



Representation Form

Local Plan Review: Preferred Approach Consultation

The consultation on the Local Plan Review: Preferred Approach will run from 13 December 2018 to 7 February 2019. The document and more information on the consultation can be viewed on our website www.chichester.gov.uk/localplanreview

All comments must be received by 11.59 pm on Thursday 7 February 2019.

There are a number of ways to make your comments:

- Comment on the document on the internet using our online consultation website www.chichester.gov.uk/localplanreview (**Recommended**)
- Complete this form on your computer and email it to us at planningpolicy@chichester.gov.uk
- Print this form and post it 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 separate policy or paragraph that you wish to comment on. Please identify which paragraph 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	Your Details	Agent's Details (if applicable ¹)
Full Name	Mr K Soobadoo	Caroline Wilberforce
Address	c/o agent	60 High Street, Wimbledon, London
Postcode		SW19 5AA
Telephone		07793 058602
Email		caroline.wilberforce@verveplanning.com
Organisation (if applicable)	Casa Coevo Group Ltd	Verve Planning
Position (if applicable)	Director	Director

Is this the official view of the organisation named above? Yes No

¹ Where provided, we will use Agent's details as the primary contact.

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>.

To which part of the document does your representation relate?

Page/ Paragraph Number:	Page 35	Policy Reference:	S3
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Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support

Object

Have Comments

Enter your full representation here giving details of your reasons for support/objection:

Object that Camelsdale is not identified as one of the service villages in the table under para 1.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Include Camelsdale as one of the service villages in the table under para 1.

Add another bullet under para 2 to say 'appropriate levels of housing development on other available, suitable and deliverable sites'.

(Continue on separate sheet if necessary)

Declaration

I understand that any comments submitted will be considered by Chichester District Council in line with this consultation and will be made publicly available on their website www.chichester.gov.uk and may be identifiable by my name or organisation, if provided.

Name (<i>print</i>):	CAROLINE WILBERFORCE
Date:	6.2.19

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To which part of the document does your representation relate?

Page/ Paragraph Number:	Page 36	Policy Reference:	S4
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Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support

Object

Have Comments

Enter your full representation here giving details of your reasons for support/objection:

Object that the Parish Housing Requirement is only 500 and that the provision in the North of the Plan Area is only 489.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Increase the Parish Housing Requirement to at least 510 and increase the North of the Plan Area distribution to over 500.

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:	Page 37	Policy Reference:	S5
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Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support

Object

Have Comments

Enter your full representation here giving details of your reasons for support/objection:

Object that Lynchmere does not have a housing figure requirement. There is insufficient evidence put forward by the Council to prove that there is now no need for an allocation of 10 units in Lynchmere.

Lynchmere is the sole parish within the north west of the District that incorporates a site capable of providing new housing that is advocated under the current adopted Local Plan policy. The north and south of the District are divided by the South Downs National Park that fundamentally constrains housing development coming forward. At the EiP for the Site Allocations DPD the policy officer noted that there was a notable shortfall within the north area.

The parish of Lynchmere, although isolated from Chichester City and other settlements in the south of the district (as a result of the National Park), has its own services and facilities. It is also conveniently located to the settlement of Haslemere in the Borough of Waverley and is therefore an important settlement to deliver housing development in the north of the district.

The Preferred Approach to remove this allocation in Lynchmere is flawed and is contrary to the aims of the NPPF (set out paragraphs 11, 15, 16 and 20 and chapter 5 of the NPPF) to deliver more housing in sustainable locations.

The parish of Lynchmere can still accommodate 10 units to meet the identified need set out in the adopted Local Plan. The site to the rear of Sturt Avenue can deliver this need; it is suitable, available and deliverable. The EA's recent confirmation that the site is in Flood Zone 1 is a particularly important material consideration.

Background

Casa Coevo Group and its planning agent submitted representations to the Local Plan Review Issues and Options Consultation (August 2017).

In addition, the Site owner and its planning agent promoted the Site known as 'Land to the rear of Sturt Avenue, Lynchmere/Camelsdale' for the development of 10 houses through the

Council's Site Allocation DPD from 2015 onwards.

Representations were submitted to the Council during the various consultation stages of the Site Allocation DPD. A Written Statement was submitted in July 2017, together a signed Statement of Common Ground with Thames Water. In addition, consultants appointed by the Site owner participated in the Examination in Public (EiP) for the DPD.

The Site was the subject of a proposed allocation under the draft/Policy LY1, up until the Site Allocation: Proposed Submission DPD (2014-2029). Draft Policy/LY1 reflected a robust and sound assessment by the Council of suitable and deliverable development for Lynchmere. The Council concluded, on its own appreciation of what would amount to an appropriate allocation for housing, that this policy would ensure the delivery of an indicative housing number of 10 units in this location, in accordance with adopted, strategic Local Plan policies 2, 4 and 5.

As the site owner advanced at the EiP for the Site Allocation DPD, the site is suitable, available and deliverable and could meet the objectively assessed need, set out under the adopted Local Plan, for 10 houses in Lynchmere. There was evidence from the relevant statutory consultees to support the inclusion of the site, in particular from:

- Environment Agency (EA) [Fluvial flood risk];
- Lead Local Flood Authority (West Sussex County Council - WSCC) [Groundwater flood risk];
- Local Highway Authority (WSCC) [Highway safety]; and
- Natural England [Ecology].

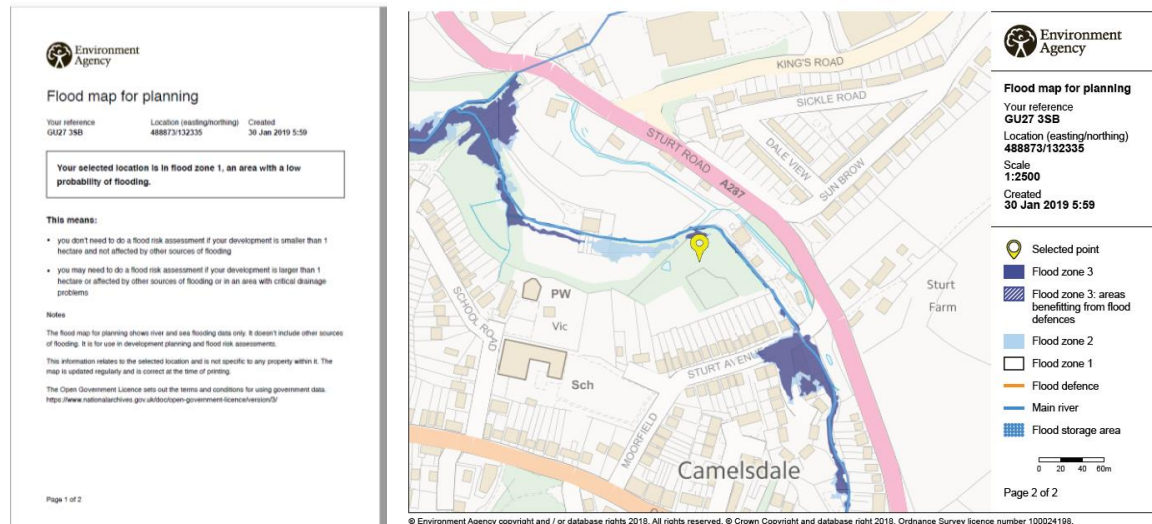
In the Inspector's Report on the Site Allocation DPD (dated 26 October 2018), the Inspector concluded that there was uncertainty regarding the deliverability of the site known as *Land to the rear of Sturt Avenue, Lynchmere* and removed the proposed allocation. Her concerns were limited to:

- access;
- potential effect on the operation of Thames Water substation; and
- uncertainty regarding both ground water and fluvial flooding.

The concerns about access and potential effect on Thames Water's operations could easily have been overcome by modifications to the wording of the policy and the imposition of conditions on any planning permission. In addition, Thames Water signed a Statement of Common Ground with the site owner in July 2017 before the EiP. A copy is **attached**. Thames Water indicated at the EiP that they would be willing to accept amendments to the policy wording. They confirmed also their capacity and willingness to work with the Site owner to ensure the safe operation of their premises.

Turning to uncertainty over ground water flooding, the LLFA (West Sussex County Council) was a statutory consultee in the Site Allocation DPD process and confirmed that no groundwater flood risk would arise.

In terms of fluvial flooding, the Environment Agency (EA) has recently published its updated flood maps following their own modelling of the Lower Wey and tributaries. The Flood Map for Planning (FMfP) on the EA's website (downloaded on 30 January 2019) now shows that the site is in Flood Zone 1 (low probability of flooding), as we always maintained during the Site Allocation DPD process. This map is embedded below and also **attached**. The Inspector's conclusion on the SAD was therefore unfortunately premature.



Importantly, the EA has therefore endorsed the site-specific modelling work that was carried out by Waterco for the site owner.

In any event, the EA had previously confirmed: *"We are satisfied that the approach taken to assess flood risk on the proposed development site is sufficiently precautionary and provides a better representation of flood risk on the site than that which the current Flood Map shows. Therefore this information could be used by Chichester DC to give a better understanding of the flood risk on the site. It could also be used as the basis for the flood risk assessment that would need to be provided at the planning application stage"*.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

The housing requirement of at least 10 units should be reinstated into the Local Plan Review and the table to draft policy S5 amended.

(Continue on separate sheet if necessary)

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Date:	6.2.19

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To which part of the document does your representation relate?

Page/ Paragraph Number:	Page 71	Policy Reference:	S19
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Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support

Object

Have Comments

Enter your full representation here giving details of your reasons for support/objection:

The policy wording is too restrictive and does not allow flexibility for small scale housing that is not included in policies S3 and S5.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

The first sentence should include the following wording at the end: ' , as well as other small scale development on suitable, available and deliverable sites'.

(Continue on separate sheet if necessary)

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(Continue on separate sheet if necessary)

The site borders an existing settlement boundary to the south and east and should be included within it. There is the opportunity to maintain and actually improve the site's ability to act as a natural buffer to the north.

The site had been neglected for a number of years and had become very overgrown and requires regular woodland management. The site still contains many trees. It is important to note that they are all either category 'B' (moderate quality), category 'C' (low quality) or category U (trees that cannot realistically be retained due to their condition). Housing could be carefully integrated into a woodland setting (as explained in the response to draft Policy S5), with further appropriate planting (particularly along the boundaries), ensuring that the natural buffer is actually improved. All new trees would be Category 'A' species to enhance and prolong the longevity of the natural buffer.

The woodland setting in this area is also reinforced by land covered with trees under different ownership. This is located to the north of the site, strengthening the buffer to the north.

What improvements or changes would you suggest?

The policies maps should be updated to include the site known as 'Land to the rear of Sturt Avenue, Lynchmere/Camelsdale', within the settlement boundary.

(Continue on separate sheet if necessary)

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