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07 February 2019 Dear Mike

Subject: SDNPA response to Chichester Local Plan Review 2035 - Preferred Approach Consultation (Regulation 18)

Thank you for consulting the South Downs National Park Authority (SDNPA) on your emerging Local Plan.

The SDNPA and all relevant authorities are required to have regard to the purposes of the South Downs National Park (SDNP) as set out in Section 62 of the Environment Act 1995. The purposes are 'to conserve and enhance the natural beauty, wildlife and cultural heritage of the area' and 'to promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.' The Authority would appreciate reference to Section 62 being added to paragraph 1.31 of the draft Plan.

Duty to Cooperate

As set out in our previous response, the SDNPA has a set of six strategic cross-boundary priorities. I would like to take the opportunity to again highlight these which provide a framework for ongoing Duty to Cooperate discussions:

- Conserving and enhancing the natural beauty of the area.
- Conserving and enhancing the region's biodiversity (including green infrastructure issues).
- The delivery of new homes, including affordable homes and pitches for Gypsies, Travellers and Travelling Showpeople.
- The promotion of sustainable tourism.
- Development of the local economy.
- Improving the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel.

Conserving and enhancing the natural beauty

We welcome the requirement in policies S26 (Natural Environment) and DM28 (Natural Environment) to ensure that development proposals have no adverse impact on the openness of views and setting of the SDNP. It is noted that a substantial amount of new homes are proposed on the A259 corridor between Emsworth and Chichester. This is a sensitive stretch of land in the coastal plain between the coast, the south coast railway and the A27. This corridor provides the connection, including intervisibility, between the protected landscapes of the South Downs National Park and Chichester Harbour AONB, for example views of the channels within the Harbour from the Trundle and Stoke Clump.



We note the intention of identifying settlement gaps and look forward to seeing the evidence base and the proposed gaps in the Regulation 19 iteration of Chichester Local Plan Review 2035, particularly as to how they will contribute to safeguarding the relationship between the SDNP and Chichester Harbour AONB. We would welcome the opportunity to work with CDC on this matter.

Locations identified for development

Development in the CDC Local Plan Review 2035, particularly along the A259 (policies AL7 Highgrove Farm Bosham, AL9 Fishbourne Parish, AL10 Chidham and Hambrook Parish, AL13 Southbourne Parish) corridor, have the potential to deliver a significant cumulative adverse impact on the setting of the National Park and its important relationship with the Chichester Harbour AONB.

We consider that the policy wording for the A259 corridor Strategic Site Allocations could be more robust and proactive with regard to conserving and enhancing the National Park. In particular, it could provide more active direction to applicants in order to ensure adverse impacts are minimised locally, and in relation to the National Park. For example, with regard to green infrastructure, each of the A259 Strategic Site Allocation policies (AL7, AL9, AL10 and AL13) include a criteria requiring the provision of green infrastructure, and we would suggest this could be re-worded as follows: *'Identify opportunities ~~are taken for~~ and secure the expansion and provision of multifunctional green infrastructure into the wider countryside and protected landscapes of the South Downs National Park, and Chichester Harbour AONB, including between settlements and facilities.'*

Reference to considering and minimising impact on the SDNP in each of the A259 Strategic Site Allocation policies (AL7, AL9, AL10 and AL13) is welcomed, for example criterion 5 of policy AL9: Fishbourne Parish. However, this could be usefully re-worded to ensure that developers do not create a scheme and only consider the impact afterwards. Wording to direct people to 'respect and respond to the National Park landscape, its setting and purposes prior to development design' avoids the risk of relying upon ill-informed and inappropriate mitigation measures. This matter could also be usefully addressed in relevant Strategic and Development Management policies elsewhere in the Local Plan concerning design, landscape, and the South Downs National Park. We would be happy to work with CDC on this matter.

We note Strategic Policy S32, which requires proposals for housing allocations and major development sites to be accompanied by a site-wide design strategy. We would strongly encourage masterplans and development briefs for each allocation (or settlement where the sites are to be allocated through a Neighbourhood Plan) to come ahead of applications and demonstrate positive design interventions which respond directly to landscape/SDNP sensitivities. We would be happy to be involved in shaping these as consultees in order to achieve the best quality scheme. These interventions could be written in to the policy wording.

There is an opportunity for allocation policies to seek to deliver the joining up of existing, and/or improvements to, the network of RoW (Equestrians, Cyclists and Pedestrians) to enable and encourage access into the National Park in accordance with the National Park's Second Purpose.

Further comments on specific allocations:

- Policy AL1 (Land West of Chichester) – We welcome the consideration of the Centurion Way in criteria 10. However, we would ask for stronger policy wording to explicitly state that development must not adversely affect, and preferably enhance usability of, Centurion Way connecting Chichester with the SDNP.



- We note that Policy AL4 (Land at Westhampnett/NE Chichester) still refers to Lavant Valley greenspace but we query if this is likely to be secured now based on planning applications submitted. We would suggest that criteria 12, last sentence, could also refer to securing offsite improvements/upgrades for cycleway links.
- Policy AL6 (Land South-West of Chichester (Apuldram and Donnington Parishes)) should address the important opportunity to secure a safe off-road connection between the Centurion Way and Salterns Way as the two flagship and largely safe off-road multi-user trails linking Chichester with (respectively) SDNP and Chichester Harbour AONB. We would welcome the opportunity for further dialogue and joint working on this matter with CDC.
- We welcome criterion 5 of policy AL14 (Land West of Tangmere). It is a sensitive site due to the impact on clear views of the site from important locations in the SDNP such as the Trundle and Halnaker Hill. We therefore ask that criterion 5 is expanded to emphasise and address the sensitivity of the site

Specific wording comments on other policies/paragraphs:

We have the following comments on the following specific paragraphs:

- Para 2.29 (challenges and opportunities facing the Plan Area): We suggest that the 7th bullet point should say 'Protect and enhance the character of the area including the Chichester Harbour AONB and the setting of the SDNP'.
- Policy S20 (Design): As mentioned above regarding the A259 Strategic Site Allocation policies, we consider that the wording of this policy could be more proactive by including wording to direct people to 'respect and respond to the National Park landscape, its setting and purposes prior to development design'.
- Policy S25 (The Coast): Paragraph 5.44: We suggest adding 'serves to provide important scenic views from the water across to the SDNP which should be conserved'.
- Policy S26 (Natural Environment): We suggest deleting reference to 'openness' and to include reference to views from and to the National Park.
- Policy S32 (Design Strategies for Strategic and Major Development Sites): We suggest that the policy requires such design strategies to be informed by landscape character and the sites landscape context. We also suggest that criteria h. includes a requirement to state maximum building heights.
- Policy DM17 (Stand-alone Renewable Energy): The policy requirement for demonstrating no significant adverse impact upon landscape or townscape character is welcomed. We request reference is also made specifically of views of the SDNP.
- Policy DM19 (Chichester Harbour AONB): We request criterion three also identifies the relationship by way of intervisibility between the AONB and SDNP.
- Policy DM22 (Development in the Countryside): Further to comments on the A259 Strategic Site Allocation policies and S20 (Design), we consider that the wording of this policy could be more proactive by including wording to direct people to 'respect and respond to the National Park landscape, its setting and purposes prior to development design'.
- Policy DM23 (Lighting): The reference to the South Downs International Dark Skies Reserve is welcomed. However, proposals that aren't immediately adjacent to the Reserve may have



significant adverse impact, for example due to the site's particular visibility within the landscape or sky glow; we suggest that wording is amended to reflect this.

- Policy DM32 (Green Infrastructure): We suggest that this policy could benefit from specifically citing that green infrastructure should be 'multifunctional'. We also recommend reference to opportunities to make better green infrastructure connections in line with Lawton Principles of 'bigger, better, more joined up', to ensure these spaces can function and therefore deliver benefits.

Conserving and enhancing the region's biodiversity (including green infrastructure).

The SDNPA welcomes the approach taken by CDC to identify green infrastructure and habitats networks as cross boundary issues in paragraph 1.26 of the Plan. The SDNPA looks forward to continuing to work with CDC on green infrastructure matters particularly as your Plan is progressed to pre-submission.

We note that an open space study has been prepared and this could be linked up with other work into a wider green infrastructure approach incorporating the identified strategic wildlife corridors, areas for natural flood management, PROW and connections between the settlements, protected landscapes and the stations, landscape views/settlement gaps and some land management guidelines for these really important areas. This would be particularly useful to inform development proposals in the A259 corridor.

Policy SD30 - Strategic wildlife corridors

The SDNPA very much welcomes and supports the inclusion into policy of wildlife corridors which traverse the district connecting the two protected landscapes of the Chichester Harbour AONB and the SDNPA.

It is important to note that there is no corresponding policy within South Downs Local Plan, currently at examination, to continue protection of the wildlife corridors within the SDNP. We have concerns that it is unlikely to be sufficient for the corridors just to reach the SDNP boundary. We also note that several of the corridors appear to be quite narrow, especially to the east of the City, and we query whether they are substantial enough to perform the intended function.

We note the detailed evidence outlined in the background paper and the SDNPA would like to work with CDC on the continued development of the strategic wildlife corridors, in particular with regard to their connection points with the National Park and how we can work together on robustly delivering this strategic cross boundary objective.

Ebernoe Common, The Mens, and Singleton & Cocking Special Areas of Conservation

The SDNPA has been working together on technical advice to facilitate sustainable development within proximity Ebernoe Common, The Mens, and Singleton & Cocking Special Areas of Conservation, which are designated for their populations of Bechstein and barbastelle bats. The draft Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol was published in 2018 in the Core Document Library as part of the South Downs Local Plan Examination. The Protocol is based on published data which identifies key impact zones, one of 6.5km and one of 12km, around each of the three SACs. It also sets out avoidance, mitigation, compensation and enhancement measures to inform and be addressed by development proposals. Parts of the Chichester District Local Plan area are within these key impact zones. These zones have been incorporated into policy SD10 of the South Downs Local Plan and the policy has not been modified by the Inspector as a result of the examination in public. The SDNPA would welcome the opportunity for further discuss with CDC and Natural England on this work.



Solent Recreation Mitigation Partnership

Both CDC and the SDNPA are members of the Solent Recreation Mitigation Partnership (SRMP) (also known as Bird Aware Solent) which has provided a strategic mitigation solution to address potential harm to the protected habitat at Chichester Harbour and ensuring compliance with the Habitats Regulations. We note that the SRMP mitigation solution is reflected in Policy DM30 and we look forward to continuing to work with CDC and other members of the SRMP on this matter.

With regard to paragraph 7.185 we suggest reference to the Medmerry Realignment be a new bullet point: '*Medmerry realignment, which is intertidal habitat created in 2013 to compensate for historic losses across the Solent to SSSI and Natura 2000 sites*'.

We also suggest the following wording amendment to paragraph 7.187: '*...This is particularly relevant to Chichester and Langstone Harbour and Pagham Harbour and the impact of recreational pressure on the birds that use these Special Protection Areas. Any negative impacts that the development ~~may have should~~ will be weighed against the benefits of the proposal. ~~This may include looking at whether the assets are surplus to requirements, if the proposal impacts on a small area or corridor or if a wider need exists for the development and there is no alternative location....~~'²*

The delivery of new homes, including affordable homes and pitches for Gypsies, Travellers and Travelling Showpeople

Policy S4: Meeting Housing Needs

The SDNPA welcomes the uplift to the housing target to address unmet need arising in that part of the SDNP within Chichester District (estimated at 44 dpa at the time the last Statement of Common Ground was agreed in April 2018). The provision of 41 dpa broadly meets this need.

We note that the Objectively Assessed Need is calculated only for the area outside the SDNP using the 'capping' method set out in the Government's standard methodology (the currently adopted target of 435 dwellings per annum plus 40% = 609) - this is helpful as it makes a clear distinction between the assessed need for Chichester District Local Plan area and that for the SDNPA, notwithstanding the Duty to Cooperate.

Policy S5: Parish Housing Requirements 2016-35

We support identification of parish specific housing requirements providing certainty to local communities. This is the same approach as we have taken in the South Downs Local Plan.

Affordable housing

We note that there is a need for 285 affordable homes per annum (source: HEDNA) which underlines the need for a strong policy which seeks to maximise affordable housing delivery. This high level of need is common to the wider sub-region and is an issue relevant to the wider housing market area. The SDNPA supports CDC's approach of taking opportunities arising from new residential development to contribute to the supply of affordable housing, to meet local needs in terms of type and tenure (paragraph 4.35). In this respect, it is important that the whole plan viability testing currently being undertaken should fully reflect Planning Practice Guidance on viability, such that as high as possible a percentage of affordable housing is sought.

We also support the positive approach to Community Land Trusts (CLTs) as a mechanism for delivering affordable housing (paragraph 4.45).

Chichester District Council may also wish to note that SDNPA has, subject to main modifications consultation, received the go-ahead from its Local Plan Inspector for unmodified inclusion of Strategic



Policy SD28: Affordable Housing in the South Downs Local Plan. This includes a lower threshold than that advised in Government policy, and also seeks on-site affordable housing from small sites below the 11 threshold stipulated in Government policy.

Policy S7: Meeting Gypsies, Travellers, Travelling Showpeoples' Needs

The SDNPA supports the principle of the policy and whilst noting the significant need arising. It is not clear whether the intention is to allocate sites to meet the need in a separate DPD. Paragraph 4.49 refers to 'the forthcoming DPD' and policy S7 to sites being allocated in a Site Allocation DPD 'where there is a shortfall in provision'. Has this work already been triggered by the scale of need? The policy and associated text could be clearer on this matter.

We would like to highlight that there is limited capacity within the National Park to allocate sites for Gypsies and Travellers through DtC, given significant landscape constraints. We suggest that the coastal authorities and SDNPA continue to work closely with regards addressing the need.

Improving the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel

The SDNPA supports in principle Policy S23 (Transport and Accessibility). In particular, we support emphasis on encouragement of use of sustainable modes. We suggest explicit support in the text for improving links into the National Park, particularly by sustainable and active transport modes. Allocation policies should also seek to deliver the joining up of existing, and/or improvements to, the network of Public Rights of Way.

SDNPA notes reference in the policy to a coordinated package of improvements to the A27 Chichester Bypass, as well as to a new road from the Fishbourne roundabout. The SDNPA would urge that any such schemes be fully assessed, including streetlighting, for potential adverse impacts on landscape where there is a relationship with the National Park and its setting. Any such impact will need to be mitigated, and opportunities taken to enhance green infrastructure networks and public rights of way networks. CDC may wish to consider whether the Policy S23 should include additional wording to reflect these principles.

Centurion Way

The SDNPA supports the reference to Centurion Way in paragraph 7.185 in relation to Green Infrastructure & resistance to dissection of green movement corridors. There are opportunities to improve these links, for example, suggest explicit reference to protecting and enhancing the Centurion Way. The reference to Salterns Way is also supported. Centurion Way and Salterns Way are two flagship off-road routes for the SDNP and AONB respectively and do not currently benefit from safe off-road connection. The SDNPA would strongly support policy to secure this connection and would welcome opportunities to discuss this further and work jointly with CDC on this strategic issue.

With regard to Strategic Policy S14 (Chichester City Transport Strategy) we request that the SDNP is included in the penultimate bullet point as a destination for strategic cycle routes.

Transport evidence

We would highlight that the transport assessment carried out to inform the South Downs Local Plan. This indicated a potential severe impact on the Petersfield Road / Bepton Road / Rumbolds Hill junction in Midhurst of additional development in the town, in the context of junctions already becoming over-capacity due to background traffic growth, for example, arising from strategic development in neighbouring planning authorities.



A review of the CDC Transport Study of Strategic Development indicates significant traffic growth arising from Scenario 1 (the preferred strategy). It is not clear from the study how this will impact on the A286 towards Midhurst, which in turn could have a critical impact on junction capacity at Midhurst. SDNPA may seek further assurance that such potential impacts have been looked at, and appropriate mitigation sought.

Other comments

Page 16 – Local Plan area map: Request clarification whether the Local Plan area includes the following two properties, as not clear from the Local Plan Area map: Stedlands Farm, and The Stable/Little Stedlands, Haslemere GU273DJ

We would like to wish you well in the progression of your Local Plan and would welcome further discussion and joint working on the strategic cross boundary matters raised. If you have any questions on the content of this letter, please do not hesitate to contact me.

Yours sincerely



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