

## Chidham and Hambrook 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: Chidham and Hambrook Parish Council

Consultation Date: 27 August 2015 to 9 October 2015

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
Highways England (001)	09.09.15	Email	We do not have any comments.
Historic England (002)	02.10.15	Email	<p>Welcome paragraph 20 for its description of the historical development of Chidham, Hambrook and the part of East Nutbourne within the parish; ideally would have liked to see more detail, and consider that it should be in a new section on "Historic Environment" together with paragraph 29.</p> <p>Welcome reference to the protected buildings within the Parish and the list in Appendix D. Have any locally historic important buildings, structures or features be identified? The National Planning Practice Guidance (NPPG) states "... where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non designated heritage assets including sites of archaeological interest to guide decisions".</p> <p>Welcome greater detail on the historical development of the communities in the parish in a new section entitled "Historic Environment". Would also welcome a reference to any buildings, structures or features of local historic importance.</p>

			<p>Welcome paragraph 29 for its references to the archaeological interest of the parish, historic land uses and listed buildings, although we consider that it should be in a new section on “Historic Environment” together with paragraph 20. We suggest that paragraphs 20 and 29 be used to form a new section in the Plan on “Historic Environment”.</p> <p>Welcome the principle of Policy EM3, but would welcome a reference to the historic environment within the policy.</p> <p>Policy EM3 be amended as follows: “...<i>protect and enhance the landscape, natural and historic environment of the Plan area. In particular it should protect.....ponds, any areas of habitat supporting a high level of biodiversity and any historic structures or features.....</i>”.</p> <p>Welcomes and supports Policy DS1, particularly the fifth bullet point.</p> <p>Welcomes and supports Policy DS2.</p> <p>Welcomes and supports paragraph 87, reference to “English Heritage” should now be to “Historic England”.</p> <p>Welcomes and supports Policy AP1 in principle. However, the National Heritage List for England identifies 22 listed buildings in the parish (as set out in Appendix D of the Plan), of which one is grade II*. The reference to “English Heritage” should be to “Historic England”.</p> <p>Policy AP1 should be amended to read: “<i>Within the Parish there are 22 significant historic buildings listed by Historic England, one of which is grade II* and the others grade II.</i>”.</p>
Marine Management Organisation (003)	04.09.15	Email	No comments to submit in relation to this consultation.
Portsmouth Water (004)	27.8.15	Email	<p>CDC guidance to Parish Councils mentions Policy 40 but not the change in relation to the Code for Sustainable Homes. In addition to this supporting text for Policy 12 is confusing as it refers to the Code and the new 110.</p> <p>Chidham still has references to the Code for Sustainable Homes which has been withdrawn.</p>

<p>Sport England (005)</p>	<p>02.10.15</p>	<p>Email</p>	<p>Planning Policy in the <b>National Planning Policy Framework</b> 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 in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, '<b>A Sporting Future for the Playing Fields of England – Planning Policy Statement</b>'. <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planningapplications/playing-field-land/">http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planningapplications/playing-field-land/</a></p> <p>Sport England provides guidance on developing policy for sport and further information can be found following the link below: <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a></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. <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</a></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. <a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p>
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Waverley Borough Council (006)	30.09.15	Email	No comments to make.
Chichester Harbour Conservancy (007)	08.10.15	Email	<p>Pleased to see that some of the previous comments made by the Conservancy have been taken on board and amendments to the text made to reflect these; however, there remain some areas where our comments have not been addressed, and we have a concern in particular relating to proposed draft Policy LP1. These points are outlined below.</p> <p><i>Draft Policy LP1</i></p> <p>The Draft NP states (paras 44-45) that because planning permission has been granted for 86 new homes since January 2014, there is no current requirement for the NP to identify new sites for major development. It also states (para 94) that as housing growth has already exceeded the Local Plan requirement of 25 houses, <b>additional development will need to demonstrate a special need before consideration</b>. We would support this principle, as it accords with the spirit of planning policies in the NPPF and Local Plan designed to protect the countryside and in particular the AONB from incremental housing development. However, Draft Policy LP1 states that development of 10 units or fewer on windfall sites ‘will be supported’, without qualification that new housing outside the settlement boundaries will only be supported where it demonstrates a special need and meets certain criteria. We find this concerning, as a developer reading the Policy may assume that any proposal for 10 or less houses will automatically ‘be supported’. We would suggest that this needs a strong caveat / qualification regarding the criteria that new housing would be required to meet (principally a special need, followed by environmental considerations, as outlined in the other draft policies). Alternatively, this statement could be qualified by adding ‘Development of 10 units or fewer on windfall sites <b>within defined settlement boundaries</b>’.</p> <p><i>Previous comments not fully addressed</i></p> <p>Pleased to see that the policies have been put into text boxes so that it is clear which part is policy and which part is supporting text; however, there are still no policy titles within these boxes (these appear to only be at the beginning of each section) and we still feel that giving the actual policy a title (at the top of the policy text box after the policy number) will help to make the document clearer and easier to read and navigate.</p> <p>The term ‘SPA’ is still used to refer to settlement boundaries (e.g. last sentence of Policy</p>

			<p>DS3); again we would suggest that the term 'settlement boundaries' is used instead, as per the adopted Chichester Local Plan, to avoid confusion with the nature conservation designation SPA (Special Protection Area).</p> <p>Previously recommended that Policy EM3 highlights the great weight that should be given to conserving and enhancing natural beauty within the AONB. The current draft policy states that any housing development proposal must show that it will 'protect and enhance the landscape and natural environment of the plan area' – this does not mention the AONB at all and we would recommend replacing the word 'protect' with 'conserve' as this accords with the primary purpose of AONBs and the duty of regard to those purposes as set out in Section 85 of the Countryside and Rights of Way Act (2000). We would also suggest that this Policy should require any development within the AONB to meet the Conservancy's planning guidelines.</p> <p><i>Additional comments</i></p> <p>We are pleased to see that Policy EM2 now addresses the issue of recreational disturbance. The Local Plan Policy number (50) should be referred to (this appears to be left out). Paragraph 50 talks about the Parish being close to the Harbour's designated areas and the AONB, but we feel this should go further and acknowledge that much of the Neighbourhood Plan Area is within the AONB.</p> <p>The title of the next chapter on page 20 and supporting text at paragraph 51 refer to 'conservation areas' when I believe they are intended to refer to the nature conservation designations. To avoid confusion, this should be amended, as the term 'conservation areas' is normally used to describe the historic parts of built-up areas which are designated to preserve and enhance their character.</p> <p>Pleased to see the Conservancy's design advice available on our website referred to under Policy DS2; however, would ask that the name of the document is referred to in the Policy for clarity ('AONB Design Guidelines for New Dwellings and Extensions').</p> <p>Policy DS5 refers to the requirement for all 'new residential development areas' to incorporate new planting and to safeguard any existing trees. We would recommend changing the term 'new residential development areas' to 'development' so that this policy would 'catch all' and apply to all new development proposals, not just new housing</p>
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			<p>development. Small groups of trees and hedgerows are very important to both biodiversity and the landscape, and therefore we would also ask that an additional requirement should be added to the policy that any new planting should be in keeping with existing features (i.e. trees and hedgerows), as they can have a longer lasting impact upon the landscape than the developments they are designed to screen.</p> <p>Otherwise we are pleased to see our other suggestions which have been taken on board, including the provision of maps showing green spaces, community assets etc.</p>
Boyer obo Taylor Wimpey (008)	07.10.15	Email	<p>Writing on behalf of Taylor Wimpey regarding the Chidham and Hambrook Neighbourhood Plan. Boyer is representing Taylor Wimpey in respect of buildings B, C and D Lion Park, Broad Road, Hambrook.</p> <p>The Lion Park development gained planning approval for 86 residential dwellings in 2010 with additional commercial space. A planning appeal is to commence shortly in respect of the use of buildings B, C and D for 25 residential dwellings.</p> <p>The Neighbourhood Plan, in its submission version, carries little weight as a policy document until it has undergone a formal examination and is adopted. We also consider that the Neighbourhood Plan has, in some cases, been prepared without regard to national planning advice and guidance.</p> <p><u>Map 2 – Settlement Area Map</u> Support with modifications.</p> <p>Suggested modifications: Map 2 should be updated to provide accurate information.</p> <p>Map 2 depicts the Settlement Area which is covered by the Neighbourhood Plan. It is, however, out of date.</p> <p>The map includes Lion Park, but shows this as an area of works rather than a completed development. As one of only five maps in the Neighbourhood Plan it must portray accurate information in order to provide a sound basis for interpreting the Neighbourhood plan; both its context and policy objectives.</p> <p><u>Housing Requirement</u> Paragraphs 42-43 – object</p>

		<p>Suggested modifications: Need for 25 units in Hambrook should be assessed in accordance with OAN of district.</p> <p>Paragraphs 42-43 of the consultation document set out the requirement for 25 houses in Chidham and Hambrook, which is in line with the requirement in the Local Plan Key Policies submission 2014-2029, noting that Policy 5 expresses this as an indicative figure. This requirement for 25 houses must however be viewed alongside the Objectively Assessed Need for the District.</p> <p>Paragraph 7.3 of the Local Plan identifies the Objectively Assessed Need (OAN) as being between 560 and 575 dwellings per annum, which when account is taken of the likely contribution of the South Down National Park, the remaining objectively assessed need can be estimated at 505 homes per year. Over the plan period, this would equate to a requirement of circa 8,500 dwellings over the plan period.</p> <p>In contrast, Policy 4 identifies the Local Plan housing target as 7,388 dwellings over the plan period. Paragraph 7.8 and 7.9 of the Local Plan confirm that this housing requirement does not meet full objectively assessed housing needs.</p> <p>The reasoning for this is explained in the Inspector's Report and associated main modifications. In summary, the ability of the Plan to accommodate a higher level of development was limited by the assessment of this lower level of development in the Transport Study undertaken by the County Council. The limitation of this is clearly acknowledged by the Inspector in paragraph 54 of her report which refers to the fact that, for the purpose of meeting the OAN, the Transport Study is flawed as it did not test development scenarios up to 505 dwellings per annum.</p> <p>In the event, the Inspector balanced the option of halting plan preparation to allow proper testing of the OAN against the advantages of allowing the plan to be adopted but subject to a commitment to a review to be completed within five years (paragraphs 55 and 56).</p> <p>A core principle of the NPPF is that every effort should be made objectively to identify and then meet the housing needs of an area, and respond positively to wider opportunities for growth. Thus, the fact that the Council can demonstrate a five year land supply is of limited</p>
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			<p>relevance when self-evidently this is not being measured against this full objectively assessed need. In the alternative, the level of supply is not sufficient to meet this full objectively assessed need if it were the basis of the five year land supply calculation. Were the objectively assessed need figure of 505 incorporated into for example MM12, the deficit in housing supply would amount to 744 new homes. In this scenario, the number of years supply would fall to 4.5.</p> <p>Whilst Policy 5 of the Local Plan refers to 25 new dwellings being provided in the Chidham and Hambrook Parish, the LPA emphasised (not least at the Examination hearings) that the figures within this policy are not maxima but indicative estimates. This is especially relevant given the overall situation with respect to scale of housing proposed <i>vis a vis</i> the level of Objectively Assessed Need.</p> <p><u>Policy LP1</u> – object</p> <p>Suggested modifications: windfall sites should be considered in accordance with the NPPF without a maximum number of units to be included in windfall sites.</p> <p>This policy sets out that development of 10 units or fewer on windfall sites shall be supported. The limitation of windfall sites to a maximum of 10 units is not supported in national planning advice in the National Planning Policy Guidance (NPPG) or National Planning Policy Framework (NPPF).</p> <p>NPPF paragraph 48 states: <i>Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.</i></p> <p>The NPPF makes no reference to the size of a windfall site and the artificial limitation of size of windfall sites in the Neighbourhood Plan result in opportunities to identify those sites which could provide a reliable source of supply of housing being omitted from positive consideration.</p> <p>Policy LP1 is also inconsistent with the parts of the NPPF which favour and promote redevelopment of sustainable brownfield land and does not impose any restriction in terms</p>
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			<p>of scale of development.</p> <p>Furthermore, this restrictive policy approach is not in general conformity with the Development Plan. Policy 1 of the 2015 Local Plan encourages a positive approach when considering development proposals. Policies 2 and 5 reference the growth levels for service villages but expresses this as an indicative level of future development. In neither instance is there a ceiling placed on windfall development in the fashion proposed by the Neighbourhood Plan.</p> <p>In the context of the situation that exists in respect of the overall housing requirement, explained in the preceding Section, the policy approach proposed by the Neighbourhood Plan does not represent sustainable development and thus contrary to the basic conditions requirement with which it must comply.</p> <p><u>The Local Economy</u></p> <p>Suggested modifications: paragraphs on policy should incorporate and reflect the NPPF para 22; this para should provide an accurate representation of current employment opportunities.</p> <p>Paragraph 58 states that 15% of respondents to the NP questionnaire work from home and would be looking to expand into small commercial units, with particular note of the Lion Park development and commercial units provided there.</p> <p>Blocks A-D in Lion Park have been advertised for four years with little or no interest in the commercial units. There is no mention here of the flexibility provided by national policy where retention of employment land is not reasonable.</p> <p>The NPPF paragraph 22 states: <i>Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.</i></p>
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			<p>The Neighbourhood Plan fails to provide such a contingency for those employment sites where such a use is no longer viable. While the aim of the Neighbourhood Plan to provide small start-up units is not disputed, the lack of interest for approved employment units demonstrates the need to apply the above NPPF paragraph to prevent a situation where commercial units remain vacant.</p> <p>Paragraph 58 also makes reference to the scope of existing local employment: “<i>a local grocery shop, GP surgery and the provision of local employment</i>”. This limited reference to the local employment area is not accurate and is contrary to paragraph 21 which refers to the main employer being agricultural use, public houses and nursing home in addition to the Cobnor Activity Centre and Christian Youth Enterprise. The undermining of current employment areas within the Neighbourhood Plan area overinflates the apparent demand for employment, rather than providing a balanced view.</p> <p><u>Conclusion</u> There are a number of areas within the Neighbourhood Plan Submission Version which we do not consider meet the basic conditions set out in the Localism Act 2011 paragraph 8(2) of Schedule 4B. The inclusion of an outdated map undermines the information depicted through the map and the assessment of windfall sites and approach to commercial space fails to take the NPPF and NPPG into account.</p> <p>The Plan fails to identify any specific sites for residential opportunities to provide additional housing to contribute towards sustainable development and meeting the Objectively Assessed Need which is greater than that set out in the Local Plan.</p>
SPP on behalf of Sunley Estates Ltd (009)	08.10.15	Email	<p><u>Introduction paragraph 1</u> - object</p> <p>The Neighbourhood Plan (NP) does not “<i>shape development and subsequent growth of the area in line with both the local and wider requirements of the district</i>”. Neither is the NP “<i>designed to meet this requirement up to 2029</i>”. <b>One of the central issues the NP has failed to consider is the impending review of the District Council’s housing requirement that is central to the adoption of the District Local Plan. That review is necessary to ensure the District’s objectively assessed need for housing is met. It will inevitably look at the development potential of land that is not subject to environmental and infrastructure constraints. Such land includes sites between the A259 and A27 that the Strategic Housing</b></p>

		<p>Land Availability Assessment (SHLAA) considers suitable and the Local Plan finds acceptable in principle in sustainable service villages such as Hambrook.</p> <p>In that respect land east of Broad Road has been the subject of a recent 4 day Public Inquiry and it is the strong view of the appellants that the merits of the site and proposed development have become clear and that the NP should wait for the Secretary of State's decision. If the Secretary of State's decision is positive then the NP would need to be revised and the site included to address future development in the parish.</p> <p>There are no proposals to shape development and subsequent growth; the NP simply adopts a number of planning permissions that have been granted and sets out a number of aspirations (paragraph 100) that NP has little means of delivering let alone shaping. In the event that the appeal concerning land east of Broad Road is allowed the NP will need to be revised to include that development.</p> <p>The NP also fails to understand that the Housing Requirement of the Chichester District Local Plan: Key Policies does not meet the full objectively assessed need for housing in the district and that Chichester District Council will be reviewing its housing requirement policy within five years and that this could have implications for shaping development and subsequent growth of the NP area.</p> <p>If the NP is to truly do what is intended then it should be looking forward and planning to 2029 rather than only dealing with an interim planning situation and being at risk of being out-of-date if the appeal on land east of Broad Road is allowed.</p> <p><u>Suggested modifications:</u></p> <p>The NP should be held in abeyance to await for the Secretary of State's decision on the appeal concerning land east of Broad Road. If the appeal is allowed the NP will need to be revised and the site included within the settlement area boundary. The NP should include proposals that shape development and subsequent growth to 2029.</p> <p>The NP should plan to deliver additional housing commensurate with the recognition in the District Local Plan that Hambrook is a sustainable service village and SHLAA opportunities. The District Local Plan policy 2 says that service villages "will be the focus for new development and facilities" and the NP should be recast to embrace that policy aim</p>
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			<p>especially as the constraints to development the District Council relies on do not apply to the land between the A259 and A27 at Chidham and Hambrook. The NP should also grasp the opportunities afforded by development to deliver the community aspirations.</p> <p><u>Introduction paragraph 41</u> – support and object</p> <ol style="list-style-type: none"> <li>1. The first sentence is supported but there is nothing in the NP that addresses future development. As a result the NP will do the opposite of what the second sentence intends - ‘the opportunity to influence what development takes place’ will be very limited.</li> <li>2. The third sentence makes no sense as the NP makes no provision for new properties despite the District Local Plan policy 2 stating that service villages will be the focus for new development and facilities. Furthermore the District Council’s SHLAA clearly shows that sites in the parish are suitable, available and deliverable and the opportunity to consider those for development in the future would be frustrated in the current NP document.</li> <li>3. Land east of Broad Road has been the subject of a recent 4 day Public Inquiry and it is the strong view of the appellants that the merits of the site and proposed development have become clear and that the NP should wait for the Secretary of State’s decision and if positive the NP should be revised and the site included so as to address the future development of the parish.</li> </ol> <p><u>Suggested modifications:</u> The NP is flawed for uncertainty and should be withdrawn and redrafted to reflect what future development the NP is not precluding or is supporting; such re-drafting to accurately reflect the purpose of District Local Plan policy 2 and SHLAA sites. Only in that way will the need for the NP be properly articulated.</p> <p><u>1. The Plan area paragraph 7</u> – support and object</p> <p>The first sentence is supported. The final sentence is opposed because the NP does not allocate any development sites in the area that the NP accepts is unconstrained. As a result the NP fails to make any provision for development commensurate with Hambrook being a sustainable service village and a focus for new development.</p> <p>Land east of Broad Road has been the subject of a recent 4 day Public Inquiry and it is the strong view of the appellants that the merits of the site and proposed development have</p>
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		<p>become clear and that the NP should wait for the Secretary of State's decision and if positive the NP should be revised and the site included so as to address the future development of the parish.</p> <p><u>Suggested modifications:</u> The NP is flawed for uncertainty and should be withdrawn and redrafted to reflect the commitment in policy LP1 and the ability of land between the A259 and A27 to make a worthwhile contribution to district housing provision. <a href="#">The site east of Broad Road has been very recently examined at a Public Inquiry and has great planning merit. It would deliver almost all the community's aspirations that the NP seeks to accommodate.</a></p> <p><u>2. Community consultation paragraph 24 – support and object</u></p> <p>The provision of a purpose built recreation ground north of the A259 is explained as being a 'major consideration' but the NP has no proposals to achieve this. Sunley Estates has put forward proposals <a href="#">for the land east of Broad Road</a> that would meet this major consideration at no cost to the community.</p> <p><u>Suggested modifications:</u> The NP should include policies and proposals to address the omission in conjunction with the inclusion of additional housing development commensurate with the sustainable location of the service village.</p> <p><u>3. Policies paragraph 41 - object</u></p> <p>Despite the intentions of the NP it does not reflect the presumption in favour of sustainable development. The NP has paid lip service to that principle and not understood that the role of a service village Furthermore it does not understand that the current Chichester District Local Plan is not meeting its objectively assessed need for housing <a href="#">and is out of step with the National Planning Policy Framework. The adoption of the District Local Plan comes with a commitment to review how the District Council will meet that need and it follows that the review will require that further sites for residential development will have to be found in the life of the District Local Plan.</a></p>
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			<p><u>Suggested modifications:</u> Paragraph 41 should be reworded so that it explains how the NP reflects the presumption in favour of sustainable development bearing in mind that it has no policy or proposals for sustainable development.</p> <p><u>Map 2 Page 14 – object</u></p> <p>The NP sets out its ‘life’ as being to the year 2029. The settlement area map seeks to draw a line around the existing main built forms of Hambrook and Nutbourne East on the basis that no additional development in the parish will come forward in that time frame. In so doing it is giving an unreasonable impression that Map 2 will apply for the whole of the NP period. It ignores the highly likely <a href="#">outcome of the impending review of the District’s housing requirement</a> that additional land will have to be found in sustainable locations such as Hambrook for new residential development.</p> <p>The drawing of the line very tightly around the existing (and permitted) built areas denies or at the very least frustrates the opportunity of land between the A259 and A27 coming forward for development commensurate with the service village role. The settlement boundary line, as drawn, creates the impression that it will last for the duration of the NP whereas in reality it is very likely to have to be redrawn again when the District housing requirement is reconsidered.</p> <p><a href="#">A potential residential development site is that on land east of Broad Road. This has been the subject of a recent 4 day Public Inquiry and it is the strong view of the appellants that the planning merits of the site and proposed development have been clearly established. The NP should wait for the Secretary of State’s decision and if positive the NP and proposed settlement area should be revised.</a></p> <p><u>Suggested modifications:</u> The NP should be held in abeyance to await for the Secretary of State’s decision on the appeal concerning land east of Broad Road. If the appeal is allowed the NP will need to be revised and the site included within the settlement area boundary.</p> <p>Notwithstanding the previous comment Map 2 should be reconsidered in any event. It should identify those areas of land that <a href="#">represent future development sites to feed into the</a></p>
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			<p>review of the District housing requirement. If it is to stay unaltered then additional text should be included in the NP that states that Map 2 is only applicable for up to five years and will be reviewed and potentially redrawn in line with the new District housing requirement.</p> <p><u>3. Policies paragraph 45 – object and comment</u></p> <p>The representor believes that the NP fails to properly provide for development in this sustainable service village. It also fails to take into account the impending review of the District's housing requirement to meet the objectively assessed need for housing that is sure to have an impact on the parish. Furthermore, for the reasons given above, the lack of any new development proposals unreasonably constrains the ability of new development from meeting the community's aspirations in paragraph 100. This paragraph continues a flawed approach and is opposed.</p> <p>However if that opposition is not accepted then the following comments should be given careful consideration. The first sentence implies that the "no current requirement" is for the life of the NP and then the second sentence indicates that there may be changing local needs later in the plan period which is presumed to be a reference to the fact that circumstances will change in the impending review of the District Council housing requirement.</p> <p>The inference to local needs could be misleading and misconstrued if the changing circumstances arise from district housing need.</p> <p><u>Suggested modifications:</u> The paragraph should be rewritten as follows: <b><i>The NP does not identify any sites for development. However the District Council's impending review of its housing requirement will lead to the need to consider allocating land in the parish for new residential development. Any such sites should be between the A259 and the A27 and deliver as many as possible of the community aspirations in paragraph 100.</i></b></p>
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		<p><u>Policy LP1 - object</u></p> <p>Provision should be made within policy LP1 for new residential development to meet the district housing need that is not being met in the District Local Plan. Land between the A259 and A27, specifically that east of Broad Road, is <a href="#">recognised in the SHLAA as</a> suitable for that purpose as it is free of environmental and infrastructure constraints and offers the opportunity of delivering almost all the community's aspirations for community and recreational facilities. Policy LP1 is out of sync with proposed paragraph 45 and the suggested redraft above. It fails to take account of the fact that within the life of the NP land may have to be found for new residential development.</p> <p><u>Suggested modifications:</u> Policy LP1 should be reworded to include a new first bullet point as follows: <input type="checkbox"/> <input type="checkbox"/> <b>Land east of Broad Road for up to 120 affordable and market price homes and the provision of new formal and informal recreation facilities, sports fields (tennis courts, football pitch and cricket nets), sports changing pavilion, new village centre and Village Green, retail shop, parking facilities, traffic calming and ecological areas.</b></p> <p><u>Policy EM2 - object</u></p> <p>Policy EM2 is out of step with the remainder of the NP in that it implies that all housing development has a potential impact on the Special protection Area. However that is not the case as earlier elements of the NP has made plain.</p> <p><u>Suggested modifications:</u> The first line of policy EM2 should be amended as follows: <b>All housing developments in the south of the Plan Area have the potential to impact on the.....</b></p> <p><u>Policy CDP1 - object</u></p> <p>The NP fails to grasp the fact that collecting money towards community development is only a part of process; the other part is land. Without the necessary land there will be no development on which to spend the money. The NP misses the opportunity to identify a preferred site and influence on-site provision.</p>
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			<p>The NP in paragraph 24 states that the provision of a purpose built recreation ground north of the A259 is a 'major consideration' but this is not reflected in the Community Development Policies. This NP is, sadly, toothless in bringing this major consideration forward.</p> <p>As drafted policy CDP1 only seeks the payment of money towards community development. This may be appropriate in the circumstances of future small-scale new development but misses the point that community facilities point can be directly provided in larger scale development. The policy should be amended to recognise on site delivery and that the payment of financial contributions or the Community Infrastructure Levy is in lieu of on-site provision.</p> <p><u>Suggested modifications:</u> A policy should be included that identifies the site for a recreation ground and the means whereby it can be achieved.</p> <p>The second sentence of policy CDP1 be amended as follows: <b><i>If on-site provision is not being made for community development this may be .....</i></b></p> <p><u>Policy DS4 - comment</u></p> <p>This policy needs re-evaluation in the light of the changes in national approach to sustainable construction and planning.</p> <p><u>Suggested modifications:</u> None suggested.</p> <p><u>Community aspirations para 100 - support</u></p> <p>Paragraph 100 lists a number of community facilities and services that the NP seeks to accommodate. This list is very much supported. However the NP offers no guidance on how these can be achieved, except by collecting money in policy CDP1.</p> <p>The NP should be positive in how it sees the delivery of those aspirations and be more proactive in their achievement. <a href="#">The NP represents the opportunity to provide a foundation for</a></p>
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			<p><a href="#">discussions with land owners and developers to meet those aspirations</a>. It is after all the community's plan to 'shape development' and 'influence what development takes place within the area'. By not being proactive the opportunity to do those things for these important aspirations is missing from the plan</p> <p><u>Suggested modifications:</u> The plan should be amended to include how these aspirations will be achieved and a new paragraph added along the following lines: <b><i>101) Where ever possible the The Parish Council will liaise with the land owners, developers, appropriate bodies and local people to secure the delivery of the community's aspirations for new and enhanced community and recreation facilities. Applicants for planning permission will be encouraged to make provision for the appropriate level of community and recreational development as part of their planning applications.</i></b></p>
Natural England (010)	08.10.15	Email	<p>We note that the plan does not allocate land for housing, on the basis of need and current consents.</p> <p>We welcome: Policy EM2 with its links to the Local Plan; Policy EM3 Policy CDP2 – which seems to imply that development will be in or adjoining (or possibly well related to) existing settlements. If so, perhaps this should be explicit. Policy DS1 – the first bullet point indicates the need for development to “integrate into the existing surroundings “. This is likely to be in terms of urban form, landscape and local habitat networks. If so, these words could be worked into the policy. Policy DS5 - could make reference to other on-site habitats (where they exist) and components in the network such a ditches, hedges etc.</p>
A Shepherd (011)	12.10.15	Post	<p><u>Paragraphs 45 and 94</u> - object</p> <p>I wish to raise formal objections to the Chidham and Hambrook Neighbourhood Plan as the plan offers no prospect of securing future housing growth within the Parish notwithstanding the adopted but is wholly deficient on two counts in producing land supply to deal with known shortfalls. The plan overestimates the provision of Housing within certain parts of the Local Plan because the there is too greater expectation from the Appledram WWD and also a great concern over supply to other sources to early in the life of the Plan. Secondly, the Officers of CDC have overestimated the provision of new houses from the allocated sites resulting in their claimed expectation of greater housing numbers coming forward. The consequence is that no more housing can be offered or built within the Parish whilst the</p>

			<p>potential is there to promote increased housing to satisfy the shortfall. In this respect the Neighbourhood Plan seeks to resolve itself of the problems in the principle District Plan which have not been dealt with or ignored.</p> <p><u>Suggested modifications:</u>  The paragraphs should be rewritten to recognise the potential to address this shortfall through amendments to both paragraphs to inclusion of the principle to acknowledge and accept that should housing requirements be needed to increase to address the stated requirements of the Local Plan. The provisions of the Local Plan and its stated Housing Provision will now take priority over the stated objections in the Neighbourhood Plan to any future housing allocations at any time during the life of the Plan.</p>
Chichester District Council (012)	07.10.15	Email	<p><u>Page 5:</u> Para 4) – typo in line 1 delete the word ‘it’ (...neighbourhood plan <del>it</del> does not preclude .....’); typo in line 8 amend ‘an’ to ‘a’ (‘Where <del>an</del> a NP is in place.....’)</p> <p><u>Page 7:</u> Title of map should be amended to read ‘Map of Chidham and Hambrook Neighbourhood Plan Area’.</p> <p><u>Page 13-15:</u> Policy LP1 Requirement for homes  The policy would benefit from some redrafting to include criteria for what development is supported in settlement boundaries and what will be resisted outside settlement boundaries. The requirement in the Chichester Local Plan: Key Policies for 25 dwellings in the Parish has been met and it may help for this to be in the policy (para 43). LP1 should include reference to the settlement boundary identified in Map 2.</p> <p>Wording in the text at paras 39, 45 and para 94 could be included in Policy LP1, possibly as criteria, similarly Page 26 makes reference in the 4<sup>th</sup> bullet point to discouraging coalescence; this could also be included.</p> <p>Para 39 - reference to ‘local environmental, economic and sustainability criteria’ and wording in para 94 ‘additional development will need to demonstrate a special need before consideration’ - these should be consistent and include criteria to define what is a special need.</p> <p>Policy LP1 – 2<sup>nd</sup> bullet point – should refer to 6 units not 10.</p>

		<p><u>Page 17:</u> Policy EM1 Management of sea and flood defences, streams and surface water drainage  Policy needs to be clear it relates to applications within areas known to be at risk of flooding.  Second para of policy – amend to read ‘All <b>new</b> housing.....’  Final para – There may other solutions rather than SUDS that are acceptable therefore the text should refer to ‘financial contributions <b>or mitigation</b>’.</p> <p><u>Page 19:</u> Policy EM2 Protection of Chichester Harbour conservation areas and related areas of special environmental value  Amend second sentence to read:  ‘.....will conserve and enhance the designated or <del>potential</del> <b>candidate</b> special protection areas, designated or candidate areas of <b>Special Areas of Conservation</b>, Sites of Special Scientific Interest.....’</p> <p>Need to define ‘other areas of special environmental or ecological value’.</p> <p>Para 52 – second sentence - mitigation measures can be requested but reference to protection of adjacent/nearby areas may not be achievable.</p> <p><u>Page 20:</u> Policy EM3 Protection and enhancement of landscape, habitat and biodiversity  First sentence - Amend to read ‘Any <b>new</b> housing ....’; delete space before ‘enhance’.  Second sentence - Insert comma after ‘orchard’.</p> <p><u>Page 21:</u> Section 3.3 Community Development Policies – not clear what is meant by this</p> <p><u>Policy CDP1:</u> The use of S106 Agreements and CIL to support community development</p> <p>Second para, it is not realistic for every scheme to first be agreed in writing with the Parish Council. One means would be to identify a process for setting out and confirming priorities for ‘community objectives’ through the IDP/IBP.</p> <p>Second para, last line has a cross reference to para 103 that does not exist. If this is meant to refer to para 100 on Page 38 this should be amended.</p> <p>Para 57, and also Page 38 para 100 – no indication/policy of how the new village centre</p>
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		<p>would be delivered, nor is there any consideration of its viability. If this is required then it would need a policy identifying where and what is to be included (eg community building, shops, public realm, public transport hub etc).</p> <p><u>Page 22:</u> Policy CDP2 The Local Economy  Para 58 – Last sentence – it is not clear what this refers to?</p> <p>Policy CDP2 – First sentence - Reference to Plan area – should this refer to <b>settlement boundary</b>?</p> <p>First bullet point - reference to Plan area - is this meant to refer to <b>Parish</b> area? The phrase ‘in keeping with’ is very general and needs clarification.</p> <p>Policy does not provide criteria for large scale commercial proposals; as worded the policy would simply provide support.</p> <p><u>Page 23:</u> Section 3.4 Housing  Policy H1 (Local occupancy conditions of affordable housing) and H2 (Diversity of housing to meet the local need) overlap and the policies need to be revised to be clear in their intentions to deliver a range of dwelling types and sizes, including affordable housing.</p> <p>Para 60 – Following the adoption of the Chichester Local Plan: Key Policies 2014-2029 (CLP), the following reference “a requirement to provide 30% affordable units, on sites of more than 5” should be removed. CLP Policy 34 seeks on-site affordable housing contributions on developments of 11 or more units, and a commuted sum will be sought on developments of 6-10 units if a scheme lies within the AONB. Without additional evidence the policy should reflect Chichester Local Plan Policy 34.</p> <p>Policy H1 would be improved by inclusion of text or part thereof of para 60; the policy can not be used to control the provision of market housing only for local people.</p> <p>Is the Plan area the Parish area?</p> <p><u>Page 24:</u> Policy H2 Diversity of housing to meet the local need  Amend first sentence to refer to ‘new <del>residential</del> <b>housing</b> development....’  Part of the text of para 64 which relates to bungalows / sheltered accommodation may also be included in Policy H2.</p>
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			<p><u>Page 25:</u> Policy H3 Impact on infrastructure Should this refer to <b>'housing'</b> rather than 'any new' development? The policy overlaps with CIL. If the intention is that the policy is related to waste water treatment (as suggested by para 65) then it should be specific. Otherwise it is not realistic to require an application to identify the impacts identified in the policy as worded.</p> <p><u>Page 25-26:</u> Design Policies DS1 (Development) and DS2 (Encouraging quality design) need to be amended. Either one policy should be included with two parts: i) criteria for all housing development (including extensions) and ii) new housing schemes, or, alternatively, two separate redrafted policies. Revisions could include text from paras 67, 69 etc.</p> <p>First bullet point (Page 26) replace 'blends in' with 'takes account of the character and appearance of the rural.....'</p> <p>As stated above (under <u>Page 13-15:</u> Policy LP1) – fourth bullet point may be better placed in any revised LP1. A policy to resist coalescence between Hambrook and Nutbourne may be feasible but the Plan can not control areas beyond its boundary (Southbourne and Bosham).</p> <p><u>Page 27:</u> Policy DS3 Provision for car parking The WSCC parking calculator makes allowance for on street parking. Amend first sentence on Page 28 to refer to 'should be designed to ensure road access is not impeded' rather than 'facilitate unimpeded road access'. Policy could be amended to resist on street parking unless justified and then parking would be in accordance with WSCC standard.</p> <p><u>Page 28:</u> Reference to Code for Sustainable Homes should be removed due to changes in Government policy (March 2015).</p> <p><u>Page 29:</u> Policy DS5 Retention of areas of natural habitat/biodiversity Amend first sentence to read 'All new <del>residential</del> <b>housing</b> development areas.....'; delete comma after landscaping.</p>
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			<p>IDP/IBP and need to be reviewed. Again there is no apparent mechanism for their delivery.</p> <p><u>Page 38:</u> Para 100 - see comments above re. new village centre under para 57.</p>
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