



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		Catherine Mason
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Organisation (if applicable)	West Sussex County Council	Savills
Position (if applicable)		Associate 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:	7.54	Policy Reference:	
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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:

See attached separate full representations.

Our client owns the former Tannery site on Westgate. The site is approximately 0.66 hectares and contains a former office of 14,000sq ft converted in the early 1970's from a closed tannery business together with five former dwellings constructed during the Edwardian period presumably as part of the tannery operation. These buildings front Westgate which is the public highway.

In preparing plans Paragraph 16 of the NPPF (2018) states that plans should:

- a) *'be prepared with the objective of contributing to the achievement of sustainable development;*
- b) *be prepared positively, in a way that is aspirational but deliverable;*
- c) *be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d) *contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) *be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f) *serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).'*

In order to be sound, paragraph 35 states that plans should be:

- a) *'Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.'

We are concerned that as drafted the Local Plan is unsound for the reasons set out below.

Paragraph 7.54 refers to regular reviewing of the suitability of existing employment sites. This is important, however, we are concerned as to how and when this occurs. As far as we are aware the suitability of this site for employment use was not assessed under either the Employment Land Review 2009 or the Update in 2013. It is also not referred to in the Economic Development and Employment Background Paper January 2019.

Due to the location of the site in the City, this is not the preferred location for offices and as such the site has remained vacant despite being actively marketed for over 36 months to seek a commercial user. If this site was to be reviewed now, then we believe that it would be sensibly concluded that it is no longer suitable for employment use and should be released for housing. The policies as worded are ambiguous and not clear as to how a decision maker should react to proposals, in conflict with paragraph 16 of the NPPF. The HELAA 2018 does not appear to have informed these policies. There is no evidence for retention of this site for employment use and the policies are therefore not justified.

Furthermore, the site has previously obtained Prior Approval for 15 residential units under office to residential permitted development rights. The same circumstances apply and this could be applied for again.

The Local Plan as drafted is already out of date and is not justified or effective, contrary to the NPPF.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

The suitability of the site for retention in employment use must be reviewed. The plan needs to reflect the conclusions in the HELAA and the site should therefore be referred to in the plan as having potential for the delivery of approximately 30 units.

(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>):	Catherine Mason
Date:	05/02/2019