



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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Email		paul@genesistp.co.uk
Organisation (if applicable)	Rawleigh Property Management 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:	49-50	Policy Reference:	S9 and S10
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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 these matters more thoroughly at Submission stage but our headline comments to the Preferred Approach deal with the retail policies S9 and S10 in connection with the Broadbridge Business Centre Bosham.

The policies have been informed by the Chichester Retail and Main Town Centre Uses Study 2018 Final Report this being part of the evidence base for the Plan. Paragraph 9.12 states that Bosham has some retail uses and services, consistent with the role of a local centre, serving the immediate local catchment area. Table 11.4 identifies Bosham as a Local/Village Parade in the retail hierarchy. Table 10B at Appendix 2 has not identified the centre but refers to the 2 principal convenience goods destinations, 1) Co-op at Delling Lane (the Broadbridge Business Centre) and 2) the Co-op at Station Road Broadbridge.

Policy S9 refers to Bosham as a 'village centre in the hierarchy to be defined in the Neighbourhood Plan or Development Plan Document DPD' and applies the impact threshold of 250m2. It also states 'local centres including shopping parades and standalone shops form an important resource for businesses, visitors and residents. The expansion and additional provision of such facilities to a scale appropriate to the existing settlement or the planned expansion of that settlement will be welcomed by the Council provided it adds to the range and accessibility of goods and services'.

Policy S10 is titled Local Centres: Local and Village Parades. Like policy S9 it encourages development at local centres but also includes local and village parades. It also refers to village centres.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Policy S9 and S10 both refer to local and village parades and village centres interchangeably which is confusing.

Policy S9 – Retail Hierarchy and Sequential Approach

The policy wording needs amending to make clear that additional retail will be supported at local centres and village centres including shopping parades and standalone shops.

For consistency the policy should either refer to village centres in the hierarchy instead of local village parades.

Consideration should be given to elevating Bosham to a local centre especially given the significant planned additional growth of 250 dwellings proposed at Highgrove Farm in policy SA7. If this is accepted the impact threshold should also be raised to over 500m2.

Importantly, the village centre (or local centre if Bosham is elevated to this in the hierarchy) must be defined in the next Submission version Local Plan and not left to a future Neighbourhood Plan or Site Allocations DPD. According to the local Development Scheme (2018-2021) the next DPD is not due to be adopted until July 2022. We understand the Bosham Neighbourhood Plan is not being reviewed.

Without this amendment allowing the definition of the Bosham village or local centre there would be no retail policy in place for Bosham until 2022 and potential retail development which would otherwise be welcomed by policy would be prevented from coming forward.

The Co-op at Broadbridge Business centre is larger than the store at Station Road. The business centre has other facilities including a doctor's surgery and some of the business units there already have an ancillary retail offer. It has ample ground level parking and is better suited as a retail destination than the Station Road parade.

We therefore recommend the Broadbridge Business Centre is defined in the Submission Plan as the retail centre of Bosham as shown on the attached plan edged blue. The centre should be at least a village centre although, with the potential 250 dwellings at Highcroft Farm, the centre would better be suited as local centre in the retail hierarchy.

Policy S10 – Local Centres, Local and Village Parades

As a corollary to our comments on S9, Policy S10 should be renamed Local Centres and Village Centres. The policy wording should confirm that within the defined centre loss of employment would not be a reason for allowing a change of use of an existing B1 use to A1 retail.

The proposed amendments would benefit the Plan in meeting the tests of soundness, namely the positively prepared, effective and consistent with national planning policy tests.

(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:	31 January 2019