



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	Mr & Mrs Tearall	Paul White
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Organisation (if applicable)		
Position (if applicable)		

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:	S2, S5, S24, AL10
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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:

The 'tests of soundness' for Local Plan preparation are set out in paragraph 35 of the NPPF2. They require the 2016-35 Local Plan to have been:

- **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;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **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
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

We will deal with the tests more thoroughly in the next Submission Plan but at this stage our headline comments cover the following policies:

Settlement Hierarchy (S2), Parish Housing Sites (S5) Countryside (S24) and AL10 Chidham & Hambrook Parish.

Policy S2 – Settlement Hierarchy

The Settlement Hierarchy background paper provides justification for the hierarchy in Policy S2 of the Local Plan. It forms the basis for the proposed distribution of growth by distinguishing between those settlements considered to be the most sustainable having the best range of facilities and accessibility from those with the least. Most development is focused on the former and development to meet local needs or no development whatsoever on the latter. We agree that

Hambrook is correctly identified as a service village in the hierarchy. However the table in the Policy S2 refers to Hambrook/Nutbourne and yet the list of Parish housing sites in policy S5 refers to Chidham & Hambrook parish. Policy AL10 also allocates 500 dwellings to Chidham and Hambrook parish.

For consistency, we'd suggest that Chidham and Hambrook parish is used throughout. Hambrook/Nutbourne in policy S2 should therefore be amended to Chidham/Hambrook.

Policy S5 – Parish Housing Sites

Parish housing allocations comprise 500 dwellings and paragraph 4.26 of the Plan says they have been distributed amongst the settlements in accordance with their ranking in the settlement hierarchy.

At present the entire housing allocation for Chidham and Hambrook parish is set out in policy AL10 as a strategic allocation to come forward on potential development site(s) in a Neighbourhood Plan. There is a nil allocation for the parish in policy S5.

We object to this as it implies all new housing has to be found on new strategic sites within the parish and overlooks the potential capacity for unidentified sites to come forward within the existing built up area and as a result of modest settlement policy boundary adjustments.

For instance, the existing settlement policy boundary for Hambrook is separated from the area to the south (Nutbourne East) in the made Neighbourhood Plan and the now expired 1999 Local Plan. But there remains a large central part of Broad Road with frontage and in depth development which is still shown as countryside. In our view this central part of Hambrook offers an opportunity for further windfall sites to come forward either as redevelopment of existing residential gardens or the development of vacant sites. A simple settlement policy boundary amendment to include the area would facilitate this. As an example, the attached plan shows a vacant plot south of Yeoman's Field to be suitable for housing. If it was included within a new settlement policy boundary, it could either count against the 'windfall allowance' of 695 dwellings in policy S4 or towards a parish allowance for small sites in S5. Any additional parish allowance in S5 should show an equal reduction in the strategic site allowance in AL10.

S24 Countryside

Policy S24 deals with countryside and settlement policy boundaries. Not all settlements however are proposed for a settlement policy boundary review in the Local Plan. Boundaries not included will be reviewed through a subsequent Site Allocation DPD or a Neighbourhood Plan Review.

According to the Local Development Scheme the Site Allocation DPD will not be adopted until July 2022 and the timetable for other Neighbourhood Plan reviews will vary.

We object to the way the settlement policy boundary reviews are proposed to take place in the Plan. We prefer an earlier boundary review now for all settlements in the Plan including Chidham and Hambrook. A boundary amendment could increase the supply of windfall sites in an urban area and

reduce the requirement for new greenfield allocations in the later DPD or Neighbourhood Plan. However if boundary reviews of all settlements are not to be made in the Plan we would request policy wording to the last sentence of S24 be amended as follows:

‘Defined settlement boundaries may be altered by a future development plan document and/or a neighbourhood plan. In the interim, where a boundary amendment is justified against the key requirements of the settlement boundaries background paper that should be regarded as a material consideration in connection with the submission of any planning application’.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

We propose a settlement policy boundary amendment to Chidham & Hambrook to include the central part of Broad currently shown as countryside as it forms part of the existing Hambrook Urban area.

Consideration should be given to an additional small site allowance for Chidham/Hambrook in Policy S5. Whatever allowance is agreed, an equal reduction to the housing proposed in AL10 as a strategic allocation should be made.

Policy S24 should have additional wording as suggested above.

(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>):	Paul White
Date:	7 February 2019