

## Bosham 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: Bosham 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)	01.09.15	Email	We do not have any comments.
Dr B Walton (002)	10.09.15	Email	<p>Opposition to part of the Bosham Parish Neighbourhood Plan 2014 – 2029 I wish to oppose part of the Policy 1 – Housing – 5.1.1. which proposes building some 25 houses on Swan Field – SHLAA BB 08197. The reason for the objection is because this is a Greenfield site within the Area of Outstanding Natural Beauty and building further houses there would significantly affect the rural character of Bosham Village within the AONB.</p> <p>I note that all the other proposed new housing sites of the BPNP are also within the AONB. I would welcome the proposed relocation of St Wilfrid's Hospice to the disused Oakcroft Nurseries site (not included in the BPNP). However, this would mean that the 23 new houses designated for this site would need to be built elsewhere. I think that it is essential that these should not be added to the proposed development at Swan Field, which would make the situation even worse, but instead they could also be located at Highgrove Farm, outside the AONB.</p> <p>I think that an alternative new housing site, instead of Swan Field, could be found within Bosham Parish, but outside the AONB. A possible site for this development would be at Highgrove Farm, north of the A259.</p>

			<p>I would welcome the proposed relocation of St Wilfrid's Hospice to the disused Oakcroft Nurseries site ( not included in the BPNP ). However, this would mean that the 23 new houses designated for this site would need to be built elsewhere. I think that it is essential that these should not be added to the proposed development at Swan Field, which would make the situation even worse, but instead they could also be located at Highgrove Farm, outside the AONB</p>
Genesis obo Mrs D Scott (003)	30.09.15	Email	<p>We object to the allocation of land at Oakcroft Nursery in Policy 2A (iii) for 23 dwellings as it is premature to the outcome of a detailed planning application (LA Ref 15/01507/FUL) submitted by St Wilfrid's Hospice for an alternative residential institutional use on the same site. The proposed hospice is referred to in the footnote to policy 2 and in the event it is approved, the Neighbourhood Plan will have find additional housing sites to redress the 23 dwelling shortfall.</p> <p>However the Neighbourhood Plan has made no such provision and without new reserve 'contingency sites' the Plan will fail to meet the full Parish housing requirement of at least 50 dwellings allocated to Bosham by Policy 5 of the adopted Chichester District Local Plan (Key Policies) 2014-2029. In this situation the Plan will fail to meet one of the basic conditions of Neighbourhood Plan preparation which is that it has to be in general conformity with the strategic policies contained in the Development Plan for the Area.</p> <p>Besides, the adopted Local Plan has not made sufficient housing allocations to meet objectively assessed housing need (OAHN) anyway and the Inspector who conducted the Local Plan Examination only found it sound on the basis the Council reviews the Local Plan within five years to aim to ensure that OAHN is met. In our view, this is another highly relevant reason why the Bosham Neighbourhood Plan should be prepared with as much in built flexibility as possible and it would make sense if significantly more than 50 dwellings were catered for in the Plan now, otherwise it will require an immediate review.</p> <p>The Parish has already conducted a thorough public consultation exercise of potential housing sites within the designated Neighbourhood Plan area and we propose the inclusion of land at Crede Farm as a new contingency site. It was the best performing site of all the alternative proposals presented to a previous Parish public exhibition in July 2014 and later in September was only ranked behind other confirmed allocated sites and land at Walton Farm which is constrained by a restrictive covenant and cannot be considered 'deliverable'.</p>

			Crede Farm is 0.76ha and assuming 30dph has a capacity of around 23 dwellings. It is immediately deliverable with no landownership or infrastructure constraints and could come forward as a direct replacement for the Oakcroft Nursery site or as a baseline site to cater for the expected additional housing to meet OAHN when the Local Plan review has been completed.
Historic England (004)	02.10.15	Email	<p>Welcomes the description of the historical development of Bosham in paragraphs 1.6 - 1.10.</p> <p>Welcomes the identification of character areas in the 2011 Bosham Village Design Statement as we consider it is very important to have such an understanding of the character of a place to underpin the policies and proposals in a Neighbourhood Plan.</p> <p>Welcome the reference to the historic area of the village in paragraph 2.1, but are not clear if this being one of the top 120 most visited sites in England is part of the Vision. If so, we are not entirely clear why. Would prefer “The historic environment of the village is conserved and enhanced”. Suggest that it would be clearer if the actual Vision was highlighted in some way e.g. in bold or in a box.</p> <p>The highlighting of the Vision in some way to make it clearer and emphasise its importance.</p> <p>Welcomes and supports the Plan’s objective “<i>to protect and enhance the Conservation Area of the village whilst guarding its unique qualities</i>”, although would prefer there to be a reference to the whole historic environment of the parish and the heritage assets therein as not all the historical interest of the parish is within the conservation area (as recognised in paragraphs 5.14.4 and 5.14.8).</p> <p>The fourth objective to refer to the whole historic environment of the parish and/or the fifth objective to read “<i>Producing sensitive development which conserves and enhances the landscape, Chichester Harbour AONB, the historic environment and local distinctiveness</i>” and/or a specific objective for the conservation and enhancement of the heritage assets of the parish.</p> <p>Welcomes the reference to “the historic qualities of the village” in paragraph 3.3.</p> <p>Welcomes and supports the principle of protecting, maintaining and enhancing the Conservation Area at the historic heart of the village as part of the Strategy in paragraph 4.2.</p>

			<p>Welcomes the commitment to carefully scrutinising proposals within the Conservation Area.</p> <p>According to our records none of the five sites allocated for development contain or are in the setting of any designated heritage assets. However, that is not to say that these sites therefore necessarily have no heritage interest; there may, for example, be archaeological remains or locally listed buildings or features that would be affected by their development. For this reason any assessment of the potential heritage impact of the development of these sites should have regard to the Historic Environment Record for the area, which should include all archaeological find spots, and we welcome and support the requirement for an archaeological investigation to be undertaken prior to any development of Bullock Barns and Burnes Shipyard.</p> <p>Welcomes and supports criterion (ix) of Policy 3.</p> <p>Welcomes and supports the comprehensive consideration of the historic environment in the Plan area in paragraphs 5.14.1 – 5.14.9.</p> <p>Historic England welcomes and supports comprehensive Policy 6 for the protection it affords to the historic environment of Bosham parish.</p>
Landlink Estates (005)	27.08.15	Email	<p>The Bosham plan seems to overlook that one of the sites listed for housing has been taken up by a hospice. This will lead to a shortage unless other sites are earmarked to compensate. This could create an opening for larger scale development by appeal.</p>
Portsmouth Water (006)	27.08.15	Email	<p>CDC guidance to Parish Councils mentions LP Policy 40 but not the change in relation to the Code for Sustainable Homes. In addition to this supporting text for LP Policy 12 is confusing as it refers to the Code and the new 110.</p> <p>Bosham still has references to the Code for Sustainable Homes which has been withdrawn.</p>
Marine Management Organisation (007)	04.09.15	Email	<p>No comments to submit in relation to this consultation.</p>
Genesis obo St Wilfred's Hospice	18.09.15	Email	<p>We object to the allocation of land at Oakcroft Nursery in Policy 2A (iii) for 23 dwellings. We suggest the wording of Policy 5 C is amended.</p>

(008)			<p>Overall we believe the Neighbourhood Plan as currently drafted fails to meet 2 of the basic conditions for Plan preparation namely it fails to contribute to the achievement of sustainable development and fails to be in conformity with the strategic policies of the development plan for the area.</p> <p>Our comments are set out in full in the accompanying representations (<i>see separate detailed representation</i>).</p>
Sport England (009)	28.08.15	Email	<p>Planning Policy in the National Planning Policy Framework identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.</p> <p>It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, 'A Sporting Future for the Playing Fields of England – Planning Policy Statement'. <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-">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-</a></p>

			<p><a href="#">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.</p> <p><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>
Waverley Borough Council (010)	30.09.15	Email	No comments to make.
Natural England (011)	06.10.15	Email	Thank you for consulting Natural England on the Bosham NP. We have previously commented on this plan a number of times and, on the basis of a quick review, there do not appear to be any outstanding matters. On this basis, we have no further comments.
West Sussex County Council (012)	07.10.15	Email	<p><u>General</u></p> <p>In general, the County Council looks for Neighbourhood Plans to be in conformity with the District and Borough Councils' latest draft or adopted development plans. The County Council supports the District and Borough Councils in preparing the evidence base for these plans and aligns its own infrastructure plans with them. The County Council encourages Parish Councils to make use of this information which includes transport studies examining the impacts of proposed development allocations. Where available this information will be published on its website or that of the relevant Local Planning Authority. In relation to its own statutory functions, the County Council expects all Neighbourhood Plans to take due account of its policy documents and their supporting Sustainability Appraisals. These documents include the West Sussex Waste Local Plan, Minerals Local Plan and West Sussex Transport Plan. It is also recommended that published County Council service plans, for example Planning School Places and West Sussex Rights of Way Improvement Plan, are also taken into account.</p> <p><u>Housing &amp; employment allocations</u></p> <p>Given that the Submission Neighbourhood Plan for Bosham includes the proposed allocation of small scale housing and employment sites, it should be noted that site specific principles in the Neighbourhood Plan will need to be tested and refined through the Development Management process (through the provision of pre-application advice or at the planning application stage) or as part of a consultation for a Community Right to Build Order. Whilst the County Council supports the proactive approach undertaken to allocate sites in the Neighbourhood Plan, we are unable to comment on site specific principles at this stage. In considering site specific</p>

			<p>principles, please refer to the attached Development Management guidance. The County Council currently operates a scheme of charging for highways and transport preapplication advice to enable this service to be provided to a consistent and high standard. Please find further information on our charging procedure through the following link:<a href="http://www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_and_projects/development_control_for_roads/pre-application_charging_guide.aspx">http://www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_and_projects/development_control_for_roads/pre-application_charging_guide.aspx</a></p> <p><u>Policies</u>  Policy 9(B): Please remove reference to 'West Sussex County Council (as the SuDS Approving Body)' and replace with the relevant Local Planning Authority (Chichester District Council).  Infrastructure  6.12: This section identifies aspirations and priorities for infrastructure provision. Please note, the County Council is working with Chichester District Council to establish appropriate governance arrangements to oversee the prioritisation of infrastructure across different services. This will be important to secure delivery of priority projects.</p>
Luken Beck obo Barratt David Wilson (Southampton) Ltd (013)	08.10.15	Email	<p><u>1.0 Introduction</u></p> <p>1.1 Following Representations on the Draft Local Plan in December 2014, Luken Beck mdp Ltd have again been instructed by Barratt David Wilson Homes (Southampton) to comment on the Submission Bosham Neighbourhood Plan (June 2015) particularly in respect of land at Highgrove Farm, Bosham, (identified as Site BB0815 in the CDC SHLAA 2014), which remains excluded from the Submission Bosham Neighbourhood Plan. No explanation or comment (other than "Noted")<sup>1</sup> has been made regarding our comments on the Draft Neighbourhood Plan. Plans and documents supporting the allocation of the site remain relevant to this further Representation and will not be resubmitted as full sets have previously been submitted to the Parish and District Councils.</p> <p>1.2 This Representation is to object to the omission of Highgrove Farm as a housing allocation in the BPNP. Whilst Chichester District Council's (CDC) Key Policies Local Plan was adopted in July 2015, it is subject to a review within 5 years as, at the inquiry, the Council acknowledged that although accommodating a significant increase in housing provision the plan does not meet the current objectively assessed need for housing (OAN). A number of matters remain uncertain that may, when resolved, enable housing provision to be increased. These include the government's proposals for improvements to the A27 around Chichester and sewerage</p>

			<p>infrastructure. 1.3 It is considered that the Highgrove Farm site should be allocated for residential development of 50 / 60 dwellings as required for the Parish by the CDC Key Policies Local Plan. All the proposed housing in Policy 2 namely, Bullock Barns<sup>2</sup>, Swan Field<sup>3</sup>, Oakcroft Nurseries<sup>4</sup>, Shipyard<sup>5</sup> and Dolphin House<sup>6</sup> are all located within an Area of Outstanding Natural Beauty which the NPPF states very clearly that “Great weight should be given to conserving landscape and scenic beauty in.....Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.”<sup>7</sup> (our underlining) It follows therefore that land at Highgrove Farm, not subject to the AONB, can accommodate the necessary housing.</p> <p>2.0 Background</p> <p>2.1 The Highgrove Farm site has an area of 14.61ha and is located approximately 4 km to the west of Chichester city centre and directly abutting the eastern edge of Broadbridge. The site lies outside the South Downs National Park and the Chichester Harbour AONB. The land is currently in agricultural (arable) use.</p> <p>2.2 The site is bounded to the west by the residential area of Broadbridge (part of Bosham Parish) and Brooks Lane, to the south by the A259; to the north by the mainline railway and to the east by open farmland and Highgrove Farm buildings moving towards Chichester. The site lies in a sustainable location abutting a settlement boundary; there are local shops adjoining Broadbridge Station approx 500 m away (located on the main south coast line) including a co-op store, and an off-license/paper shop, there is also a larger co-op store, post office and doctor’s surgery at the roundabout on Delling Lane, within a short walking distance of the site. Chichester is approximately 4 km away with its full range of shops and services. There are regular bus services along the A259, between Chichester, Old Bosham to the south and Southbourne and Havant to the west. There is a primary school in Bosham (approx 1.5 km away) and secondary schools in Southbourne and Chichester. Access to the site is directly from the A259 to the south of the site, which itself provides transport links between the site and the wider area.</p> <p>2.3 The Neighbourhood Plan has to be considered against the background of the adopted Key Policies Local Plan as it has to be in conformity with both it and National Planning Policy. There remains an overriding presumption in favour of sustainable development and to boost the supply of houses. The Key Policy Plan makes provision to deliver 7,388 homes over the period</p>
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			<p>2012-2029 with the East-West Corridor providing 6,156. This includes several strategic sites and small allocations in other parishes. The Key Policies Local Plan sets out a requirement of 50 dwellings for Bosham Parish, sites to be determined by the Neighbourhood Plan. However, in terms of the District – wide housing requirement, the Local Plan currently does not meet the objectively assessed housing need, a matter that should be reviewed within the next 5 years<sup>8</sup>. If further housing land is required, this will fall on areas such as Highgrove Farm that are not constrained by environmental designations such as the National Park and AONB. The current draft Neighbourhood Plan should not be approved therefore because it is inconsistent with the NPPF. Instead the site at Highgrove Farm which is not located in the AONB could be designated for 50 – 60 dwellings.</p> <p>2.4 The Highgrove Farm site provides perhaps the only real opportunity to develop land in the Parish for housing in sufficient levels to provide affordable housing and other aspirational community facilities including a replacement school, allotments and additional public open space together with a replacement church hall and cricket pitch. The site lies outside and beyond the AONB in a highly sustainable location within a few minutes walk of the railway station and local facilities.</p> <p><b>3.0 Representation</b></p> <p>3.1 In brief, the site at Highgrove Farm, Broadbridge, Bosham should be allocated for residential and community use. The site has been promoted through the District Local Plan and SHLAA process and, by invitation, at public exhibitions held during the Neighbourhood Plan preparation process. As part of the representations a number of documents have been prepared and submitted. As stated earlier it is not considered necessary to resubmit these documents at this stage but they do however continue to be relevant. These documents included:</p> <ul style="list-style-type: none"> <li>• Scheme layout (prepared by Simon Cooper Associates);</li> <li>• Landscape Visual Impact Assessment (prepared by Terra Firma Landscape Architects);</li> <li>• Transport Assessment (prepared by Paul Basham Associates);</li> <li>• Flooding and Drainage Strategy Report (prepared by Paul Basham associates);</li> <li>• Ecology Report (prepared by White Young Green)</li> </ul> <p>3.2 This technical evidence previously submitted demonstrates convincingly that development of this land can be achieved without detriment to the village and its wider context, or causing</p>
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		<p>harm to interests of acknowledged importance, as the site lies outside the AONB and the National Park, and is one of the few sites in the locality about which this can be said. The site is sustainable and can provide many of the social and community aspirations set out in the justification paragraphs relating to Neighbourhood Plan Policy 5 namely a replacement community hall, land for a replacement school and also provides significant open space for both formal and informal recreation. The school in Bosham village cannot at present expand because it is confined by the size and location of its site and there is a shortage of community meeting space. The site at Highgrove Farm is able to deliver much needed community benefits, including the provision of land for a new primary school with community hall. Such accommodation would also likely satisfy a wider community need for the local church. Policy 5 states that any proposal for the extension or relocation of the primary school will be considered as an exception to other policies of the BPNP. Such a relocation of the school and new community facilities will realistically never happen unless enabling development is permitted to support it, and the BPNP is short-sighted in this respect.</p> <p>3.3 The District Council's SHLAA (May 2014) continued to include Highgrove Farm as a site [BB08195] considered suitable for development for up to 265 dwellings<sup>9</sup>. The site is neither within the AONB nor the South Downs National Park and is therefore unconstrained by national designations. This site is situated in a sustainable location on the edge of a settlement where the proposed development would create an extension to the eastern edge without significant detriment to the landscape qualities of the area (with appropriate boundary treatment). Access can be obtained directly from the A259. The Council's Settlement Capacity profile for Bosham, confirms that Broadbridge is less constrained than the old village of Bosham, has a railway station and could accommodate some additional housing development. The eastern side of the settlement is less sensitive in landscape terms than land to the north and west but with sensitive design and respect for long distance views, the site can be developed without significant harm. The proposals for the site demonstrate how this can be achieved. The site would also be able to contribute significantly to the affordable housing needs of the District.</p> <p>3.4 Land at Highgrove Farm is sustainable, deliverable and available.</p> <p>4.0 <a href="#">Specific comments on the Submission BPNP</a></p> <p>4.1 The following comments are made with reference to specific points made in the Draft Neighbourhood Plan and numbering will refer to respective paragraph numbers in the Plan:</p>
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		<p>acknowledged in the BPNP the Parish has very small amounts of available land for housing within the constraints set by the AONB. The NPPF makes it clear that policies relating to sites in Areas of Outstanding Natural Beauty have the highest levels of landscape protection.</p> <p>4.4 The Chichester Local Plan Inspector concluded there were several reasons why the Local Plan could not accommodate the full OAN in accordance with the NPPF and one of those reasons was the constraint of the AONB. Ironically the Bosham Plan is proposing all of its housing allocations within the AONB under Policy 2. It follows therefore that Policy 2 is wholly inconsistent with the NPPF and the Local Plan Inspector's findings.</p> <p>4.5 The recently adopted Local Plan for Chichester says. <i>"The Chichester Harbour Area of Outstanding Natural Beauty (AONB) covers a significant part of the Plan area. AONBs are national designations that have the highest status of protection in relation to landscape and scenic beauty. In accordance with its designation, the AONB is given great weight in determining planning applications. The Chichester Harbour AONB Management Plan sets out how the area should be managed. Its management principles include the need to conserve and enhance the area's natural beauty and to retain the quiet, undeveloped nature of parts of the AONB (see Policy 43)."</i></p> <p>4.6 The Adopted Local Plan devotes a section to the Chichester Harbour AONB<sup>13</sup> and whilst acknowledging that communities within the AONB have development needs<sup>14</sup>, in the case of the Bosham NP, where better, more appropriate land for development is available and developable outside the AONB, there is a clear conflict of Policy 2 in terms of the NPPF and the adopted Local Plan.</p> <p>4.7 It is clear from the consultation response from the Harbour Conservancy at the Pre submission Policy stage that there were particular objections to Policies 1 and 215 of the Bosham NP.</p> <p>4.8 Section 4 of the BPNP says at paragraph 4.1 says that 84% of the Parish is within the AONB and it is vital that proposals do not have significant adverse impacts on this land. It then says, at Paragraph 4.4 that any development to the east or west of Broadbridge to the north of the A259 would be contrary to a fundamental objective of retaining the separation of settlements. It has been demonstrated by previously submitted documentation, including a full LVIA for Highgrove Farm concluding that some adverse landscape effects will stem from the</p>
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			<p>change in land use of the site itself as the area is currently an arable field and is proposed to partly become areas of residential development, affecting the landscape character of the site through the change of land use. This is common to any change in the landscape but the evidence suggests there is no significant adverse effect which provides the acid test. However, it also says that the proposed development also has some beneficial landscape effects that arise from the provision of extensive green infrastructure, including replacement of boundary hedge lines and tree planting, amenity open space and ecological areas that enhance and reinforce the landscape character and biodiversity of the wider area and the strategic gap, reducing the adverse effects of the introduction of built form. Any adverse visual effects are considered at worst, moderate from representative viewpoints adjacent to the site boundary but these reduce in effect with summer leaf cover to moderate / minor adverse and over time with the maturing of vegetation to moderate/minor in winter and minor adverse in summer. Adverse effects on other representative viewpoints reduce due to intervening existing features and proposed hedge and tree planting within the site itself. Long distance views from the AONB are not possible due to topography and intervening vegetation and long distance views from the SDNP are possible but when seen in the context of the wider panoramic view, the visual effects of the proposed development are minor. It concludes that proposed landscape strategy is appropriate to local policy and guidance and adverse landscape and visual effects of the proposed development are not of significance and should not prevent the development of this site.</p> <p>4.9 Paragraph 5.11.4 of the BPNP confirms that there is a serious shortfall of affordable housing within the parish with a known waiting list of 50 households at March 2014. THE BPNP has to conform to the adopted CDC Key Policy Local Plan policy 34 in terms of affordable housing which says that 30% affordable housing should be provided on site on all sites of 11 or more dwellings and on sites of 6-10 dwellings, in designated rural areas (including AONB), a financial contribution will be sought. Whilst there is a concern regarding second homes, the BPNP with its small site allocations in the AONB will achieve very few affordable houses. The Highgrove Farm site could provide up to 60 affordable homes with occupancy controlled by legal agreement if considered a strategic housing site but in the short term 18 affordable units would be delivered as part of a 60 unit scheme.</p> <p><b>4.10 Policy 1 Settlement Boundaries</b> Map 1 of the BPNP shows the proposed changes to the settlement boundaries to accommodate the proposed allocations. The extension to include Bullock Barns has some logic,</p>
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		<p>it being clustered around the roundabout, albeit still in the AONB. However the inclusion of Dolphin House, is less so, as there is no logical boundary and it is within the AONB. The inclusion of part of Swan Field and Oakcroft Nurseries is clearly illogical and unacceptable as these sites have no bearing on the topography or form of the existing built up area.</p> <p><b>4.11 Policy 2: Housing Allocations.</b>  The sites selected in the Neighbourhood Plan for development to provide 50 dwellings are all within the AONB, contrary to a fundamental objective of the Neighbourhood Plan, the Chichester Local Plan and the NPPF. It is noted that no significant changes have been made to housing allocations in the Submission version of the BPNP. Our comments essentially remain as before.</p> <p>4.12 The allocated sites are:  <i>SHLAA BB08198. Bullock Barns: 8 units (Requires on-site sewerage unit, Brownfield Land)</i>  This site is located within the AONB and will deliver no significant affordable housing given the small nature of the proposal. The site is identified as a Wet spot (Plan p 50), therefore there may be constraints on development.</p> <p><i>SHLAA BB08194. Oakcroft Nurseries: 23 units. Considered unsuitable by Chichester District Council, brownfield, minor flood risk, on-site sewerage unit required</i>  Described by the District Council in its updated, SHLAA May 2014 as Land south of Walton House, it is described as having no potential as it is unsuitable because of its isolation from the settlement. The site is also located within the AONB. The Parish has included it because it considers it to be previously developed land – it is a derelict greenhouse, part of a horticultural unit and as such is not normally considered as brownfield land but a rural land use; the definition of previously development land excludes agricultural buildings. Either way, it does not make it suitable for development, particularly in this location.</p> <p><i>SHLAA 08185 Dolphin House: 5 units. Brownfield.</i>  This allocation is insignificant in terms of numbers, although it would extend linear development northwards on this west side of Delling Lane, visually reducing the gap between the two parts of the settlement.</p> <p><i>SHLAA BB08197 Swan Field : 25 units. Onsite sewerage required.</i>  The District Council describes the site as within the AONB and very open to the south, and</p>
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		<p>forming part of the Broadbridge/Bosham gap, with a low landscape capacity for development. It is Grade 1 Agricultural Land. It considers that development of this site would be in conflict with the NPPF. The Neighbourhood Plan is proposing that just part of this site would be developed, however it does not have a natural southern boundary and would artificially divide this area. Its' development would have a severe impact on the already limited gap between Bosham's historic village and Broadbridge. Once again due to the small nature of the site, no significant affordable housing would be forthcoming. Furthermore, it will only come forward if the Bullock Barns site is developed first, therefore there is doubt as to its delivery. It is on a site identified as a site used by Brent Geese (Plan on p 44 of the BPNP), casting further doubts as to its suitability. For the reasons above, it is not considered that the housing allocations proposed in the Submission BPNP can provide the 50 dwellings required in the Key Policies Local Plan. The land at Highgrove Farm has none of these restrictions. In our opinion therefore despite the submissions made by the proponents of the NP, the fundamental conditions contained in the NPPG16 have not been met because of the conflict with the NPPF and the adopted Chichester Local Plan.</p> <p><b>4.13 Policy 3 – Criteria for Housing Development</b>  This section includes a range of criteria including affordable housing provision, provision of a varied mix of housing with a high quality spatial design. The size and scale of housing land allocations in the BPNP hardly justifies these criteria. Development of Highgrove Farm would be able to provide affordable housing and a wide range of house types and sizes.</p> <p><b>4.14 Policy 7. Landscape and Environment</b>  The Neighbourhood Plan aims to conserve and enhance the natural beauty and locally distinctive features of the AONB, to protect the integrity of the open rural character of the Parish and to ensure that development retains the rural landscape character of the area and protects the most versatile agricultural land</p> <p>The allocations referred to above are all within the AONB described above; with the possible exception of Bullock Barns, their development would have an adverse impact on the integrity of the gap between the two built up areas of the Parish, and on the open undeveloped rural character of the AONB.</p> <p><b>4.15 Policy 8. Ecology, Wildlife and Biodiversity</b>  This Policy says the development proposals must protect and enhance the biodiversity value of the site, or have any demonstrable harm to protected habitats or species. One of the allocated</p>
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		<p>sites is used by Brent Geese, therefore its allocation would be contrary to this policy.</p> <p>An Extended Phase 1 Habitat Assessment has been prepared for Highgrove Farm which does not identify any significant constraints and makes recommendations for enhancements. The proposals include significant areas of open space.</p> <p><b>4.16 Policy 9: Flooding and Drainage</b>  This Policy requires that flood risk and the effects of flooding must be taken into account in the determination of all development proposals.</p> <p>An FRA and Drainage Statement have been prepared for proposals for Highgrove Farm including 150 residential units, a 420 pupil school and a church hall. The site is located in Flood Zone 1, which is suitable for all types of development, but must not increase the flood risk elsewhere. A drainage strategy has been prepared based on positively draining all hard surfaced areas, restricting the outflow to greenfield run-off rates and attenuating the excess water within oversized pipes, a cellular storage system with the central area of POS, and a balancing pond in the southwest corner. Due to the level nature of the site, surface water has to be pumped from the cellular storage system to the remainder of the system further south. The risk of fluvial flooding is not increased as a result of the proposals and the risk of groundwater flooding is substantially reduced as all hard paved areas will be positively drained under the proposal. In terms of foul sewage disposal the preferred means of disposal is to connect to an existing manhole in Brooks Lane, upgrade the existing Delling Lane sewer and the Stumps Lane Pumping Station. The proposals therefore comply with this policy in the Neighbourhood Plan.</p> <p><b>5. Legal compliance</b></p> <p>5.1 A Neighbourhood Plan will be part of the statutory development plan for the area and so must conform to national policy and existing strategic local planning policy. It must not promote less development than identified in the plan for the local area but can allow greater growth levels.</p> <p>5.2 Neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. The BPNP is based solely on the minimum 50 residential unit allocation in the adopted Local Plan but currently proposes</p>
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		<p>additional dwellings. Where a Local Plan fails to meet its objectively assessed housing needs (as required in the NPPF) the Local Plan will need to be revised accordingly. Given the uncertainty regarding the housing requirements and the requirement for CDC to review the Local Plan within 5 years, the housing policies of the BPNP should be flexible to ensure that it can accommodate the housing needs that could be identified in reviews of the Local Plan within the period of the Neighbourhood Plan.</p> <p>5.3 A neighbourhood plan can allocate sites for development and should carry out an appraisal of options and assess individual site against identified criteria. There is insufficient evidence provided in this regard, nor do the allocations appear to stem from CDC SHLAA assessments. For example Swan Fields, as chosen in the BPNP is within the AONB and is grade 1 Agricultural land. In contrast, evidence has previously been provided to demonstrate the suitability of Highgrove Farm for housing: it lies in a sustainable location, outside the AONB and landscape evidence has been submitted by BDW demonstrating that landscape and visual effects of its development are not of significance and should not prevent the development of this site. Furthermore, although the land is currently in agricultural use, various planning appeal inspectors have determined that, while the loss of agricultural land is a material consideration, on its own it is not a significant issue that would outweigh the benefits of delivering housing particularly where there is a significant shortfall in supply. The site is separated from its nearest settlement by some 2.5 km and its development in the manner proposed would not cause coalescence of settlements. CDC's SHLAA has identified Highgrove Farm as being suitable for development.</p> <p>5.4 All the housing allocations made in the BPNP have fundamental issues relating to agricultural land quality, AONB designation, ecology and flooding, which would conflict with other policies with the BPNP. Furthermore they are too small to provide any significant affordable housing or contribute to a wider mix of housing in the Parish. The proposed sites would not make appropriate provision for even the minimum of 50 units required in the Key Policies Local Plan. Land at Highgrove Farm should be included as an allocation in the BPNP.</p> <p>6. Summary</p> <p>6.1 Highgrove Farm is identified in the District Council's 2013 SHLAA as having potential for housing development within 6-10 years, a time frame given to allow time for revisions to planning policy (such as alterations to the settlement policy boundary) and to find overall</p>
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			<p>solutions to infrastructure issues. This timescale does not prevent the site coming forward before that date.</p> <p>6.2 The Key Policies Local Plan sets an agenda for housing numbers and growth, and the council has a commitment to review this within 5 years. It is considered that insufficient evidence has been provided to show that allocated sites are the most appropriate. All of those sites currently identified for development are located with an AONB, which has the highest level of protection. Those identified on brownfield land are actually on greenfield sites within the AONB as the BPNP has erroneously described former glasshouses as brownfield. There is a lack of credible evidence upon which the allocations are based. Very few affordable houses will result given the nature of the small sites.</p> <p>6.3 It is considered that the Highgrove Farm site should be considered by both the District Council in the Review of the Local Plan, and the Parish Council in the emerging Neighbourhood Plan as being appropriate for residential development. The proposal will increase the supply of high quality and sustainable homes in Chichester, which will help to meet projected requirements, including the provision of affordable housing and will positively benefit towards the Parish of Bosham as it will provide for starter, family and affordable housing, provide community benefits (land for a replacement primary school, allotments and new much larger replacement church hall) and recreational space, including significant improvements to the biodiversity value of the land and appropriate mitigation against the likely level of potential disturbance to Chichester Harbour SPA. The site is available, suitable and deliverable.</p>
Chichester Harbour Conservancy (014)	09.10.15	Email	<p>Members of the Conservancy's Planning Consultative Committee have been consulted as to their views on my attached Officer report, under the partially delegated protocol.</p> <p>The responses received endorse the enboldened and italicised recommendations within the report. Some additional comments have also been made by Members. Can these also be passed to the examiner for their consideration.</p> <p>Those additional views are –</p> <p>“Looks good only thought is where you talk of North A259 in the context of development should you emphasis the this is the only part of the village outside the AONB. It is disappointing they are prioritising protection of the strategic gap (as it used to be called) over the AONB.”</p>

		<p>“I totally agree with all your comments. The “presumption in favour of sustainable development” is quoted from the National Planning Policy Framework but I didn’t find the quotations from the Conservation section. My impression is that in several places the weight of consideration given to the AONB does not reflect NPPF 115: “Great weight should be given to conserving landscape and scenic beauty in ... Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.” This, then applies to 84% of the Neighbourhood Plan Area according to the BPNP.”</p> <p>“I am in agreement with the comments made. Ideally I would like to see the comment under Policy 3 iv stronger so that rather than “promoting” native species we should be “expecting” plantings to be of natives, indeed of appropriate natives i.e. ones that have meaning in the local landscape and the ones that give it distinctive character. As I mentioned earlier today these plantings may well be there long after the developments they screen have been replaced.</p> <p>Under Policy 7 an observation is that although poor agricultural land might be preferred for development over good, but these would also be the places to make green open space as poor sites make much better herb-rich grasslands, better for wildlife and needing less management by mowing etc. Flower rich grasslands are much more threatened than ancient woodland these days and in shorter supply, they can also be created more easily where suitable sites come available.”</p> <p>Summary of Conservancy’s planning officer views:</p> <p>RECOMMENDATION:</p> <p>Officers are recommending that the <b><i>bold and italicised text</i></b> which follows, should be forwarded as the Conservancy’s further comments on the Neighbourhood Plan (NP).</p> <p>Italicised text which is not bold, is taken verbatim from the Submission version of the NP.</p> <p><u>General overview:</u>  The Conservancy’s previous Officer delegated comments on the Pre-submission version are set out as <b>Appendix A</b> to this report. <b>Those shown <i>italicised</i> in Appendix A, have not really been addressed by the Parish Council and should be re-stated.</b></p>
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		<p>Policies have been re-ordered, re-written and some (tourism) absorbed into the Commercial &amp; Economic Development Policy.</p> <p>In general terms, links to local and national policy and existing guidance are summarised after each Policy.</p> <p>Previous Census figures have been dramatically corrected in some cases. Population/households has dropped from 4,256 to 2,900 / 1,833 to 1,328 respectively for example, having obvious implications for development demanded by residents to meet their needs up to 2029.</p> <p>Much of the evidence base material has been removed to a stand alone 'Consultation Statement' supporting the NP.</p> <p>General strategy to retain separate identity and not coalesce east or west with others remains and the status of the AONB is given greater emphasis in the strategy.</p> <p>A prescriptive requirement for on-site sewage works has been tempered to being certain a technical solution and adequate capacity exist before permission is to be granted.</p> <p><b>Policy 1 – The Settlement Boundary</b>  Strategy now more closely aligned with Chichester Local Plan (CLP) Policy 2 and Bosham's place in the identified settlement hierarchy –</p> <ol style="list-style-type: none"> <li>1. <i>Respecting the setting, form and character of the settlement;</i></li> <li>2. <i>Avoiding actual or perceived coalescence of settlements; and</i></li> <li>3. <i>Ensuring good accessibility to local services and facilities</i></li> </ol> <p><b>Policy 2 – Housing allocations</b>  <i>Whereas Map 1 now omits Swan Field and Oakcroft Nursery as extensions to the settlement boundary, Map 2 still shows them as housing allocations. Either this is a drafting error, or the Parish is arguing they are rural exception sites. This needs to be clarified. The planning application for a Hospice at Oakcroft is acknowledged, yet the Parish still want to allocate the land for housing.</i></p> <p>Mention is made of the District allowing sites under 6 dwellings to be counted towards the 50</p>
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		<p>dwelling allocation for Bosham up to 2029, yet then says such ‘windfalls’ are excluded by the EIP Inspector making her minor modification 18 to the Local Plan.</p> <p><b>No further consideration that housing be placed north of the railway station and combined with new parking for the station has been given.</b></p> <p><b>Policy 3 – Criteria for housing development</b></p> <p>Housing is to be directed to the defined Settlement Policy areas, where –</p> <p><i>Housing on the allocated sites must –</i></p> <p><i>(i) provide at least the required percentage of the total number of dwellings as affordable housing (as defined in the NPPF) with a mix of tenure types designed to meet the housing needs of individuals, couples and, or, families on the CDC Housing Register with a proven local connection to the Parish of Bosham; (NB CLP34 does now say any net increase in dwellings)</i></p> <p><i>(ii) provide a varied mix of suitably-sized market housing in keeping with, and wherever possible enhancing, the character of adjacent residential areas; words ‘wherever possible’ could be deleted, otherwise most developers will say it’s not possible or required.</i></p> <p><i>(iii) comply with the highest standards of design and sustainability by achieving as a minimum, Level 5 of the Code for Sustainable Homes or equivalent Building Regulations standards whichever is the most up to date, use locally common materials wherever possible and provide for optimum Broadband connectivity; Code for Sustainable homes no longer exists so will have to find some other form of words.</i></p> <p><i>(iv) be designed within a layout that observes high standards of spatial design including green spaces and gardens which make and maintain provision for locally naturalised flora, fauna and wildlife; cannot expect the developer to provide wildlife! Better to just say promote use of native species planting, with best potential to attract wildlife.</i></p> <p><i>(v) be designed to minimise any increase in the generation of vehicular traffic and provide safe and convenient access and links to all local services for pedestrians and cyclists by way of</i></p>
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		<p><i>professionally designed footpaths and cycleways; <b>not sure what this means. Do they want 'skinny streets' with tightly defined geometry? Surely main requirement is to provide for safe access at an appropriate speed (covered in criterion (vi) below), favouring the pedestrian and cyclist over the motorist.</b></i></p> <p><i>(vi) demonstrate that the local road network can safely accommodate the development and that there is safe vehicular access to the site; any highways improvements necessary to make the development acceptable in terms of pedestrian or vehicular safety, traffic management or the mitigation of potential congestion must be provided either as part of the development itself or by a highways agreement and/or by planning obligations;</i></p> <p><i>(vii) must make suitable provision appropriate in scale and extent to meet all local requirements, whether on-site or via commuted payments, for increased education facilities, for green infrastructure and for public open space; <b>not sure this is compliant with CLP9 (e. g. Does any net gain in dwellings have to make a contribution to education? And need to mention CIL, which is due to be introduced by CDC in the future.</b></i></p> <p><i>(viii) must comply with all the requirements of BPNP Policy 9 - 'Flooding and Drainage' and demonstrate that prior to any planning application purposeful consultations with the Environment Agency and the West Sussex County Council (as the Sustainable Drainage Systems Approving Body) have taken place; <b>what about Southern Water?</b></i></p> <p><i>In addition, development on Bullock Barns and Burnes Shipyard must investigate archaeology.</i></p> <p><i>“(B) Proposals for residential or housing development of sites not allocated under Policy 2(A) may be permitted provided that the development proposed;</i></p> <p><i>(i) is either within the Settlement Boundary (defined under Policy 1) or is covered by Policy 4(B) or is for the small-scale redevelopment (to create no more than 6 dwellings) of previously developed land outside the AONB; and,</i></p> <p><i>(ii) meets all the requirements of (A) above.”</i></p> <p><b><i>Policy 3B is too permissive outside settlement boundaries as does not stipulate either</i></b></p>
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		<p><i>rural exception sites or for agricultural workers needing to live in the countryside as a first consideration and just implies general needs housing may be acceptable.</i></p> <p><i>Query accuracy of Notes 1 and 2 to Policy 3. CLP34 says any net gain in housing must contribute towards affordable housing and does not distinguish between whether a site is within or outside of an AONB. Note implies that in Bosham village or the AONB, 40% affordable must be provided, not 30% under CLP34.</i></p> <p><b>Policy 4 – Commercial and economic development</b></p> <p><i>Reference is made to retaining Broadbridge Business Centre in employment use, yet this has sadly been undermined by a recent prior approval. The Policy also then goes on to say the Parish will be flexible on this site, so there seems little point in seeking to safeguard it. Indeed, the whole raft of prior approval flexibilities introduced for farm buildings (albeit their conversion to up to 3 dwellings is NOT permitted in AONB's) is not acknowledged and ought to be.</i></p> <p>Evidence on economic activity, previously in a table from the 2011 Census, is now referred to in a paragraph of text. 36 local businesses were consulted in preparing the plan, with most of the 21% in AONB, seeing that designation as a positive thing for their business.</p> <p><b>Policy 5 – Community facilities</b></p> <p>The possibility of relocating the Primary School is still talked about (albeit relevant at Officers at West Sussex County Council have previously said to Steve Lawrence they have no plans in this respect. The location talked about is currently open countryside, albeit recognised on the District Council's SHLAA map as having potential to accommodate some housing.</p> <p><b>Policy 6 – Heritage</b></p> <p>More specific reference has been made to distinctive historic features within the Parish such as the stream corridors and ancient woodland. This is good because the distinctiveness of the Parish is being set out. There is also continued reference to specific features within the Conservation Area, whose character and setting need to be safeguarded.</p>
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		<p><i>into the northern part of the Harbour.”</i></p> <p><i>“5.18.2 Two 20mph limit areas are planned. The first is to the north of the A259 including all roads from the level crossing southwards. Secondly, south of the A259 to include all of Walton Lane and Delling Lane from north of Green Lane and southwards to include the whole of the rest of the village except Taylors Lane. These planned improvements are very much welcomed and seen as necessary irrespective of any future development.”</i></p> <p><b>As written, the first part of the Policy says all development must be subject to the sequential test (i.e. consider least flood risk areas first), whereas in fact this stipulation only applies to Flood Risk areas 3.</b></p> <p>A lot of descriptive text about Bosham’s drainage and how it functions has been removed from the document, but two paragraphs giving evidence on drainage have been added.</p> <p>An emphasis on the developer carrying out capacity calculations is stressed and Southern Water now seem to be agreeing that additional headroom capacity would be required to support new development.</p> <p><b>Policy 10 – Transport and Highways</b></p> <p>Reconfiguration of the main car park is still talked about, but all reference to increasing the number of spaces from 250 to 400 has been omitted (presumably because the ‘stress’ caused by tourism does not want to be encouraged to increase, but merely managed by the Parish).</p> <p>Much of earlier text has now been re-written as aspirations, such as minimizing traffic from new housing development.</p> <p>An update is that the introduction of 20 mph zones is intended, principally to improve the safety of children walking to school and this is welcomed by the Parish.</p> <p>Appendix A:</p> <p><b>Summary of Conservancy’s comments on pre-submission version of Bosham Neighbourhood Plan, sent to Parish Clerk 13 February 2015</b></p>
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		<p><i>Particular concern for Swan Field and Oakcroft nursery having been identified for significant new housing, as both within AONB, with Swan field having greater landscape impact;</i></p> <p>Commended level of research and community participation;</p> <p>Statements on controlling future levels of visitors perhaps a little aspirational and beyond plan's control;</p> <p>General comment that Policy numbering should be separated from paragraph numbering;</p> <p>More work required to set out distinctiveness of Bosham and what developers ought to design for;</p> <p>If matter not controllable under Planning Act, then little point in having a land use policy seeking to control it;</p> <p>Policy 34 seeking a higher % of affordable housing than the Chichester Local Plan unlikely to be tenable, unless compelling evidence given. The Secretary of State for Communities and Local Government has just been given leave to Appeal the High Court ruling quashing the 28.11.14 Ministerial statement that sites of 10 or less dwellings should not be expected to contribute towards affordable housing. A further judgement could have implications for this Policy;</p> <p><i>Definition of 'local people' in glossary of terms needed to ensure new housing genuinely goes to those resident in village;</i></p> <p>If seeking to restrict development in certain areas, better to shade on Proposals Map and link to Policy 45 in Chichester Local Plan;</p> <p>Housing requirements from the local plan need to be recognised as minima in the NP; Oakcroft nursery site does not call for on-site sewage treatment - is that an omission?;</p> <p>SHLAA comments and Brent Geese/Waders constraints to putting forward housing sites;</p>
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			<p>Protection of best quality agricultural land could better be illustrated using map showing land classifications;</p> <p>Requirement for development being served by own onsite sewage treatment works needs to be tempered by scale of development being sought;</p> <p>Cannot expect sewage works outside the NP area and their improvement to be bound by NP policies;</p> <p>Would be useful to show current map of EA flood zones and refer to website in terms of up to date mapping thereafter;</p> <p>No need to repeat NPPF verbatim, just refer to relevant paragraphs;</p> <p>Aspirations for public transport need realistic targets in terms what S.106 money might be spent on to encourage greater usage;</p> <p><i>Same goes for intended new footpaths - show them on the Proposals Map and explain how to be delivered;</i></p> <p>Traffic statements supporting applications should be proportionate to scale of development being sought; Need best practice on cycle parking and whether should be covered with appropriate locations pinpointed on the 'ideas' map;</p> <p>If land is to be safeguarded for a particular purpose or new development, then it should be shown on the Proposals Map and clearly justified;</p> <p><i>No harm in clarifying what is meant by the word 'quality' in terms of design of new housing layouts - good to have concept diagrams to guide developers.</i></p>
Phoenix Planning Consultancy obo Mr & Mrs J	09.10.15	Email	Note the general rule that Neighbourhood Plan Examinations be carried out by written representations we request that the examiner ( once appointed) exercises his/her discretion to hold a public Hearing in this case as these representations give rise to concerns regarding the

<p>Hollond (015)</p>			<p>manner in which the BNP (as currently written) meets the relevant basic conditions and will require the input of other parties ( most notably the Chichester District LPA and third party landowners) if they are to be properly considered by the examiner.</p> <p><b>Paragraph Numbers: 5.10.1 – 5.10.4 /Policy 1 - The Settlement Boundary</b></p> <p>The Neighbourhood Plan must comply with the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004 and the <i>Basic Conditions Statement</i> submitted with the BNP asserts that it has been prepared in accordance with those basic conditions. The two basic conditions of most relevance to this aspect of our clients representations read as follows:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <i>the making of the neighbourhood development plan contributes to the achievement of sustainable development and</i></li> <li><input type="checkbox"/> <i>the making of the Neighbourhood Development Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)</i></li> </ul> <p>BNP Paragraphs 5.10.1 – 5.10.4 make it clear that the Policy 1 of the BNP is designed to implement and reflect the principles set out in Policy 2 of the Chichester Local Plan: Key Policies 2014-2029 (CLP) which Chichester District Council adopted on 14 July 2015 and that the settlement boundary established in the previous 1999 Local Plan has only been extended in the BNP so as to include existing development around Broadbridge on the south side of the A259 roundabout with Delling Lane as shown on Map 1 so that the Settlement Boundary has not been extended to include any of the BNP Policy 2 Housing allocations.</p> <p>CLP Policy 2 specifically states that Bosham is a service village that will be the focus for new development and facilities so that provision will be made for Small scale housing developments consistent with the indicative housing numbers set out in CLP Policy 5; Local community facilities, including village shops, that meet identified needs within the village, neighbouring villages and surrounding smaller communities, and will help make the settlement more self-sufficient; and Small scale employment, tourism or leisure proposals. <i>The policy also goes on to state that with these aims in mind “There is a presumption in favour of sustainable development within the Settlement Boundaries which will be reviewed through the preparation of</i></p>
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		<p><i>Development Plan Documents and/or Neighbourhood Plans, reflecting the following general approach:</i></p> <ol style="list-style-type: none"> <li><i>1. Respecting the setting, form and character of the settlement;</i></li> <li><i>2. Avoiding actual or perceived coalescence of settlements; and</i></li> <li><i>3. Ensuring good accessibility to local services and facilities”.</i></li> </ol> <p>The last paragraph of the CLP policy 2 then states that “<i>Development in the Rest of the Plan Area outside the settlements listed above is restricted to that which requires a countryside location or meets an essential local rural need or supports rural diversification in accordance with Policies 45-46.</i></p> <p>Therefore the purpose of the redefined settlement boundary areas is not just to define suitable housing sites but is also to define the area within which all new development will be focussed for the purposes of CLP Policy 2.</p> <p>We have considerable sympathy with the Bosham Parish Council and any other Neighbourhood Plan group in this district in having to interpret CLP Policy 2 (which is less than clear) when preparing Neighbourhood Plans (as they must in order to meet the basic conditions outlined) but logically meeting the principles in CLP Policy 2 when defining Settlement Boundaries must involve amending the existing boundaries so that they include the Housing sites allocated in BNP Policy 2 (where those sites meet sustainability principles and are deliverable (see our second representations below). Thereafter the BNP Policy 1 should be worded so as to reflect the last paragraph of CLP Policy 2 as stated in paragraph 5.10.4 of the BNP itself in the way that we suggest below.</p> <p><b>Paragraph Numbers: 5.11.1 – 5.11.19 Policy 2 - Housing Allocations</b></p> <p>On reading BNP paragraphs 5.11.1 – 5.11.19 it is clear that Bosham PC has been pressurised and to some extent misled by Chichester District Council into believing that they must include all of the sites suggested for allocation in order to “do their bit” in meeting district wide needs. This is not the case and has in our view led to the unnecessary inclusion of a number of sites in the allocations policy which should not be included as they are either not sustainable or not deliverable or both. (See also the site assessments undertaken by the Bosham PC itself included in the submitted Consultation Statement) .Therefore we have suggested below which allocations can and should be deleted for these reasons. The remaining sites together with the suggested amendment to the settlement boundary area and the windfall allowance would still</p>
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		<p>enable the BNP to meet/exceed the indicative numbers for the parish set out in CLP Policy 5.(50 dwellings).</p> <p>This said our particular concern relates to (iv) Dolphin House (the old poultry sheds) (SHLAA ref. BB08185).</p> <p>Despite representations made at earlier stages in the plan process the site proposed to be allocated continues to include land which is owned by our clients and is not available. (Site ownership information is available on request). It also remains to be an unsuitable housing site in terms of its distance and accessibility to village services and the development proposed remains undeliverable in terms of an inability to be satisfactorily accessed and its likely impact on protected trees and residential amenity.</p> <p>Since the site is unavailable, unsuitable and the development undeliverable the allocation should be deleted.</p> <p><b><u>Suggested modifications:</u></b></p> <p>Policy 1 – The Settlement Boundary Map 1 should be amended so that the Settlement Boundary includes those sites to be allocated (see below) and the policy reworded so that it reflects BNP Paragraph 5.10.4 and CLP Policy 2 as follows:</p> <p>Policy 1 - The Settlement Boundary (A) Within the Settlement Boundary there is a presumption in favour of sustainable development that will apply to proposals for development of an appropriate size and type for the settlement of Bosham/Broadbridge and which comply with the requirements of the other policies of this BPNP.</p> <p>(B) Outside of the Settlement Boundary development will not be permitted unless it requires a countryside location or meets an essential local rural need or supports rural diversification in accordance with CLP Policies 45-46</p> <p>Policy 2 - Housing Allocations Map 2 should be amended and the policy reworded as follows:</p>
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			<p>(A) The following sites within the settlement boundary shown on Map 1 as shown on 'Map 2 - Housing Allocations' are allocated for housing:</p> <p>(i) Bullock Barns (SHLAA ref. BB 08198) and (ii) Swan Field (SHLAA ref. BB 08197) with a combined site area of 1.74 hectares should provide for at least 33 dwellings</p> <p>(ii) Oakcroft Nurseries (SHLAA ref. BB 08194) - this 1.26ha brownfield site should provide for at least 23 dwellings;</p> <p>(B) Any residential or housing development on the sites allocated under (A) must fulfil all the requirements of Policy 3 - Criteria for Housing Development</p>
Carter Jonas Obo Burhill Developments Limited (016)	09.10.15	Email	<p><b>Policy 1 – Comments:</b></p> <p>Our comments relate to the settlement boundary and where this extends to and covers. The boundary runs adjacent to Shore Road in the southern area of Bosham and this includes all of the built-up area. However, the western boundary has been pulled back from the coastline and does not include the built-up area that runs adjacent to the Bosham Channel.</p> <p>In defining the settlement boundary, at paragraph 5.10.1, it states that the settlement boundary reflects the two distinct built-up areas of Bosham Parish. With this in mind, there is no justification as to why the built-up area along the western boundary of Bosham has not been included, and we consider the boundary should be extended to include this built-up area.</p> <p>This would result in the entirety of the built-up area of Bosham being covered by the same policies and planning-related objectives and ensure that a thoughtful, innovative approach to development is maintained.</p> <p>Include the built form along the western boundary within the settlement boundary.</p> <p><b>Policy 2 para A(v) - support</b></p> <p>We support the identification of Burnes Shipyard (SHLAA Ref: BB 08190) for the allocation of 2 dwellings in accordance with relevant guidance and advice provided by the Chichester Harbour</p>



			<p>Conservancy.</p> <p><b>Policy 3 – support</b></p> <p>We support Policy 3 with regards the housing sites that have been allocated under Policy 2.</p>
Bosham Parish Council (017)	12.10.15	Email	<p>Provided an agreed amendment to our Policy 3 note in line with the July ruling which saw the lower thresholds being reinstated following the High Court ruling with the Government's own Planning Policy Guidance amended accordingly. We understand that DCLG has since won leave to appeal the High Court <i>West Berks</i> decision on these affordable housing thresholds, and will keep an eye to incorporate the outcome if need be.</p> <p>Notes to Policy 3</p> <p>1. The <i>required percentage</i> is the percentage of the total number of dwellings to be built on the site that must be provided as <i>affordable housing</i>. The <i>required percentage</i> will be the percentage that accords with the CLP or any planning guidance that may supersede it and will always apply where the <i>threshold number of units</i> is permitted. On sites within the AONB, where the market value of housing is generally higher and partly as a result, the requirement for <i>affordable housing</i> greater, the <i>required percentage</i> will always be 10% higher than that applying outside the AONB and the <i>threshold number of units</i> will be lower.</p> <p>2. As at October 2015, for sites outside the AONB the <i>required percentage</i> is 30% and on sites within the AONB the <i>required percentage</i> is 40% affordable dwellings to be provided on any development which creates a net increase in dwellings, so (in accordance with Policy 34 CLP) the <i>threshold number of units</i> is 1 or more.</p> <p>3. On sites where the net increase in dwellings is 5 or less the <i>affordable housing</i> may be fulfilled by the payment of a <i>commuted sum</i> (rather than the provision of on-site affordable dwellings) at a rate per unit to be agreed between BPC and CDC and that relates precisely to the <i>required percentage</i> (of 30%, or within the AONB, 40%).</p> <p>4. For the avoidance of doubt, the site allocations under Policy 2(A) above that are outside the Settlement Boundary may, but need not, be developed as 'exception sites' under Policy 35 CLP. These sites may therefore be developed without the constraints imposed by Policy 35 CLP provided that all the elements of Policy 2 and Policy 3 above are satisfied.</p>

			<p>5. Affordable housing should be secured through planning obligations under <i>Section 106, Town and Country Planning Act 1990 (as amended)</i> to ensure that appropriate tenure types, threshold prices or rents and local occupancy requirements are met in perpetuity (these requirements can only be met by a s.106 agreement or undertaking - a planning condition is insufficient for this purpose.) At least the heads of terms of any such planning obligations should be agreed in advance with affordable housing officers at CDC and with BPC before a planning application is submitted.</p> <p>6. Subject to consultation with and the agreement of CDC affordable housing officers and BPC, any <i>commuted sum</i> payable instead of all or part of the on-site affordable housing requirement may be made and secured either through a s.106 planning obligation or via the Community Infrastructure Levy (CIL) provided that a clear, accountable and enforceable mechanism is agreed between BPC and CDC for the allocation of any such commuted sums to the provision of affordable housing within the Parish.</p> <p>7. The specific requirements of Policy 3(A)(vi) or(vii) for planning gain to be provided should be agreed by relevant CDC officers and with BPC and secured either through a s.106 planning obligation or CIL or a combination of both and in order to direct the planning gains obtained to the Parish.</p>
S Marchant (018)	09.10.15	Email	<p>I have revised submission at your suggestion. I have consulted with as many residents as I could in a short space of time and all are in strong agreement that something needs to be done about the situation. I was away on the occasions of the 2 public meetings that were held regarding Neighbourhood Plan. However having read the plan and discussed it with friends and neighbours we felt the following points should be made.</p> <p>The plan rightly points out the excessive speed of some motorists using Taylors Lane. This, however, is only the tip of the iceberg when it comes to speeding in the parish. Brooks Lane and Williams Road are used by many motorists trying to access the shops in Station Road. Many of these motorists speed through this residential area where many families with small children live.</p> <p>When arriving at the shops they often find chaos due to the inadequate parking facility. The plan, rightly, mentions this but with no apparent remedy. The whole area is crying out to be redeveloped by creating adequate parking with accompanying landscaping. This could be</p>

		<p>achieved by creating a car park alongside the Co op in Williams Road accessible from Station Road only.</p> <p>This would have the effect of making Williams Road a cul de sac. Not only would this give more appropriate parking for the area but would also stop Williams Road from being used as the local race track.</p> <p>The parking problems in the area are exacerbated by a lack of adequate parking at the station. Commuters not able to park there often use local roads or the small existing car park to park their cars. Any new car park should be time limited to encourage shoppers but dissuade commuters.</p> <p>Further problems arise with the arrival of the Co op delivery lorry. The driver often has no alternative but to use Williams Road adding to the general chaos of the area.</p> <p>The local MP and WSCC have been made aware of the problems but it appears little can be done until there is a serious accident. As you will be aware there have been numerous accidents here including the destruction of the much loved traditional frontage of Luscombes.</p> <p>Photographic evidence has been gathered by neighbours which can be made available. The names and addresses of those supporting these proposals can also be made available if needed.</p> <p>If nothing is done the problems will intensify as further building and population increases in the area will increase traffic flow.</p> <p>Adoption of the above proposals would enhance the quality of life for residents and visitors alike. It would also further a number of the plans policy proposals as follows.</p> <p><u>Policy 3 - Conservation of the Historic Environment</u> The traffic chaos at the Station Road shops detracts from the feeling of being in an historic environment. This is a gateway area and often the first port of call for visitors to the parish.</p> <p><u>Policy 6 - Visitors and Tourism</u> Visitor experience would be better accommodated bringing tourist income to the wider area.</p>
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		<p><u>Policy 7 - Transport, Communication and Footpaths</u>  Promotion of 20 mph limit as Williams Road becomes cul de sac.</p> <p>Potential impact of traffic on pedestrians/cyclists in the area will be minimised as well as the parking and congestion problems improved.</p> <p><u>Policy 8 - Local Economy</u>  It will support the on-going activity of local employer and food providers.</p> <p>Support highly significant local businesses.</p> <p>Support local retailers.</p> <p>By increasing the attractiveness of the area the likelihood of attracting increased business to the Swan Garage site improves.</p> <p>There will be an enhancement of the environmental quality.</p> <p>Noise pollution will reduce as proposals will act as a traffic calming measure.</p> <p>The Broadbridge area is an integral part of the parish and we believe the above proposals need to be given serious consideration.</p> <p><u>Bosham Parish Neighbourhood Plan 2014 – 2029</u></p> <p>I would like these comments to be taken into account regarding the BPNP In consultation with a good number of local residents I forwarded a submission via E Mail to Bosham Parish Council in December 2014. I received no reply. When I recently read in the parish magazine that the council required 50% of residents to vote on the plan for its acceptance I E mailed again to ask why my submission received no response. I was told that they had not received it and gave their apologies. This despite the fact I received no failed to deliver notification and a neighbour I had copied in had no problem receiving it.</p> <p>I now make this submission after a very quick consultation with other residents who are still in</p>
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		<p>agreement with the core points. This is not as comprehensive as it should be due to a lack of time.</p> <p>The plan rightly points out the excessive speed of some motorists using Taylors Lane. This, however, is only the tip of the iceberg when it comes to speeding in the parish. Brooks Lane and Williams Road are used by many motorists trying to access the shops in Station Road. Many of these motorists speed through this residential area where many families with small children live.</p> <p>When arriving at the shops they often find chaos due to the inadequate parking facility. The plan, rightly, mentions this but with no apparent remedy. The whole area is crying out to be redeveloped by creating adequate parking with accompanying landscaping. This could be achieved by creating a car park alongside the Co op in Williams Road accessible from Station Road only.</p> <p>This would have the effect of making Williams Road a cul de sac. Not only would this give more appropriate parking for the area but would also stop Williams Road from being used as a rat run.</p> <p>The parking problems in the area are exacerbated by a lack of adequate parking at the station. Commuters not able to park there often use local roads or the small existing car park to park their cars. Any new car park should be time limited to encourage shoppers but dissuade commuters.</p> <p>Further problems arise with the arrival of the Co op delivery lorry. The driver often has no alternative but to use Williams Road adding to the general chaos of the area.</p> <p>The local MP and WSCC have been made aware of the problems but it appears little can be done until there is a serious accident. As you will be aware there have been numerous accidents here including the destruction of the much loved traditional frontage of Luscombes.</p> <p>Photographic evidence has been gathered by neighbours which can be made available. The names and addresses of those supporting these proposals can also be made available if need be and I have no doubt a petition would receive many signatories. If nothing is done the problems will intensify as further building and population increases in the wider area will</p>
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		<p>increase traffic flow. Adoption of the above proposals would enhance the quality of life for residents and visitors alike. It would also further a number of the plans policy proposals.</p> <p><b>BPNP – Introduction</b> 1:2 The BPNP is not the product of a good many people of Bosham as their voice has not been heard. There is a widely held belief that if the aforementioned problems existed in Old Bosham a remedy would have been found before now. If local democracy is to mean anything surely it needs od be inclusive of all members of the community.</p> <p><b>2 The Neighbourhood Plan and its Vision for Bosham</b> <i>to encourage a thriving and prosperous community within an attractive landscape setting;</i>  <i>to maintain the scenic beauty of the AONB and adjoining landscape areas and the integrity of the distinct settlements and the areas that separate them;</i></p> <p>By adoption of the aforementioned proposals a step would be taken in meeting these proposals. The Broadbridge parade of shops is a Bosham gateway. Many people driving to Old Bosham stop at the shops. People arriving by train pass this area as do some bus travellers and walkers. This is the first impression many people get of Bosham is this area and it will often not be a very good first impression due the, often, appalling traffic conditions.</p> <p>Providing a good first impression also enhances many of the other objectives of the plan.</p> <p><b>4 Strategy</b> 4.1 Some 84% of the Parish lies within the Chichester Harbour Area of Outstanding Natural Beauty ("the AONB"). The land within the AONB is important in creating the attractive setting and environment of the Parish as is the rural land adjacent to and beyond the AONB including the views to the South Downs National Park. It is vital that development in the Parish does not have any significant adverse impacts on the landscape and the views it affords or on the AONB.</p> <p>As well as being a gateway area it also the place where many people leave the parish to enter the South Downs National Park or go to the station. Lets let them leave the parish with good memories.</p>
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		<p><i>4.3 The retail hub of the village centred around the A259 roundabout at Broadbridge should continue to be a thriving centre for local shops and a variety of community services and facilities. Sustaining local businesses and improving local facilities in this readily accessed location is one of the keys to the success of this Plan.</i></p> <p>The BPNP highlights the success of the Broadbridge shopping parade as key to success of the plan. There is a fundamental flaw in this if a good traffic management plan is not put into affect.</p> <p><i>4.7 the estimated 275,000 visitors to the Parish annually should be catered for and their needs managed. They are vital to a number of local businesses and the visitor experience and the impact they have could be better managed and provided for by some specific infrastructure and service improvements.</i></p> <p>Again good reason to consider residents proposals.</p> <p><b>5 The Neighbourhood Plan Policies</b></p> <p><i>5.3 The CLP Policy 2 continues that; "outside of Chichester city and the Settlement Hubs, the Service Villages will be the focus for new development and facilities. Provision will be made for the following:</i></p> <p><i>Local community facilities, including village shops, that meet identified needs within the village, neighbouring villages and surrounding smaller communities, and will help make the settlement more self-sufficient;</i></p> <p>There appears to be provision in the plan to initiate proposed changes.</p> <p><i>5.12.8 There has been concern that the widespread introduction of 20mph zones in residential areas of the Parish would be unpopular with businesses. However, 94% of them said that a 20mph speed limit on residential roads in the Parish would have no impact on their business, whilst 17% thought the business would benefit.</i></p> <p>Experience of living in Williams Road shows a number of motorists care little for speed limits and traffic calming is essential. There is the added problem of CO-OP delivery lorries using Williams road to exit the area. Drivers have said of the risks in trying to park in the area.</p>
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		<p><i>5.12.11 The business survey also considered vehicle movements, parking arrangements and space for expansion with 58% of businesses responding that they did not have sufficient space for expansion that would otherwise be desirable in the short term.</i></p> <p>A parking solution would greatly enhance local business. I have had a good many conversations with people outside the area that have tried to park to use the shops but have given up due to the dire traffic situations. Let's encourage this business.</p> <p><i>5.12.13 Aspirations</i>  <i>New opportunities should be found to intensify the activity at the site on the south-west corner of the Swan Roundabout, if possible by an appropriately designed mixed-use development. BPC would encourage a design brief to this effect and welcome any proposals for such a development that is consistent with the strategy and policy objectives of the BPNP.</i></p> <p>There is a knock-on effect of the traffic problems as there are times when traffic queues stretch back to the roundabout. Not creating a good impression if you wish to encourage new sustainable business.</p> <p><i>5.14.1 The settlements and the surrounding rural areas of the parish are rich in historic assets. These comprise listed buildings and structures, notably locally listed buildings, archaeological sites, ancient millstream and associated pond and sluices as well as the settings of and views from all of these discrete elements. Conserving and enhancing, as well as assisting the interpretation, understanding and appreciation of these historic elements are objectives of the BPNP and its Policy.</i></p> <p>The much loved traditional frontage of Luscombes was destroyed by a vehicle in part due to inadequate traffic management.</p> <p><b>5.14.10 Aspirations - redesigning the main car park</b></p> <p>Much has been made of the redesigning of the main car park in Old Bosham yet parking at Broadbridge shops although mentioned does not seem to warrant any suggestion of a solution. Why is this?</p> <p><b>Policy 7 - Landscape and the Environment</b></p>
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			<p><b>(ii) the integrity of the predominantly open and undeveloped rural character of the AONB and the wider Parish is not undermined either individually or cumulatively;</b></p> <p>The rural character would be enhanced by adequate traffic management at Broadbridge.</p> <p><b>(v) that the tranquil and rural character of the area is not undermined;</b></p> <p>The tranquil and rural character is being undermined by not fully acknowledging the scale of the parking problems and inherent risk to public safety.</p> <p><b>Policy 8 - Ecology, Wildlife and Biodiversity</b></p> <p>Increase car emissions due to current situation will not only have an effect on public health but likely effect ecology, wildlife and biodiversity.</p> <p>People feel very strongly about this situation and I would urge you to give it your due consideration.</p>
Chichester District Council (019)	07.10.15	Email	<p><u>Page 16:</u> Para 5.8 This sentence needs to be amended. The policies will form part of the development plan and therefore it will be a requirement for them to be taken into account rather than 'observed' as a 'guide'.</p> <p><u>Page 17:</u> Policy 1 The Settlement Boundary Criterion (A) - It is not clear what 'development of an appropriate size and type for the settlement' means. Development will need to take account of the character and appearance of the area and the policy should be reworded to reflect this.</p> <p>Criterion (B) (ii) – If the intention is to support development that requires a countryside location then this should be made clear. If it is other than this then again the policy needs to be worded to identify clearly what development is envisaged and what exceptions may be acceptable (e.g. a new school etc).</p> <p><u>Page 19:</u> Para 5.11.2 Delete the word 'an' after 'is'.</p>

			<p><u>Page 20:</u> Para 5.11.12 The last sentence is misleading. The allocation of land outside existing settlement boundaries is a recognised way of accommodating new housing.</p> <p><u>Page 22:</u> Policy 2 Housing Allocations Criterion (B) – Policy needs to be clear what is meant by ‘Any residential or housing development’. It should not include extensions and alterations to the dwellings once built.</p> <p><u>Page 24:</u> Policy 3 Criteria for Housing Development Criteria (A) (ii): The SHMA emphasises a need for smaller market units as they are generally more affordable. Repword criterion to enable a balanced mix. The mix of housing would be better informed by this and the character of the area, rather than solely the character of the adjacent residential areas. The policy should be amended to reflect this.</p> <p>Criterion (A) (iii) - Reference to the ‘Code for Sustainable Homes’ should be removed due to changes in government policy (March 2015).</p> <p>Criterion (A) (v) – what is meant by ‘professionally designed’? This should be either removed or defined.</p> <p>Criterion (B) (i) – there is no justification for the policy to limit the scale of development to 6 dwellings on previously developed land outside the AONB.</p> <p><u>Page 25:</u> <u>Notes to Policy 3 (1):</u> Remove reference to “or where the combined gross internal floorspace of the development exceeds 1000sqm” as this has been removed from the NPPG and it is not referred to in the Chichester District Local Plan.</p> <p><u>Notes to Policy 3 (2):</u> Incorrect reference is made to the requirement of 40% affordable housing on sites within the AONB; this should refer to 30% in accordance with the Local Plan. If the figure of 30% is to be varied it would require justification and evidence to demonstrate that the viability of the scheme.</p>
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		<p>Chichester Local Plan Policy 26 and Appendix E.</p> <p><u>Page 29-30: Bosham Primary School</u> The text clearly identifies issues relating to education provision and the recreation ground. This does not seem to be replicated in the section towards the end of the Plan related to Infrastructure Aspirations. This would benefit from cross referencing.</p> <p><u>Page 29: Community Facilities</u> Para 5.13.2 – This states that the village hall is not in need of any refurbishment or updating. This is inconsistent with the Council’s Infrastructure Delivery Plan that identifies the village hall for improvements. The Parish needs to clarify the position. If the village hall is in need of improvements then the text of the NP should be altered to reflect this and a cross reference to the need for this infrastructure should be included in Section 6. If not then the project will be removed from the IDP.</p> <p><u>Page 30: Policy 5 Community Facilities</u> With regard to any proposed loss of a community facility a cross reference should be included to the need for a marketing exercise in accordance with the requirements of the Local Plan (Appendix E) to provide adequate protection to such facilities.</p> <p><u>Page 37: Policy 6 Conservation of the Historic Environment</u> Criterion (A) (iv) – state Conservation Area Character Appraisal in full as forms part of the Policy rather than CACA.</p> <p>Criterion (B) (iv) – ‘provide adequate but appropriate parking’ – it is not clear what is meant by adequate or appropriate. Wording should reflect the highways authority standards/parking calculator and any exceptions should be made clear (eg in the interest of preserving and enhancing the conservation area/protecting listed buildings etc.)</p> <p><u>Page 48: Policy 9 Flooding and Drainage</u> Criterion (A) – Amend first sentence to make it clear the policy relates to applications within areas known to be at risk of flooding.</p> <p>Criterion (A) (iv) – it is not clear what is meant by ‘not result in coastal squeeze of any designated sites’. Amend to read ‘no encroachment of designated sites....’</p>
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			<p><u>Page 55: Policy 10 Transport and Highways</u> The text would benefit from aspirations for wider connectivity beyond the parish. Paragraph 5.18.3 could be amended to read 'Better footpaths and public rights of way linking areas of the village <i>and wider communities/destinations</i> would help address this issue'. Relatedly there is a local group promoting an Emsworth to Chichester cycle route <a href="https://www.facebook.com/chemroute">https://www.facebook.com/chemroute</a></p> <p>The transport aspirations would have greater clarity through an annotated plan/map. This should include the signage, bike racks and routes for addition/upgrade. Quantification would facilitate the addition of such infrastructure to the Infrastructure Delivery Plan with the associated estimated cost.</p> <p>Para 5.18.9: If items 3, 6 and 7 by inference refer to the production of 'feasibility studies', then the BNP would have greater clarity if the items were reworded to have specific reference to 'feasibility studies' (which would assess the aspiration and work up the costings necessary to make the aspiration more implementable).</p> <p>Para 5.18.9: Bullet point 8: add specific bus service numbers for clarity.</p>
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