

7 February 2019

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Planning Policy  
Chichester District Council  
East Pallant House  
1 East Pallant  
Chichester  
West Sussex  
PO19 1TY

Ref: COUS3002

Dear Sir / Madam

## **CHICHESTER LOCAL PLAN REVIEW – PREFERRED APPROACH CONSULTATION**

On behalf of our client **Countryside Properties**, thank you for inviting us to submit representations on the Chichester Local Plan Review – Preferred Approach Consultation (“Preferred Approach Local Plan”).

Countryside Properties has recently been appointed as the Council’s development partner for the Strategic Development Location (SDL) at Tangmere and therefore welcomes the opportunity to comment on the emerging Local Plan Review. We would be grateful if the Council would take the comments made below into account, in accordance with Regulation 18(3) of the Town and Country Planning Act (Local Planning) (England) Regulations 2012.

Having reviewed the Preferred Approach Local Plan and the accompanying Sustainability Appraisal report, our client welcomes the overall approach taken by the Council and is broadly in support of the policies and supporting text set out within the Preferred Approach Local Plan document. Nevertheless, it is considered that there are areas within the emerging local plan which would benefit from further consideration or where revised text could be inserted in order to address potential issues that we have identified. Countryside Properties would welcome an opportunity to meet with Officers to discuss these matters further, if this would be of assistance to the Council in its preparation of the ‘Pre-Submission’ draft of the local plan.

Our detailed comments on the document, including our suggestions for revised text where this is considered necessary, are set out below:

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## INTRODUCTORY SECTIONS

Policy / Paragraph	Comments and suggested modifications
<p><b>Para 1.27</b></p>	<p>Paragraph 1.27 indicates that the Council is currently preparing statements of common ground in relation to the ‘duty to cooperate’ and will place these on the Council’s website. This approach is welcomed and is in line with the National Planning Policy Framework (NPPF). However, our client trusts that these statements will be made available well before the local plan is published for ‘Pre-Submission’ consultation.</p> <p>Paragraph 27 of the NPPF states that the statements should be <i>“made publicly available throughout the plan-making process to provide transparency.”</i> This is important because the duty of cooperate is not something that can be addressed retrospectively once the local plan reaches Examination. Therefore, the publication of the statements of common ground will enable potential issues or gaps in compliance with the duty to be identified and addressed, well before the commencement of the Examination.</p>
<p><b>Para 2.4</b></p>	<p>Paragraph 2.4 provides a summary description of the four settlements outside of the city of Chichester that will provide a focus for future growth. The bullet point covering Tangmere states:</p> <p><i>“Tangmere, to the east of Chichester City, is a settlement of some 2,700 people. It hosts a number of local businesses, and has some dispersed community facilities including shops and a medical centre. However, it currently lacks many of the amenities and services normally associated with a settlement of its size.”</i></p> <p>Our client considers that the final sentence is not consistent with the more detailed description found within paragraph 6.91 of the Preferred Approach Local Plan. It is suggested that the text is revised to ensure consistency and to highlight the opportunities to enhance such amenities through the policies of both the ‘made’ Neighbourhood Plan and the emerging Chichester Local Plan Review.</p>

## STRATEGIC POLICIES

Policy / Paragraph	Comments and suggested modifications
<p><b>Policy S4 (Meeting Housing Needs)</b></p>	<p>Whilst our client supports the overall approach set out within Policy S4, it is noted that no housing trajectory has been provided anywhere within the Preferred Approach Local Plan. The Council will note that paragraph 73 of the NPPF now requires strategic policies on housing delivery to include a housing trajectory within the local plan. We would be happy to discuss and contribute to this with respect to the assumptions made for the Tangmere SDL.</p>
<p><b>Policy S6 (Affordable Housing)</b></p>	<p>Our client does not disagree with the approach set out within Policy S6 and its supporting text. However, it is noted that the proposed affordable housing target has not yet been viability tested and it is therefore uncertain at this stage as to whether or not it will prove to be achievable. The updated Planning Practice Guidance (PPG) covers the need for local</p>

	<p>plan policies, including those setting expectations for affordable housing, to be subject to proportionate viability testing (See PPG Reference ID: 10-001 and 10-002).</p> <p>It is considered that the first sentence of Policy S6 is potentially ambiguous and we suggest that it is revised as follows:</p> <p><i>“The provision of affordable housing will be required <del>for</del> at a target level of at least 30% of all new dwellings as set out in the criteria below:-”</i></p>
<p><b>Paras 4.61 – 4.65</b></p>	<p><b><i>Defining the Retail Hierarchy</i></b></p> <p>Our client supports the statement in paragraph 4.63 that <i>“a further Local Centre will be developed at Tangmere as the Strategic Development Location is developed.”</i> However, it is considered that the table following paragraph 4.65 is misleading as it defines Tangmere as a lower order ‘village centre’. Whilst this is reflective of the current position, it would be helpful if a note could be inserted (for example, underneath the table) to clarify that Tangmere is anticipated to transition to become a higher order ‘Local Centre’ during the plan period. The development of the Tangmere SDL will support this process, although significant parts of what will form the new ‘Local Centre’ remain outside of the Tangmere SDL policy boundary.</p>
<p><b>Policy S9 (Retail Hierarchy and Sequential Approach)</b></p>	<p>Similar to the preceding table, Policy S9 defines Tangmere as a ‘village centre’ based on its current level of services. The remainder of Policy S9 seeks to protect the viability and vitality of the higher order retail centres by limiting retail growth within ‘village centres’. Whilst we have no disagreement with the objectives of the policy, it is unhelpful in the way in which it has been applied to Tangmere where there is a clear proposal, reflected within other parts of the Preferred Approach Local Plan and within the ‘made’ Tangmere Neighbourhood Plan, for the transition to a ‘Local Centre’ as part of the development of the Tangmere SDL.</p> <p>It is recommended that Policy S9 is clarified to ensure that it will not inadvertently stifle retail development (or indeed other main town centre uses) which may be appropriately located within the emerging Tangmere ‘Local Centre’. It is also important that the final paragraph of Policy S9 is applicable to Tangmere, to ensure that the achievement of the ‘Local Centre’ is supported in strategic retail policy terms.</p>
<p><b>Policy S10 (Local Centres, Local and Village Parades)</b></p>	<p>The second paragraph within Policy S10 refers to <i>“town centre uses”</i>. It is recommended that this is revised to <i>“main town centre uses”</i> to be consistent with the terminology used within the NPPF and within Policy S9.</p> <p>The final paragraph within Policy S10 states: <i>“Other uses will be granted where it has been demonstrated that all the following criteria have been met:”</i></p> <p>This is ambiguous and it would benefit from additional clarity to confirm that the policy here is referring to proposals for a change of use at existing retail premises.</p>
<p><b>Paras 4.80 – 4.86</b></p>	<p><b><i>Providing Supporting Infrastructure and Services</i></b></p> <p>The supporting text in this section is broadly supported, although it must be recognised</p>

	<p>that, at this stage, the developer contributions being sought through the Local Plan Review have yet to be subject to up-to-date viability testing, although we are aware that this process is now underway.</p> <p>Having reviewed the latest iteration of the Infrastructure Delivery Plan (IDP) it is clear that, for the larger strategic development proposals at least, there is an expectation that significant levels of new supporting infrastructure will be funded through Planning Obligations secured by Section 106 Agreement.</p> <p>Whilst this may be an appropriate developer contributions mechanism for larger-scale development, it is important to understand the potential viability impacts that such an approach would have on scheme deliverability. This is especially important as the emerging Planning Obligations requirements would be in addition to a range of further policy and contribution requirements impacting on the Tangmere SDL including: affordable housing; adopted Community Infrastructure Levy (CIL) rates (which are also subject to annual indexation); proposed policy requirements for the adoption of 'National Space Standards'; and proposed higher optional Building Regulations (under Parts M4(2) and M4(3)).</p> <p>It is understood that the whole-plan viability evidence work, now underway, is intended to serve as evidence for a review of the Chichester CIL rates. This approach is supported. However, it is recommended that the next version of the local plan includes a clear commitment to review the Chichester CIL, in parallel with the preparation of the Local Plan Review. This will help to ensure that the impact of adopted CIL charge rates, which are not negotiable, will not undermine the viability of proposed development at the point it comes forward, including larger scale development upon which the success of the emerging local plan depends.</p>
<p><b>Policy S12 (Infrastructure Provision)</b></p>	<p>The fourth criterion within Policy S12 proposes that development should “<i>facilitate accessibility to facilities and services by a range of transport modes;</i>”</p> <p>Whilst this aspiration is laudable, it should be recognised that it is not always possible to achieve this in practice as the ability to deliver off-site accessibility and different transportation modes is often beyond the control of developers of any given site. The Council are encouraged to provide further guidance on this point. For example, this could be achieved by clarifying that developer contributions, to be used to fund future accessibility improvements between a development site and local facilities, would allow for compliance with this criterion of Policy S12.</p> <p>The final part of Policy S12 provides guidance on how the Council will respond to circumstances where viability evidence has been presented to demonstrate that infrastructure requirements would render a proposed scheme unviable. The three-stage sequential approach is noted. However, in order to increase the flexibility of the approach, it is recommended that a new bullet is added (between the first and the second). This would indicate that the Council will work with the applicant to explore and agree alternative forms of infrastructure / facility provision that would address the identified viability concern. This pragmatic approach would enable facilities or infrastructure to be provided in potentially more cost-effective ways and so avoid the need to defer provision or consider any refusal of planning permission.</p>

<b>Para 5.3</b>	The ninth line of paragraph 5.3 should be worded: “... <i>establish or maintain a strong sense of place...</i> ”
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## STRATEGIC SITE ALLOCATION POLICIES

Policy / Paragraph	Comments and suggested modifications
<b>Para 6.92</b>	<p><b>Tangmere</b></p> <p>The fourth sentence of paragraph 6.92 lists a range of benefits the SDL is anticipated to bring for the existing community. The last of these is “improved public transport services”. As referred to previously, whilst this is a legitimate aspiration, it is not normally within the developers control to ensure that the desired public transport improvements can be secured, and importantly that they can be sustained over the long term. Therefore, in the context of the likely community benefits being listed here, it is recommended that the reference is revised to “<i>improved public transport services <u>in partnership with the relevant authorities.</u></i>”</p> <p>The last sentence of paragraph 6.92 states: “<i>Tangmere currently has a relatively high proportion of social housing and it may be appropriate to diversify housing tenures, including by providing low cost or shared ownership options.</i>”</p> <p>Given that the need for a diversity of tenures has already been established through the ‘made’ Tangmere Neighbourhood Plan, it is considered that the above sentence should be revised to reflect the increased level of certainty provided by the Neighbourhood Plan.</p>
<b>Para 6.93</b>	<p>The final sentence of paragraph 6.93 states: “<i>However, regard will need to be paid to the open landscape of the area and views from the South Downs must be carefully protected.</i>”</p> <p>Our client fully supports the objective of protecting the views from the National Park. However, we would encourage the Council to recognise that in bringing forward a scheme of the scale of the Tangmere SDL, it is unlikely that there could be no impact at all on views from the National Park. The appropriate approach is to carefully reduce and minimise any potential impact through a range of measures that can be explored through the masterplanning and design process. Therefore, the Preferred Approach Local Plan is correct to seek to minimise such adverse impacts and this approach is already set out within the text of Policy AL14 and is supported. As a consequence, it is recommended that the supporting text in paragraph 6.93 is revised to be consistent with the approach taken by Policy AL14, for example, as follows:</p> <p>“<i>However, regard will need to be paid to the open landscape of the area and <u>views to reducing any impact on views</u> from the South Downs <del>must be carefully protected.</del>”</i></p>
<b>Para 6.94</b>	The first sentence of paragraph 6.94 describes the development that the site is anticipated to deliver. The identification of the additional 300 dwellings, to provide a total of 1,300, is supported. However, it may be helpful to add, at the end of the first sentence of this paragraph that the precise number of dwellings to be delivered will be determined

	through the masterplanning process.
<b>Para 6.95 (1<sup>st</sup> bullet point)</b>	<p>The first bullet point of paragraph 6.95 could be clarified to ensure that it is consistent with the proposed strategic policies relating to retail development, which we commented on above. We suggest that the following revisions would achieve this:</p> <p><i>“Local community aspirations for existing facilities serving the village, including <del>a Village centre</del> <u>transforming the existing village centre into a 'Local Centre' focussed around a village main street, improved/expanded local convenience shopping and enhanced social, community, recreation, primary education and healthcare facilities;</u>”</i></p>
<b>Para 6.95 (5<sup>th</sup> bullet point)</b>	<p>As expressed above, whilst they are fully committed to maximising the potential for sustainable travel, our client does have some concern about the extent to which developers are able to bring about ‘<i>substantially improved public transport</i>’ without clear partnership arrangements with the relevant local authorities and the bus operators. Therefore, consistent with the approach we have recommended elsewhere, we suggest that the 5<sup>th</sup> bullet point of paragraph 6.95 is revised as follows:</p> <p><i>“Opportunities, <u>in partnership with the relevant authorities,</u> to provide <del>substantially improved</del> <u>sustainable</u> public transport services linking the village with Chichester City, to improve cycle routes to the city, and to provide better transport links to Barnham rail station and the 'Five Villages' area in Arun District;”</i></p>
<b>Para 6.95 (7<sup>th</sup> bullet point)</b>	<p>The reference within the 7<sup>th</sup> bullet point to the provision for the expansion or relocation of the Tangmere Military Aviation Museum is potentially ambiguous as there is no proposal for the Museum to relocate or expand to any part of the Tangmere SDL site. We have suggested a minor revision below which more accurately reflects the indirect relationship between the provision of additional allotment space within the SDL site and the opportunity for the Museum to expand or relocate onto land that is currently used as allotments and is controlled by the Parish Council:</p> <p><i>“Conserving and enhancing the setting of the historic village (particularly the Conservation Area), the heritage of the World War II airfield, including provision for <u>the relocation of existing allotment space that could facilitate</u> the expansion or relocation of the Tangmere Military Aviation Museum and the potential archaeological /heritage assets of the surrounding area;”</i></p>
<b>Para 6.95 (8<sup>th</sup> bullet point)</b>	<p>The 8<sup>th</sup> bullet point covers the need to consider ‘shielding’ the homes within parts of the site close to the A27 from potential road noise impacts. Our client considers that the use of the term ‘<i>shielding</i>’ implies some of physical barrier and this may not be the most appropriate form of noise mitigation. At the current stage, the technical noise assessment work has not yet been undertaken and so we cannot yet be certain about which noise reduction measures will be required. We would recommend the following revision to the 8<sup>th</sup> bullet point:</p> <p><i>“<del>Shielding</del> <u>Noise mitigation measures for residential properties from noise</u> on the A27, through for example the use of acoustic screening;”</i></p>

<p><b>Policy AL14 (Land West of Tangmere)</b></p>	<p>Whilst our client supports the increase in the anticipated capacity of the site to 1,300 dwellings, flexibility is required to ensure the policy can respond to the site assessment and masterplanning process. Rather than being expressed as an inflexible minimum, we would suggest there is merit in the first sentence of Policy AL14 being amended to:</p> <p><i><u>“Approximately 73 hectares of land to the west of Tangmere is allocated for residential development of a minimum of 1,300 dwellings around 1,300 dwellings, with the precise number to be determined through the masterplanning process.”</u></i></p> <p>The third site-specific issue relates to the new or expanded community facilities. Consistent with the approach we have recommended above, we suggest the following minor revisions to aid clarity:</p> <p><i><u>“Incorporate new or expanded community facilities (including <u>transforming the existing village centre into a new Local Centre</u> <del>a new village centre</del>) providing <del>local</del> convenience shopping. Opportunities will be sought to deliver enhanced recreation, open space, primary education and healthcare facilities;”</u></i></p> <p>At the fifth site-specific issue, to be sufficiently flexible to respond to the masterplan process and public consultation on this issue, we would suggest a minor addition is made to the fifth site-specific point to require important views of the cathedral be respected wherever possible:</p> <p><i><u>“<del>Protect</del> <u>Respect important</u> existing views of Chichester Cathedral spire and reduce any impact on views from within the National Park;”</u></i></p> <p>Consistent with our comments above in relation to the deliverability of public transport improvements over the long term, we suggest the following revision to the seventh site-specific issue within Policy AL14:</p> <p><i><u>“Make provision for improved <u>sustainable travel modes between Tangmere and Chichester City, in partnership with the relevant authorities including more direct and frequent bus services between Tangmere and Chichester City, and improved and additional cycle routes linking Tangmere with Chichester City, Shopwhyke and Westhampnett. Opportunities should also be explored for improving transport links with the 'Five Villages' area and Barnham rail station in Arun District; and”</u></u></i></p> <p>As recommended above, we propose the following revision to the eighth site-specific issue to reduce ambiguity over the nature of the provision being referred to in relation to the Tangmere Military Aviation Museum:</p> <p><i><u>“Conserve and enhance the heritage and potential archaeological interest of the village, surrounding areas and World War II airfield, including <u>provision for the relocation of existing allotment space to facilitate the expansion or relocation of the Tangmere Military Aviation Museum.</u>”</u></i></p>
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## DEVELOPMENT MANAGEMENT POLICIES

Policy / Paragraph	Comments and suggested modifications
<p><b>Policy DM2 (Housing Mix)</b></p>	<p>Policy DM2 sets out the proposed housing mix for the main anticipated residential tenures. Our client understands the importance placed by the Council in setting guidance on the mix of homes that will be delivered, and it is also recognised that proposed Policy DM2 does contain elements which would appear to allow for welcome flexibility, particularly as set out within paragraph 2 of the policy text.</p> <p>The housing mix proposed within Policy DM2 has been informed by the latest version of the Chichester Housing and Economic Development Needs Assessment (HEDNA, January 2018). However, for market homes it is evident that the proposed mix seeks a higher proportion of smaller homes than is supported by the evidence within the HEDNA. This is particularly the case when Table 69 of the HEDNA is considered, as this disaggregates the anticipated housing mix required by each of the different areas within Chichester District.</p> <p>Overall, and notwithstanding the variation noted between the evidence base and the proposed market homes mix, it is important to remember that the Chichester HEDNA can, at best, only provide a snapshot in time of what is needed across the District. This evidence cannot provide a definitive picture as to the demand for different types of homes in specific locations, nor can it predict future need and demand beyond the very early years of the plan period. Therefore, whilst our client supports the aspiration to achieve an overall housing mix that is broadly balanced throughout the plan period, it would be helpful if a specified mix were not introduced directly into policy. However, if the Council does propose to maintain a specified housing mix within Policy DM2, it is considered that this should either accurately reflect the evidence within the latest version of the HEDNA, or the Council should provide alternative evidence to justify varying the specified mix from that indicated in the HEDNA.</p> <p>Paragraph 3 of Policy DM 2 is considered to be ambiguous. It appears to be seeking the delivery of specialist and accessible housing and housing which meets people's needs over their lifetime. However, it does not make any reference or connection to Part M4(2) of the Building Regulations, which provide the nationally prescribed standards for accessible and adaptable dwellings. Our client considers that the focus and requirements of this paragraph should be clarified. It is also recommended that the requirements to be made should be subjected to appropriate viability testing to ensure that the costs involved in achieving these are taken into account in light of other policy requirements and financial contributions that will be expected of residential development.</p> <p>Policy DM2 also requires, within paragraph 6, that <i>“all housing should be designed to meet the Nationally Described Space Standards (or any replacement standards)”</i>. We note the intention of the Council to provide evidence as part of the revision of the Planning Obligations and Affordable Housing SPD. However, no revision to that document has yet been published and we would encourage the Council to consult on this revised SPD as soon as possible so that the evidence is available for review and comment.</p> <p>Again, it is also important that the requirement to apply the nationally described space standards is subjected to appropriate viability evidence, in line with national planning</p>



	<p>policy and the PPG. This will ensure it does not constitute a barrier to the delivery of development upon which the success of the local plan depends.</p>
<p><b>Policy DM8 (Transport, Accessibility and Parking)</b></p>	<p>The final sentence of paragraph 4 of Policy DM8 states that: <i>“Development should incorporate the requisite infrastructure necessary for charging plug-in and other ultra-low emission vehicles”</i>.</p> <p>This is considered to be ambiguous and clarification is sought over the meaning of <i>“requisite infrastructure”</i>. For example, whether this means the provision of cabling within the roads only, or infrastructure <i>“to the front door”</i> of each property. There is a considerable cost difference between the two and this should be factored into the viability testing that the Council is currently preparing for.</p>
<p><b>Policy DM16 (Sustainable Design and Construction)</b></p>	<p>Paragraph 4 of Policy DM16 requires that: <i>“the energy supplied from renewable resources to be maximised to ensure that at least 10% of the predicted residual energy requirements of the development, after the standards in point 2 and point 3 are achieved, is met through the incorporation of renewable energy.”</i></p> <p>The wording of this element of Policy DM16 is considered to be prescriptive in nature and therefore inflexible. The policy makes no reference to ‘fabric first principles’ which provide an alternative approach to reducing carbon emissions. A fabric first method, rather than renewable energy, can reduce the need for maintenance during the building’s life. Buildings designed and constructed using the fabric first approach aim to minimise the need for energy consumption through methods such as maximising air-tightness, using super-high insulation and optimizing natural ventilation. Focusing on the building fabric first, is generally considered to be more sustainable than relying on energy saving technology, or renewable energy generation, which can be expensive, can have a high embodied energy and may or may not be used efficiently by the consumer.</p>
<p><b>Policy DM28 (Natural Environment)</b></p>	<p>Paragraph 5 of Policy DM28 requires development to show that both the actual and perceived identity of a settlement is maintained. However, our client’s view is that attempting to make a decision on the basis of a <b>perceived</b> rather than actual impact is ambiguous and open to subjectivity. This is because any decision would be based on an individual’s own experience and bias, making it challenging to achieve consistency in decision-making. It is recommended that Paragraph 5 of Policy DM28 is revised as follows:</p> <p><i>“The individual identity of settlements, <del>actual or perceived,</del> is maintained and the integrity of predominantly open and undeveloped land between settlements is not undermined.”</i></p>

## POLICIES MAP

Policy / Plan	Comments and suggested modifications
<p><b>Plan AL14</b></p>	<p><b>Plan Legend</b></p> <p>Whilst the policies map’s definition of the Tangmere Strategic Site Allocation is broadly the same as that within the adopted Chichester Policies Map, we note that there are a number</p>

of relatively minor changes proposed. It is therefore considered that the legend provided stating “Existing Strategic Site Allocation” is misleading as it is not identical to that the adopted Policies Map. We recommend that the legend is revised to clarify this, for example, by adding “(including minor boundary changes)” to the legend.

**Land west of ‘Kimkarlo’, Church Lane**

We note that the small parcel of land to the west of ‘Kimkarlo’ on Church Lane is proposed to be omitted from the policy boundary of the Tangmere SDL (Policy AL14). Given that this parcel now benefits from a planning permission for the construction of two dwellings, this proposed change is supported.

**Land north of 24 & 25 Saxon Meadow**

It is noted that the proposed definition of the policy boundary for Policy AL14 omits a small parcel of land to the north of 24 and 25 Saxon Meadow. This land is included within the current definition of the Tangmere SDL within the adopted Policy Map (see image below). Our client can see no reason to omit this land and it is recommended that it is reinstated, consistent with the existing definition of the Tangmere SDL boundary.



## SUSTAINABILITY APPRAISAL

Assessment Criteria	Comments and suggested modifications
	A Sustainability Appraisal (SA) report accompanies the Preferred Approach Local Plan. Countryside Properties have reviewed the SA scoring within the Appendix to the SA ( <b>Strategic Development Location Assessments updated from the Initial Sustainability Appraisal (May 2017)</b> ) and would like to make several comments on specific assessment criteria. These are as follows:
<b>1a (Biodiversity Loss)</b>	Our client notes that the site has secured a minor negative (red) scoring, yet there is no

<p><b>and habitat fragmentation)</b></p>	<p>reference to any specific evidence base that supports this conclusion, or which confirms if the <i>'bird species of note'</i> are protected species and therefore if any negative impact is justified. It should be noted that majority of the site is currently comprised of a viable farmland with limited areas of potential higher ecological value. Further, in order to secure planning permission for this site our client will undertake a comprehensive ecological assessment of the site which will identify the biodiversity assets and implement the necessary mitigation to ensure these are not lost to the community. This will also highlight the opportunities for the proposed scheme to make ecological enhancements. On this basis we would recommend that the score is changed to at least neutral (amber), if not a higher positive score.</p>
<p><b>6a / 6b (Encouraging modal shift and use of networks for cyclists and pedestrians)</b></p>	<p>The Tangmere SDL is ideally placed on the edge of Tangmere for residents to access the village and wider key services and facilities (such as those in Chichester) via walking, cycling and public transportation, all of which will be strongly encouraged through good design and a sustainable transport strategy. It is also the case that the proposed scheme will enhance the level of local services through the expansion of the existing village centre to a 'Local Centre'. This would be well located to meet the everyday needs of both new and existing residents of Tangmere. On this basis our client believes that the current negative (red) scores should be changed to a positive (green) score.</p>
<p><b>7c (Conservation of historic assets)</b></p>	<p>As part of any planning application, appropriate heritage and archaeological surveys will be undertaken to identify any sensitive assets and ensure appropriate mitigation through good design. On this basis our client suggests that the current negative score (red) be changed to neutral (amber).</p>
<p><b>8a / 8b (Housing need and provision of housing mix and tenure)</b></p>	<p>Our client strongly supports the SA's conclusion that Land West of Tangmere will make a strong positive contribution (dark green) to the provision of much needed private and affordable housing with a range of sizes and tenures. Countryside Properties will work proactively with Chichester District Council and Tangmere Parish Council to ensure this is delivered as part of a sustainable new settlement extension.</p>

We trust that the above comments are helpful and look forward to participating in the next stage of the local plan review. Please do not hesitate to contact us if you would like to discuss our comments further or require any additional clarification.

Yours faithfully



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