



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
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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:	AL6
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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 AL6 - Land South-West of Chichester (Apuldram and Donnington Parishes)

1. Land South-West of Chichester ("the Site") is allocated to deliver approximately 33 hectares of employment land and a minimum of 100 dwellings, as well as a new link road. For the reasons set out below, we have significant reservations with respect to the deliverability of housing from this proposed allocation.
2. The Council acknowledges at paragraph 6.47 of the Plan that the impacts of developing the Site, along with its commercial attractiveness, need to be tested further. It is clear, therefore, that the Council does not currently have sufficient evidence to demonstrate the suitability or deliverability of this site. Due to the lack of any flexibility in terms of housing supply (see our representations to Policy S4) this raises significant questions as to the Council's ability to meet the identified housing requirement.
3. Furthermore, whilst there is no specific assessment in the Preferred Approach Sustainability Appraisal October 2018 ("SA"), it is evident that the Issues and Options SA (May 2017) confirmed that the Site scored poorly against a number of the assessment criteria. Most notably:
 - Ecology - the SA concludes that development of the Site would have an adverse impact on bat and barn owl habitats, as well as the east-west movement of wildlife. Furthermore, the site is within close proximity of the Chichester Harbour Special Protection Area ("SPA") and has the potential to cause adverse impacts in this regard (as acknowledged in the May 2017 SA against assessment criterion 3c);
 - Waste water treatment capacity – there is very limited headroom within the existing facility at Apuldram (sited within close proximity of the Site). Policy AL6 states that proposals will need to demonstrate that there is sufficient capacity in the sewer network but it is unclear whether this can be demonstrated. This raises further doubts with respect to the deliverability of the Site; and
 - Chichester Harbour AONB - the Site is situated immediately adjacent to the Chichester Harbour AONB where the NPPF confirms that great weight should be afforded to

protecting the setting of the AONB. There is no evidence to confirm that the proposed development could come forward without an unacceptable impact in this regard;

- Flood risk - much of the western portion of the Site is situated within Flood Zone 3 and a watercourse runs through the centre of the Site. The NPPF seeks to direct development away from areas at highest risk of flooding (paragraph 155). Therefore much of the Site is unsuitable for development without significant mitigation, raising further doubts regarding its ability to deliver the full extent of development allocated through Policy AL6.
4. For these reasons, we consider that there is considerable uncertainty as to the suitability and deliverability of this site to deliver housing. Given the lack of any flexibility in housing supply having regard to Policy S4, this is a critical issue.