

27 May 2025

**Email**

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

Dear Sir/Madam

**CONSULTATION ON MAIN MODIFICATIONS TO THE CHICHESTER LOCAL PLAN 2021-2039  
WATES DEVELOPMENTS: REPRESENTOR ID 4762**

We write in respect of the current consultation on main modifications to the Chichester Local Plan 2021-2039. The consultation follows the Examination hearings held in October – November 2024 and the Post Hearings Advice Letter received from the Inspector in January 2025.

As you will be aware, Turley acted on behalf of our client, Wates Developments Ltd, throughout the Local Plan Examination process to date. Wates Developments have land interests in the District, including those to the east of Southbourne within the Broad Location for Development that Chichester District Council propose to deliver under draft Local Plan Policy A13. This response is informed by iTransport who also appeared at the Examination on behalf of Wates.

Our comments relate to specific main modifications, and this response is structured accordingly.

**MM31 – Policy H1 Meeting Housing Needs**

We support the clarification provided through the proposed modifications in respect of the housing requirement to reflect the latest completions figures. Importantly the housing requirement continues to be expressed as a minimum figure, which provides appropriate flexibility to allow for a greater quantum to potentially come forwards should it be demonstrated that this can be appropriately mitigated. This is of particular importance given the discussions during the Examination hearings on the outcome of the new standard method and the robustness of the Council's highways evidence base. The expression of a minimum figure should equally apply to the stepped delivery rates should it be possible to deliver greater growth in the early years of the Plan than currently envisaged particularly in light of the current 'Liverpool' approach to delivery which has been proposed.

Table XX provides a breakdown of the anticipated sources of housing supply. Reference is made to 5,257 commitments as at 31 January 2015. No non-implementation allowance for some of these commitments failing to come forward appears to have been made, and it is important that sufficient flexibility is allowed to ensure the housing target of at least 11,484 homes is met.

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## MM62 – Policy T1 Transport Infrastructure

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

## MM63 – The Mitigation Package

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

## MM77 – Policy A13 Southbourne Broad Location for Development

We note the clarification which has been provided on the extant permissions which the Council consider would contribute to the requirement for the Southbourne broad location for development. The policy text itself has been updated to refer to approximately 800 dwellings, it is considered this flexibility is important given the potential for some of the extant permissions to not be delivered as anticipated as no non-implementation allowance has seemingly been applied. Furthermore, as per our previous submissions it is considered that as the overall Local Plan housing requirement is a minimum figure, and in light of future housing requirements which the Council will need to plan for, a degree of flexibility should be applied.

Paragraph 10.56 of the Policy is proposed to be amended to ensure that development addresses issues around matters in relation to minerals and waste. We would note that these are matters that should in the first instance be addressed through the Southbourne Allocation DPD in allocating the site to be developed with any residual matters then addressed through future planning applications. This also applies to criteria 16 and 17 of the proposed revised Policy wording.

Bullet 5 of the Policy wording seeks to provide additional clarity on the role of masterplanning and infrastructure provision in addresses in terms of addressing severance caused by the railway line within the allocation area and the village generally. We would note that this role should also be applied to east-west connectivity into the village not just the north-south routes associated with the railway line. Furthermore, iTransport have advised that the bullet point should clarify that any mitigation packaged proposed should be justified through a Transport Assessment submitted in respect of any planning application. Suggested revised wording for the bullet is provided below:

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

Bullet 9 of the Policy adds additional text which requires that the development “*facilitates the achievement of biodiversity net gain and the creation of high levels of habitat connectivity within the site, the wider green infrastructure network and identified strategic wildlife corridors.*” Given the achievement of biodiversity net gain is a statutory requirement we would suggest that this does not need to be replicated in the policy and can be deleted. As currently drafted it is considered the additional text is ambiguous and suggests that the development would need to deliver offsite improvements to the wider green infrastructure network and identified strategic wildlife corridors. It is understood that this is not the intention of the policy wording and as such it is suggested that this element of the policy is updated as follows:

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

Bullet 14 is proposed to be amended to *"preserve the significance of heritage assets, having due regard to their settings."* As currently drafted this is considered inconsistent with national policy as it does not allow for the balancing exercise advocated in the NPPF (2024) and should be updated accordingly.

We trust the above comments are of assistance to the Council and Inspector in informing the next steps of the Local Plan Examination. We look forward to continuing to engage with the process.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'DBrearley', with a horizontal line underneath.

Donna Brearley  
**Associate Director**

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