



Representation Form

Local Plan 2021 – 2039 Main Modifications Consultation

Ref:

(For official use
only)

The consultation on the Local Plan 2021 – 2039: Main Modifications will run from 10 April to 29 May 2025. The document and more information on the consultation can be viewed on our website www.chichester.gov.uk/main-modifications-consultation

All comments must be received by 5pm on Thursday 29 May 2025.

There are a number of ways to make your comments:

- Comment on the document on the internet using our online consultation website <https://www.chichester.gov.uk/localplanconsultation> (**Recommended**)
- Post a copy of this form to us at: Planning Policy Team, Chichester District Council, East Pallant House, 1 East Pallant, Chichester, West Sussex, PO19 1TY

How to use this form

Please complete Part A in full. Please note anonymous comments cannot be accepted, a full address including postcode must be provided.

Please complete Part B overleaf, using a new form for each modification that you wish to comment on. Please identify which modification your comment relates to by completing the appropriate box.

For more information, or if you need assistance completing this form, please contact the Planning Policy Team by email at planningpolicy@chichester.gov.uk or telephone 01243 785166.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title

First Name

Last Name

Job Title

(where relevant)

Organisation

Address Line 1

Line 2

Line 3

Line 4	<input type="text"/>	DEVON
Post Code	PO18 8EH	TQ6 9RL
Telephone Number	/	0755 400 6494
E-mail Address	/	lisa@jacksonplanning.com

Part B

Please use a new form for each representation that you wish to make. Please note anonymous comments cannot be accepted. Any personal information provided will be processed by Chichester District Council in line with the General Data Protection Regulations 2018. More information is available at: <http://www.chichester.gov.uk/dataprotectionandfreedomofinformation>.

Anyone that comments will be notified of the next stages of the Local Plan, including the publication of the Inspectors' recommendations and the adoption of the Plan – you may opt out of future communications by contacting us using the contact details at the top of this form.

3. To which Main Modification does this representation relate?

Main Modification reference

MM10
Policy
NE3

Please indicate if you support or object to the Main Modification:

Support

☐

Object

☒

Comment

4. Do you consider the Main Modification is:

4.(1) Legally compliant

Yes

☐

No

☐

4.(2) Sound

Yes

☐

No

☒

Please tick as appropriate

5. Please give details of why you consider the Modification is not legally compliant or is unsound. Please be as clear and concise as to what you would like this part of the plan to say.

If you wish to support or comment on the legal compliance or soundness of the Modification, please also use this box to set out your comments.

This policy change introducing “landscape character” as a measure of the ability to designate a gap at a local level is not sound.

This policy cannot be effective as there is no control over consistency in terms of landscape character, as it is not defined in the policy or guidance and there has been no test regarding capacity in the landscape for all the development required to fulfil the plans’ objectives and in particular all forms of large scale renewable and low carbon energy projects that are a requirement to meet net zero, a legal requirement of the plan.

In order to make the policy sound there must be an exemption/ exception for all forms of renewable and low carbon energy within landscape gaps between settlements. This is because the designation of local landscape gaps is unknown, the requirement for renewable and low carbon development is also unknown across the District. It is necessary to locate renewable energy proposals at a reasonably short distance to suitable points of connection to the national grid. Such connections are often close to undeveloped land outside settlements, some of which locally may be regarded as ‘local landscape gaps’.

Southern Electric Power Distribution plc (SEPD) set out its Long-Term Development Statement (LTDS) for its electricity distribution network, both In-Area and Out-of-Area last year. This LTDS identifies network reinforcement projects that connect to the Lovedean (Waterlooville)BSP some of which upgrade the grid connection capacity within Chichester District at existing sub stations and where cables have been uprated to 33KV. Likewise with the NESO grid reforms mean the capacity to connect renewable projects is changing rapidly. The Council has not assessed this latest evidence of where there is grid capacity and the Council’s Climate Change Action Plan (the only evidence on this matter in the Local Plan evidence base) is incorrect to state there is no capacity for large scale solar, this is incorrect and out of date as demonstrated by live applications and live EIA screening requests for such development.

Request the following changes to the policy (**additional text in bold**) to make it sound as follows:

Policy NE3 Landscape Gaps between settlements

In order to prevent coalescence of built-up areas, maintain the individual identity of settlements, actual or perceived, and ensure the integrity of predominantly open and undeveloped land between settlements is not undermined, the generally open and undeveloped nature of landscape gaps between settlements will be protected. Including by taking account of the landscape character, the ~~The~~ precise boundaries of landscape gaps will be defined in either a Site Allocations DPD or through neighbourhood plans.

Development will only be permitted within landscape gaps, where these have been defined as set out above, provided:

- a) It would not diminish the physical, visual and/or perceived openness of the gap; and
- b) Individually or cumulatively, it would not result in the actual or perceived coalescence of settlements.

In addition, proposals for renewable energy or low carbon development can be located within local landscape gaps where they are otherwise acceptable.

(Continue on a separate sheet /expand box if necessary)