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| CDC b&w LOW res | **Representation Form**  Local Plan 2021 – 2039 Publication Stage | | | | | | | **Ref:**  **(For official use only)** |
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| The consultation on the Local Plan 2021 – 2039: Proposed Submission will run from 3 February 2023 to 17 March 2023. The document and more information on the consultation can be viewed on our website [www.chichester.gov.uk/localplan](http://www.chichester.gov.uk/localplan)  **All comments must be received by 5pm on Friday 17 March 2023.**  There are a number of ways to make your comments:   * Comment on the document on the internet using our online consultation website [www.chichester.gov.uk/localplanconsultation](http://www.chichester.gov.uk/localplanconsultation) **(Recommended)** * Post a copy of this form to us at: Planning Policy Team, Chichester District Council, East Pallant House, 1 East Pallant, Chichester, West Sussex, PO19 1TY   **How to use this form**  Please complete Part A in full. Please note anonymous comments cannot be accepted, a full address including postcode must be provided.  Please complete Part B overleaf, using a new form for each separate policy or paragraph that you wish to comment on. Please identify which paragraph your comment relates to by completing the appropriate box.  For more information, or if you need assistance completing this form, please contact the Planning Policy Team by email at [planningpolicy@chichester.gov.uk](mailto:planningpolicy@chichester.gov.uk) or telephone 01243 785166. | | | | | | | | |
| **Part A** | | | | | | | | |
| 1. Personal Details\* | | |  |  |  | 2. Agent’s Details (if applicable) | | |
| \**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.* | | | | | | | | |
| Title | |  | | |  | | Mr | |
|  | | | | | | |  | |
| First Name | |  | | |  | | Paul | |
|  | | | | | | |  | |
| Last Name | |  | | |  | | White | |
|  | | | | | | |  | |
| Job Title | |  | | |  | | Director of Planning | |
| (where relevant) | | | | | | |  | |
| Organisation | |  | | |  | | Smith Simmons & Partners | |
|  | | | | | | | | |
| Address Line 1 | | Greenwood Group Ltd | | |  | | 32 North Street | |
|  | | | | | | |  | |
| Line 2 | |  | | |  | | Chichester | |
|  | | | | | | |  | |
| Line 3 | |  | | |  | | West Sussex | |
|  | | | | | | |  | |
| Line 4 | |  | | |  | |  | |
|  | | | | | | |  | |
| Post Code | |  | | |  | | PO19 1LX | |
|  | | | | | | |  | |
| Telephone Number | |  | | |  | | 01243 850411 | |
|  | | | | | | |  | |
| E-mail Address | |  | | |  | | paul@ss-p.co.uk | |
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| **Part B**  Please use a new form for each representation that you wish to make. Please note anonymous comments cannot be accepted. Any personal information provided will be processed by Chichester District Council in line with the General Data Protection Regulations 2018. More information is available at: <http://www.chichester.gov.uk/dataprotectionandfreedomofinformation>. | | | | | | | | | |
| Name or Organisation: Greenwood Group Ltd | | | | | | | | | |
| 3. To which part of the Local Plan does this representation relate? | | | | | | | | | |
|  | | | | | | | | | |
| Paragraph |  | Policy | | See below | | Policies Map |  | | |
| 4. Do you consider the Local Plan is:  ✓ | | | | | | | | | |
| 4.(1) Legally compliant  4.(2) Sound | | | Yes  Yes | |  | | | No  No | ✓ |
| 4 (3) Complies with the  Duty to co-operate Yes No  ✓ | | | | | | | | | |
| Please tick as appropriate | | | | | | | | | |

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| 5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.  If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. | | | | |
| The ‘tests of soundness’ for Local Plan preparation are set out in paragraph 35 of the July 2021 NPPF. They require the 2021-39 Local Plan to have been:   * **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; * **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; * **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and * **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.   Our comments concern the Sustainability Appraisal for the Local Plan and the following policies in connection with Sidlesham: S2 - Settlement Hierarchy and Parish Housing Sites - H3. In our view, Sidlesham should be re classified as a service village in the hierarchy and allocated a modest level of development. This would improve the overall plan in terms of it performance against the ‘justified’ test of soundness.  **Sustainability Appraisal (SA)**  This forms part of the evidence base for the Local Plan Review. It has updated the SA prepared for the last Preferred Approach 2018 Local Plan. We note from paragraph 5.2.11 of the updated SA that the southern part of the plan area (i.e. the east west corridor and the Manhood Peninsula) is highly constrained by capacity on the A27. Detailed discussions with National Highways and WSCC, over the course of 2019-2022, have led to a resolution that there is capacity for no more than 535 dpa in this area (with a further 40 dpa in the north part of the District outside the National Park). This contrasts with the actual housing need for the area of 638dpa.  The figure of 535dpa has now been adopted for the submission Local Plan in the southern part of the plan area with no standard 10% supply buffer.  Under providing against OAN will be a matter for discussion at Examination but even accepting the 535dpa can be justified in the south part of the district we still have concerns about the housing distribution for the manhood peninsula. For instance, in order to avoid traffic impact issues on the A27, paragraph 5.2.23 of SA says this would need avoid or minimise growth on the Manhood Peninsula and weight growth to the west of Chichester. Paragraph 5.2.29 also states that growth should be limited on the peninsula because of the need to cross or join the problematic Stockbridge and Whyke A27 junctions which is an issue for private car travel and bus connectivity.  We disagree with this analysis however. 1) it does not explain why development to west of Chichester will not cause the same impacts of having to cross the A27 as suggested will occur for the peninsula; and 2) it assumes the direction of travel will always be towards Chichester. However development on the peninsula could help support local facilities already present in the area and looking in the other direction, could help support the vitality of Selsey and East Wittering as settlement hubs. 3) Development could also help the local economy on the peninsula and introduce a younger profile to the area which the SA notes has a very significant older age structure (33% of those living on the Manhood Peninsula are aged 65+).  The table B in in the SA lists the developable 2021 HELAA sites (Housing and Economic Land Availability Assessment). It includes Site Ref HSI0004 at Sidlesham on page 86. Across a range of performance indicators the site scores 13 green, 4 light green, and 3 red points. Red indicates a significant negative effect; light green a positive; and green a significant positive effect.  Despite the very positive scoring of the site, it has been completely overlooked for any development because of the ranking of Sidlesham as within the ‘rest of the plan area’ category.  **Policy S2 – Settlement Hierarchy**  The Settlement Hierarchy background paper was prepared for the last Preferred Options Local Plan in Dec 2018. It has not been updated for the Submission Plan but provides justification for the hierarchy in Policy S2 of the Local Plan. It forms the basis for the proposed distribution of growth by distinguishing between those settlements considered to be the most sustainable having the best range of facilities and accessibility from those with the least. Most development is focused on the former and development to meet local needs or no development whatsoever on the latter. Paragraph 4.8 of the background paper includes Sidlesham in the ‘rest of the plan area’ least suited for development because it does ‘not contain the range of facilities and services to be classified as sustainable’.  We therefore disagree with this classification and believe Sidlesham should be included as a ‘service village in the hierarchy based on its population and range of available facilities.  The Councils own Settlement Capacity Profile 2013 shows Sidlesham with a population of over 1,100. This historic population is more than Boxgrove, Kirdford and Westhampnett which are all service villages in Policy 2 of this draft Local Plan.  Sidlesham has 4 employment areas at Enbourne Business Park, Walnut Tree Science Park Locks Lane, Jury Lane and the Horticultural Development Area. Community facilities include a petrol filling station with convenience store and off licence, church, recreation ground and football field with licensed bar and hall, primary school with sports hall available for wider community use, 2 other pubs (one a ‘gastro pub’ at Sidlesham Quay). Access to bus services are available from the B2145, 1 regular daytime bus service (51) linking to Chichester & Selsey (Most frequent daytime service, every 15 minutes). A more irregular daytime bus service (150) is on Mondays, Wednesdays and Fridays (3 daytime services in each direction).  Based on this range of facilities we therefore believe Sidlesham should be re-categorised as a service village and allocated for a modest amount of development. This would support its existing facilities and the settlement hubs of Selsey and West Wittering. A modest amount of development need not lead to critical impacts on the A27 as travel impacts would not necessarily be attracted towards Chichester.  **Policy H3 – Parish housing Sites**  We have already explained our reasons why Sidlesham should be included as a ‘service village’ in the hierarchy in connection with S2. Based on this revision to the hierarchy, it follows that some housing should be directed to Sidlesham. We believe a parish allocation of the order of 35-70 dwellings would be justified.  Assuming this is accepted we would point out that the 2021 HELAA Site Ref HSI0004 referred to above is still available at Greenwood Nursery Highleigh Road Sidlesham. The Council said the site was deliverable and had an identified capacity of around 35-67 dwellings. A draft layout plan is attached showing a 35 dwelling scheme. The site is outside the designated horticultural development area, within flood zone 1 (least liable to flood) and has no biodiversity or heritage interest. It is located outside the Chichester Harbour Area of Outstanding Natural Beauty. It has a footpath link to the nearby school.  The proposal would generate fewer trips (and no HGV’s) compared to the existing nursery business.  (Continue on a separate sheet /expand box if necessary) | | | | |
| 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. | | | | |
| Policy S2 – Sidlesham should be included as a ‘service village’ in the settlement hierarchy of S2. The description of Sidlesham should recognise that this includes Highleigh.    Policy H3 - Sidlesham should be allocated around 35-70 dwellings.  (Continue on a separate sheet /expand box if necessary) | | | | |
| ***Please note*** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*  ***After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*** | | | | |
| 7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? | | | | |
|  | | | | |
|  | ✓ | **No**, I do not wish to  participate in  hearing session(s) |  | **Yes**, I wish to participate in  hearing session(s) |
| Please note that while this will provide an initial indication of your wish to participate in hearing sessions(s), you may be asked at a later point to confirm your request to participate. | | | | |
| 8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: | | | | |
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| ***Please note*** *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.* | | | | |