make on this modification.

Change suggested by respondent:

-

Legally compliant: Yes**Sound:** Yes**Attachments:**Chichester Local Plan Main Modifications NE Response [1411].pdf - <https://chichester.oc2.uk/a/tgj>

MM62

7086

Support

Respondent: Wates Developments [7778]**Agent:** Turley (Donna Brearley, Associate Director) [8276]**Summary:**

iTransport have reviewed the proposed revised policy wording and supporting text and are in principle supportive of a move towards monitor and manage principles, focussed on reducing car reliance.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**27 May 2025 Local Plan Proposed Mods Reps - Wates.pdf - <https://chichester.oc2.uk/a/tdh>

7134

Support

Respondent: National Highways (Mr Nigel De Wit, Spatial Planner) [8406]**Summary:**

Welcome and support MM.

Commitment to monitor and manage approach to identifying transport schemes to support development strategy ensures Local Plan is consistent with national policy: Department for Transport Circular 01/2022: Strategic road network and the delivery of sustainable development.

National Highways are committed to the process, as demonstrated by involvement with newly established Transport Infrastructure Management Group (TIMG).

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

MM63

7087

Comment

Respondent: Wates Developments [7778]**Agent:** Turley (Donna Brearley, Associate Director) [8276]**Summary:**

iTransport welcome the greater clarity provided in terms of the level of contribution that will be sought and the mechanism for how these improvements are delivered. To ensure future planning applications are compliant with paragraph 58, it is recommended that the A27 Chichester Bypass Mitigation SPD is updated to take account of this contribution level. The SPD should be applied to Local Plan allocations going forward.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**27 May 2025 Local Plan Proposed Mods Reps - Wates.pdf - <https://chichester.oc2.uk/a/tdh>

7135

Support

Respondent: National Highways (Mr Nigel De Wit, Spatial Planner) [8406]**Summary:**

Welcome and support MM.

Commitment to monitor and manage approach to identifying transport schemes to support development strategy ensures Local Plan is consistent with national policy: Department for Transport Circular 01/2022: Strategic road network and the delivery of sustainable development.

National Highways are committed to the process, as demonstrated by involvement with newly established Transport Infrastructure Management Group (TIMG).

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

MM64

7121

Comment

Respondent: Hampshire County Council [1393]**Agent:** Hampshire County Council (Emily Howbrook, Head of Spatial Planning) [8161]**Summary:**

Concerned about the omission of wording featured in the SoCG for Policy T2, in relation to the need for a Transport Assessment to measure potential cross-boundary impacts.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**Written representation - <https://chichester.oc2.uk/a/tf9>

MM73

7091

Comment

Respondent: West Sussex County Council (Tracey Flitcroft, Principal Planning Officer) [8119]

Summary:

Para 10.35 2nd bullet reference refers to a requirement for land for a two-form entry primary school – this is not in line with the 3rd bullet point of the policy which also states the requirement for ‘early years/childcare and special educational needs and disability’. ‘Early years/childcare and special educational needs and disability’ should also be added to the text in the supporting text of the policy regarding land requirements.

Criterion 12. There has been no evidence of a requirement and feasibility work undertaken to determine what is achievable in terms of walking and cycling improvements as set out in Policy A8 Criterion 12. However, WSCC are supportive of improved active travel including walking and cycling links from Oving and Tangmere to Chichester.

Change suggested by respondent:

To allow flexibility through master planning of the site and viable and deliverable options of infrastructure we suggest the modification is amended to read

12. Provide for improved sustainable travel options and new or improved cycle and pedestrian facilities (that could include public rights of way) to provide linkages with Chichester, Westhampnett, Tangmere and Oving, subject to feasibility

Legally compliant: Not specified

Sound: Not specified

Attachments:

CDC Local Plan Main Mods Consultation WSCC Reps FINAL.pdf - <https://chichester.oc2.uk/a/tdz>

7123

Comment

Respondent: Obsidian Strategic, DC Heaver and Eurequity Limited [8396]

Agent: DWD Ltd (Stephen Rose) [8288]

Summary:

To avoid conflict with Policy NE4 and safety concerns, the inclusion of Oving as a location for a linkage with the A8 site should be removed.

Change suggested by respondent:

Oving as a location for a linkage with the A8 site should be removed.

Legally compliant: Not specified

Sound: Not specified

Attachments:

250529 CDC Local Plan Main Modifications Representation - May 2025 Revised.pdf - <https://chichester.oc2.uk/a/tfs>

MM74**6989****Support****Respondent:** Historic England [1394]**Agent:** Historic England (Alan Byrne, Historic Environment Planning Adviser) [1084]**Summary:**

MM74 - we support the revision at bullet point 7 to "Preserve the significance of heritage assets, having due regard to their settings" in Policy A10 Land at Maudlin Farm.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**Historic England Rep - <https://chichester.oc2.uk/a/tcn>**7099****Object****Respondent:** Teren Project Management Ltd [8174]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

MM74 add additional burdens which could undermine delivery. It is considered unjustified and not representative of positive planning and therefore unsound.

Change suggested by respondent:

To make the Plan and Policy A10 sound, MM74 should be amended as follows:

...265 dwellings, including (add *4*) (delete - 13) serviced self/custom build plots; ...

Legally compliant: Not specified**Sound:** No**Attachments:**Chichester Main Modifications response.Teren.May25.pdf - <https://chichester.oc2.uk/a/twt>

7132**Support****Respondent:** Southern Water [1388]**Agent:** Southern Water (Mr Ryan Lownds) [1306]**Summary:**

We welcome and support the Modification.

Having regard to the above, and for consistency we propose the following additional criterion to site policy A10:

Occupation of development will be phased to align with the delivery of infrastructure for adequate wastewater conveyance (meeting strict environmental standards).

Change suggested by respondent:

Add an additional criterion: Occupation of development will be phased to align with the delivery of infrastructure for adequate wastewater conveyance (meeting strict environmental standards).

Legally compliant: Not specified**Sound:** Not specified**Attachments:**

Southern Water Rep. - <https://chichester.oc2.uk/a/tfg>

MM75**7109****Object****Respondent:** Barratt David Wilson Homes [7523]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

MM75 amends Policy A11 to reduce flexibility and add additional burdens. This will undermine delivery and is not considered justified or effective. As such it is considered unsound.

Change suggested by respondent:

To make the Plan and Policy A11 sound and maintain delivery, MM75 should be amended as follows:

... (Add - *A minimum of*) 245 dwellings, including (add - *4* (delete - *12*) suitable serviced plots to provide for self/custom build housing; ...

Legally compliant: Not specified**Sound:** No**Attachments:**

Chichester Main Modifications response.BWD.May25.pdf - <https://chichester.oc2.uk/a/twd>

MM76**7001****Comment****Respondent:** Merrow Wood [8390]**Agent:** Intelligent Land (Mr Simon Trueick) [8009]**Summary:**

Merrow Wood does at least welcome the Modifications to Policy A12 in Chidham and Hambrook which allow for consideration of additional development sites should delivery of the appeal sites fail to come forward. It is also very likely that additional housing will be required in the area to meet the significantly increased housing requirements created by the new Local Housing Needs calculations.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None**7011****Object****Respondent:** Chichester Harbour Conservancy (Mr Lawrence and Mrs Park Chichester Harbour Conservancy, Principal Planning Officers) [795]**Summary:**

Please delete this policy, rather than trying to get around the fact that it is not needed by providing various caveats.

Change suggested by respondent:

Delete this policy altogether.

Legally compliant: No**Sound:** No**Attachments:** None**MM77****6990****Support****Respondent:** Historic England [1394]**Agent:** Historic England (Alan Byrne, Historic Environment Planning Adviser) [1084]**Summary:**

MM77 - we support the revision at bullet point 14 to "Preserve the significance of heritage assets, having due regard to their settings" in Policy A13 Southbourne Broad Location for Development.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**Historic England Rep - <https://chichester.oc2.uk/a/tcn>

7068

Support

Respondent: Network Rail (Craig Hatton, Senior Town Planner) [8332]

Summary:

MM77 – Criterion 5

NR supports the inclusion of the need to consider the severance by the railway in the masterplanning of the Southbourne BLD. Southbourne has several of high risk railway crossings that give rise to significant safety concerns due to the quantum of development proposed. Dealing with the safety issues of the crossings is a critical element of the infrastructure needs within Southbourne to allow development to come forward.

Additionally, improving connectivity should be an important focus of the Policy however this must be done to minimise railway interactions and safe, alternative means of crossing the railway is essential for current and future occupiers within Southbourne. NR will continue to work with CDC to support development and minimise the impacts of this on railway safety.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

Network Rail response to Chichester Local Plan Main Modifications_March 2025.docx -
<https://chichester.oc2.uk/a/td7>

7088

Comment

Respondent: Wates Developments [7778]

Agent: Turley (Donna Brearley, Associate Director) [8276]

Summary:

Bullet 5 - iTransport have advised that the bullet point should clarify that any mitigation packaged proposed should be justified through a Transport Assessment submitted in respect of any planning application.

Bullet 9 - Given the achievement of biodiversity net gain is a statutory requirement we would suggest that this does not need to be replicated in the policy and can be deleted. As currently drafted it is considered the additional text is ambiguous and suggests that the development would need to deliver offsite improvements to the wider green infrastructure network and identified strategic wildlife corridors.

Bullet 14 - As currently drafted considered inconsistent with national policy as it does not allow for the balancing exercise advocated in the NPPF (2024).

Change suggested by respondent:

For criterion 5 suggested revised wording proposed is as follows:

"Ensure that the masterplanning and infrastructure provision adequately addresses the impact of the development, in terms of addressing severance caused by the railway line within the allocation area *defined through the Southbourne DPD* and the village generally. Provide any required mitigation, *as justified through a Transport Assessment submitted in respect of any planning application*, to ensure there is no *unacceptable* adverse impact on the safety of existing or planned railway crossings and make provision for suitable connectivity, both within the development and with the village;"

For criterion 9 it is suggested that this element of the policy is updated as follows:

"facilitates (delete - *the achievement of biodiversity net gain and the*) creation of high levels of habitat connectivity within the site, *and connected to* the wider green infrastructure network and identified strategic wildlife corridors."

Criterion 14 needs to be amended in order to reflect the balancing process encompassed by the NPPF in relation to heritage assets.

Legally compliant: Not specified

Sound: Not specified

Attachments:

27 May 2025 Local Plan Proposed Mods Reps - Wates.pdf - <https://chichester.oc2.uk/a/tdx>

7112

Comment

Respondent: Church Commissioners for England [1858]**Agent:** Lichfields (Amy Jones) [8352]**Summary:**

The Commissioners are concerned that the amended requirement to provide 53 serviced self/custom build plots is not justified. The significant uplift in the requirement (from 16) is not sufficiently evidenced or explained. The significant uplift at this stage in Plan preparation, and the disparity between the requirement for allocated and unallocated sites reflect an inconsistent approach to provision of serviced plots. This raises questions regarding how this approach has been evidenced/justified. The Commissioners do not consider the approach to be sound..

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**Written representation - <https://chichester.oc2.uk/a/tfj>

7119

Comment

Respondent: Hampshire County Council [1393]**Agent:** Hampshire County Council (Emily Howbrook, Head of Spatial Planning) [8161]**Summary:**

The County Council is pleased to see that the suggested wording around the proposed enhancements of the Chichester to Emsworth Cycle path (ChEm Route) as part of MM77.

However, the County Council notes the omission of wording featured in the signed Statement of Common Ground (SoCG) that relates to the potential cross-boundary traffic impacts that could arise from the Southbourne site allocation (Policy A13).

Thus, as the Local Highway Authority for Hampshire and member of the Transport Infrastructure Management Group (TIMG), the County Council requests to be engaged and consulted as part of any future consultations regarding the allocated Southbourne BLD (Policy A13).

Change suggested by respondent:

Refer to potential cross boundary impacts and Transport Assessment.

Legally compliant: Not specified**Sound:** Not specified**Attachments:**Written representation - <https://chichester.oc2.uk/a/tfm>

MM78**6967****Object****Respondent:** Saxon Meadow Tangmere Ltd (David Parr) [8386]**Petition:** 2 petitioners**Summary:**

In response to the Main Modifications Consultation, the revised map of 10.8 is not in accordance with the CPO agreement dated the 7 December 2023.

Change suggested by respondent:

Update map boundaries to reflect attached revised boundary map.

Legally compliant: Not specified**Sound:** Not specified**Attachments:**

Saxon Meadow (8156) - Saxon Meadow Revised Boundary Map 10.4.pdf -

<https://chichester.oc2.uk/a/tch>

Saxon Meadow (8156) - Letter_CDC_14.04.25 - Redacted.pdf - <https://chichester.oc2.uk/a/tfk>

Saxon Meadow (8156) - Agreement - Tangmere - 7 December 2023 - executed by Countryside - Redacted.pdf - <https://chichester.oc2.uk/a/tfz>

6968**Object****Respondent:** Paula Riches [8388]**Summary:**

There is an error on the map outlining Saxon Meadow boundary. It has not included the land on the East side to the right hand side of the entrance road from the pond to the gate that enters the path along the field and our Meadow. This land belongs to the Pitts and was agreed during the prolonged discussion regarding the CPO that it would become part of Saxon Meadow Ltd.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

7063

Object

Respondent: Mr John Wolfenden [7853]

Petition: 43 petitioners

Summary:

Change Required to Chichester Local Plan 2021–2039

MM78

Policy A14 10.0

Subject: Objection to MM78 Policy A14 10

As a member of TAAG (Tangmere Allotment Advisory Group) and a representative of the Tangmere Allotment Tenants, I am submitting this formal objection to the proposed statement in Policy A14 10 that reads: “making provision for the relocation of existing allotment space to facilitate the potential expansion or relocation of the Tangmere Military Aviation Museum.”

OBJECTION

This statement should be removed as it is neither sound nor legal and should be removed from the plan.

Change suggested by respondent:

Change Required

The Statement “making provision for the relocation of existing allotment space to facilitate the potential expansion or relocation of the Tangmere Military Aviation Museum.” in MM78 Policy A14 10 is legally non-compliant and lacks the necessary substantiation to be deemed sound.

I strongly urge the Inspector to remove this reference from the Local Plan regarding any move of the allotments and reference to the museum.

Legally compliant: No

Sound: No

Attachments:

Objection Forms - <https://chichester.oc2.uk/a/tw4>

MM79**7076****Object****Respondent:** Martin Grant Homes [1652]**Agent:** Henry Adams LLP (Helen Murch) [8397]**Summary:**

MM79 amends Policy A15 to reduce flexibility and add additional burdens. This will undermine delivery and is not considered justified or effective. As such it is considered unsound.

Change suggested by respondent:

To make the Plan and Policy A15 sound and restore flexibility, maintain housing delivery and enable good quality strategic placemaking, MM79 should be amended as follows:

Policy A15 amended to the following:

- Land will be allocated for development in the revised Loxwood Neighbourhood Plan for (delete text - *approximately*) (add text - *a minimum*) of 220 dwellings (delete text - *(minus extant permissions for 5 dwellings or more within the parish since 1 April 2021)*) and supporting facilities and infrastructure.

- The Explanatory text amended to remove the reference to 32 units being permitted and thus only 188 remaining to be allocated.

Legally compliant: Not specified**Sound:** No**Attachments:**Chichester Main Modification response - Martin Grant Homes.pdf - <https://chichester.oc2.uk/a/tdf>**MM82****6981****Support****Respondent:** Environment Agency (Miss Anna Rabone, Sustainable Places Technical Specialist) [7883]**Summary:**

The Environment Agency is satisfied with the amendments made in accordance with our comments to the Regulation 19 consultation.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

MM83

7092

Comment

Respondent: West Sussex County Council (Tracey Flitcroft, Principal Planning Officer) [8119]

Summary:

MM83 – Criterion 12 - reference has been removed which refers to considering the safeguarding of minerals against Policy M9 of the West Sussex Joint Minerals Local Plan (or updated version). WSCC require this to be retained and considered as part of a planning application as it is an area of sharp sand and gravel.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

CDC Local Plan Main Mods Consultation WSCC Reps FINAL.pdf - <https://chichester.oc2.uk/a/tdm>

MM84

7093

Comment

Respondent: West Sussex County Council (Tracey Flitcroft, Principal Planning Officer) [8119]

Summary:

MM84 – Criterion 8 - The wording relating to Minerals and Waste Safeguarding Guidance is not consistent with other parts of the plan and only refers to the Guidance rather than the minerals safeguarding policy. Amendments should be made to refer to policy, as elsewhere in the plan.

Change suggested by respondent:

Refer to the minerals safeguarding policy

Legally compliant: Not specified

Sound: Not specified

Attachments:

CDC Local Plan Main Mods Consultation WSCC Reps FINAL.pdf - <https://chichester.oc2.uk/a/tdn>

MM85**6975****Object****Respondent:** Gleeson Land [7914]**Agent:** Gleeson Land (Mr Joshua Mellor, Director) [8377]**Summary:**

Non-compliant with NPPF; marginal above 5 year requirement; sites identified unlikely to meet definition of deliverable. Plan at risk of being out of date on adoption. Need to significantly boost housing supply now not later in Plan.

Change suggested by respondent:

Identify further suitable and deliverable housing sites and/or inclusion of positively worded windfall policy supporting development adjoining sustainable settlements.

Legally compliant: Not specified**Sound:** Not specified**Attachments:**Written representation - <https://chichester.oc2.uk/a/tcm>**MM86****7094****Comment****Respondent:** West Sussex County Council (Tracey Flitcroft, Principal Planning Officer) [8119]**Summary:**

The proposed amendment to the "Monitoring Indicators" column: "Travel patterns across Local Plan area/ forecasts of future transport needs" is vague while the reference to forecasting will require using consultants at some expense to update forecasts regularly through the Plan period. The county council suggests that indicators can be taken or adapted from those already used in the county council's West Sussex Transport Plan (WSTP) Annual Monitoring Report which includes traffic and cycle count cordons in Chichester. Some further datasets which the WSTP considers at a county-wide level are also available at Chichester District Level. This includes the Sport England active lives survey, which sits alongside active travel in monitoring how many people integrate regular exercise into their weekly routine, although it covers a wider range of physical activity. Use of already existing indicators for which data is available could help to reduce the extent to which the district council may need to commission its own questionnaire surveys into residents' regular travel choices.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:**CDC Local Plan Main Mods Consultation WSCC Reps FINAL.pdf - <https://chichester.oc2.uk/a/tdy>

7133

Comment

Respondent: National Highways (Mr Nigel De Wit, Spatial Planner) [8406]**Summary:**

Correct agency reference against Policies T1 and T2 – should be National Highways, not Highways England.

Welcome commitment to monitor and manage approach although emphasise that National Highways will not be the lead authority for identified improvement schemes for the SRN (A27) nor that it can be presumed that infrastructure will be funded through a future RIS. National Highways will work with developers, local planning and highway authorities on identifying and assessing emerging schemes through involvement with TIMG, but will not fund or deliver schemes or accept developer contributions.

Change suggested by respondent:

Please correct the agency reference against Policies T1 and T2 – it should be National Highways, not Highways England.

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

Comment

6970

Comment

Respondent: Surrey County Council [1404]**Agent:** Surrey County Council (Tamas Gyorfi, Planning Policy Technical Support Officer) [8274]**Summary:**

Thank you for consulting Surrey County Council on the Chichester Local Plan 2021-2039 – Main Modifications Consultation.

Please note that we have no comments to raise.

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

6971

Object

Respondent: Reverend D A Hider [6451]**Summary:**

Objection to additional building, particularly on green spaces, without major infrastructure upgrades.

Change suggested by respondent:

Not specified

Legally compliant: Not specified**Sound:** Not specified**Attachments:**Written representation - <https://chichester.oc2.uk/a/tcz>

6976

Object

Respondent: Gleeson Land [7914]**Agent:** Gleeson Land (Mr Joshua Mellor, Director) [8377]**Summary:**

Outcomes in EA latest modelling different from SFRA. Should be consistent approach between flood data relied on by Council and Environment Agency (25/3/25 updated modelling work) to ensure no constraints to achieving development on existing commitments or proposed allocations. No clarity on this or whether sites which are relied upon and previously 'suitable' are no longer.

Change suggested by respondent:

Review of Strategic Flood Risk Assessment should be completed in context of new NaFRA 'flood zone' data.

Legally compliant: Not specified**Sound:** Not specified**Attachments:**

Written representation - <https://chichester.oc2.uk/a/tcm>

7002

Comment

Respondent: Waverley Borough Council [1371]**Agent:** Waverley Borough Council (Mr Matthew Ellis, Planning Policy Team Leader) [8391]**Summary:**

Waverley Borough Council has no comments to make except that it welcomes all the main modifications that provide measures to mitigate the impacts of development in the Climate Change and the Natural Environment Chapters

Change suggested by respondent:

-

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

7012

Comment

Respondent: Chichester Harbour Conservancy (Mr Lawrence and Mrs Park Chichester Harbour Conservancy, Principal Planning Officers) [795]**Summary:**

Overall we feel that the Local Plan consultation is not user-friendly. The consultation should provide a clear map showing all allocations within the District, as has been done for the Havant Local Plan consultation. Otherwise it is off-putting for the average person to try to wade through everything to try to understand what is being planned, and less people will engage with the process.

Change suggested by respondent:

Include a map of all site allocations

Legally compliant: Not specified**Sound:** Not specified**Attachments:** None

7100

Comment

Respondent: Suez (Sita UK) (Emma Smyth, Senior Planning Manager) [11]

Summary:

SUEZ has been working with the adjacent landowners' representatives, Obsidian (acting for DC Heaver and Eurequity Limited) since 2015 to promote draft site allocation A8. SUEZ has previously submitted representations in response to the Regulation 18 consultation in February 2018, the Regulation 19 consultation in March 2023 and submitted Hearing Statements to the Local Plan Examination in September 2024. We have summarised our most recent comments in Table 1. SUEZ has no further comments in response to the Main Modifications consultation.

Change suggested by respondent:

-

Legally compliant: Not specified

Sound: Not specified

Attachments:

SUEZ - CDC LP Main Mods Consultation.docx - <https://chichester.oc2.uk/a/tw3>