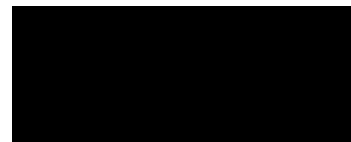


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Date: 3rd March 2023
Our Reference: 3667-BS



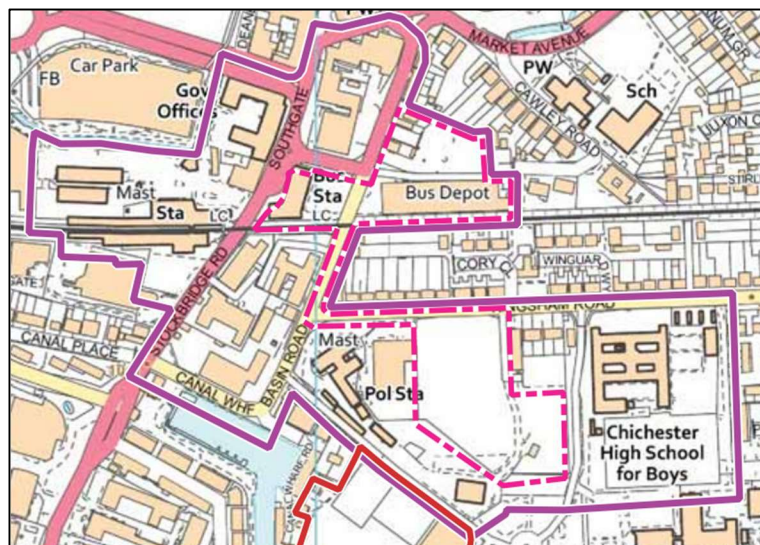
Dear Sir / Madam

CHICHESTER LOCAL PLAN 2021-2039 PROPOSED SUBMISSION REVIEW: REGULATION 19 CONSULTATION RESPONSE

I herein respond on behalf of Bellway Homes Limited [“Bellway”], a well-respected, national developer that builds beautiful, expertly crafted homes which meet the needs of today while considering the demands of the future.

Bellway have an interest in the land known as Police Field, Kingsham Road (allocated for residential development under Policy A5 of the plan). The site comprises a field (historically tied to the police station) and forms part of the wider Southern Gateway Regeneration Area, delineated in pink on the inset map. The regeneration area was originally identified in an SPD and is replicated in the draft Plan. The regeneration of the area will ‘*create a more attractive gateway into the southern side of the city with opportunities to improve active travel linkages*’.

The site forms part of an allocation for new development therein. It is located close to the shops, services, employment and leisure opportunities in the city centre, and in close proximity to the railway station providing convenient access to destinations further afield.



In preparing this response, Bellway has been cognisant of the guidance set out in the National Planning Policy Framework [“NPPF”] and Planning Practice Guidance [“PPG”]. Paragraph 35 of the NPPF:

Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:

a) Positively prepared – *providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs²¹; 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;*

b) Justified – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

c) 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*

d) Consistent with national policy – *enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

The tests of soundness will be applied to non-strategic policies where these are contained within the Local Plan, in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies in the area.

Bellway duly acknowledges that there are current proposals to reform National Planning Policy including the National Planning Policy Framework [“NPPF”] with a public consultation overlapping with Chichester Council’s Local Plan Consultation Period, running from the 22nd December 2022 to the 2nd March 2023. This proposes fundamental changes to plan-making.

Notwithstanding this, it is clear that the emerging Chichester Local Plan 2021-2039 has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and NPPF 2021. It is underpinned by a raft of technical studies, appraisals, assessments and has had regard to other plans and strategies where relevant. Bellway applaud the timely consultation.

The structure of this consultation response mirrors that of the pre-submission document, as follows:

- Duty to co-operate (para 1.23-1.28)
- Cross Boundary Strategic Objectives (para.2.53)
- Spatial strategy and settlement hierarchy
- Climate Change and the Natural Environment
- Housing

- Placemaking, Health and Wellbeing
- Employment and Economy
- Infrastructure
- Strategic and Area Based Policies

Thereafter consideration is given to:

- The schedule of changes to the proposals map
- The draft Habitats Regulations Assessment
- The draft Sustainability Appraisal and non-technical summary

Bellway has not sought to comment on all of the draft policies, rather focussing on those policies where it has something meaningful to say.

Bellway is conscious that, to be effective, plans should be concise and user friendly. The draft Plan is lengthy and there is significant duplication in the policies contained therein. There is significant scope for consolidation and rationalisation, both between overlapping draft policies and with the NPPF. Bellway would be pleased to assist the Council in this process if time permits.

DUTY TO COOPERATE (para.1.23-1.28)

So far as Bellway is aware, the *pre-submission* plan is legally compliant. The Council may well have fulfilled the Duty to Co-operate, (Bellway recognise that the West Sussex and Greater Brighton Strategic Planning Board comprises representatives of local planning authorities across West Sussex) however a Local Strategic Statement 3 has not yet been agreed / adopted.

Page fourteen of the Proposed Local Plan states that *'the Council has engaged constructively, actively and on an ongoing basis with other local authorities and organisations to address key strategic matters. Statements of Common Ground with relevant strategic policy-making authorities are currently being prepared and will be made available for review on the Council's website'*. These statements are not available on the website at this point.

We respectfully reserve our position on this however Bellway believe that the Local Planning Authority has followed the letter and spirit of the Duty to Cooperate in arriving the pre-submission plan. As such, this consultation response focuses upon the tests of soundness.

CROSS BOUNDARY STRATEGIC OBJECTIVES (para.2.53)

Bellway supports spatial priority 2 which sets out that Chichester City / Tangmere / Bognor Regis gives priority to the infrastructure improvements needed to support delivery of strategic employment and housing sites identified in the Chichester and Arun Local Plans.

It is considered that there is a need for significant investment in Chichester's infrastructure to enable housing targets to be met. Bellway therefore consider it vital that strategic infrastructure improvements are delivered. New development offers the best means of securing investment in the area including through contributions towards such improvements albeit there is a fine balance to achieve in ensuring development is viable, particularly in regeneration areas such as the Southern Gateway.

SPATIAL STRATEGY (DRAFT POLICY S1)

Draft Policy S1 distributes growth in line with an edited settlement hierarchy that correlates with accessibility to infrastructure along the A27 east-west corridor. The majority of planned growth would be steered towards areas 'within or adjacent to the sub regional centre of Chichester City' and thereafter at the settlement hubs of Southbourne and Tangmere as well as the 'service villages' of Bosham, Hambrook / Nutborne and Loxwood. The draft Policy also makes provision for non-strategic development. The final sentence of draft Policy S1 seeks to provide some flexibility with '*Any changes to the distribution will be clearly evidenced and monitored through the Authority Monitoring Report*', presumably in recognition of the infrastructure challenges and the fact that not all of the identified housing needs can be met. In the circumstances this is a pragmatic approach.

Bellway support the intent of draft Policy S1 and the wording but for one minor clarification to support the wording (discussed further below). The focus on Chichester City is appropriate and welcome. It reflects the preferred spatial option, which was derived following careful consideration of the strengths and weaknesses of alternative strategy options in the Sustainability Appraisal, dated January 2023. The wide dispersal of allocations is testimony to the Council's relentless exploration of opportunities throughout the north and southern areas of the plan area.

Bellway respectfully suggest that point 7 of draft Policy S1 requires clarification – as '*the above*' is a little ambiguous and it is unclear whether this relates to the entire policy or the non-strategic provision. This requires clarification.

For the reasons set out above, Bellway contend that (following minor amendments) the section titled 'Spatial Strategy' as conveyed in the Pre-submission Plan has been positive prepared, is fully justified, effective and consistent with the NPPF.

As set out in the monitoring section of this report (Appendix F), distribution of new homes throughout the plan area throughout the duration of the plan period will need to be assessed in line with the development strategy and kept under review, so that if delivery departs from the spatial strategy, interventions can be made.

SETTLEMENT HIERARCHY (DRAFT POLICY S2)

Bellway note that there is slight tension / overlap with draft Policy S1 which establishes the spatial strategy. The purpose of draft Policy S2 is seemingly to reaffirm the full settlement hierarchy and function of each tier, insofar as this might guide all forms of development, windfall and speculative applications. However, this is not explicit in the wording of the draft policy, but moreover is covered

in the supporting text at paragraph 3.33. We would recommend minor amendments for the sake of clarity (see below). Bellway welcomes the spatial depiction set out in the key diagram.

Bellway agree with the Councils stance on development within settlement boundaries and welcome the approach that settlement boundaries must respect the setting form and character of the settlement.

Recommendations:

Amend sentence 1 of draft Policy S2 to state '*while sustaining the vitality of communities...*' the location of settlements identified in table ... are shown on the key diagram'.

We would recommend revision of the second sentence of draft Policy S2 to state '*Each category within the settlement hierarchy contributes towards future growth in the plan area, with the largest levels of growth directed towards the sub-regional centre, settlement hubs outside the Manhood Peninsula and service villages located on the Key Diagram*'.

Bellway recommend amending policy to ensure it is clear what quantum of development is envisaged (allocation or windfall) at each tier.

We would suggest removing capitalisation of 'rest' in the final paragraph.

For the reasons set out above, Bellway contend that (following minor amendments) the section titled 'Spatial Strategy' as conveyed in the Pre-submission Plan has been positive prepared, is fully justified, effective and consistent with the NPPF.

CLIMATE CHANGE AND THE NATURAL ENVIRONMENT (POLICIES NE4 TO NE8)

Bellway recognise the importance of biodiversity and the contribution that it makes to the wellbeing of both local communities and our global ecosystem. Bellway welcome the intent of draft Policies NE4, NE5 and NE8 and the opportunity to deliver net gain for biodiversity through new development, according with the Environment Act 2021.

Bellway recognise the need for a strategic approach to protect and promote biodiversity and to prevent fragmentation and isolation of species and habitats. Paragraph 179 of the NPPF states that plans should identify, map and safeguard components of local wildlife rich habitats and wider ecological networks, including wildlife corridors and stepping stones that connect them. Bellway commend Chichester Council for already publishing a strategic wildlife corridors background paper (consulted on in 2018).



Figure 1: extract from the Strategic Wildlife Corridor Background Paper

It is unfortunate that paragraph 4.18 of the proposed plan does not read clearly. Bellway question whether it should it state *'it will be necessary to demonstrate that land within the corridors will not be available for development. Land outside of the corridors will need to demonstrate that it will not have an adverse impact on the integrity of the corridor?'*

Bellway do not consider that draft Policy NE4 (Strategic Wildlife Corridors) accords with paragraph 180 of the NPPF which states, *'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), **adequately mitigated, or, as a last resort, compensated for**, then planning permission should be refused'*.

Draft Policy NE4 should include; **adequately mitigated, or, as a last resort, compensated for** (in accordance with National Planning Policy para 180). Whilst Bellway has reservations about consistency with the NPPF, minor modifications could render it consistent and sound.

Points c and d should be removed as they are too prescriptive and their points are already covered within the metric 3.1. Policy should retain some degree of flexibility.

Bellway supports draft Policy NE6 which has regard to Internationally and Nationally designated sites. Bellway understand that development is only permitted where it can be demonstrated that it would not lead to an adverse effect on the integrity, either alone or in combination, directly or indirectly, to internationally, European and nationally important habitat sites. Explicit reference to the designation and features provides helpful clarification. It is respectfully suggested that the policy be accompanied by an inset map showing the respective zones of influence.

Bellway support draft Policy NE7, acknowledging the Council's duty to protect internationally important wildlife sites.

Bellway support the intent of draft Policy NE8. There is clear capacity for the Police Fields site to maximise opportunities for planting trees and hedgerows, contributing to biodiversity net gain, green infrastructure and nature recovery strategies and networks. Bellway recommend amending draft Policy NE8 to reflect the NPPF stating, all major development proposals will be required to provide

street tree planting, unless, in specific cases there are clear, justifiable and compelling reasons why this would be inappropriate’.

Draft Policy NE8 (trees, hedgerows and woodlands) states *‘Development proposals will be granted where it can be demonstrated that all the following criteria have been met’* albeit it is implicit that the plan be read as a whole. Bellway are concerned that the absolute nature of the wording is highly likely to result in policy conflicts that will require a degree of pragmatism and professional judgement. Whilst the explanation in paragraphs 4.41-4.42 of the supporting text is welcome, the definition of a hedgerow in so far as it applies to criteria 2 of the policy is unclear – a different approach to hedgerows as defined under the Hedgerows Regulations, as to a short section in a domestic garden is required. I believe that the latter would fall to criteria 3, but the differentiation is not entirely clear. Concern is also expressed in relation to the use of the word ‘maximise’ in criteria 4, as taken to the extreme this might only ever support woodlands. Bellway respectfully suggest that this be replaced with the ‘harness’.

For the reasons set out above, following minor amendments, Bellway contend that draft Policies NE4, NE5, NE6, NE7 and NE8 and their supporting text as conveyed in the Pre-submission Plan has been positively prepared, is fully justified, effective and consistent with the NPPF.

FLOOD RISK AND WATER MANAGEMENT (DRAFT POLICY NE15) AND SUPPORTING EVIDENCE BASE: SFRA AND SFRA2.

Bellway note the adaptive approach to managing flood risk within Chichester, in draft Policy NE15, underpinned by Chichester District Council’s SFRA and considers the provisions pragmatic and broadly consistent with national government guidance.

The second sentence seems a little misguided stating: *‘Development will be directed to the areas of lowest flood risk applying the sequential test and where relevant the exceptions test’*. I would respectfully suggest that the ‘where relevant’ should come before sequential test too, as it doesn’t apply to all forms of development. The fifth paragraph seeks to establish buffers from fluvial watercourses and tidal watercourses to allow for access for maintenance and repair. Bellway has no objection in principle, but the prescribed distances (8m and 16m) respectively should be regarded as a guide, that allows for flexibility depending on site circumstances. For instance, where existing built form presents an incursion the Local Planning Authority should look for a betterment.

Bellway welcome the clear steer on drainage / build requirements (nos.1-4). Bellway support the intent for sustainable drainage systems to be designed into the landscape of all major development and for the use of construction materials with low permeability up to at least the same height as finished floor levels.

Bellway recognise that the Local Plan has been informed by the sequential test¹ which has underpinned the 2022 Level 1 SFRA for the Chichester Plan Area and the supplementary Level 2 SFRA.

¹ https://www.chichester.gov.uk/media/37921/Sequential-Test-for-CDC-Local-Plan-2021---2039/pdf/Sequential_Test_for_CDC_Local_Plan_2021_-_2039.pdf

Bellway commend Chichester Council for commissioning a Level 2 SFRA which considers all potential development sites and all sources of flooding. The exceptions test has nominally been applied to all proposed site allocations (including the Southern Gateway Allocation) – a point that we return to under draft Policy A5.

Bellway contends that the section titled ‘flood risk and water management’ is positively prepared, fully justified and effective.

Whilst Bellway has reservations about the limitations of the draft Policy, it is considered that subject to modifications, it is capable of being made effective and found sound.

WATER MANAGEMENT AND WATER QUALITY (DRAFT POLICY NE16)

Bellway note the contents of draft Policy NE16.

Bellway are concerned that several of the criteria (f-g) require ‘compliance’ with as yet unpublished position statements. There is no surety that they would be subject to prior consultation.

Under ‘Residential development within the catchment of the Apuldram Waste Water Treatment Works’, it is unclear how allocations are reconciled with the need to negate any net increase in flows to the treatment works (criteria c). I note that criteria 13 of draft Policy A5 Police Fields refers to phasing, albeit it would be prudent to ensure that any early headroom is ring-fenced to the Southern Gateway Allocation to ensure deliverability. The delivery mechanism should also be expanded upon in Chapter 9 on Infrastructure Provision.

Whilst Bellway has reservations about the limitations of the draft Policy, it is considered that subject to modifications, it is capable of being made effective and found sound.

WATER NEUTRALITY (DRAFT POLICY NE17)

Bellway note the contents of draft Policy NE17. For the avoidance of doubt, it is respectfully suggested that the title of the draft Policy be amended to ‘Water Neutrality within the Sussex North Water Resource Zone’. Given that this draft Policy wouldn’t impact upon the deliverability of the Police Field site, no further comments are proffered.

SOURCE PROTECTION ZONE (DRAFT POLICY NE18)

Bellway note the contents of draft Policy NE18. Given that this draft Policy wouldn’t impact upon the deliverability of the Police Field site, no further comments are proffered.

NUTRIENT NEUTRALITY (DRAFT POLICY NE19)

Bellway note the contents of draft Policy NE19, the supporting text of which cross-references Policy NE16 and largely replicates draft Policy NE6(b). As such, the need for draft Policy NE19 is unclear. It certainly presents an opportunity for consolidation. Bellway acknowledge that nutrient neutrality is an evolving issue and would encourage Chichester Council to consider the implications of the LURB through the SHRA. The lack of identification of either Council led, or third party, solutions to deliver

credits is disappointing. The draft Policy should be expanded to actively promote and encourage suitable schemes, which might yield wider environmental benefits.

POLLUTION (DRAFT POLICY NE20)

Bellway note the contents of draft Policy NE20 but query whether it is necessary to include; *'Development proposals will need to address the criteria contained in, but not limited to, the policies concerning water quality; flood risk and water management; nutrient mitigation; lighting; air quality; noise; and contaminated land'* when all are policies in their own right, noting that the plan needs to be read as a whole.

LIGHTING (DRAFT POLICY NE21).

Bellway note the contents of draft Policy NE21. Bellway has no objection to the criteria therein, albeit consider that in many cases (beyond AONB's) such matters are capable of being addressed by means of an appropriately worded condition. This observation is perhaps more pertinent to the validation list than the draft Plan.

AIR QUALITY (DRAFT POLICY NE22)

Bellway welcome the inclusion to maximise the provision of pedestrian and cycle networks to minimise traffic generation and congestions. The sustainable location of the Police Fields provides significant opportunity to maximise the use of the site, being a walkable development in terms of access to the city centre. Bellway contend that the proposed draft policy 'Air Quality' as conveyed in the draft Plan has been positively prepared, is fully justified, effective and consistent with the NPPF.

NOISE (DRAFT POLICY NE23)

Bellway agree with the sentiment of draft Policy NE23, acknowledging that noise can have an impact on the living conditions of future occupiers in residential developments. Bellway has no objection to the criteria therein, albeit consider that in many cases (beyond AONB's) such matters are capable of being addressed by means of an appropriately worded condition. This observation is perhaps more pertinent to the validation list than the draft Plan. Bellway contend that the draft Policy 'Noise' as conveyed in the draft Plan has been positively prepared, is fully justified, effective and consistent with the NPPF.

CONTAMINATED LAND (DRAFT POLICY NE24)

Bellway note the contents of draft Policy NE24. Bellway has no objection to the criteria therein, albeit consider that in many cases (beyond AONB's) such matters are capable of being addressed by means of an appropriately worded condition. This observation is perhaps more pertinent to the validation list than the draft Plan. Bellway contend that the draft Policy 'Contaminated Land' as conveyed in the draft Plan has been positively prepared, is fully justified, effective and consistent with the NPPF.

MEETING HOUSING NEEDS (DRAFT POLICY H1)

Bellway support draft Policy H1 recognising that allocation HCC0061 (Police Fields) contributes to the proposed housing target for the plan area.

Bellway do have concerns over the housing requirement figure of 10,350 (an average of 575dpa) which a) does not meet local housing needs [“LHN”] nor b) does not allow for a supply buffer. However, Bellway are sympathetic to the significant constraints faced by the Council – not least the capacity of the A27. It is evident that the Council has undertaken an exhaustive search for suitable sites (of all scales) and has afforded some future flexibility.

Bellway agree with the Sustainability Appraisal (January 2023)², with concerns over whether this will lead to a risk of supply falling below the required housing trajectory in practice, and result in development being subject to the tilted balance. It is noted that this has been a considerable issue for the Council already, with many ‘unplanned’ sites gaining permission at appeal. Further, a lack of housing also raises issues in meeting affordable housing targets.

The Sustainability Appraisal is emphatic that scenario’s setting the housing requirement above the Local Housing Need can be ‘safely ruled out as unreasonable’. The alternative is to wait until capacity issues along the A27 can be resolved. The ongoing dialogue with key stakeholders such as Highways England is acknowledged, but Bellway understand that a permanent solution is still some way-off with investment in improvements along the A27 recently deferred. Regrettably, it is a case of plan positively for the short term or delay the plan indefinitely. Given the choices available, Bellway commend the Council for seeking to plan positively in less-than-ideal circumstances. Bellway, understand the rationale behind the spatial strategy, to focus on sustainable locations in Chichester and the east-west corridor to internalise trips and / or encourage travel by means other than the private car. Hence it being critical to optimise the development potential of sites in sustainable locations such as Police Fields. It would therefore be prudent to encourage higher density forms of development and regard housing numbers on prospective allocations as a minimum. Bellway is pleased to see the draft Policy H1 express provision as ‘at least’, albeit this should carry through into the title of the right-hand column.

Bellway express concern over the surety of draft Policy H1 designed to deliver housing to meet the needs of the local population where affordability in the area is currently worsening, with median house prices in the district now 14 times the median earnings of those working in the district³. There is a recognised shortfall of housing projected to be delivered in the area, and despite some assurance that this may be resolved via an updated Local Strategic Statement (version 3), this has not yet been published and therefore Bellway lack certainty that housing need for the area will be achieved. Additional infrastructure support will also be required to ensure the timely delivery of allocated sites and Bellway respectfully reserve their position in the absence of a published trajectory.

² https://www.chichester.gov.uk/media/37868/Sustainability-Appraisal---January-2023/pdf/Sustainability_Appraisal_-_January_2023.pdf

³ Paragraph 5.2.15 of the sustainability Appraisal https://www.chichester.gov.uk/media/37868/Sustainability-Appraisal---January-2023/pdf/Sustainability_Appraisal_-_January_2023.pdf

STRATEGIC LOCATIONS / ALLOCATIONS 2021-2039 (DRAFT POLICY H2).

Bellway welcome the inclusion of the Southern Gateway as an allocation for 180 dwellings, albeit for the reasons set out in relation to draft Policy H1 above, the anticipated numbers should be prefixed by at least or approximately. Consideration should be given to the timing of any intervention, should the Neighbourhood Plans not progress in a timely manner. This would provide clarity for all concerned. Subject to these modifications, Bellway contend that policy H2 has been positively prepared, is fully justified and effective.

NON-STRATEGIC PARISH HOUSING REQUIREMENTS 2012-2039 (DRAFT POLICY H3)

Bellway note the contents of draft Policy H3. Given that this draft Policy wouldn't impact upon the deliverability of the Police Fields site, no further comments are proffered.

AFFORDABLE HOUSING (DRAFT POLICY H4)

Bellway express concern over the apparent disparity in year-on-year affordable housing needs, as flagged in the ICENI HEDNA⁴. This suggests that the need for affordable housing has fallen from 348 social / affordable rented homes per annum to 278 affordable homes per annum in the space of two years between 2019 and 2022. The need for affordable home ownership products has however increased to 301 per annum from 130 per annum which the HEDNA attributes largely to a different method in assessing future supply. The actual gross need has according to the HEDNA fallen from 385 per annum to 316 per annum. This is a significant difference within just two years as a result in a change to methodology and therefore questions the integrity of the HEDNA report which underpins draft Policy H4.

Given the scale of the affordability challenge, the aspiration to optimise the proportion of affordable homes is to be commended. Bellway support the delivery of affordable homes, recognising that the provision of and access to suitable housing is one of five key priorities identified in the council's Corporate Plan.

It is noted that the tenure mix can be negotiated on a case by case basis where necessary, subject to appropriate justification, in liaison with the Council's Housing Department.

The strategic allocation of A5 and the wider Southern Gateway could, subject to viability considerations, ensure the timely provision of affordable housing within Chichester City. It is therefore absolutely crucial to the effectiveness of the plan. Great care should be taken to avoid prejudicing delivery by ensuring suitable flexibility is 'built in' to the local plan.

HOUSING MIX (DRAFT POLICY H5)

⁴ https://www.chichester.gov.uk/media/36877/Housing-and-Economic-Development-Needs-Assessment---April-2022-Final-Report/doc/HEDNA_April_2022_FINAL.docx

Bellway supports draft Policy H5, which requires the delivery of an appropriate type and size, consistent with the most up to date HEDNA. Bellway welcome that planning permission can be granted for an alternative mix subject to a robust evidencing that the proposal addresses any housing imbalance that exists or that it addresses need and demand for affordable housing, self-build housing, older person and specialised housing. Bellway recommend that this sentence also includes reference to need for the housing mix to take into account the location of the site, for example city centre sites are more suitable for a higher density form of development with smaller units vs other sites where a greater proportion of family housing may be appropriate.

Bellway contend that the draft Policy 'Housing Mix' as conveyed in the Pre-submission Plan has been positively prepared, is fully justified, effective and consistent with the NPPF.

CUSTOM AND / OR SELF BUILD HOMES (DRAFT POLICY H6)

Draft Policy H6 has been introduced since the Reg 18 stage. It has limited supporting text which refers to the Self Build and Custom Housing Act 2015. The supporting text outlines that the Council must grant enough suitable serviced plots of land to meet the demand within 3 years of the end of each base period.

Bellway support draft Policy H6 insofar as it requires all residential schemes of 200+ homes to provide self and custom build service plots. This will ensure that a choice and range of sites become available for such purposes across Chichester. Bellway do however share concern over the requirement for 2% of market units provided on strategic scale housing sites (there is some ambiguity on what is meant by strategic scale housing sites) to be provided as self-build / custom build plots. It can prove very difficult to integrate self / custom build products on more modest sites (particularly those being built out at higher densities), as the opportunity to introduce self / builders / specialist custom build developers can be problematic from a health and safety perspective, service / infrastructure connections, and / or timeframes.

Bellway consider that this may result in lower density housing in a plan area where their objectively assessed housing needs. The requirement for self / custom build products on sites of less than 200 homes might only serve to hamper delivery.

Recommendation:

Confine self/custom build plots to strategic scale housing sites of 200 or more (whether allocated or speculative). Exclude reference to smaller sites other than to encourage allocation via Neighbourhood Plan policies.

Bellway contend following the proposed amendments above, that the draft Policy H6 as conveyed in the Pre-submission Plan has been positively prepared, is fully justified, effective and consistent with the NPPF.

ACCESSIBLE AND ADAPTIVE HOMES (DRAFT POLICY H10).

Bellway support the intent of draft Policy H10 which promotes accessible and adaptable homes to meet the needs of the population and ensure that people can remain in their own homes for longer, however have significant reservations in terms of it's practicality. In Bellway's experience compliance with the M4(2) typically results in a 10% increase in floorspace over and above standard market house types, with a commensurate increase in build costs. This is seldom reciprocated in an increase in GDV. It will be important to test the implications of this requirement on whole plan viability, albeit it isn't clear whether this has been modelled. Bellway consider that it would be more appropriate for only a proportion of dwellings to be M4(2). The draft Gosport Local Plan refers to 15% of dwellings to being M4(2) while Havant Housing Delivery Position Statement refers to 30% of dwellings being M4(2). Bellway acknowledges that the Government are currently consulting on further technical changes for raising accessibility standards for new homes, however this has not been brought into force and there is no certainty that it will do so. Should M4(2) compliance be enforced through Part M of building regulations it would be inappropriate to duplicate matters covered (paragraph 16f of the NPPF) in National Policy. The majority of Bellway's standard house types meet this criteria.

DESIGN PRINCIPLES (DRAFT POLICY P1).

The intent of draft Policy P1 is supported. Bellway welcome the emphasis upon a design led approach to all development and the consistency with the National Design Guide. Bellway welcome the requirement of Sustainability Statement, although question whether this should be required for 'all development proposals' (this is perhaps best elaborated upon in the validation checklist). Point A is welcomed, albeit a proportionate and flexible approach is required, particularly given the challenges in sourcing materials. It will be important to allow some freedom and avoid making the mechanism for assessment too prescriptive and cumbersome. It is considered that the policy strikes the right balance.

Bellway contend that the draft Policy 'P1' as conveyed in the Pre-submission Plan has been positively prepared, is fully justified, effective and consistent with the NPPF.

LOCAL CHARACTER AND DISTINCTIVENESS (DRAFT POLICY P2)

Bellway supports the draft Policy P2, which seeks to ensure that development protects, enhances and reflects the positive characteristics and distinctiveness of the local area. Bellway welcome the in-built flexibility of the policy which enables justification of non-compliant areas to allow for alternative design styles.

Bellway do have the following recommendations;

- Remove reference to 'building typologies and silhouettes'.
- Remove bullet point 5 re. heritage assets as this is covered in draft Policy P9.
- Bullet point 6 should state 'retains **where possible** existing boundary treatments...'
- Bullet point 8 should state '**respects and where possible retains**, enhances or creates vistas, panoramas and views...'

Bellway contend that the draft Policy 'P2' as conveyed in the draft Plan has been positively prepared, is fully justified, effective and consistent with the NPPF.

DENSITY (DRAFT POLICY P3)

Bellway support the requirement for '*Development proposals to make efficient use of land*', broadly mirroring paragraph 119 of the NPPF (albeit that talks about making 'effective' use). Bellway also support the restraint in avoiding arbitrary targets that pay little attention to the form of buildings, instead placing emphasis on a design led approach. To this end, the pertinent parts of draft policy P3 could well be integrated with draft Policy P2, thereby helping to rationalise the number of policies.

LAYOUT AND ACCESS (DRAFT POLICY P4)

Bellway welcome the intent, but recommend that flexibility built into this policy to enable site's to be able to respond to specific site opportunities and constraints. Bellway suggest adopting similar wording to that in draft Policy P2 which enables deviation to the design parameter subject to justification. Subject to this modification, Bellway contend that the draft Policy 'P4' as conveyed in the draft Plan has been positively prepared, is fully justified, effective and consistent with the NPPF.

SPACES AND LANDSCAPING (DRAFT POLICY P5)

Bellway supports the intent of draft Policy P5, and the emphasis placed on multi-functional spaces. Bellway is however, surprised by the apparent assertion in criteria that all open space should be lit. This might need clarification. Otherwise, Bellway contend that the draft Policy 'P5' as conveyed in the draft Plan has been positively prepared, is fully justified, effective and consistent with the NPPF.

AMENITY (DRAFT POLICY P6)

Bellway supports the intent of draft Policy P6 albeit note that many of the criteria (a-g) have significant overlap with policies presented early in the draft Plan. Thus, there is scope for consolidation.

The requirement for all new homes to meet the Nationally Described Space Standards ["NDSS"] is acknowledged. It will be important to test the implications of this requirement on whole plan viability. Bellway respectfully reserve their position. It should also be recognised that the requirement to meet NDSS in combination with M4(2) will influence the overall density that can be achieved on a site and could serve to limit the overall number of homes delivered, though the majority of Bellway's standard house types meet this criteria.

The approach to external amenity space is welcomed, although again there is cross over with earlier policies insofar as it references noise pollution and odour. Rigid adherence to the 21m separation distance between directly facing principal windows of habitable rooms, can result in unintended consequences and jar with the creation of distinctive places exhibiting a tighter grain. Bellway are therefore pleased to see some flexibility afforded within the policy.

MATERIALS AND DETAILING (DRAFT POLICY P8)

Bellway supports the intent of draft Policy P8 which requires a high standard of materials and detailing to be embraced in new development. Bellway do query whether there is a need to have an entire policy dedicated to materials and detailing when this could be incorporated within draft Policy P1 (design). Some aspects are prescriptive such as the requirement to 'avoid UPVC products'. Alternatives might well be available but will add significant cost. It is unclear whether such policy requirements have fed into the whole plan viability assessment.

THE HISTORIC ENVIRONMENT (DRAFT POLICY P9)

Bellway welcome the positive stance under criteria 3 and 4, albeit the remaining criteria merely repeat large tracts of national policy. It is unclear what criteria 1, 2 and 5 add. This could be consolidated into a single heritage policy, noting that there are separate policies dealing with Listed Buildings (P10) and Conservation Area (P11).

LISTED BUILDINGS (DRAFT POLICY P10)

Bellway welcome the positive stance to alterations to mitigate climate change and allow for reuse, however the pre-ambles Bellway welcome the positive attitude adopted by the Council in relation to Listed Buildings. This policy merely repeats large tracts of national policy. It is unclear what it adds. The draft policy could be consolidated into a single heritage policy.

CONSERVATION AREAS (DRAFT POLICY P11)

Bellway welcome the fact that the policy is tailored to local circumstances but is concerned that draft Policy P11 won't be regarded as positively prepared and consistent with the NPPF owing to criteria A2 requiring development to 'protect the setting'. Bellway recommend changing this to '*adopting sensitive approach to the setting (including views into and out of the area)*' or words to that effect. Subject to this amendment, Bellway consider that there is no reason why draft Policy P11 as conveyed in the draft Plan could not be considered as having been positively prepared, fully justified, effective and consistent with the NPPF.

NON-DESIGNATED HERITAGE ASSETS (DRAFT POLICY P12)

Bellway support the intent of draft Policy 12 and consider that it aids interpretation of national planning policies, recognising the importance of the historic environment. Bellway are surprised by the first section of criteria 2(c) in so far as this implies that non-designated heritage assets could be designated solely based on their contribution towards their surroundings. This would appear to be more a matter of townscape / character than heritage per-se.

Bellway note the inclusion of archaeology into this policy but would be surprised if criteria 4(a-c) need apply to all developments (even minor applications) that involve excavation and ground works. This is perhaps more appropriately addressed through the validation checklist.

REGISTERED PARKS AND GARDENS (DRAFT POLICY P13)

Bellway welcome the fact that the policy is tailored to local circumstances but is concerned that draft Policy P11 won't be regarded as positively prepared and consistent with the NPPF owing to criteria 4

requiring development to 'preserve the setting'. Bellway recommend changing this to '*preserve or enhance*' which acknowledges that some existing features may detract from the setting.

OPEN SPACE, SPORT AND RECREATION (DRAFT POLICY P15)

Bellway support the spirit of draft Policy P15, recognising the importance that open space, sport and recreation has on the health and wellbeing of local communities. Bellway welcome the opportunity to improve the quality and accessibility of open space at the Police Fields given that the site is not currently publicly accessible, alongside the residential development. Delivering public access to public open space is a clear benefit to the proposal. Bellway note that following the guidance in the preceding text c.0.168ha on on-site amenity and natural greenspace is likely to be required alongside an Equipped Play Space (children). Existing open space is ill-defined in the final part of draft Policy P15. It is respectfully suggested that this might more appropriately reference open space and playing fields identified on the proposals map (adding this if necessary).

HEALTH AND WELLBEING (DRAFT POLICY P16)

Bellway support draft Policy P16 and note the need for planning applications for 50 or more dwellings to be accompanied by a Health Impact Assessment. Bellway are unclear where this threshold has come from – there is no explanation in the supporting text, and it feels a little arbitrary. Bellway would respectfully suggest that a higher threshold be applied contiguous with the standards established in earlier policies and tables (for instance the full range of on-site open space, sport and recreation facilities kicks in at 100 dwellings in table 6.2).

There is some overlap, most notably in respect of allotments (under criteria 2) with the preceding draft Policy P15, albeit this needn't detract from the fact that the policy has been positively prepared and is broadly consistent with the NPPF.

EMPLOYMENT AND ECONOMY (DRAFT POLICIES E1 TO E10)

Bellway note the contents of the above policies. Bellway welcome the prospect of delivering new housing to support economic development in a sustainable location.

TRANSPORT INFRASTRUCTURE (DRAFT POLICY T1)

Bellway support the intent and approach of draft Policy T1 appreciating that existing road capacities are the main reason for Chichester District Council to be unable to meet their Local Housing Need figure.

Draft Policy T1 states that '*all development is expected to demonstrate how it will support four key objectives to create an integrated transport network which will alleviate pressure on the road network, improve highway safety, encourage sustainable travel behaviours and help improve air quality, by:*

- *avoiding or reducing the need to travel by car,*
- *Enabling access to sustainable means of travel, including public transport, walking and cycling;*

- *managing travel demand; and*
- ***mitigating the impacts of travel by car.***

It is not made clear how developments are to mitigate the impacts of travel by car, albeit it is assumed that encouragement for car sharing (through travel plans) and electric vehicles (through the provision of charging points) are but two means.

Point 5 of draft Policy T1 states *'all parties, including applicants, are expected to support these objectives by;...Phasing the delivery of new development to align with the provisions of new transport infrastructure and the outcomes of monitoring travel demand.* Bellway agree that there is need for new transport infrastructure to come forwards alongside new development but consider that the phasing of development of sites that serve to minimise impacts upon the A27 (notably the Southern Gateway) need not be impaired owing to their City Centre location and proximity to travel interchanges.

Bellway concur that it is beholden upon strategic development to promote the delivery of sustainable forms of travel and deliver new transport infrastructure, but that this must be proportionate to the potential effects of the development. Bellway notes that per dwelling contributions towards A27 improvements have formed part of the viability testing undertaken by Dixon Searle. Bellway are keen to understand the overall whole plan viability picture, taking account of the full range of policy requirements. Bellway respectfully reserve their position on this.

TRANSPORT AND DEVELOPMENT (DRAFT POLICY T2)

Bellway support the intent and approach of draft Policy T2. There is some overlap with draft Policy P4 titled 'layout and access' albeit this needn't detract from the fact that the policy has been positively prepared and is broadly consistent with the NPPF.

ACTIVITY TRAVEL – WALKING AND CYCLING PROVISION (DRAFT POLICY T3).

Bellway support the intent and approach of draft Policy T3. Again, there is some overlap with draft Policy P4 titled 'layout and access' albeit this needn't detract from the fact that the policy has been positively prepared and is broadly consistent with the NPPF.

INFRASTRUCTURE PROVISION (DRAFT POLICY I1)

Bellway support the approach of draft Policy I1. There is perhaps a missed opportunity to make reference to some of the infrastructure to be covered by the IDP, particularly where funded in totality or in part via CIL. Bellway note that a site-specific Infrastructure Plan has been prepared for Kingsham. This is welcome albeit it makes no reference to the River Lavant Flood Alleviation Scheme; So it is understood that this would be a strategic matter (right and proper given the established properties at risk). In the interest of clarity, this could be explicitly referenced in the supporting text at para.9.3. Bellway would be grateful if the 'commitment' to the Alleviation Scheme could be drawn out in the wider IDP together with an indication of programme, as well as potential upgrade works to Apuldram Waste Water Treatment Works.

Bellway assume that any and all relevant in-perpetuity costs, as described in criteria (v) have been taken into consideration in whole plan viability modelling. Similarly, Bellway trust that the feasibility and costs associated with installing Gigabit-capable broadband have informed the whole plan viability modelling.

CHICHESTER CITY DEVELOPMENT PRINCIPLES (DRAFT POLICY A1)

Bellway welcome the opportunity to contribute to the Plan's realisation of draft Policy A1, providing new development in the allocated Southern Gateway which will enhance the city's role as a sub-regional centre and visitor destination, contribute to meeting local needs while conserving and enhancing the city's historic character and heritage. Bellway contend that the draft Policy 'A1' as conveyed in the draft Plan has been positively prepared, is fully justified, effective and consistent with the NPPF.

CHICHESTER CITY STRATEGIC HOUSING LOCATION (DRAFT POLICY A2)

Bellway welcome that draft Policy A2 requires a minimum of 270 dwellings to be allocated for development in Chichester City. This is important for providing flexibility should additional dwellings be able to be brought forwards sustainably, recognising the plans inability to meet the local housing need.

Bellway support the design led approach, requiring development to be master planned and designed for a high quality form of development. Bellway note that the draft policy appropriately draws upon the theme of the general Development Management policies set out earlier in the draft Plan. Bellway contend that the draft Policy A2 as conveyed in the draft Plan has been positively prepared, is fully justified, effective and consistent with the NPPF.

SOUTHERN GATEWAY DEVELOPMENT PRINCIPLES (DRAFT POLICY A3)

Bellway welcome the proposed allocation of the Southern Gateway regeneration area which lends weight to the Southern Gateway Masterplan SPD. Bellway welcome this inclusion and appreciate the masterplan led approach of the proposed allocation, as established through the SPD. Draft Policy A3 establishes a mix of uses and high-level design principles.

Bellway contend that the draft Policy 'A3' as conveyed in the draft Plan has been positively prepared, is fully justified, effective and consistent with the NPPF.

SOUTHERN GATEWAY – POLICE FIELD, KINGSHAM ROAD (DRAFT POLICY A5)

Bellway are cognisant that draft Policy A5 rolls forward some of the early concepts set out in the Southern Gateway Masterplan Supplementary Planning Document which was adopted by Chichester District Council in November 2017. The SPD identified a regeneration area that is contiguous with draft Policy A3 (replicated in Map 10.1 of the draft Plan). The allocations under draft Policies A4 and A5 were / are a subset but present robust development opportunities that will help to revitalise the area.

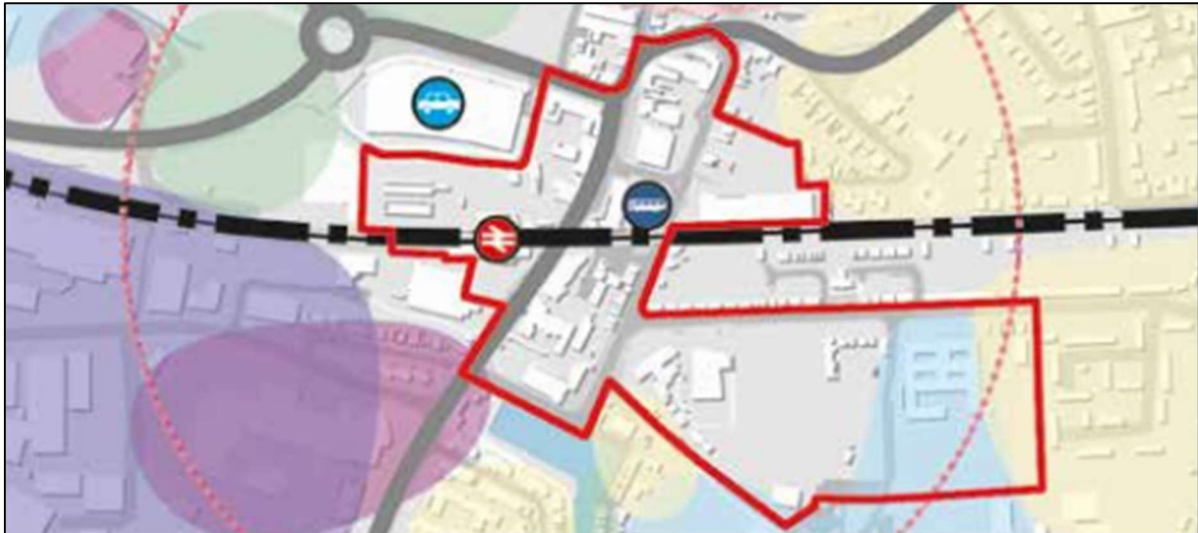


Figure 2: Southern Gateway as defined in the Southern gateway Masterplan SPD

The SPD provided an indicative layout plan which also includes land to the east of the site. A new residential quarter providing a range of housing types and sizes and fronting Kingsham Road was envisaged. Bellway Homes would be pleased to share its emerging concepts for the site with the Council in due course.



Figure 3: Example layout of the proposed site located within the Southern Gateway Masterplan SPD

Bellway welcome the allocation of land at the former Police Field, Kingsham Road for 70 residential dwellings, albeit would suggest that this either be expressed as 'a minimum' or 'approximately', to mirror the delivery of 'at least' 10,350 dwellings in Policy H1. The site performs well in the Sustainability Appraisal. The sites inclusion within the plan is essential to ensure that the plan is effective particularly in respect of meeting the objectively assessed housing need, delivering a mix of house types, boosting affordable housing supply and providing enough homes to sustain Chichester's workforce and contributing to the realisation of the Southern Gateway.

Bellway recognise that the Southern Gateway presents an opportunity to transform the area, contribute to the creation of a vibrant new quarter and significantly improve the first impression of

the city, being a key point of arrival. Bellway will ensure that the design of the proposed development contributes positively to its role and function and addresses the principles set out within the adopted Southern Gateway Masterplan SPD. Bellway welcome the emphasis placed upon a design led approach, with the intent of draft Policy A5 supported and embraced. The design of the proposal will be addressed at planning application stage.

Bellway recommend that provision 3 is amended to state that key views, particularly of Chichester Cathedral Spire are '*respected*' ...' as opposed to 'protected'.

Bellway question whether provision 7 is appropriate given the former use of the site (which is not currently accessible to the public) and the largely urban location that is unlikely to allow for equivalent appropriate provision in the immediate vicinity. The delivery mechanism for this is far from transparent given that a range of options are outlined in draft Policy P15. This, along with the responsibility for the provision needs clarification. Should this be monetised, then it should appear in the site-specific delivery plan and be taken into account in the Dixon Searle site-specific viability appraisal. The development would of course deliver multifunctional open space which would be accessible to the public along with potential for provision of an equipped play area (children).

Bellway recognise that further technical work will be required to inform provision 8 of draft Policy A5 but that this will not impact on the deliverability of the residential development.

Bellway are confident that provisions 9-11 can be satisfied through a combination of on-site measures and obligations towards off-site infrastructure / mitigation.

Bellway are cognisant of the flood risk issues highlighted in provision 12 and concur with the principle that vulnerable uses should be located outside of the areas at most risk from flooding. Appendix A of the Strategic Flood Risk Assessment (January 2023) provides a helpful site summary table. An appropriate commitment to the maintenance and management of the River Lavant Flood Alleviation Scheme is required so that the development is safe for the intended life. Bellway support this approach and the other bullet pointed measures set out under key messages in relation to the Southern Gateway but consider that the 'appropriate commitment' should be expanded upon in Chapter 9 on Infrastructure Provision. The concluding key messages of the site summary table for the Southern Gateway is positive and constructive.

Bellway concur with the 'Flood Risk, Sequential and Exceptions Test (2023)' document, in particular the statement: '*Overall, this is considered to be one of the most sustainably located sites within the plan area, and provides a unique opportunity to provide a range of housing typologies within a highly sustainable location and stimulate the regeneration of the wider area*'. It clearly responds to flood risk mapping, appreciating the risk of flooding on sections of the site, but balancing this against the allocation's prospective contribution to wider sustainable development objectives in accordance with paragraph 163 of the NPPF. There are no alternative sites that could deliver the same extent of sustainability benefits. With the benefit of this clear explanation, the Local Plan is considered fully justified and deliverable. The site is therefore considered to pass requirement A of the exception test.

Requirement B of the exception test requires development to be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. It is considered that draft Policy A5 of the proposed Local Plan responds to this, including by seeking to minimise any development in the in those areas at highest risk. Furthermore, the Flood Risk, Sequential and Exceptions Test specifies that *'resilience measures will be required if buildings are situated in the flood risk area or in the area at residual risk of flooding in a blockage scenario for the culverted River Lavant. The SFRA states that raising finished floor levels above the design event may remove the need for additional resilience measures.* Bellway appreciate that due to flood risk on site, a site specific flood risk assessment will be required during the planning application stage for the development at the Police Field, providing an opportunity to reduce surface water flow, deliver flood mitigation and improve water quality while also responding to comments above. Bellway agree with the Council that the site offers a multitude of sustainability and community benefits and therefore outweighs the limited managed flood risk. Preliminary feasibility work commissioned by Bellway suggests that this is capable of being satisfactorily addressed in line with the strategy set out under provision 12. We would be pleased to share further details with the Council moving forward.

Despite the housing trajectory in Appendix E of the proposed Local Plan setting out that completions will not be brought forwards prior to 2032/2033, Bellway consider that a concerted effort should be made to accelerate delivery – particularly given the potential to limit impacts on the A27 and the wider regeneration benefits that would arise. As set out in relation to Policy I1 clarification is required in relation to the wider River Lavant Flood Alleviation Scheme, as well as creating headroom at Apuldram Waste Water Treatment Works (the latter being expressed in provision 13). Both of these matters are strategic in nature and go beyond Police Field, such that they are likely to be reliant upon alternative sources of programmed funding. I note that neither appear in the site-specific Infrastructure Plan and it is unclear whether any allowance was made in Dixon Searles site-specific viability assessment for direct investment or interim mitigation. Whilst on the matter of viability it unclear how whole plan viability considerations (for example the affordable housing tenure mix, optional building reg standards M4(2) and M4(3), NDSS, materials specifications, gigabit-capable broadband infrastructure) have fed into the site-specific viability assessment. Bellway respectfully reserve is position on viability pending clarification.

Bellway consider provisions 14 and 15 capable of being satisfied.

Bellway contend that the draft Policy A5 as conveyed in the draft Plan has been positively prepared, is fully justified, effective and consistent with the NPPF subject to the recommended amendments highlighted above. The Southern Gateway Masterplan SPD states that *'implementation of the masterplan is anticipated to take place over a number of years to 2029 corresponding with the Local Plan'*. The housing trajectory (outlined in Appendix E of the pre-submission plan) departs from this. The proposed housing trajectory indicates that the Southern Gateway will not deliver dwellings until 2032/2033. The first three years are projected to see 20 dwellings completed a year and from 2035/36, 30 dwellings a year. It is not clear what underpins this pace or why there is a stepped change, but through a collaborative and concerted effort Bellway would be looking to accelerate delivery.

SCHEDULE OF PROPOSED CHANGES TO THE POLICY MAP

Bellway agree with the proposed changes to the policy maps, including alterations to the Chichester City settlement Boundary, the strategic wildlife corridors added on map NE4a and NE4b.

Bellway welcome the inclusion of the Southern Gateway Regeneration Area, and the Southern Gateway Police Field, Kingsham Road on to map A3 – A5.

As set out in the body of the representation, there might be some advantage in identifying areas of open space, playing pitches, existing allotments etc.

HABITATS REGULATION ASSESSMENT

Bellway supports the outcome of the HRA⁵ which establishes that the Chichester Local Plan contains a sufficient protective Policy Framework to ensure that development coming forward under the Chichester Local Plan will not result in adverse effects on integrity of any European sites, either in isolation, or in combination, subject to further detailed work for planning applications in the standard manner.

It is a requirement of the Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the European sites in question. The HRA outlines that the primary consideration is recreational pressure, to which European Sites are Vulnerable. This is strongly related to housing and employment provision, along with the actual geographic impact within the context of relevant infrastructure.

The HRA considers housing to be delivered in authorities neighbouring to Chichester District Council, including;

- South Downs National Park Authority
- Arun District Council
- Horsham District Council
- Waverley Brough Council
- East Hampshire District Council (Whitehill-Bordon Eco-town)
- Havant Borough Council
- Portsmouth City Council

This is outlined in Table 1 of the HRA. There is some confusion in the table 1, which references withdrawn Local Plans and Draft Reg 18 Local Plans). This questions how reliable the dataset used by the HRA is, considering that full weight cannot be attributed to draft Reg 18 Plans.

Bellway appreciate that the HRA declares that the pre-submission plan supports a reduction in atmospheric pollution. This includes;

⁵ https://www.chichester.gov.uk/media/37866/Habitats-Regulation-Assessment---January-2023/pdf/Habitats_Regulation_Assessment_-_January_2023.pdf

- Behavioural measures and modal shift – reducing the amount of traffic overall;
- traffic management – modifying traffic behaviour to control where emissions are generated;
- emissions reduction at source – reducing the emissions level per vehicle.

Within Appendix A of the HRA, it is considered that draft Policy H2 (incorporating Policies A4 and A5) has the potential for likely significant effects. Despite this, the HRA explains that the pre-submission plan contains positive measures that aim to mitigate or avoid the likelihood of significant adverse effects from reduced air quality and that policies NE21, T2, T3, NE1 form a protective framework to help reduce atmosphere pollution.

Bellway consider the draft HRA to be robust.

SUSTAINABILITY APPRAISAL – JANUARY 2023 – INCLUDING THE NON-TECHNICAL SUMMARY.

Bellway were pleased with the competency of the sustainability report which provides concise reasoning behind the Councils strategic policies and provides a number of growth scenarios.

HELAA ref.	Parish	Broad area	Size (ha)	AQMA	SPA	SAC	SSSI	LWS	Ancient woodland	Priority habitat	TPO	Wildlife corridor	Conservation area	G1 listed building	G2* listed building	G2 listed building	RPG	Scheduled monument	Archaeological Record	National park	AONB	Landscape capacity	Flood Zone	SWFR	Agricultural land	Minerals safeguarding	Primary School	Secondary School	Doctors Surgery	Train Station	Bus stop	IMD	
HBO0025	Bosham	East-west corridor	159	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
HBO0009	Bosham	East-west corridor	19.8	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
HBO0002a	Bosham	East-west corridor	12.6	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
HBO0011	Bosham	East-west corridor	3.3	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
HBO0003	Bosham	East-west corridor	1.6	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
HBO0023	Bosham	East-west corridor	0.4	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
HBX0007	Boxgrove	East-west corridor	16.9	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
HBX0002b	Boxgrove	East-west corridor	11.2	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
HBX0003a	Boxgrove	East-west corridor	4.7	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
HBX0006	Boxgrove	East-west corridor	3.1	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
HBX0002a	Boxgrove	East-west corridor	2.3	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
HBX0012	Boxgrove	East-west corridor	1.2	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
HBX0011	Boxgrove	East-west corridor	1	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
HBX0010	Boxgrove	East-west corridor	0.9	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
HBX0013	Boxgrove	East-west corridor	0.8	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
HCC0039	Chichester	East-west corridor	31.8	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
HCC0061	Chichester	East-west corridor	12.4	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Bellway support the Sustainability Appraisals prediction that the development plan will have neutral effects for accessibility, air / environmental quality, biodiversity, climate change adaption, historic environment and landscape.

Bellway recognise that the sustainability appraisal predicts that climate change mitigation will have a moderate or uncertain negative effect. Bellway note that the concern does not come from the proposed strategy for the southern area (where the Police Field site is located) but would encourage policy to require a high standard of sustainability in the northern area of the plan. It is clear that there is some concern over proposed density of the Police Field not contributing fully to the decarbonisation

of the built environment due to flood risk on site. Bellway recognise that flood risk could reduce the density of development on site, but seek to ensure that the land is used efficiently in accordance with the NPPF.

Bellway support the prediction that the plan will result in moderate and uncertain positive effects for communities and health, which identifies the southern gateway to provide benefits that are wide ranging. It states that the Southern Gateway Regeneration Area is strongly supported, from a communities perspective.

Bellway support the sustainability appraisals predication that the plan will have significant positive effects for the economy and employment.

Bellway have significant concern over the fact that the Sustainability Appraisal predicts a significant negative effect with regards to housing. Bellway concur that the plan's inability to meet the local housing need will have significant impacts on the local area, where the affordability of homes is already high. The sustainability appraisal defends the plan by stating '*it is important to be clear that it is difficult to envisage a reasonable alternative strategy that performs significantly better, in terms of meeting housing needs, without giving rise to significant drawbacks in respect of other plan and wider sustainability objectives*'. It is Bellway's opinion that the need to meet the areas local housing need needs to be addressed and should not, as it currently is, be beholden on the capacity of the A27 when development should be encouraged to encourage public transport, walking and cycling.

Bellway Support the Sustainability Appraisal's conclusion that the plan will have significant positive impacts to transport and water.


Bellway support the sustainability statement which outlines that '*there is strong support for allocating the Southern Gateway*'.

Bellway consider the Sustainability Appraisal (including the non-technical summary) to be robust.

CONCLUSION

I trust that the information set out above assist Chichester District Council in arriving at a plan which meets the tests of soundness. On behalf of Bellway, we would at the Inspectors discretion, welcome the opportunity to participate in the Examination process.

Yours faithfully,



Brett Spiller MRTPI MCIWM BTP BA Hons
Director