

Becca Stokes

From: Linda Park <Linda@conservancy.co.uk>
Sent: 07 October 2015 16:43
To: Neighbourhood Planning
Cc: Steve Lawrence; Richard Austin; Keith Martin; Bob Chapman; Pieter Montyn
Subject: Chidham and Hambrook Parish Neighbourhood Plan - Regulation 16 Consultation
Attachments: Letter responding to Draft Plan Reg 16 - Sep 2015.docx

Dear Valerie,

Please find attached Chichester Harbour Conservancy's response to the latest consultation on the Chidham and Hambrook Parish Neighbourhood Plan.

If you have any queries please do not hesitate to contact me.

Regards,

Linda.

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7th October 2015

www.conservancy.co.uk

By e-mail only:
neighbourhoodplanning@chichester.gov.uk

Dear Valerie,

Chidham and Hambrook Parish Neighbourhood Plan (NP) – Regulation 16 consultation: August – October 2015

Thank you for the opportunity to comment on the latest draft of the 'Chidham and Hambrook Neighbourhood Plan (Submission Version) July 2015'.

We are 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.

Draft Policy LP1

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, **additional development will need to demonstrate a special need before consideration**. 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 **within defined settlement boundaries**'.

Previous comments not fully addressed

We are 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.

The term 'SPA' is still used to refer to settlement boundaries (e.g. last sentence of Policy 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).

We 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.

Additional comments

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.

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.

We are pleased to see the Conservancy's design advice available on our website referred to under Policy DS2; however, we would ask that the name of the document is referred to in the Policy for clarity ('AONB Design Guidelines for New Dwellings and Extensions').

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 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.

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.

Thank you once again for the opportunity to comment on the latest draft. We hope that these comments are helpful and will be taken into consideration in the development of the next version of the Neighbourhood Plan.

Yours Sincerely

Linda Park

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