



## 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](http://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](http://www.chichester.gov.uk/localplanreview) (**Recommended**)
- Complete this form on your computer and email it to us at [planningpolicy@chichester.gov.uk](mailto: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](mailto:planningpolicy@chichester.gov.uk) or telephone 01243 785166.

<b>PART A</b>	Your Details	Agent's Details (if applicable <sup>1</sup> )
Full Name		Catherine Mason
Address		33 Margaret Street
Postcode		W1G 0JD
Telephone		020 7409 8130
Email		cmason@savills.com
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

<sup>1</sup> 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:		Policy Reference:	S4
----------------------------	--	-------------------	----

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.

Policy S4 sets a target for delivery of 12,350 homes in the District over the plan period. Site AL5 (Southern Gateway) on the southern side of Chichester City (includes bus station and depot, public car park, former law courts and Chichester Railway station) is allocated in the draft plan for regeneration including a minimum of 350 homes. In addition Policy S5 sets a target for the delivery of a further 50 units in Chichester City. We are concerned that 50 units is very low and contrary to NPPF that states that policies must be justified and represent an appropriate strategy. The policy does not encourage development of appropriate previously developed sites conflicting with Government objectives in the NPPF.

The main strategy for delivering housing within the district appears to be urban extensions on greenfield sites on the edge of settlements. The first priority should be to make best use of appropriate brownfield sites. The former Tannery site is the largest opportunity for residential development (apart from AL5, which has complex issues due to the different parcels of land) in the central area of Chichester City and could deliver in the region of 25-30 units. The site has been vacant for several years and marketing as employment use has been carried out over the past 36 months which has found there to be no commercial interest. A full report would be submitted as part of any application.

Furthermore the site was identified by Chichester District Council in Appendix 3 of the HELAA 2018 as having potential for the delivery of 30 units (HCC0035) in years 1-5 of the plan period. The form concludes that *'There is a reasonable prospect that development would be achievable during the Plan period.'* Whilst we appreciate that compared to the other sites being allocated this site is of a smaller scale, it is the largest housing site (apart from AL5) in Chichester City and would make an important contribution to the housing supply in the central area. It is therefore a strategic site for Chichester City.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

For the reasons set out above and to ensure that there is no ambiguity moving forward, in accordance with Paragraph 16 d) of the NPPF, the plan should identify the site 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](http://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