

Birdham Parish Neighbourhood Plan

Report by Independent Examiner

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Summary and Conclusion

1. The Birdham Parish Neighbourhood Plan has a clear Community Vision. The Plan does not allocate sites for housing development, listing those sites with planning permission that will provide in excess of the Local Plan indicative housing number of 50 dwellings. Policy 14 restricts housing development within the Settlement Boundary Area to windfall development. Subject to some minor modifications to the housing policies, I am satisfied that the overall housing strategy in the Neighbourhood Plan will contribute towards the achievement of sustainable development.
2. I have recommended modifications to some of the policies in the Plan, in order to meet the Basic Conditions. Many of the recommended modifications are matters of clarification to strengthen the policies to provide a practical framework for decision making. In particular, I have recommended that the views referred to in Policy 4 are identified on a map. I have not made reference to all of these modifications in this summary.
3. As regards car parking requirements, I do not consider the findings of the Neighbourhood Survey constitute the robust justified evidence required to depart from adopted parking standards. However, it may be that further justifiable evidence would support the need for at least two cars per unit. On this basis, I have recommended modification to Policy 16 to state that off street parking is required to be in accordance with current parking standards unless there is justified evidence to indicate otherwise.
4. I realise that flooding is a major concern for local residents. I have recommended modification to Policy 18 to refer to the requirement for a site-specific flood risk assessment in areas within Flood Zone 1 which have critical drainage problems.
5. Whilst I note the importance of retaining local business and facilities, I have no clear evidence before me to justify the restrictive approach to redevelopment or change of use in Policy 23. This policy does not allow for the more flexible approach to redevelopment or change of use outlined in the Local Plan. Therefore, I have recommended cross reference to relevant Local Plan Policies.
6. My recommendations ensure that the Plan meets the Basic Conditions. Subject to my recommendations being accepted, I consider that the Birdham Parish Neighbourhood Plan will provide a strong practical framework against which decisions on development can be made.
7. **I am pleased to recommend that the Birdham Parish Neighbourhood Plan as modified by my recommendations should proceed to Referendum.**

Introduction

8. On 4 December 2012 Chichester District Council (CDC) approved that the Birdham Parish Neighbourhood Area be designated in accordance with the Neighbourhood Planning (General) Regulations 2012. The Area covers the whole of the parish of Birdham.
9. The qualifying body is Birdham Parish Council. The plan covers the period 2014 to 2029. The Birdham Parish Neighbourhood Plan (BPNP) has been prepared by a Steering Group comprising Parish Councillors and residents.
10. A representation has been received questioning whether correct procedures have been undertaken by the Steering Group. I sought clarification from Birdham Parish Council. From the response I received, I am satisfied that the Steering Group has acted in the appropriate manner.

Legislative Background

11. As an independent Examiner, I am required to determine, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, whether:
 - the policies in the Plan relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;
 - the Plan meets the requirements of Section 38B of the 2004 PCPA where the plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area; and
 - that the Plan has been prepared for an area that has been designated under the Localism Act 2011 and has been developed and submitted for examination by a qualifying body.
12. Subject to the modifications I have recommended in this report, I am content that these requirements have been satisfied.
13. I am obliged to determine whether the plan complies with the Basic Conditions. These are that the Plan is required to:
 - have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies contained in the Development Plan for the area; and
 - not breach, and is otherwise compatible with, EU obligations and human rights requirements.

14. CDC has prepared a Strategic Environmental Assessment (SEA) Opinion Screening Determination, within which it has stated that the Plan does not require a Strategic Environmental Assessment, *due to there being no adverse comments from the Statutory Bodies and for the reasons set out in the Criteria and response of screening.*
15. In Natural England's response to the Screening Report for the Plan, it has stated that the main potential effect is recreational disturbance, which is covered in the interim Solent Scheme and Policy 50 in what was then the emerging Local Plan. *This (with other provision in the Local Plan) appears to provide an adequate basis for dealing with windfall proposals to avoid significant impact on the natural environment.*
16. CDC's Interim Policy Statement on Development and Disturbance of Birds in Special Protection Areas and identified Compensatory Habitats (Effective April 2014) provided an interim policy statement pending the adoption of the Local Plan.
17. The Habitats Regulations Appropriate Assessment Screening Report (May 2014) sets out why an Appropriate Assessment is not necessary for the Pre-Submission Local Plan. Following proposed modifications to the Pre-Submission Local Plan, URS undertook a Habitats Regulations Assessment (HRA) analysis of these modifications in order to determine whether they would alter any of the conclusions previously reached regarding the HRA of the Chichester Local Plan: Key Policies Pre-submission 2014-2029 in May 2014, or introduce any new impacts/effects.
18. The conclusion can be found in their letter dated 7 January 2015. It states that following discussions with Natural England it was agreed that *the access management measures in place are considered to be scalable to deal with the increase in housing numbers proposed, enabling Chichester District Local Plan to meet the needs of recreation provision for new residents resulting from the additional dwellings. As such, it is considered that this amendment to the Local Plan will not result in any likely significant effects and can be screened out.*
19. I note that the Inspector reporting on the Examination into the Local Plan has accepted these findings. On the basis of these particular circumstances in the context of the level of development proposed in this Neighbourhood Plan, I consider that this Neighbourhood Plan does not require an assessment for future development under Article 6 or 7 of the Habitats Directive.
20. A Neighbourhood Plan must be compatible with European Union obligations, as incorporated into UK law, in order to be legally compliant. I am satisfied that the Plan is compatible with EU obligations and does not breach the European Convention on Human Rights obligations.

Policy Background

21. *The National Planning Policy Framework 2012 (NPPF)* sets out the Government's planning policies for England and how these are expected to be applied. The *Planning Practice Guidance* provides Government guidance on planning policy.
22. Birdham Parish is within the local authority area of Chichester District Council. The development plan for the Birdham Parish Neighbourhood Plan Area comprises the *Chichester Local Plan Key Policies 2014-2029* adopted on 14 July 2015. This Local Plan contains strategic policies including those regarding the natural environment and housing provision.
23. The Local Plan has been adopted after the submission of the BPNP for examination. I was appointed as an independent Examiner for the BPNP in May 2015. CDC asked for my Examination of this Neighbourhood Plan to be held in abeyance pending the adoption of the Local Plan. In the interest of fairness, as a result of the timing of the adoption of the Local Plan, I invited further comments from those who had already made representations at the Regulation 16 consultation stage, with regard to whether their original representation still stands or if there were any amendments to be made in the light of the adoption of the Local Plan. These comments were sought between 6 August 2015 and 7 September 2015. I have taken all comments received into consideration in my examination.
24. It is necessary for Neighbourhood Plans to provide *a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency* as stated in the core planning principles in paragraph 17 in the NPPF. I do refer to clarity with regard to a number of recommendations to modifications to the Plan. Where I do so, I have in mind the need to provide a practical framework in accordance with the core principles in the NPPF, thus ensuring that the Plan has regard to national policy in this respect.
25. The Local Plan and the BPNP have been advancing in parallel. References in the BPNP are to policies in the *Chichester Local Plan: Key Policies Pre-submission 2014-2029*. In the interest of precision, the current adopted Local Plan should be referred to throughout.
26. **Recommendation: in the interest of precision, to meet the Basic Conditions, I recommend modification to the text throughout the Plan to reflect the current development plan situation and for existing references to the emerging Local Plan to be replaced with references to the adopted Local Plan as appropriate.**

The Neighbourhood Plan Preparation

27. I am required under The Localism Act 2011 to check the consultation process that has led to the production of the plan. The requirements are set out in Regulation 14 in The Neighbourhood Planning (General) Regulations 2012.
28. The initial consultation process included an open day followed by two questionnaires for residents and businesses. As a result of these consultations a follow up open day concentrated on water related problems in March 2013.
29. A dedicated web site was set up to inform residents. I have viewed this web site, which provides a useful central source of background information.
30. A third open day was held in November 2013 where the draft vision, objectives and proposed key policies were outlined. Subsequently, focus groups, with the help of outside organisations, compiled policies and the pre-submission document.
31. The consultation period on the pre-submission draft of the BPNP ran from 9 June to 21 July 2014. Leaflets were distributed to residents and businesses across the parish. A copy of the document was posted on the Neighbourhood Plan website while hard copies were distributed at key locations across the parish and made available from Steering Group members.
32. A fourth Open Day was held in mid-June. At the end of June the Parish Council newsletter, distributed to all residents, reminded them of the consultation and encouraged responses. Relevant stakeholders and statutory consultees, including CDC and neighbouring parish councils and other interested parties, were notified by email. All comments received were subsequently analysed. Apart from minor amendments, it was considered that none of the responses warranted a major reassessment of the Plan.
33. There has been criticism of the consultation process. From the information before me, I am satisfied that the pre-submission consultation and publicity has met the requirements of Regulation 14 in The Neighbourhood Planning (General) Regulations 2012. The consultation and publicity went well beyond the requirements and it is clear that the qualifying body went to considerable lengths to ensure that local residents and businesses who wanted to make comment were able to engage in the production of the Plan. I congratulate them on their efforts and hard work.
34. CDC publicised the submission BPBP for comment during the publicity period between 11 December 2014 and 12 February 2015 in line with Regulation 16 in The Neighbourhood Planning (General) Regulations 2012. A total of eighteen responses were received. I am satisfied that all these responses can be assessed without the need for a public hearing.
35. Some responses suggest additions and amendments to policies. My remit is to determine whether the Plan meets the Basic Conditions. Where I find that

policies do meet the Basic Conditions, it is not necessary for me to consider if further suggested additions or amendments are required. Whilst I have not made reference to all the responses in my report, I have taken them into consideration.

The Birdham Parish Neighbourhood Plan

Background To The Neighbourhood Plan

36. The background section in the BPNP includes details of the existing status of the community, its history and heritage and environment. It highlights transport and drainage problems, explains the existing housing situation and emphasises the importance of existing businesses to the local economy. As such, this section provides a clear background to the Plan.
37. There have been suggestions by interested parties for inclusions of further details in the background section. As this section is setting a brief context of the Plan, I do not consider further additions are required for the Plan to meet the Basic Conditions.

Vision and Objectives

38. A clear Community Vision for the Parish has been established as follows: *To enhance Birdham as a beautiful harbour-side Parish with a close, supportive community at its heart, and to promote a sustainable thriving economy with a robust infrastructure and maintain the Area of Outstanding Natural Beauty, ecology and character of the harbour, canal and its rural and agricultural surroundings.*
39. English Heritage (now Historic England) has suggested an addition to this Vision Statement to include reference to enhancing the Area of Outstanding Natural Beauty and refer to the local heritage. I do not consider it appropriate to amend the Vision Statement as it has been compiled based on the views and comments of the local community. The suggested amendment is not required for the Plan to meet the Basic Conditions.
40. A Summary of Objectives cross refers to policies in the Plan, providing a useful context for the policies. These objectives are re-iterated in the relevant policy sections in the Plan.

Policies

41. The policy section is divided up into subject categories, with supporting text and conformity references for each policy. This provides an excellent policy reference section, which is easy to follow. I congratulate those responsible.
42. English Heritage (now Historic England) has requested specific reference to paragraphs 126 and 132-134 in the NPPF with regard to heritage assets to be included in the Planning Policy Context section. As this section already refers to the need for the Plan to demonstrate that it is consistent with the policies and intent of the NPPF, I do not consider specific reference to these paragraphs is necessary for the Plan to meet the Basic Conditions.

Heritage Policies

Policy 1 – Heritage Assets and Their Setting

43. I consider that the requirement for all development to ‘conserve and enhance’ heritage assets in Policy 1 does not have regard to national policy. The *Planning (Listed Buildings and Conservation Areas) Act 1990* imposes duties requiring special regard to be had to the desirability: firstly at Section 16(2), of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses; and secondly, at Section 72(1), of preserving or enhancing the character or appearance of a Conservation Area.
44. Whilst I recognise the objective of Policy 1, there may be circumstances where new development has absolutely no impact on any heritage asset, either due to the nature or due to the location of the new development. In these instances, it would be an onerous requirement for the development to be required to enhance heritage assets. Therefore, I recommend modification to Policy 1 to refer to conserving or enhancing heritage assets. This would meet the Basic Conditions, having appropriate regard to national policy.
45. Policy 1 cross refers to Listed Buildings in Appendix 7.1. Representations have stated that there are errors in the listing in this Appendix. I have been referred to Broken Stone and Hammonds Farm, which are listed as Grade I buildings, whereas apparently they should be listed as Grade II buildings. In addition, it has been brought to my attention in the representations that Holt Place is not a Grade I listed building.
46. It is not for me to check the accuracy of the listing. In the interest of clarity and precision, I recommend the listing in Appendix 7.1 is checked and amendments made where appropriate.
47. English Heritage (now Historic England) has suggested revised wording to Policy 1 and CDC has sought clarification regarding support for the continued presence of houseboats on Chichester Canal and the significance of the list of buildings in Policy 1. I do not consider the suggested revised

wording is necessary to meet the Basic Conditions. Whilst further information regarding the buildings would be helpful, the policy clearly states that they are of architectural significance, local distinctiveness and character and historic importance. As such, I consider no further modification to Policy 1 is required to meet the Basic Conditions.

Recommendation: to meet the Basic Conditions, I recommend that the listing in Appendix 7.1 is checked and corrections made where appropriate and modification to the first sentence of Policy 1 to read as follows:

Any development must conserve or enhance the heritage assets of the Parish and their setting, including maintaining settlement separation.

Policy 2 – Archaeological Sites

48. This policy seeks the investigation and preservation of archaeological remains. In the interest of clarity, I recommend the inclusion of the words 'where appropriate' as suggested by CDC. This Policy as modified would have regard to paragraph 128 in the NPPF.
49. English Heritage (now Historic England) has suggested inclusion of reference to the Chichester Historic Environment Record in the supporting text to this Policy. Whilst such a reference would be an appropriate addition, it is not required for the Plan to meet the Basic Conditions.
50. **Recommendation: modification to Policy 2 to read as follows: Non-householder development on previously undeveloped land must allow for the investigation and the preservation of archaeological remains and protect recognised sites of archaeological importance, where appropriate.**

Environment Policies

Policy 3 – Habitat Sites

51. This policy seeks to protect existing ecological assets. Natural England has requested reference to stepping stones. In the interest of clarity, I recommend such a modification.
52. CDC and Southern Water have referred to the inclusion of aspects of Local Plan policy. Rather than re-iterate Local Plan Policy, in the interest of clarity, I recommend modification to Policy 3 by the inclusion of cross reference to the relevant Local Plan Policies. Thus separate reference to utility infrastructure would not be necessary.
53. The Green Infrastructure/Ecology Network Map referred to in Policy 3 is not clearly annotated. In the interest of clarity, I recommend the inclusion of a key with this map.

54. The second supporting paragraph refers to *English Nature's Green Infrastructure Guidance*. As this guidance has been removed from the *Planning Practice Guidance*, I consider it appropriate to remove this sentence, to ensure that the Plan has regard to national policy.
55. **Recommendation: to meet the Basic Conditions, in the interest of clarity, I recommend the following:**
- the inclusion of a key with the Green Infrastructure/Ecology Network Map;**
- the deletion of this last sentence in the second paragraph of the supporting text - 'This approach is in line with English Nature's Green Infrastructure Guidance'; and**
- modification to the first paragraph in Policy 3 to read as follows:**
- Development must avoid harming existing ecological assets i.e. the habitats and dependent local biodiversity, with the recognised wildlife corridors and stepping stones (including those identified in the Green Infrastructure/Ecology Network Map) in accordance with Local Plan Policies 49 and 52.**

Policy 4 – Landscape Character and Important Views

56. The second sentence in Policy 4 refers to *any development that intrudes into the landscape character must be appropriate*. 'Appropriate' has not been defined in this sentence. The first sentence sets out criteria. Thus, I recommend the deletion of the second sentence, which is unnecessary and not precise.
57. Representations have raised concern regarding the precise definition of the views of areas identified in this policy, the definition of heritage landscape and agricultural heritage. Whilst there are photographic examples in Appendix 7.5, in the interest of precision, I consider it essential that the views are identified on a map and this map is referred to in Policy 4.
58. Susan and Derrick Pope made representations at the pre-consultation stage of the Plan (Regulation 14 stage) where they requested the inclusion of open views northwards across farmland in the Area of Outstanding Natural Beauty (AONB) from Main Road (B2179), east of its junction with Shipton Green Lane to the mini roundabout at Bell Lane. It was agreed that this would be added to Policy 4. However, they have submitted further representation stating that the last bullet point *views north from Shipton Green Lane from the B2179* in Policy 4 is not accurate, as the views northwards are not from Shipton Green Lane. Their suggested amendment is for this bullet point to read: *views north from B2179 between Bell Lane and Shipton Green Lane*. It does appear that this latter suggestion is an accurate reflection of the original accepted suggested view.

59. **Recommendation: in the interest of precision, to meet the Basic Conditions, I recommend:**
- the deletion of the second sentence ‘any development that intrudes into the landscape character must be appropriate’;**
- the last bullet point to be deleted and replaced with –‘views north from B2179 between Bell Lane and Shipton Green Lane’; and**
- the inclusion of a map within this section of the Plan showing the particular areas identified in Policy 4, and a cross reference to this map in Policy 4.**

Policy 5 - Light Pollution

60. This policy seeks to limit the impact of light pollution and clearly defines areas considered to be ‘dark at night’.
61. Premier Marinas has requested further flexibility in this policy to allow for signage related to economic development. Given the particular light quality and clear skies of the Manhood Peninsula as outlined in the documents *Towards ICZM and the Manhood Peninsula Destination Management Plan 2011-15*, I do not consider such an approach to be appropriate. The policy does not prevent unlit signage in areas defined as dark at night and seeks to limit the impact of light pollution. I consider this has regard to national policy with regard to light pollution and the core principle in the NPPF that planning should *take account of the different roles and character of different areas*. Thus, I consider Policy 5 meets the Basic Conditions.
62. The supporting text states that *any developments within the Parish should not feature street lighting unless it is required to mitigate a potential road safety hazard*. However, this is not a specific requirement in Policy 5. Without such a requirement in the policy, in the interest of clarity, this sentence should be deleted.
63. **Recommendation: in the interest of clarity I recommend the deletion of the last sentence in the third supporting paragraph accompanying Policy 5.**

Policy 6 - Biodiversity

64. This policy seeks to maintain and enhance local biodiversity. This has regard to national policy to conserve and enhance biodiversity and is in general conformity with Local Plan Policy 49 in this respect. Policy 6 meets the Basic Conditions.

Community & Leisure Policies

Policy 7 - Integration & Sense of Community

65. This policy seeks to integrate new residential development within the existing community. This policy has regard to the NPPF, where it seeks an integrated approach to the location of housing. To provide a practical framework for decision making, I recommend that the first sentence is modified to refer to *new residential development must be **designed to integrate well...***
66. I do not consider the proposal for leisure provision to be designed in consultation with local residents to be a practical framework for decision making as CDC is the decision maker on planning applications. Therefore, I recommend modification to the last sentence in accordance with the suggested wording of CDC. This will meet the Basic Conditions.
67. **Recommendation: modification to Policy 7 to read as follows:**

New residential development must be designed to integrate well into the existing community and should provide good pedestrian routes, preferably from more than one access. Consideration must be given to connectivity and permeability as expressed in Policy 11. Site layouts must be designed to provide safe routes to schools and other local amenities, giving consideration to footpaths and other off-site schemes, where appropriate. Any leisure provision within or associated with a residential development must be designed to encourage use by both future residents of the development and existing local residents.

Policy 8 – Retention of Assets of Community Value and Other Facilities

68. This policy seeks to retain Assets of Community Value. This has regard to the NPPF, where it seeks to guard against the unnecessary loss of valued community facilities. CDC has suggested that the Plan needs to go further by recognising the aspirations of the parish for these assets. My remit is to examine the Plan to see if it meets the Basic Conditions and the future aspirations are not necessary to satisfy this requirement. Therefore, I consider that Policy 8 meets the Basic Conditions.

Transport Policies

Policy 9 - Traffic Impact

69. This policy is concerned with the traffic impact of new development. The highway authority, rather than local residents, determines the traffic impact of proposed developments. Therefore, to provide a practical framework for decision making, I recommend modification to this policy to delete reference to *measures agreed with residents*.

70. Susan and Derrick Pope have requested reference to the need to protect the rural area from significant visual urbanisation through highway safety measures and signage. As these are usually within the remit of the highway authority and do not usually require planning permission, I do not consider such an addition to this policy to be appropriate.

71. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy 9 to read as follows:**

Any new development within the Parish with a significant traffic impact will only be supported if that impact can be mitigated via developer contributions to measures agreed with the highway authority. Traffic impact includes effects of adverse road safety, congestion and pollution on both the main roads and rural lanes.

Policy 10 - Footpaths and Cycle Paths

72. CDC has requested a map showing potential and existing routes for commuting to Chichester. The map in Appendix 7.3 does show the existing Chichester Cycle route through the Parish. I do see the importance of ensuring that cycle routes link with those outside the Parish. To strengthen this Policy to provide a practical framework for decision making, I recommend reference to connectivity with cycle routes outside the Parish.

73. **Recommendation: To meet the Basic Conditions I recommend modification to Policy 10 to read as follows:**

Any development must protect the existing cycle and pedestrian network. New development with significant traffic impact will be expected to contribute, via developer contributions, to the enhancement of the footpath and cycle network within the Parish in order to:

- enable safe and easy pedestrian access to amenities, especially the Village Store & Post Office, Village Hall, Playing Field and Church.
- provide and maintain a safe and suitable cycle path network for both commuting to work (e.g. Chichester) and recreational use as part of a wider network of cycle routes beyond the Parish.

Policy 11 – Village Severance

74. This policy seeks to ensure that new development does not create village severance. CDC has pointed out that the policy should refer to roads and paths being *connected and permeable*, as the objective of the policy is to create community cohesion, rather than *connected or permeable*. In the interest of clarity, I recommend modification to Policy 11 to reflect this.

75. **Recommendation: to meet the Basic Conditions, I recommend modification to the last bullet point in Policy 11 to read as follows:**

ensuring roads and paths are connected and permeable to offer safe pedestrian and cycle access and the avoidance of cul-de-sac developments.

Housing Policies

Policy 12 - Housing Development

76. Concern has been raised regarding the Local Plan not meeting Objectively Assessed Needs (OAN) for housing. The Inspector examining the Local Plan stated: *I conclude that the Plan should be adopted now, subject to a commitment to a review to be completed within five years. This will ensure that housing delivery after the first five years of the Plan period can be updated to take account of emerging evidence on highway infrastructure and rigorous testing of the impacts of providing housing up to the OAN or any updated OAN.*
77. Concern has been raised as to whether CDC can identify a five year housing land supply. The Local Plan Inspector at the time of her examination concluded: *On the basis of the updated information it is clear that there is a five year housing land supply which is made up predominantly of identified sites or sites with planning permission.*
78. In the light of the conclusions on the OAN and housing land supply made by the Local Plan Inspector, she retained the indicative parish housing number for Birdham Parish in Local Plan Policy 5. For Birdham Parish the indicative number is 50 dwellings. The four sites identified in Policy 12 are estimated to be capable of providing 79 dwellings. Thus, the housing allocations in the Neighbourhood Plan exceed the numerical requirements of Local Plan Policy 5.
79. I sought up-to-date clarification from CDC regarding housing land supply. I was provided with a Position Statement: *Chichester Local Plan Area - Five Year Housing Land Supply 2016-2021 Updated Position at 1 September 2015* in which CDC stated *In summary, the Council's current assessment of five year housing land supply for the Chichester Local Plan area identifies a potential housing supply of 3,408 net dwellings over the period 2016-2021, compared with an identified housing requirement of 2,987 net dwellings. This results in a surplus of 421 net dwellings, equivalent to 5.7 years of housing supply.*
80. I have been supplied with evidence from Mr P Knappett that seeks to show that CDC cannot identify a five year housing land supply. Whether or not this is the case, the Neighbourhood Plan Examination process does not require a rigorous examination of district wide housing land requirements.
81. I have considered detailed representations from a number of interested parties seeking further residential development in the Parish including a proposal for residential development on land adjacent to Martins Cottage.

82. There are no adopted strategic policies upon which to base a more significant growth strategy. National policy emphasises that development means growth. I consider the Neighbourhood Plan has sought to provide for sustainable growth, with the aim to ensuring housing is provided to meet, and indeed exceed, the strategic policy requirement.
83. Whilst the site selection process has been criticised, the chosen sites received local support during a robust consultation process. Any assessment of land availability in the production of Neighbourhood Plans needs to be proportionate. The chosen sites either have planning permission or an agreement in principle. Concern has been raised regarding the deliverability of the Rowan Nursery site. I note the planning permission for this site requires commencement by October 2016. I have no clear evidence to confirm that the chosen sites are not deliverable. From the details before me, I am satisfied that the chosen sites are deliverable and together with the overall housing strategy in the Neighbourhood Plan will contribute towards the achievement of sustainable development by the provision of sustainable growth.
84. On a matter of detail, CDC has stated that social housing is no longer proposed on the Rowan Nursery Site. In the interest of precision, I recommend deletion of that reference from Policy 12.
85. Since the submission of the Plan for examination, the allocated sites may now all have planning permission, rather than some being subject to a Section 106 agreement. If this is the case, in the interest of clarity, Policy 12 should be updated as appropriate.
86. **Recommendation: to meet the Basic Conditions, I recommend updating of the planning position for the allocated sites where appropriate in Policy 12.**

Policy 13 - Settlement Boundary

87. It is necessary for new development in rural areas to be in accordance with not only Policy 15 in this Neighbourhood Plan, and Policy 45 in the Local Plan but also all relevant policies, such as the environment policies. Therefore, in the interest of clarity, I recommend the last sentence of Policy 13 simply defines the area outside the SBA as rural.
88. **Recommendation: in the interest of precision, to meet the Basic Conditions, I recommend modification to Policy 13 to read as follows**

**The Settlement Boundary Area (SBA) for Birdham has been reviewed and the revised boundary is shown on the map below.
Within the SBA, development that complies with other policies in this plan will be permitted.
Outside of the SBA is deemed to be rural.**

Policy 14 - Windfall Sites

89. The Plan has met its strategic housing requirement through the site allocations in Policy 12. The support for windfall sites in Policy 14 contributes towards the achievement of sustainable growth.
90. On matters of detail, in the interest of precision, I recommend referring to windfall 'sites' rather than 'plots'. The Chichester Harbour Conservancy Design Guidelines are not relevant for areas outside the AONB and part of the settlement within the SBA lies outside the AONB. Therefore, in the interest of clarity, I recommend modification to Policy 14 to state that conformity with these guidelines is only required where applicable.
91. In the third bullet point, reference to preserving 'open views' is not clearly defined. In the interest of clarity, this section of Policy 14 should cross refer to Policy 4.
92. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy 14 to read as follows:**

The Neighbourhood Plan will support proposals for 'windfall' development, defined as schemes of 5 or fewer dwellings, within the Settlement Boundary Area, provided:

- the quantum of dwellings and their site coverage will not be an over-development of the site in relation to the characteristics of neighbouring sites in respect of built form, massing and building line
- the scheme meets the requirements of the Chichester Harbour Conservancy Management Plan where applicable
- the development preserves open views in accordance with Policy 4
- the development protects the residential amenity of neighbours
- the scheme will not adversely affect any Heritage assets as set out in Heritage Policies 1 & 2
- that the scheme will not result in the loss of valuable trees, hedges or other natural features that form part of the character of the Parish and the Biodiversity is maintained or enhanced in line with Environment Policies 4 & 6
- the development is well integrated with the existing village and enhances the facilities in line with Community & Leisure Policies 7 & 8.

Policy 15 - Rural Area Policy

93. The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013 allows existing redundant agricultural buildings of 500m² or less to change to a range of new business uses, to boost the rural economy whilst protecting the open countryside from development. Prior approval is required for such a change of use of buildings between 150 - 500m².
94. The Town and Country Planning (General Permitted Development) (Amendment and Consequential Provisions) (England) Order 2014 came into force on 6 April

2014. This allows, under certain circumstances, the change of use of agricultural buildings to residential use and change of use of agricultural buildings to registered nurseries providing childcare or state-funded schools, under the prior approval system.

95. Although Policy 15 refers to the General Permitted Development Order, it does not provide sufficient clarity with regard to the re-use of agricultural buildings. I recommend Policy 15 is modified to clarify that development supported in this Policy is in addition to that allowed under the General Permitted Development Order.
96. Concern has been raised regarding conflict with NPPF paragraph 55. Whilst Policy 15 specifically refers to the re-use of buildings for agricultural/ horticultural/ business purposes, the Policy does not preclude development in accordance with NPPF paragraph 55. Thus, I do not consider it necessary to make further modification in this respect.
97. Concern has been raised as to the suitability of large farm buildings in the countryside for conversion. I am satisfied that the first criterion regarding suitability of buildings in terms of size, bulk and location, restricts the re-use of unsuitable buildings. Thus, I do not consider it necessary to make further modification in this respect.
98. **Recommendation: in the interest of clarity and precision, to meet the Basic Conditions, I recommend modification to the first paragraph of Policy 15 to read as follows:**

Development within the rural area will be in accordance with the NPPF paragraph 55, Local Plan Policy 45 and the General Permitted Development Order. The re-use of farm and rural buildings outside the Settlement Boundary for agricultural/ horticultural/ business purposes or to provide dwellings for agricultural workers, which is not allowed under the General Development Order, will be supported subject to the following criteria:

Policy 16 - Housing Density & Design

99. As mentioned previously, The Chichester Harbour Conservancy Design Guidelines are not relevant for areas outside the AONB and part of the settlement within the SBA lies outside the AONB. Therefore, in the interest of clarity, I recommend modification to Policy 16 to state that conformity with these guidelines is only required where applicable.
100. The NPPF promotes sustainable transport. Paragraph 29 in the NPPF states: *However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.*
101. I note that there is a restrictive bus service in the Parish. The Neighbourhood Survey found that 63% of respondents possessed two cars or more. On this basis, Policy 16 requires a minimum of two parking spaces

per dwelling. I understand that this is beyond the adopted parking standards set by West Sussex County Council.

102. I do not consider the findings of the Neighbourhood Survey constitute the robust justified evidence required to depart from adopted parking standards. However, it may be that further justifiable evidence would support the need for at least two cars per unit. On this basis, I recommend modification to Policy 16 to state that off street parking is required to be in accordance with current parking standards unless there is justified evidence to indicate otherwise. The accompanying text should be amended to reflect this modification. This approach recognises the promotion of sustainable transport and therefore meets the Basic Conditions with regard to contributing towards the achievement of sustainable development.
103. Residents in neighbouring Itchenor have requested modification to the Plan to ensure that appropriate reference is made to consultation on planning applications in the 'zone of influence' in a small area of Birdham Parish identified in the *West Itchenor Village Design Statement 2nd Edition* (2012).
104. Policy 16 refers to the need to consider design statements for neighbouring Parishes for any development within Birdham Parish. The accompanying text specifically refers to the 'zone of influence'. I consider this adequately refers to the crossover between the parishes.
105. Subject to the recommended modifications above, I consider that Policy 16 has regard to the NPPF, particularly in the context of the need for housing densities to reflect local circumstances.
106. **Recommendation: to meet the Basic Conditions, I recommend modification to the accompanying text to reflect the parking requirements and modification to Policy 16 to read as follows:**

Any residential development as described in Policies 12 & 14 will be supported provided:

- it is of a density that reflects Birdham's character as a rural village settlement rather than an urban one giving an impression of space, with uniform houses and plots being avoided
- the design of housing (including outside of the Chichester Harbour AONB) must comply with the Chichester Harbour Conservancy 'Design Guidelines for New Dwellings and Extensions' where applicable and adopt the principles as set out in Building for Life 12
- the design and materials are in keeping with the individual character and local distinctiveness of the Parish through building styles, which should be diverse and make a valuable contribution to the rural character of the village.
- a satisfactory road access
- off street car parking in accordance with current parking standards unless there is justified evidence to indicate otherwise
- the disposal of Surface Water and Wastewater is in line with Drainage Policies 18-21

- landscaping complies with the Chichester Harbour Conservancy Design Guidelines where applicable.

Any development within Birdham Parish that is adjacent or close to other Parishes must give consideration to their design statements, character appraisals or management proposals.

Policy 17 - Housing Need

107. CDC operates an Allocations Scheme for affordable housing. In the interest of clarity, I recommend modification to Policy 17 to refer to the need for the allocation of social and affordable housing to be in accordance with the CDC Allocations Scheme.
108. The accompanying text refers to the requirement for a 30% allowance of affordable housing for proposals of 6 units or more. However, this is not written as a policy requirement in Policy 17. Thus, in the interest of clarity, I recommend deletion of this reference in the text.
109. The accompanying text refers to existing planning permission for 37 affordable homes. As CDC has stated that social housing is no longer proposed on the Rowan Nursery Site, this accompanying text may require amendment.

110. **Recommendation: in the interest of clarity, to meet the Basic Conditions, I recommend:**

modification to the accompanying text by the deletion of the first sentence regarding 30% affordable housing provision and the updating of the number of affordable homes to be provided from current planning permissions; and

modification to Policy 17 to read as follows:

Any development must contain a mix of housing sizes and types to suit the demographic characteristics and requirements of the Parish, and social and affordable housing must be allocated in accordance with the Chichester District Council Allocations Scheme.

Drainage Policies

Policy 18 - Flood Risk Assessment

111. This policy seeks to avoid development in flood risk zones 2 and 3. Reference is made to paragraph 100 in the NPPF. The NPPF actually provides further policy on flooding in subsequent paragraphs. In the interest of precision, I recommend modification to Policy 18 to refer to the NPPF, rather than just paragraph 100.

112. The NPPF does not prevent all development in areas of flood risk, just inappropriate development that does not meet the specific tests. To have regard to the NPPF, I recommend reference to *inappropriate development* rather than development in the first sentence of Policy 18.
113. Footnote 20 to paragraph 103 in the NPPF states that *a site specific flood risk assessment is required for proposals of 1 hectare or greater in Flood Zone 1,....or in an area within Flood Zone 1 which has critical drainage problems (as notified to the local planning authority by the Environment Agency).*
114. Policy 18 requires a site-specific flood risk assessment for all new development in Flood Zone 1 or in areas identified as wet spots. An accompanying map in Appendix 7.3 identifies areas susceptible to flooding, but I see no specific reference to 'wet spots'.
115. I realise that flooding is a major concern for local residents and I note the awful flooding incidents in 2012, much of which occurred in areas designated as being in Flood Zone 1. It appears from the Black and Veatch study that this is largely explained by the exceptional rainfall and the lack of drainage capacity in the Manhood Peninsula.
116. I note that CDC is due to update the outdated 2008 Strategic Flood Risk Assessment during 2015. The Environment Agency is the statutory body which is consulted on flooding issues. It is their evidence, rather than a Strategic Flood Risk Assessment that is used to determine flood risk. To have regard to national policy, I recommend modification to Policy 18 to refer to the requirement for a site-specific flood risk assessment in areas within Flood Zone 1 which have critical drainage problems (as notified to the local planning authority by the Environment Agency).
117. **Recommendation: to meet the Basic Conditions I recommend modification to Policy 18 to read as follows:**

Inappropriate development in areas of flood risk zones 2 & 3 as identified by the Environment Agency flood risk maps should be avoided in accordance with the NPPF.

Development in areas within Flood Zone 1, which have critical drainage problems, (as notified to Chichester District Council by the Environment Agency), should be subject to a site-specific Flood Risk Assessment.

Where appropriate, Exception Tests must be applied, taking into account the effect of extreme weather conditions and any adverse impact on neighbouring areas. Measures must also be taken to ensure that local flooding does not take place due to a rise in the water table.

Policy 19 - SUDS Design & Management

118. This policy seeks Sustainable Urban Drainage Systems. As such, this Policy contributes to the achievement of sustainable development.

Policy 20 - Surface Water Run-off

119. This policy seeks to ensure that surface water drainage does not increase flood risk elsewhere. This has regard to national policy in paragraph 103 in the NPPF and is in general conformity with strategic policy in the Local Plan. Therefore, Policy 20 meets the Basic Conditions.

Policy 21 - Wastewater Disposal

120. CDC has requested that reference is made in the second paragraph to the necessary waste water infrastructure being provided *prior to the first occupation of the development* rather than *in time to serve the development*. In the interest of clarity, I agree that Policy 21 should be modified in accordance with this suggestion by CDC.
121. The Environment Agency has referred to the *Environmental Permitting Regulations 2010* where they specify that a small sewage discharge to water or groundwater is only exempt from the requirement for a permit *if it cannot reasonably, at the time it is first made, be made to the foul sewer*. To have regard to national policy, I recommend modification to the second bullet point to reflect this statutory requirement.
122. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy 21 to read as follows:**

Any development will be permitted only if the sewer network can accommodate the additional demand for sewerage disposal either in its existing form or through planned improvements to the system in advance of the construction of the development. Planning proposals will not be supported unless it can be shown by rigorous analysis that there is sufficient capacity in the local sewerage system and that any new connections will not increase the risk of system back up/flooding.

On individual sites, planning permission will be granted provided the necessary wastewater infrastructure is either available or can be provided prior to the first occupation of the development. The planning authority will consult Southern Water on major applications and planning conditions will be imposed, if necessary to ensure that, in advance of any construction work:

- Sidlesham Waste Water Treatment Works has sufficient headroom capacity judged on the basis of national industry-wide standards**
- a connection is provided to the existing local sewerage network at the nearest point of adequate capacity, or if a connection cannot be reasonably made, developers will need to provide alternative and proven methods of treating and disposing of wastewater that meet Environment Agency requirements and water quality objectives**

- the whole route to the Waste Water Treatment Works has adequate capacity and the risk of flooding is not increased in wet weather conditions
- a management plan is provided for future maintenance of any on-site wastewater treatment systems
- discharge into Pagham harbour and the rife at Medmerry meet Environment Agency requirements so that they do not endanger the ecology.

Business Policies

Policy 22 - Development for Business Use

123. Representations include a request for Policy 22 to recognise employment sites and businesses outside the SBA and cross refer to Policy 15, the rural areas policy.
124. Policy 22 does refer to existing businesses in the whole parish, allowing for small-scale expansion of existing businesses outside the SBA. Policy 13 in the Plan clearly distinguishes between development inside and outside the SBA. The Plan has to be read as a whole. I do not see it necessary for other policies, particularly Policy 15, to be re-iterated within Policy 22.
125. The second paragraph refers to development within the SBA requiring conformity to the Chichester Harbour Conservancy Design Guidelines. These guidelines are not relevant for areas outside the AONB and part of the settlement within the SBA lies outside the AONB. Therefore, in the interest of clarity, I recommend modification to Policy 22 to state that conformity with these guidelines is only required where applicable.
126. Policy 22 seeks to support business opportunities, including the conversion of existing buildings and the expansion of existing businesses. As such, subject to the recommended modification above, I consider it has regard to national policy and contributes to the achievement of sustainable development, by supporting sustainable economic growth.
127. **Recommendation: to meet the Basic Conditions, in the interest of clarity, I recommend modification to the second paragraph of Policy 22 to read as follows:**

Support will also be given for small-scale development of buildings for business use within the Settlement Boundary Area, provided they conform to the CHC Design Guidelines where applicable and are in character with the existing or neighbouring buildings. Small-scale conversions or extensions to buildings, e.g. for home workers, must demonstrate that they are required for business use.

Policy 23 - Retention of Businesses

128. Paragraph 21 in the NPPF states that *investment in business should not be over-burdened by the combined requirements of planning policy expectations*.
129. Local Plan Policy 3 is a strategic policy that recognises the need to protect and enhance existing employment sites to meet the needs of modern business. Local Plan Policy 26 allows the redevelopment of existing employment sites in defined circumstances. Local Plan Policy 38 lists criteria against which the loss of local and community facilities is to be considered.
130. Whilst I note the importance of retaining local business and facilities, I have no clear evidence before me to justify the restrictive approach to redevelopment or change of use in Policy 23. This policy does not allow for the more flexible approach to redevelopment or change of use outlined in the Local Plan and it is not in accordance with NPPF paragraph 21. To ensure that Policy 23 has regard to national policy and is in general conformity with strategic policy in the Local Plan, I recommend cross reference to Local Plan Policies 3, 26 and 38.
131. **Recommendation: to meet the Basic Conditions I recommend modification to Policy 23 to read as follows:**

Support will be given to the retention of the Village Shop and Post Office (A1 shop unit) against any proposals for redevelopment or change of use in accordance with Local Plan Policy 38. Proposals that adversely affect businesses related to the marine heritage of Birdham (i.e. Birdham Pool & Chichester Marina) will be discouraged.

Support will be given to the retention of all business related to tourism, marine, horticulture and agriculture against any proposals for redevelopment or for a change of use in accordance with Local Plan Policies 3 and 26. Accordingly, proposals for development must not have a significantly adverse impact on the tourism, marine, farming and horticultural businesses.

Policy 24 - Broadband and Telecommunications

132. The definition of *appropriate proposals* has not been clearly defined in the first sentence. I recommend the deletion of *appropriate* as it is not precise and is unnecessary because the impact on the landscape is referred to in the second sentence.
133. *Open landscapes* are not clearly defined in the second sentence. For clarity, I recommend deletion of *and not located in or near to open landscapes*. To ensure that network installations are sympathetically located this policy should cross refer to Policy 4.

134. **Recommendation: in the interest of precision, to meet the Basic Conditions, I recommend modification to Policy 24 to read as follows:**

Support will be given to proposals to provide access to a super-fast broadband service and improve the mobile telecommunication network that will serve businesses and other properties within the Parish. This may require above ground network installations, which must be sympathetically located and designed to integrate into the landscape in accordance with Policy 4.

Additional Infrastructure Policy

135. Southern Water has requested a new infrastructure policy and has referred to paragraph 157 in the NPPF with regard to Local Plans needing to plan positively for development and infrastructure.
136. Local Plan Policy 9 seeks to co-ordinate development and infrastructure provision. It states that CDC will work with infrastructure providers to ensure infrastructure is provided to support the development identified in the Local Plan. It is not necessary to re-iterate Local Plan policy in a Neighbourhood Plan. Therefore, I do not consider it necessary to include the suggested additional infrastructure policy for the Plan to meet the Basic Conditions.

Action Plan

137. This section in the Plan includes proposals that form part of the community aspirations and requirements that cannot be delivered by planning policy alone. CDC has requested amplification of the Action Plan to assist in directing funds.
138. My remit is to determine whether the Plan meets the Basic Conditions. Whether the Action Plan is modified in line with the suggestions of CDC, or whether the Action Plan remains as written, would have no effect on the Plan meeting the Basic Conditions. I will leave this matter to the Parish Council to decide.

Appendices

139. CDC has raised concern regarding the retention of Appendix 7.4. This explains the background to the Settlement Boundary Area extension. This appendix is not required to meet the Basic Conditions. If it remains in the Plan, it would have no effect on the Plan meeting the Basic Conditions. I will leave this matter to the Parish Council to decide.
140. CDC has raised concern that the Position Statement on Wastewater in Appendix 7.6 will need to be updated during the Plan period and thus it may be more appropriate to either remove it from the Plan or state that it will be

updated. The Position Statement is clearly dated October 2013. Whether the Plan is modified in line with either of these suggestions, or whether this position statement remains as written, would have no effect on the Plan meeting the Basic Conditions. I will leave this matter to the Parish Council to decide.

Referendum and the Birdham Parish Neighbourhood Plan Area

141. I am required to make one of the following recommendations:
- the Plan should proceed to Referendum, on the basis that it meets all legal requirements; or
 - the Plan as modified by my recommendations should proceed to Referendum; or
 - the Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.
142. **I am pleased to recommend that the Birdham Parish Neighbourhood Plan as modified by my recommendations should proceed to Referendum.**
143. I am required to consider whether or not the Referendum Area should extend beyond the Birdham Parish Neighbourhood Plan Area. I see no reason to alter or extend the Neighbourhood Plan Area for the purpose of holding a referendum.

Janet Cheesley

Date 23 October 2015

Appendix 1 Background Documents

The background documents include

The National Planning Policy Framework (The Framework) (2012)

The Planning and Compulsory Purchase Act 2004

The Localism Act (2011)

The Neighbourhood Planning Regulations (2012)

The Planning Practice Guidance (2014)

Chichester Local Plan Key Policies Pre-submission 2014-29

Chichester Local Plan Key Policies Pre-submission 2014-29 Proposed Modifications

Report On The Examination Into Chichester

Local Plan May 2015

Chichester Local Plan: Key Policies 2014-2029 adopted on 14 July 2015

Statement By Chichester District Council: Neighbourhood Plans And Adoption Of The Chichester Local Plan: 2014-2029 (July 2015)

Chichester District Council Interim Policy Statement on Development and Disturbance of Birds in Special Protection Areas and identified Compensatory Habitats Effective April 2014

Coastal West Sussex SHMA – Chichester District summary.

Interim Statement on affordable housing September 2007

Chichester District Council – Allocation scheme July 2013

Birdham Neighbourhood Development Plan Strategic Environmental Assessment Opinion Screening Determination under Regulation 9 and Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004 dated 6 November 2014

Chichester Local Plan Area - Five Year Housing Land Supply 2016-2021 Updated Position at 1 September 2015

Supporting Documentation:

Birdham Neighbourhood Plan 2014-2029 Statement of Public Consultation (October 2014)

Birdham Parish Basic Conditions Statement (November 2014)

Birdham Neighbourhood Survey Report (AiRS), July 2013

Birdham Open Day Comments Nov 2012, Nov 2013 – Summaries & Verbatim Comments

Birdham Business Survey Summary of Responses & Comments 2013

Birdham & Earnley Flood Prevention Group – Ditch Report, 2014

Birdham Primary School Comments 2013

Black & Veatch 2012 Flooding Report- Southern Manhood Peninsula Building for Life 12

CDC Infrastructure Delivery Plan 2013

CDC Local Biodiversity Action Plan 2011-14

CDC Settlement Capacity Profiles 2013 & SHLAA 2013

CDC Somerley Conservation Area Character Appraisal 7 May 2013
CDC Transport Study of Strategic Development Options and Sustainable
Transport Measures 2013
Chichester Area Strategy Development Plan South Coast Corridor Multi-
Modal Study Prepared for GOSE.
August 2002 by Halcrow Group Limited
Chichester Employment Land Review 2013
Chichester Harbour Conservancy Design Guidelines for New Dwellings and
Extensions (2010),
Chichester Harbour Conservancy Management Plan 2014-19
Coast to Capital Local Enterprise Partnership
Coastal West Sussex and Greater Brighton Local Strategic Statement
Delivering Sustainable Growth 2013-
2031
Manhood Peninsula Destination Management Plan 2011-2015
Manual for Streets 2 – Department for Transport 2010
Natural England's National Character Area Profile: 126 South Coast Plain
(NE525) - Feb 2014
Strategic Growth Study – Wastewater Treatment Options (August 2010)
Sussex Historic Landscape Characterisation
The Economic Impact of Tourism Manhood Peninsula Study
The National Environment and Rural Communities (NERC) Act 2006
The Selsey and East/West Wittering Visitor Survey
The West Sussex Transport Plan (2011-2026)
Towards ICZM on Manhood Peninsula 2011
UK Government Natural Environment White Paper 2011 - Making Space for
Nature

Regulation 14 Responses
Birdham Neighbourhood Plan Regulation 16 Consultation Responses
Summary Document

Regulation 16 responses from:
Christopher Mead-Briggs
English Heritage (now Historic England)
Environment Agency
Homes and Communities Agency
Itchenor Society
Natural England
SGN Gas
West Itchenor Parish Council
Sport England
WSCC
Anna Pockney
Southern Water
CBRE Ltd obo Premier Marinas
Paul Knappett
Susan and Derrick Pope

MCC obo local resident/landowner
R C de Chair
Chichester District Council

Post Chichester Local Plan: Key Principles Adoption Consultation
Responses (August 2015) from:
Birdham Parish Council
Environment Agency
Historic England
WSCC
MCC on behalf of local resident/landowner
Paul Knappett
Chichester District Council
Natural England
SGN

Emails dated 14 September 2015 and 15 September 2015 from Mr Paul
Knappett
Email dated 22 September 2015 from Birdham Parish Council regarding the
Steering Group