



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		Hywel James
Address	c/o Agent	5th Floor, Thames Tower, Reading
Postcode		RG1 1LX
Telephone		01182 149340
Email		h.james@nexusplanning.co.uk
Organisation (if applicable)	CEG	Nexus Planning
Position (if applicable)		Senior Planner

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:		Policy Reference:	AL5
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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:

Please see separate sheets below

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Please see separate sheets below

(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>):	Hywel James
Date:	05/02/2019

Chichester Local Plan Review - Regulation

18 Preferred Options Consultation

Policy AL5 - Land at Southern Gateway

1. The Southern Gateway ("the Site") is allocated to deliver at least 350 dwellings and approximately 21,600 (presumably sqm) of mixed commercial space. We acknowledge that there is an adopted masterplan document (December 2017) relating to the Site and that the land is, largely, within the ownership of Chichester District Council. However, there are significant reservations with respect to its deliverability.
2. The Site is located adjacent to a Site of Importance for Nature Conservation. Mitigation will need to be provided to ensure that development does not significantly harm this environmental designation (as required by NPPF paragraph 175a), and this will inevitably reduce the developable area of the site. This does not appear to have been considered within the masterplan document.
3. Furthermore, much of the Site is within Flood Zones 2 and 3 and in accordance with NPPF paragraph 157, a sequential approach to the location of development, taking into account flood risk, must be adopted. The Sustainability Appraisal ("SA") that accompanies the Local Plan Review highlights, unsurprisingly, that the Site does not perform well with respect to flood risk matters.
4. Additionally, the Site contains numerous listed buildings. This will limit the capacity of the Site given the need to protect their setting, and any harm caused will have to be assessed having regard to the provisions of paragraphs 195 or 196 of the NPPF. The SA concludes that the impact of the development of the Site on the existing heritage assets is uncertain. We are not clear that the Council has ascertained whether substantial harm to heritage can be avoided.
5. In light of the above, we do not consider that there is sufficient information to conclude that the Site is suitable for development, and at the very least the above questions its ability to accommodate 350 homes. Given the lack of any flexibility in terms of the housing supply allocated in this Plan (see our representations to Policy S4), this is particularly concerning.