

Tangmere Neighbourhood Plan Regulation 16 Consultation Responses

Summary of representations received by Chichester District Council (CDC) as part of Regulation 16 publication and submitted to the independent examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act

Parish Name: Tangmere Parish Council

Consultation Date: 30 April 2015 to 11 June 2015

Please note: CDC comments are submitted as a separate document (reference 014)

All the original representation documents are included, in full, as part of the examination pack. The table below may be a summary of the representations received so may not always be a verbatim report.

Name and Reference	Date received	Method of submission	Summary of representation
A2 Dominion Group (001)	28.05.15	Email	<p>A2Dominon owns properties along Malcolm and Tangmere roads. We are concerned that the Plan's proposals will curtail the future development of both the land within our ownership and land which we maintain on behalf of others.</p> <p>The land in question appears in the Tangmere Neighbourhood Plan under Policy 7. This policy stipulates that, with the exception of the garage block, the land currently owned by A2Dominion should be retained as amenity open space. The labelling of the land in this manner will restrict any future development use. We have been working for some time with Chichester District Council (CDC) regarding the development potential of this land and believe that the proposed restriction on our land will unjustifiably result in an inability to maximise the potential of this land and the surrounding area.</p> <p>It is disappointing, that despite our previous comments and objections to the Clerk of Tangmere Parish on 21st November 2014, no direct contact has been made to request further comments on the updated Neighbourhood Plan. This has resulted in the use of land that is not in the ownership of the Parish, being restricted by the Parish. This decision will also have a detrimental effect on the value of land not owned by the Parish. A2Dominion are a willing developer</p>

			<p>within the Borough, able of providing much needed housing in the area. The labelling of the land in this manner will curtail future development, irrespective of tenure.</p> <p>Point 4.50 requires that the land should be retained as amenity open space and "should form a feature of the wider plans for the 'Street' area". This suggests it could be considered public space in future plans. This land is retained, at our own expense, for use by our tenants only. They have been given permission to use the land, at our discretion, for as long as we see fit within their tenancy agreements. We strongly object to proposals that suggest opening up this privately owned space for general use.</p> <p>We would like to highlight our complete objection to the inclusion of this land within Policy 7 and with the nominated use of amenity open space.</p> <p>A copy of our previous objection is attached for your information.</p>
Ben Simpson obo Cater Jonas (002)	11.06.15	Email	<p>As with our previous representations, the content will already be familiar to you through the comments raised by us at the Steering Group meetings. In general terms we are content that the Neighbourhood Plan provides an effective policy context for the delivery of the Strategic Development Location, but we are concerned to ensure that the Neighbourhood Plan is fit for purpose and does not unnecessarily constrain the preparation of the masterplan for the Strategic Development Location.</p> <p>4. Vision, Objectives and Land Use Planning Policies</p> <p>Para 4.6 – As we commented on the Pre-Submission version, the second sentence of this paragraph refers to policies within the Neighbourhood Plan replacing policies in the Local Plan. This is incorrect. Policies in the Neighbourhood Plan cannot 'replace' those in the Local Plan but may supplement them, once adopted.</p> <p>Policy 1: A Spatial Plan for the Parish</p> <p>This is a re-statement of strategic policy from the Local Plan regarding the principle of</p>

		<p>development within settlement boundaries and the approach to be taken to development restraint outside those boundaries. It is not appropriate or necessary to include within the Neighbourhood Plan. Instead it is suggested that a cross reference is inserted to policy 2 in the Pre-Submission Draft Chichester Local Plan.</p> <p>Key Diagram</p> <p>The boundary of the Strategic Development Location must accord exactly with the boundary within the soon to be adopted Chichester Local Plan. In particular, the medical centre on the western end of Malcolm Road should be excluded from the boundary, and land west of Saxon Meadow is included in the SDL boundary.</p> <p>Policy 2 Strategic Housing Development</p> <p>Thank you for incorporating many of our previous comments in the text of the revised policy. We have a few remaining points to raise for consideration by the Examiner.</p> <p>Policy 2(v) – For clarity we suggest that any reference to custom built homes or self-build homes is removed, rather than stating that they will not be required.</p> <p>Policy 2 (vii) – The policy unreasonably asks for all hedgerows and landscape features to be retained. This should be softened to say 'where appropriate' or 'hedgerows and landscape features of nature conservation value'.</p> <p>Policy 2 (vii b) - Justification needs to be provided for seeking to restrict any development to the west of Saxon Meadow prior to the finding of detailed masterplanning studies. The policy is unclear about why it must remain 'open' and does not state what sort of use it should be put to.</p> <p>Policy 2 (ix) – The text should state that “Land of up to 1ha will be provided for a new community facility.”. The supporting text to the policy should also be amended to refer to the provision of land, rather than the provision of the facility itself.</p> <p>The supporting text should also make clear that potential items to be funded or contributed towards via a S.106 Agreement are community aspirations that will be sought subject to</p>
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			overall scheme viability and any CIL contribution that may be payable, and will be subject to the planning tests set out at paragraph 204 of the NPPF and Circular 05/2005: Planning Obligations (18 July 2005).
Chris Rees (Savills) obo Bloor Homes (003)	11.06.15	Email	<p>The comments made in this representation remain consistent with that provided at the Pre-Submission stage of the Plan production.</p> <p>You will note that the majority of these comments mirror that presented by the other two parties of the Consortium, having been formed through review of the draft policies jointly by the three parties. Where separate comments are made, these concern specifically the land controlled by Bloor Homes in the vicinity of Malcolm Road.</p> <p>3.Planning Policy Context Para 3.13 – This paragraph is worded as if an Appropriate Assessment (AA) will be necessary. It is not certain that an Appropriate Assessment will be necessary, and therefore the final sentence should be re- worded as follows:</p> <p><i>“In addition, due to the overwintering of birds in the Chichester and Pagham Harbours, development may need to contribute towards mitigation/avoidance measures should an Appropriate Assessment be required, and deem this necessary.”</i></p> <p>4. Vision, Objectives and Land Use Planning Policies Para 4.6 – The second sentence of this paragraph refers to policies within the Neighbourhood Plan replacing policies in the Local Plan. This is incorrect. Policies in the Neighbourhood Plan cannot ‘replace’ those in the Local Plan but may supplement them once adopted. The paragraph needs to be amended to reflect this.</p> <p>Policy 1: A Spatial Plan for the Parish This is a re-statement of strategic policy from the Local Plan regarding the principle of development within settlement boundaries and the approach to be taken to development restraint outside those boundaries. It is not appropriate or necessary to include within the Neighbourhood Plan. Instead it is suggested that a cross reference is inserted to policy 2 in the Pre-Submission Draft Chichester Local Plan.</p>

			<p>Policy 2: Strategic Housing Development</p> <p>In general, we support the policy directions within policy 2, although as drafted the Policy seeks to provide detailed direction to the laying out and form of development at the Tangmere SDL in the absence of necessary and appropriate studies and assessments being completed. Studies such as Landscape and Visual Impact Assessment, Highway Assessment, Ecology, Archaeology etc, will guide and shape the formation of the most appropriate masterplan and laying out of the SDL, which should be recognised within the NP and the introductory wording of Policy 2.</p> <p>Policy 2 (i)</p> <p>It is agreed that the SDL should contain a series of connections, however, what status those connections will have cannot be concluded until the necessary Highway Assessment and modelling has been completed. In particular, I refer to the East/ West Corridor where it connects to Malcolm Road, and whether such a connection will be limited to cycle, pedestrian and buses, or whether the connection will allow unrestricted vehicular access.</p> <p>It is noted within Paragraph 4.18 that the NP considers this area to be suited to all forms of Transport. Such a statement is made without the Parish Council understanding the implications of allowing through traffic along Malcolm Road, nor whether this is actually achievable in respect of the additional traffic that would move east to west through the existing village.</p> <p>It will be important that the correct road hierarchy system is put in place, that provides a pleasant environment for residents, pedestrians and cyclists, while also facilitating connections through the SDL and back to the existing village itself. The NP should recognise that the scale, form and design of these connections, and whether they are bus only or open to all traffic (Malcolm Road), will be a matter for the detailed masterplanning stage.</p> <p>Policy 2 (ii /iii / viii / x)</p> <p>As drafted, the NP envisages the area to the west of Malcolm Road to contain a</p>
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			<p>number of elements, including a new 'Village Main Street', specific house types and the provision of a new Primary School.</p> <p>We are pleased to see that the text in respect of the commercial uses proposed at the Village Main Street now has the caveat of 'subject to marketing evidence' added to the wording (x). We would reiterate that prescribing commercial requirements for the SDL to deliver in the absence of any such evidence would be unsound.</p> <p>Further commentary on this new 'Street' is provided within Paragraphs 4.18 and 4.19, and we would reiterate that any commercial use classes to be provided within the SDL would need to be subject to a full viability and marketing exercise to show that it is deliverable. Such wording should also be added to these paragraphs.</p> <p>In respect of Policy 2 iii a, we maintain our objection to prescribing that this area of the SDL should include specifically smaller house types suited to starter homes and for those wishing to downsize. Firstly, such homes will be suited to many parts of the SDL, not just specifically this location, and thus there is no justification for the NP to set out such a principle. Secondly, it is nonsensical to have a 'principle' that directs homes for first time buyers and those who are later in life and wishing to downsize specifically to the area of the site where the Primary School is to be located. Such housing will on average have less primary aged children, and yet, the NP would seek to locate them as a matter of principle next to the school.</p> <p>Moreover, there is no scale applied to this 'principle' nor what 'emphasis' would mean against which the Planning Application can be considered against.</p> <p>The reality is there will be a range of house types across the SDL to meet both the affordable and market demand for housing. The NP should not be seeking to define where those house types should be located, potentially hindering the ability to create a balanced community across the SDL.</p> <p>In respect of the school site (viii), Bloor Homes considers that this could be an appropriate location for the school. Early discussions have already taken place with the District Council, County Council and Parish in respect of the SDL providing for a 2FE facility, which would represent an over provision of education land when measured against the needs of the SDL.</p>
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			<p>The delivery of the 2FE in line with the CIL Regulations will need to be discussed further as part of formation of the Planning Application.</p> <p>Policy 2 (v) We are pleased to see that a requirement to provide self build homes has been removed from the Submission Draft, however, in light of this, there would be no need for criterion v.</p> <p>Policy 2 (vii) Overall, the Policy wording is considered too prescriptive, and goes beyond setting broad principles for the masterplan to take into account. The masterplan will need to consider a range of opportunities and constraints to the laying out of infrastructure, services, facilities and housing, and will be informed by a wide range of assessments and studies. By way of example, it may not be the most appropriate solution to retain all of the hedgerows in the current location, but instead, replace or even move those hedgerows in line with an overarching strategy for habitat creation and green infrastructure on site. The NP is preempting analysis that will need to be completed as part of the masterplanning process, which in turn could hinder that process.</p> <p>It is noted within Paragraph 4.14 of the Submission Draft that the 'precise area and nature of development in Policy 2 will be subject to the outcome of any necessary Environmental Impact Assessment of the proposals'. Such a statement should be added to the wording of Policy 2, which coupled with the changes sought, would provide a more flexible policy and one which can evolve as the design process evolves.</p> <p>Paragraph 4.23 cites that 'around 25m' would be required to act as a buffer to the A27, which is a distance that has been formed by the Parish without the benefit of understanding the noise constraints and appropriate mitigation. A buffer will be required, the precise width of which will be tested through the design process. Consequently, the wording of the NP should be amended to remove reference to 25m, and instead simply refer to the width of the buffer to be a matter for the detailed design process to conclude.</p> <p>As a general observation, there is little recognition within the NP wording that the potential items to be funded or contributed towards via the legal agreement, are subject to the overall</p>
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			assessment of viability, inclusive of any CIL Contribution to be payable. Such a statement should be included within the opening sections of the NP, to ensure that all parties are aware that such an assessment will be required as part of the Planning Application process.
Environment Agency (004)	15.06.15	Email	<p>We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.</p> <p>We consider that the key environmental constraints regarding the strategic allocation in Tangmere have been addressed through your own Local Plan policy, however, we are pleased that the Neighbourhood Plan identifies that any planning proposal recognises the high groundwater levels in the area and that appropriate Sustainable Drainage Systems and flood protection measures would be required.</p> <p>We are also pleased to see the commitment to delivering a Green Infrastructure network for the area. We would recommend that environmental infrastructure, including habitat enhancements, water storage areas, and green space, is taken into account when looking to fund local infrastructure</p>
Highways England (005)	10.06.15	Email	<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the strategic road network.</p> <p>We do not have any comments.</p>
Historic England (006)	10.06.15	Email	<p>Historic England welcomes the brief history of Tangmere in paragraphs 2.6 - 2.9 as helping to set the context for the Plan's policies and proposals.</p> <p>Historic England welcomes and supports the reference of the listed buildings within the parish and the Conservation Area. However, as previously advised, the National Heritage List for England, available through Historic England's website, identifies a total of 17 listed buildings within the parish. Also, the reference to English Heritage should now be to Historic England</p>

		<p>following the split of the regulatory, advisory and research side of the Historic Buildings and Monuments Commission from the properties side, with the former now known as “Historic England”.</p> <p>We also consider that it would be helpful to explain when the Conservation Area was designated, why it was designated (i.e. what its special historic or architectural interest is), that a Conservation Area Appraisal was published in 2007 and that a review of that Appraisal has just taken place, with the results, if known. Is there a list of locally important buildings and features ?</p> <p>The second sentence of paragraph 2.16 should be modified to read “It also shows that the Parish contains 16 Grade II listed buildings and structures.”</p> <p>The inclusion of an explanation of when the Conservation Area was designated, why it was designated (i.e. what its special historic or architectural interest is), that a Conservation Area Appraisal was published in 2007 and that a review of that Appraisal has just taken place, with the results, if known.</p> <p>Historic England is pleased to see that support has been expressed for the protection and enhancement of the Conservation Area and retention of historic buildings.</p> <p>Historic England is pleased to note the existence of a Village Design Statement and the intention for this to be refreshed for the Plan.</p> <p>Historic England is pleased to see that “heritage” gets a mention in the Objectives but as previously noted, we would prefer to see a specific objective for the conservation and enhancement of the historic environment, which would follow from the support expressed for the protection and enhancement of the Conservation Area and the retention of historic buildings. The measures could include the number of heritage assets (designated and undesignated) and the proportion at risk of neglect, decay or other threats.</p> <p>The addition of a specific objective for the conservation and enhancement of the historic environment of the parish, with measures being or including the number of heritage assets (designated and undesignated) and the proportion at risk of neglect, decay or other threats.</p>
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			<p>Historic England welcomes and supports clause vi of Policy 2 and paragraph 4.27 (St Andrew's Church).</p> <p>Historic England welcomes the reference to an Environmental Impact Assessment being submitted with any planning application for the development of the Strategic Development Area in paragraph 4.14.</p> <p>Historic England welcomes and supports Policy 10 and paragraph 4.59.</p>
Lucy Seymour Bowdery obo WSCC (007)	11.06.15	Email	<p>Thank you for the opportunity to comment upon the Parish Council's Consultation Submission Neighbourhood Plan for Tangmere. Given that the Submission Neighbourhood Plan for Tangmere includes the proposed allocation of small scale housing and commercial development, it should be noted that this will be subject to the resolution of any highway safety and access issues at the planning application stage or as part of a consultation on a Community Right to Build Order.</p> <p>Policy 2: Strategic Housing Development Please note, the Chichester Infrastructure Delivery Plan (IDP) identifies new library provision as part of a new community centre or school in Tangmere. The County Council can provide further details when needed.</p> <p>Policy 4: Tangmere Academy The County Council has previously provided comments on the Pre-Submission Neighbourhood Plan, and would like to re-state comments regarding the Tangmere Academy: This policy is intended to allocate land at the existing Tangmere Academy for redevelopment for housing. However, the deliverability of this policy cannot be demonstrated at this stage, as use of the existing site is a matter for the County Council as the landowner, the Academy as the long term tenant, notwithstanding the statutory controls and Secretary of State approvals that are required to release former school lands. Paragraph 4.37 of the supporting text acknowledges the uncertainty of this proposal. It is suggested that this policy is either removed from the Neighbourhood Plan, or is amended to reflect a more aspirational tone.</p> <p>Policy 9: Tangmere Sustainable Movement Network This policy has been updated to include a corresponding plan (Plan G). However, the aim of this policy is unclear. It would be useful if Plan G distinguished between criteria i) footpaths, bridleways and cycleways of strategic value and ii) the strategic or local road network. This</p>

			<p>network should be supported by sufficient evidence.</p> <p>(ii) For clarification, please either remove 'strategic' and refer to the 'local road network'; or add an 'and' in between the strategic and local.</p> <p>Policies Map Please note before the specific location of a school site is determined, the County Council would require full topographical and ecological surveys, site areas etc. The site must be unencumbered and have all services available up to the site.</p> <p>Please note, the Parish Council should liaise with Highways England regarding the A27 Chichester major scheme.</p>
Office of Rail and Road (008)	07.05.15	Email	The Office of Rail and Road has no comment to make on this particular document.
Simon Oakley (009)	11.06.15	Email	<p>Proposed amends below submitted in order to improve accuracy of Neighbourhood Plan. Accuracy amends:</p> <p>P22 Policy 1 - Needs to be made clear as to whether this map or the Maps on pp39/40 (Policies Maps) is the definitive Settlement Boundary map.</p> <p>P24 Policy 2ixb – this is a repeat of 2viig – needs amending to relate ongoing management proposals to the Community Facility not the GI Network.</p> <p>P35 Plan G. Green Infrastructure and Sustainable Movement Networks. Need to amend to address inconsistencies with Plan F (p33) and aims of Policies 8 and 9. See also maps submitted by myself at Pre-submission consult stage. Green Dotted line required along length of Decoy Lane, all field boundaries and along N side of new Oving Road. Red lines required along all existing PROWs (282, 292, 3581 and cycleway W from A27/285 junction not delineated) plus public access path around permitted WSCC Solar Farm (see County Application No. WSCC/074/14/TG). GI Asset areas – delete Woodhorn recycling site. Add: Wooded area W of skid pan; Smiths Copse; Common Land and Decoy Lane; S end of path leading S of Museum (all NE Deciduous woodland BAP areas); open area N of Hawker Close; if Policy 2 allotment area shown as a GI asset then so should proposed new Rec. field on SDL and open area W of Saxon Meadow.</p>

			<p>P39 Policies Map. Open Area West of Saxon Meadow to include in Policy 2 area to align with Policy 2viib and Local Plan SDL boundary. Needs to be made clear as to whether this map (and p40 Policy 2 Inset map) or the Map on p22 (Policy 1) is the definitive Settlement Boundary map.</p> <p>P40 Policy Inset Map As previously noted, Open Area West of Saxon Meadow to include in Policy 2 area. Format/text accuracy corrections:</p> <p>P20 para 4.2B – change B from normal to bold text for consistency with rest of para.</p> <p>P25 Para 4.15 line 2 – delete “s” from “principles”.</p> <p>P26 Para 4.15 line 12 – delete “the” at end of line.</p> <p>P27 para 4.20 penultimate line – insert “Area Character Appraisal ” after “Conservation” and delete “Policy” - see Annex E.</p> <p>P34 Para 4.52 line 1 – delete “western part of the” and line 2 – delete “below”.</p> <p>P36 para 4.61 line 7 replace “and obstruction of the view” with “obstruction of these views”.</p>
Southern Water (010)	08.06.15	Email	<p>Comments relating to Policy 2:</p> <p>Policy 2 sets out the development principles for the ‘Tangmere Strategic Development Location’. As indicated in our previous representations to the Tangmere Neighbourhood Development Plan (NDP), additional wastewater treatment capacity and local sewerage infrastructure would be required to serve this strategic development, which includes 1,000 homes. This is recognised in policy 18 of the emerging Chichester Local Plan. However, it is considered that as the provision of this essential infrastructure is fundamental to the delivery of the strategic development site, it should be included in the NDP. This approach is in line with paragraph 184 of the National Planning Policy Framework (NPPF) that states ‘.....<i>local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood Plans should</i></p>

			<p><i>reflect these policies and neighbourhoods should plan positively to support them'</i> (underlining is our emphasis).</p> <p>Without the requisite policy provision, the Tangmere NDP does not meet the basic conditions necessary for a NDP, namely: to have regard to national policies and advice contained in guidance issued by the Secretary of State, to be in general conformity with the strategic policies contained in the development plan for the area of the authority and contribute to the achievement of sustainable development.</p> <p>National policies and guidance</p> <p>Specific policy provision to facilitate the delivery of local infrastructure and phasing of development in line with additional capacity at the wastewater treatment works, would be in line with government policy and guidance, including:</p> <ul style="list-style-type: none"> • paragraph 7 of the NPPF identifies that the economic role of sustainable development is to ensure <i>'sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure'</i> (highlighting is our emphasis). • paragraph 21 of the NPPF states that <i>'Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or lack of infrastructure, services or housing'</i>. • paragraph 183 of the NPPF requires NDPs to set planning policies to determine decisions on planning applications, • the National Planning Practice Guidance (NPPG) advises in paragraph 41 that <i>'A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared'</i>. • paragraph 45 of the NPPG also directs that <i>'infrastructure is needed to support development and ensure that a neighbourhood can grow in a sustainable way. The following may be important considerations for a qualifying body to consider when</i>
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			<p><i>addressing infrastructure in a neighbourhood plan: * what additional infrastructure may be needed to enable development proposed in a neighbourhood plan to be delivered in a sustainable way...’.</i></p> <p>If development is permitted to proceed where there is inadequate capacity in the sewerage network or at the wastewater treatment works, it could lead to flooding and pollution of the environment. This situation would be contrary to paragraph 109 of the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution.</p> <p>Strategic policies</p> <p>Policy 9 of the latest version of the Chichester Local Plan states that <i>‘Development and infrastructure provision will be coordinated to ensure that growth is supported by the timely provision of adequate infrastructure, facilities and services.....All development will be required to meet all the following criteria:2. Provide or fund new infrastructure, facilities or services required, both on- and off- site as a consequence of the proposal’.</i> Paragraphs 15 and 16 of the ‘Position Statement on Wastewater and Delivering Development in the Local Plan’ set out that the majority of headroom at Tangmere Wastewater Treatment Works is taken up until the works are upgraded. Our proposed policy provision would ensure that a sustainable development is achieved in general conformity with the area’s strategic planning policies.</p> <p>There is a risk that: (i) the necessary local sewerage infrastructure (i.e. the network of underground sewer pipes and associated facilities such as pumping stations) will not be delivered in time to serve the proposed development and (ii) it could proceed before there is sufficient capacity at Tangmere wastewater treatment works, unless the delivery of local infrastructure and the phasing of development is supported by planning policies and subsequently in planning conditions.</p> <p>The ‘Basic Conditions Statement’ submitted in support of the Tangmere NDP does not identify paragraphs 17, 109 or 162 of the NPPF or demonstrate how it is in general conformity with policy 9 of the emerging Chichester Local Plan.</p> <p>To ensure consistency with the strategic policies of Chichester District Council, the NPPF and National Planning Practice Guidance, we reiterate the following criteria should be included in</p>
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			<p>policy 2 of the Tangmere NDP:</p> <p><i>Development proposals for housing and other uses on land designated....provided they accord with the following principles:</i></p> <p><i>xi. Development will be dependent on the provision of infrastructure for adequate wastewater conveyance and treatment to meet strict environmental standards.</i></p> <p>Comments relating to Policy 7:</p> <p>Policy 7 sets out the development principles for 'Land to the West of Malcolm Road'. Additional wastewater treatment capacity would be required to serve the redevelopment of this site. Accordingly, we seek policy provision to phase this development in concert with the delivery of the necessary strategic infrastructure. This approach is in line with paragraph 184 of the National Planning Policy Framework (NPPF) that states '<u>.....local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood Plans should reflect these policies and neighbourhoods should plan positively to support them</u>' (underlining is our emphasis).</p> <p>Without the requisite policy provision, the Tangmere NDP does not meet the basic conditions necessary for a NDP, namely: to have regard to national policies and advice contained in guidance issued by the Secretary of State, to be in general conformity with the strategic policies contained in the development plan for the area of the authority and contribute to the achievement of sustainable development.</p> <p>National policies and guidance</p> <p>Specific provision to phase this redevelopment with the provision of additional capacity at the wastewater treatment works would be in line with government policy and guidance, including:</p> <ul style="list-style-type: none"> • paragraph 7 of the NPPF identifies that the economic role of sustainable development is to ensure '<u>sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure</u>' (highlighting is our emphasis).
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			<ul style="list-style-type: none"> • paragraph 21 of the NPPF states that <i>‘Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or lack of infrastructure, services or housing’</i>. • paragraph 183 of the NPPF requires NDPs to set planning policies to determine decisions on planning applications, • the National Planning Practice Guidance (NPPG) advises in paragraph 41 that <i>‘A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared’</i>. • paragraph 45 of the NPPG also directs that <i>‘infrastructure is needed to support development and ensure that a neighbourhood can grow in a sustainable way. The following may be important considerations for a qualifying body to consider when addressing infrastructure in a neighbourhood plan: * what additional infrastructure may be needed to enable development proposed in a neighbourhood plan to be delivered in a sustainable way...’</i>. <p>If development is permitted to proceed where there is inadequate capacity at the wastewater treatments works, it could lead to flooding and pollution of the environment. This situation would be contrary to paragraph 109 of the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution.</p> <p>Strategic policies</p> <p>Policy 9 of the latest version of the Chichester Local Plan states that <i>‘Development and infrastructure provision will be coordinated to ensure that growth is supported by the timely provision of adequate infrastructure, facilities and services’</i>. Paragraphs 15 and 16 of the <i>‘Position Statement on Wastewater and Delivering Development in the Local Plan’</i> set out that the majority of headroom at Tangmere Wastewater Treatment Works is taken up until the works are upgraded. Our proposed policy provision would ensure that a sustainable development is achieved in general conformity with the area’s strategic planning policies.</p> <p>There is a risk that the development could proceed before the necessary wastewater</p>
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		<p>treatment capacity is in place, unless delivery is supported by planning policies and subsequently in planning conditions.</p> <p>The 'Basic Conditions Statement' submitted in support of the Tangmere NDP does not identify paragraphs 17, 109 or 162 of the NPPF or demonstrate how it is in general conformity with policy 9 of the latest version of the Chichester Local Plan.</p> <p>To ensure consistency with the strategic policies of Chichester District Council, the NPPF and NPPG, we reiterate the following criteria should be included in policy 2 of the Tangmere NDP:</p> <p><i>Development proposals for housing and other uses on land designated....provided they accord with the following principles:</i></p> <p><i>xi. Development will be dependent on the provision of infrastructure for adequate wastewater treatment capacity.</i></p> <p>Comments relating to the need for a new Policy on the provision of infrastructure:</p> <p>We can find no policies to support the delivery of new or improved infrastructure, which is required to serve new development identified in the Neighbourhood Development Plan (NDP) or meet stricter environmental standards. Without this policy provision, the NDP does not meet the basic conditions necessary for a NDP, namely to have regard to national policies, be in general conformity with the strategic policies contained in the development plan for the area and contribute to the achievement of sustainable development, as outlined below.</p> <p>National policies and guidance</p> <p>Southern Water is the statutory sewerage undertaker, providing wastewater services to Tangmere. It has been identified that additional capacity is required at Tangmere Wastewater Treatment Works (WTWs) to serve proposed development. Therefore, we will be undertaking improvements to the wastewater treatment works.</p> <p>Accordingly, we seek policy provision to support new or improved utility infrastructure. Such policy provision would be in line with the main intention of the National Planning Policy Framework (NPPF) to achieve sustainable development. For example, one of the core</p>
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			<p>planning principles contained in paragraph 17 of the NPPF is to <i>‘proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs’</i>. Also paragraph 157 of the NPPF requires positive planning for development and infrastructure required in an area. Page 8 of the National Planning Policy Statement on Wastewater states that <i>‘Waste water treatment is essential for public health and a clean environment. Demand for new and improved waste water infrastructure is likely to increase in response to the following main drivers: More stringent statutory requirements to protect the environment and water quality; Population growth and urbanisation; Replacement or improvement of infrastructure. Adaption to climate change’</i>.</p> <p>Strategic policies</p> <p>Policy 9 of Chichester’s emerging Local Plan states that <i>‘The Council will work with partners, neighbouring councils, infrastructure providers and stakeholders to ensure that new physical, economic, social, environmental and green infrastructure is provided to support the development identified in the Local Plan’</i>. Similar policy provision is sought for the NDP, which also allocates sites for housing developments.</p> <p>To meet the basic conditions necessary for a NDP, we propose the following additional policy:</p> <p><i>New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community, subject to other policies in the development plan.</i></p>
Sport England (011)	05.05.15	Email	<p>Planning Policy in the National Planning Policy Framework identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.</p> <p>It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England’s role</p>

			<p>in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, 'A Sporting Future for the Playing Fields of England – Planning Policy Statement'. http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</p> <p>Sport England provides guidance on developing policy for sport and further information can be found following the link below: http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations. http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</p> <p>If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p>
Turley Associates obo G Heaver (012)	09.06.15	Email	<p>Para 4.6 states that the Chichester Local Plan will be 'replaced' by the TNP. The TNP cannot replace the Local Plan, but should be read alongside, and be in general conformity with the Local Plan.</p> <p>The text should state that "relevant polices of the Chichester Local Plan will still be used by the Local Planning Authority to consider and determine planning applications"</p> <p>Policy 2: In general terms Policy 2 is supported in that it allows for planning applications for 'housing and other uses' to come forward on land within the TSDL, where no other specific use has been identified on the Policies Inset map. This is significant improvement on the Pre Submission version and demonstrates the commitment of the Parish to respond to the concerns of the Key Stakeholders on previous drafts of the document. In this respect the Policy is supported. The Plan must continue to provide flexibility for planning application</p>

		<p>proposals to be prepared, based on evidence, views of the local community and the Environmental Assessment process as appropriate, albeit informed by the strategic guidance of both the Local Plan and TNP policy. It is correct that the TNP is not overly prescriptive in this regard.</p> <p>Policy 2 iii (b): Notwithstanding the support for the policy in general, this element of the policy states that within the southern area regard should be made to the high winter groundwater levels and that consideration should be made to providing ponds and water areas etc. As a full drainage strategy for the site has yet to be resolved, it is premature for the Plan to suggest that such 'ponds and water areas' will be required in this location. It may be that through detailed assessment work a different response to flood protection and drainage may be resolved, or that an alternative location is required. This principle is already recognised in the Plan at paragraph 4.14 which states that "the precise area and nature of development will be subject to the outcome of any necessary EIA". As such the policy is considered too prescriptive as currently worded.</p> <p>The policy should be reworded in this respect to read "in establishing a layout in this area consideration should be given to the requirements of the drainage strategy and flood protection measures". Such wording allows for flexibility in form and location.</p> <p>Policy 2 iv and para 4.28: This element of the policy seeks compliance with the Local Plan requirement for 30% affordable housing policy, but seeks a specific provision of intermediate tenure. Whilst this may reflect the local context currently, it is suggested the policy allows for flexibility to respond to changing demand of local need as it evolves and allows for the housing team at CDC to advise on an individual planning application basis</p> <p>It is therefore suggested the policy includes "or as agreed with the Chichester Borough Council"</p> <p>Policy 2 vii e and para 4.21: We note that policy 2 vii e requires a structural landscape belt, including along the southern boundary and this is reflected in policy 8. The principle of providing a linkage in this area is</p>
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			<p>not disputed, albeit there is likely to be some flexibility necessary at application stage as to the exact route, as an entirely external footpath is unlikely to promote integration and a route through a housing development may provide a more appropriate response in promoting the 'one village' vision.</p> <p>Further, 4.23 is imprecisely worded as it suggests the belt, or 'buffer' will be 25m in width. This is not necessary in all locations, and certainly not along the southern boundary as there is no adjoining use against which to 'buffer'. This paragraph should be revised.</p> <p>Policy 2 vii(e) should be amended to delete reference to the 'boundaries' of the site, thus allowing sufficient flexibility for a structural landscaping belt to be provided 'around the site' but allowing for footpaths, cycleway etc to be delivered in a more flexible manner, still in accordance with the overall objectives of Policy 9.</p> <p>This it should be reworded as follows "a comprehensive Structural Landscape Belt around the site of sufficient width to include a landscape amenity and a foot and cycle path to form part of the Tangmere Sustainable Movement Network of Policy 9"</p> <p>Para 4.23 should be amended to delete reference to the size of the buffer as this will be dictated by the detailed EIA process.</p> <p>Policies Map Insert: For greater clarity this map should be expanded to include the whole of the TSDL, as it excludes the south eastern corner of the site (known as Tangmere Corner), which should be included.</p>
Waverley Borough Council (013)	05.05.15	Email	We have no comments to make.
Chichester District Council (014)	11.06.15	Email	<i>See separate document</i>