



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

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:	Sustainability Appraisal	Policy Reference:	
----------------------------	-----------------------------	-------------------	--

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](http://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

## Sustainability Appraisal

1. The Sustainability Appraisal for the Chichester Local Plan Review – Preferred Approach October 2018 (“the Preferred Approach SA”) states at paragraph 3.5 that it has been prepared having considered the findings of the SA carried out for the Issues and Options consultation in 2017. It is evident, therefore, that its findings rely to an extent on the contents of the SA report that accompanied the Issues and Options Local Plan (“the Issues and Options SA”).
2. The Preferred Approach SA first considers the most appropriate spatial strategy and concludes that Option 1A – a focus on the settlement hubs and East/West corridor, with reduced numbers on the Manhood Peninsula, is the most sustainable. We would not disagree with this conclusion which accords broadly with that of the adopted Local Plan.
3. As an appendix to the Preferred Approach SA is an assessment of the allocations proposed in the Local Plan Review. It can be noted that there is no comparative assessment here of the reasonable alternatives to the sites proposed to be allocated in the emerging Local Plan Review. This is, in and of itself, a flaw in the SA process that must be rectified. The absence of such consideration means that it is not possible for any consultee to determine why the preferred sites were selected, and other reasonable alternatives rejected.
4. It may be that the Preferred Approach SA is seeking to rely on the Issues and Options SA which considered 10 potential strategic development locations and 33 non-strategic locations. This is not made clear and results in the need for a paper-chase, which is unlawful. However, the Issues and Options SA simply assesses the identified alternatives – it makes no choices. As such it is clear that this necessary justification is demonstrably missing.
5. Furthermore, neither the Issues and Options SA nor the Preferred Approach SA has considered, as either a strategic or non-strategic option (or both), the potential for the development of some of the additional land that forms part of the Westhampnett / North East Chichester SDL as allocated in the adopted Local Plan. The opportunity in this regard is explained in detail in our representations to Policy AL4. As the Council is already aware, the availability of this land, and its merits, were advanced in detail submissions to the Call for Sites

process in 2016. Despite this, it was not even included as an option for consideration in the Issues and Options SA.

6. This is a fundamental failing of the SA process to date that must be rectified. It is wholly irrational and thereby unlawful to exclude consideration of a site such as this which is, on any reasonable basis, a reasonable alternative to the other strategic and specifically the non-strategic options (and indeed is demonstrably one of the most sustainable options for development in the District based on the Council's own evidence, settlement hierarchy and spatial strategy).

#### Proposed Changes

7. With reference to our Call for Sites submission in 2016, and our representation to Policy AL4, the Council must consider, as a reasonable alternative to both the strategic and non-strategic development options (or both), the merits of the additional promoted land which forms part of the existing Westhampnett / North East Chichester SDL.