



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		Paul White
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Organisation (if applicable)	Greenwood Group Ltd	
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, S4, S5
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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 in connection with Sidlesham:

Settlement Hierarchy (S2), Housing Need (S4), Parish Housing Sites (S5) and Countryside (S24).

Policy S2 – Settlement Hierarchy

The Settlement Hierarchy background paper provides justification for the hierarchy in Policy 2 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. Paragraph 4.8 of the background paper includes Sidlesham in the 'rest of the plan area' least suited for development

because it does 'not contain the range of facilities and services to be classified as sustainable'.

We disagree with this classification and believe Sidlesham should be included as a 'service village in the hierarchy based on its population and range of available facilities.

The Councils own Settlement Capacity Profile 2013 shows Sidlesham with a population of over 1,100. This historic population is more than Boxgrove, Kirdford and Westhampnett which are all service villages in Policy 2 of this draft Local Plan.

Sidlesham has 4 employment areas at Enbourne Business Park, Walnut Tree Science Park Locks Lane, Jury Lane and the Horticultural Development Area. Community facilities include a petrol filling station with convenience store and off licence, church, recreation ground and football field with licensed bar and hall, primary school with sports hall available for wider community use, 2 other pubs (one a 'gastro pub' at Sidlesham Quay). Access to bus services are available from the B2145, 1 regular daytime bus service (51) linking to Chichester & Selsey (Most frequent daytime service, every 15 minutes). A more irregular daytime bus service (150) is on Mondays, Wednesdays and Fridays (3 daytime services in each direction). According to the November Waste Water Monitoring 2018 update, Sidlesham WWTW has available capacity for 487 dwellings.

Presently the affordable need at Sidlesham (January 2019) comprises 6 households with a local connection to the area all in high priority need. Without any open market housing allocations the only way this need will be met is with rural exception development. On the other hand an allocation would deliver 30% affordable dwellings to the settlement immediately. We therefore believe Sidlesham should be re-categorised as a service village and allocated for 50 dwellings like the equivalent sized settlements at Boxgrove and Westhampnett.

Policy S4 – Meeting Housing Needs

The identified housing need has been informed by GL Hearn's Chichester Housing and Economic Development Needs Assessment (January 2018)

The Assessment confirms the objectively assessed need (OAN) is capped at 40% above the adopted housing requirement. The Local Plan was adopted on the basis of approximately 435 dpa. Capping the OAN to 40% above the adopted figure gives Chichester a housing need of 609 dpa. The Plan actually provides for 12,350 dwellings over a 19 year period equivalent to 650dpa to meet the 609dpa plus 41dpa which are unable to be met within the District part of the National Park.

Whilst we understand the need assessment has been carried out in accordance with the standard method set out in PPG we suggest it has potential flaws as the 435dpa in the adopted plan already fails to meet need. It should also consider the un-met needs of other adjoining authorities not just the National Park.

Out of the total 12,350 dwellings, 4,400 or 35% are proposed as new strategic allocations. Given this

significant reliance on large sites and the potential longer lead in times for housing delivery we therefore suggest the plan includes a trajectory for them especially as this would better comply with Paragraph 73 of the NPPF2.

In meeting need S4 includes a 'windfall small sites allowance' of 695 dwellings and a Parish sites allowance of 500 dwellings. They are both an important land supply component as they will help deliver completions on smaller sites and maintain housing supply in the short term before the larger strategic sites come forward. We welcome both.

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.

We have already explained our reasons why Sidlesham should be included as a 'service village' in the hierarchy in connection with S2. Based on this ranking it follows that S5 should allocate some housing on parish sites to Sidlesham. We believe an allocation of the order of 25-50 dwellings would be justified as this has been deemed suitable for the other service villages in S5.

Assuming this is accepted we would point out that land is available at Greenwood Nursery Highleigh Road Sidlesham for around 35 dwellings. The site is outside the designated horticultural development area, within flood zone 1 (least liable to flood) and has no biodiversity or heritage interest. It is located outside the Chichester Harbour Area of Outstanding Natural Beauty. It has a footpath link to the nearby school.

The proposal would generate fewer trips (and no HGV's) compared to the existing nursery business. A site plan and transport note are both submitted for additional information.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Policy S2 – Sidlesham should be included as a 'service village' in the settlement hierarchy of S2. The description of Sidlesham should recognise that this includes Highleigh.

Policy S4 - The Plan needs to include a housing trajectory of the strategic allocations to assist future monitoring of housing delivery as suggested by paragraph 73 of the NPPF2. This would benefit the Local Plan in better meeting the 'consistent with national policy' test of soundness.

Policy S5 - Sidlesham should be allocated up to 50 dwellings as Parish housing sites.

(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