

Selsey 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: Selsey Parish Council

Consultation Date: 9 February 2018 to 23 March 2018

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
Sport England (001)	13/02/2018	Email	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), 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. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Planning Policy Statement: 'A Sporting Future for the Playing Fields of England'. http://www.sportengland.org/playingfieldspolicy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p>

			<p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new</p>
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			<p>development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign</p> <p><i>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p>
Southern Water (002)	28/02/18	Email	<p>Southern Water understands the desire to protect land outside of the settlement boundary from development. However, we cannot support the current wording of Policy 003 where it states:</p> <p><i>'Outside the Settlement Boundary development will not be permitted unless it is specifically and expressly supported by another policy of the development plan and complies with all other policy requirements of the development plan.'</i></p> <p>This is because Policy 003 in its current form contains no allowance for the provision of essential utility infrastructure.</p> <p>Preventing development outside the built up area is not in line with the National Planning Policy Framework (NPPF), unless the land has been designated as Green Belt (Paragraph 89).</p>

			<p>Paragraph 80 of the NPPF establishes that one of the purposes of Green Belt land is <i>'to assist in safeguarding the countryside from encroachment'</i>. However, caveats necessarily exist, and in the case of Green Belts, paragraph 90 of the NPPF states that <i>'certain other forms of development are also not inappropriate'</i>, including <i>'engineering operations'</i>.</p> <p>Due to the need to connect into the existing sewerage network, there may be limited options available for the location of new sewerage infrastructure (e.g. a new pumping station), and since such works would be classified as <i>'engineering operations'</i>, it is considered that the provision of sewerage infrastructure constitutes appropriate development. The National Planning Practice Guidance (ref: 34-005-20140306) recognises this scenario and states that:</p> <p><i>'it will be important to recognise that water and wastewater infrastructure sometimes has particular locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered'</i> (our highlight).</p> <p>In addition, Policy 45 of the Chichester Local Plan states that:</p> <p><i>'Within the countryside, outside Settlement Boundaries, development will be granted where it requires a countryside location and meets the essential, small scale, and local need which cannot be met within or immediately adjacent to existing settlements.'</i></p> <p>As has been established, essential utilities infrastructure may require a countryside location, and so by restricting the provision of essential utilities infrastructure in the countryside, Policy 003 is not in conformity with the strategic policies of the development plan for the area.</p> <p>Therefore Policy 003 of the Selsey Neighbourhood Development Plan does not meet the basic conditions necessary for a Neighbourhood Development Plan (NDP), namely:</p> <ul style="list-style-type: none"> · to have regard to national policies and advice contained in guidance issued by the Secretary of State and contribute to the achievement of sustainable development. · to be in conformity with the strategic policies of the development plan for the area. <p>Our proposed amendment would accordingly be in line with the NPPF and NPPG and so enable</p>
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			<p>the basic conditions of a Neighbourhood Plan to be met (new text is underlined):</p> <p><i>'Outside the Settlement Boundary development will not be permitted unless it is specifically and expressly supported by another policy of the development plan and complies with all other policy requirements of the development plan, <u>unless it is required for the provision of essential utility infrastructure, where the benefit outweighs any harm, and it can be demonstrated that there are no reasonable alternative sites available</u>.'</i></p>
Historic England (003)	18/03/18	Email	<p>Thank you for your e-mail of 9th February advising Historic England of the consultation on the Submission version of the Selsey Neighbourhood Plan 2017. We are pleased to make the following comments in line with our remit for the conservation and enhancement of the historic environment.</p> <p>Whilst we welcome and support Policy 001 in principle, the requirements for new development to recognise the “distinctive character” of the Parish and for materials in any new development to complement the “established vernacular” seems rather at odds with the opening sentence in the section on Design and Heritage that “<i>there is no dominant architectural character or vernacular style to provide a reference for future development</i>”.</p> <p>However, if Selsey is characterised by “quite distinct areas defined by the different styles of architecture prevalent at the time of construction”, then perhaps Policy 001 should refer to these distinct character areas. We note that Part 3 of the previous version of the Plan referred to a character assessment that had been undertaken for the Plan area. However, we cannot find any reference to the character assessment in the revised version of the Plan (unless this is the “Neighbourhood Audit”?)</p> <p>Historic England previously welcomed the character assessment as we consider that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan, in accordance with paragraph 58 of the National Planning Policy Framework, which states that Local and Neighbourhood Plans should “... <i>develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be</i></p>

			<p><i>based on stated objectives for the future of the area and <u>an understanding and evaluation of its defining characteristics</u></i> (our underlining).</p> <p>As drafted we consider it doubtful that Policy 001 is really sufficiently robust or comprehensive to meet this requirement, but we do consider that the Neighbourhood Audit does provide the required “<i>understanding and evaluation of its defining characteristics</i>”.</p> <p>We welcome and support Policy 002, although again the issue of the character of existing development arises. The policy refers to Conservation Areas but the opening text to this section suggests that there is only one. We (and the National Planning Policy Framework) refer to the “significance” of historic buildings and sites, so we would prefer the third bullet point to say “...significance, local distinctiveness and character.....”.</p> <p>We welcome and support the third bullet point of Policy 006 that “<i>The proposal conserves and enhances key historic features of the existing building</i>”.</p> <p>We welcome the reference in the vision for 2029 to a design code working alongside national planning policy to help protect and enhance the town’s iconic buildings and heritage assets. However, we have previously noted that we could find no reference in the design code to the conservation and enhancement of the significance of heritage assets and now we cannot find any further information in the Plan about the design code.</p> <p>We are not sure why the section on Sustainability does not include any reference to the historic environment. The National Planning Policy Framework makes it clear that the conservation and enhancement of the historic environment is an integral part of sustainability: paragraph 7 refers to the three dimensions of sustainable development and the consequent need for the planning system to perform a number of roles, with “<i>contributing to protecting and enhancing our natural, built and historic environment</i>” part of the environmental role. Paragraph 9 states “<i>Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment</i>”.</p>
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			<p>We welcome the description of the historical development of Selsey in Annex B, including the sequence of historical maps. However, we consider that some more detail on the Selsey Conservation Area would be helpful - when was it designated and what is its special interest (the reason for designation)?</p> <p>We welcome the information on the grade I and 68 grade II listed buildings in the parish identified on the National Heritage List for England in Annex B. However, some further information would be helpful e.g. do they represent a particular period of development of Selsey? Are they concentrated in one place or scattered? Do they tell us anything about the history and historical development of Selsey?</p> <p>The National Planning Practice Guidance considers that it would be helpful for Neighbourhood Plans to include enough information “<i>about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale</i>” and “<i>about local non-designated heritage assets including sites of archaeological interest to guide decisions</i>”.</p> <p>We note the identification of “iconic buildings” on the map on page 6; does this constitute a list of locally important historic buildings? (Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity).</p> <p>However, what information is there on the Chichester Historic Environment Record about non-designated archaeological sites? Is there any information on historical landscape types in the Plan area in West Sussex Historic Landscape Character Assessment? (We do acknowledge that this information is not specifically required to meet the basic conditions).</p> <p>Although none of the heritage assets in the parish are currently on the Historic England Heritage at Risk Register the Register does not include grade II listed secular buildings outside London. Has a survey of the condition of grade II buildings in the Plan area been undertaken?</p>
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Highways England (004)	22/03/2018	Email	<p>Dear Neighbourhood Planning Team,</p> <p>Thank you for your email dated 9 February 2018 advising Highways England of the above consultation and seeking a response no later than 23 March 2018.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to</p>

			<p>ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case the A27.</p> <p>Having examined the revised Selsey Neighbourhood Plan 2017, we note that two sites have been granted planning permission, which will meet the Chichester Local Plan housing requirement of 150 dwellings for Selsey by delivering up to 249 dwellings as follows:</p> <ul style="list-style-type: none"> • Park Farm/Middle Field – up to 139 dwellings; and • Drift Field – delivering 110 houses. <p>Should further sites be identified, Highways England requests that we are kept informed for consideration of whether there would be a cumulative impact on the Strategic Road Network, and in accordance with normal national policy and procedure, we would also expect to be consulted on any applications or proposals that could impact on the safety or operation of the SRN.</p> <p>With regard to the Town Council’s comments with regard to improvements on the A27 at Chichester in Annex A, Highways England are continuing to work with partners to implement improvements to the A27 to accommodate development, while Highways England would not be agreeable to the creation of an additional access to the A27 Chichester Bypass from a spur road from either the A286 or the B2145 as it would potentially create further issues on the operation of the A27 Chichester Bypass.</p> <p>Thank you again for consulting with Highways England and please continue to consult us via our inbox: planningse@highwaysengland.co.uk.</p>
Natural England	23/03/2018	Email	Dear Neighbourhood Planning team,

(005)			<p>Thank you for your consultation regarding the Revised Selsey Neighbourhood Plan 2017.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals.</p> <p>We have reviewed the revised plan policies document however Natural England does not have any specific additional comments on this neighbourhood plan. In relation to our previous comments (our reference 208926), the following remains valid:</p> <p><i>“As the Neighbourhood Plan does not allocate new sites for residential development, there will be no impacts on internationally designated sites (Pagham Harbour Special Protection Area (SPA) and Chichester to Langstone Harbours SPA) through increased recreational disturbance. In this respect, we welcome the recognition of potential recreational disturbance impact in Policy 004.”</i></p> <p>If the Neighbourhood Plan changes and there is the potential for environmental impacts, Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening exercises may need to be undertaken.</p>
West Sussex County Council (006)	22/03/2018	Email	<p>Introduction</p> <p>West Sussex County Council (WSSCC) submitted representations to Selsey Town Council on 31 March 2017 as part of the pre-submission (Regulation 14) consultation on the Selsey Neighbourhood Plan (SNP). These comments were not included in Appendix 1 – Regulation 14 Schedule of Comments in the ‘Selsey Town Council Neighbourhood Planning Regulations 2012 (Part 5 s15) Neighbourhood Plan - Consultation Statement’ (August 2017). WSSCC have therefore taken the opportunity to repeat these comments as part of the consultation on the submission version (Regulation 16) of the SNP. In addition, WSSCC seek clarification on Policy 004, Policy 008 and Policy 013.</p> <p>The focus of the County Council's engagement with the development planning process in West Sussex is the new Local Plans that the Districts and Boroughs are preparing as replacements for existing Core Strategies and pre-2004 Local Plans. Whilst welcoming the decisions of so many parishes to prepare Neighbourhood Plans, the County Council does not have sufficient resources</p>

			<p>available to respond in detail to Neighbourhood Plan consultations unless there are potentially significant impacts on its services that we are not already aware of, or conflicts are identified with its emerging or adopted policies.</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.</p> <p>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>Strategic Transport Assessment</p> <p>The Strategic Transport Assessment of the Chichester Local Plan, adopted in July 2015, tested the cumulative impact of strategic development proposed within the Chichester District. The Strategic Transport Assessment identified the additional travel demand as a result of planned development, over and above development already committed plus background growth. The County Council worked collaboratively with Chichester District Council to inform the Strategic Transport Assessment and on the basis of continuous review of the work carried out, supports its conclusions.</p> <p>The Strategic Transport Assessment of Strategic Development Options identified the impact of the Strategic Development Locations on the highway network through a robust transport modelling exercise using the Chichester Area Transport Model (CATM). The study methodology was agreed by the County Council and Highways England.</p> <p>The Strategic Transport Assessment identifies a package of mitigation measures consisting of</p>
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			<p>improvements to junctions on the Chichester Bypass section of the A27 and smarter choices measures to encourage the use of sustainable modes of transport. The effects of smarter choices measures were modelled by applying a 5% reduction in car trips to / from the SDLs in 2031 to test the effects of development-specific travel planning and behaviour change packages. A 7% reduction in trips to / from Chichester city centre in 2031 was also applied to test the effects of area-wide smarter choices and local infrastructure measures. The study demonstrates that this package of mitigation measures is sufficient to accommodate the levels of development proposed within the Chichester Local Plan.</p> <p>The purpose of the Strategic Transport Assessment was to undertake an assessment of the transport implications of development proposed by the Chichester Local Plan on the highway network, identify the impacts and appropriate and feasible mitigation. Mitigation measures have then been included in the Infrastructure Delivery Plan that accompanies the Chichester Local Plan. The Strategic Transport Assessment took account of the sites allocated in the Chichester Local Plan and included a forecast estimate of background traffic growth.</p> <p>Policy 004 allocates land at Home Farm for temporary accommodation for agricultural workers. However, no detail is provided on the number of units proposed and therefore the County Council is not in a position to confirm what impact this development would have on the transport network. As the accommodation is for seasonal agricultural workers, it is assumed vehicle movements would be limited (please see WSCC's representations under Policy 004).</p> <p>On the basis that there are no other allocations for residential development in the Selsey Neighbourhood Plan, the Neighbourhood Plan is broadly considered to be in accordance with the forecast estimate of background traffic growth assumed in the Strategic Transport Assessment. The Strategic Transport Assessment indicates that there will be no severe impacts on the transport network that cannot be mitigated to a satisfactory level. WSCC confirm that no further strategic transport work is required, but further details will be required at the planning application stage for the proposals at Home Farm.</p> <p>The County Council currently operates a scheme of charging for highways and transport pre-application 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:</p> <p>http://www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_a</p>
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			<p>nd_projects/development_control_for_roads/pre-application_charging_guide.aspx</p> <p>Specific comments</p> <p>The vision for Selsey in 2029, as set out in Annex A, states ‘Selsey will have a renewed identity as a centre for eco-tourism, walking, cycling and bird watching. This identity will be promoted around the UK and Selsey will increase its profile and therefore economy as a result.’ The public survey 2012 results, also in Annex A, highlight the level of respondents that would support better pedestrian and cycle access in the area.</p> <p>Other than policy 009 there is no reference to public footpaths or footways, or how the walking and cycling vision will be achieved. Further consideration of cycling, pedestrian and equestrian access through the preparation of the Neighbourhood Plan is therefore requested. A suggestion, in order to achieve the vision, could be to support better connections with neighbouring parishes, so increasing the reason for seasonal visitors to stay and travel, and thereby spend, locally; this was a goal of the Selsey Destination Management Plan. Consideration could also be given to part of the local proportion of CIL being spent on improvements to support the Neighbourhood Plan vision and development of the area.</p> <p>Policy 004 Policy 004 is not clear or precise in terms of the amount of temporary accommodation for agricultural workers proposed at Home Farm. The policy needs to clarify this. It is unlikely that there will be any highway implications associated with the allocation of this site, but without understanding the amount of accommodation, WSCC cannot confirm this at this stage. Further details will be required at the planning application stage.</p> <p>Policy 008 WSCC suggest that the wording for this policy is revised to: ‘The principle of cross peninsular links will be supported’. The revised wording would support the principle of cross peninsular links rather than proposals which could include a wide range of different types of projects that have not been tested in terms of their suitability or impact on the environment.</p> <p>Policy 013 and Appendix 1 - Selsey Infrastructure Projects of Annex A Policy 013 relates to new retail and commercial development and sets out that it will support such development where ‘The provision of such facilities delivers enhanced community facilities as</p>
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			<p>identified in the Infrastructure Priorities list'. WSCC seeks clarification on the 'infrastructure Priorities list' - is this the list in Appendix 1 – Selsey Infrastructure Projects of Annex 1?</p> <p>It is not clear how the projects listed in Appendix 1 of Annex 1 would be required as part of retail and commercial projects e.g. education projects. It would be more appropriate if this list was linked to residential development or all development.</p> <p>Appendix 1 - Selsey Infrastructure Projects of Annex A – History, Design and Guidance Background Evidence</p> <p>The aspirations for transport improvements in Appendix 1 of Annex A have been noted. There is a note at the bottom of the table which should be included under the table heading to make it clear that the list of projects is not approved and planned to come forward, but it is a list compiled from feedback at the neighbourhood plan consultation exercise and responses to specific consultations. The 'Development Lead' column heading should be changed to 'Possible Development Lead'. As these are aspirational and not approved projects, the development lead may be different if the projects were to be taken forward, an example being the B2145 Ferry Bend improvements that are being led by the developer, not WSCC or STC.</p> <p>Annex A – History, Design and Guidance Background Evidence</p> <p>When consulted on planning applications, WSCC will take into account WSCC guidance. The 'Design and Guidance' (page 41 and 42) of Annex A should be consistent with WSCC standards. Therefore, WSCC recommend the following points are updated:</p> <ul style="list-style-type: none"> • WSCC garage dimension standard is 3x6m for garages to accommodate car and bicycle storage, not 3.5m as stated. • Regarding parking, please refer to the County Council's Guidance on Car Parking in Residential Developments and the Car Parking Demand Calculator for residential units and Parking standards and transport contributions methodology supplementary planning guidance for non-residential development, which can both be accessed via the following link: <p>www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_and_projects/development_control_for_roads/pre-application_charging_guide.aspx</p> <p>In addition, shared pedestrian and cycle surfaces should be worded as 'should, where appropriate'</p>
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			<p>as opposed to 'will'.</p> <p>West Sussex County Council March 2018</p>
Chichester District Council (007)	21/03/2018	Email	<p>The first section of this response relates to the Selsey Neighbourhood Plan's proposed policies (Part 1). In addition, Selsey Neighbourhood Plan Part 2 includes Annexes A and B and a number of points are set out below in relation to these Annexes on the basis of accuracy and clarity.</p> <p><u>General:</u></p> <p>The first section of the plan (pages 1 to 20) contains the land use policies. The advice provided during pre-submission consultation stage by the District Council has been taken into consideration whereby the background evidence is clearly indicated (by Annexes A and B). However, the evidence should not be included with the main Neighbourhood Plan (NP) document itself. The background evidence informs the policies in the NP, but it does not itself carry any material weight where decision-making is concerned. Annexes A and B should therefore be removed from the NP document and published in a separate background document.</p> <p>More generally, it is commended that the advice previously provided regarding the presentation of the policies has been taken into consideration. However, it would help users of the NP if the policies were named as well as numbered (e.g. Policy 001 – 'Design of new development').</p> <p>As a general point, references to documents are not referenced with a date which would be helpful. For example, when referring to the census, a date to identify which census it is would be helpful.</p> <p><u>Part 1: Policies</u></p> <p><u>Page 1 – Background:</u> As stated above, the only information the Neighbourhood Plan should include is that which relates to policy, not background evidence which should be separate to the Plan itself.</p> <p><u>Page 3: Background 3rd paragraph:</u> There is no evidence presented regarding the statement that Selsey has higher than average car ownership.</p>

			<p><u>Policy 001</u>: The first bullet point refers to dwellings only, however it should refer to high quality development overall. Also, new development should recognise the distinctive character of the Parish. For accuracy the policy should remove reference to 'roof elevations' and the third bullet point should be amended to read:</p> <ul style="list-style-type: none"> • 'In terms of design, new development should take careful account of the height and roof elevations scale of building elevations in the context of the topography of the local area in relation to the coastline, built form and rural hinterland'. <p><u>Page 4 - 2nd paragraph</u>: The setting of the Conservation Area and other heritage assets is an important consideration and the text should be amended to reflect this. Reference to 'historical or iconic features' would normally be included as 'heritage assets' in the context of the NPPF.</p> <p><u>Page 4: Policy 002</u>: There is no reference to listed buildings; reference to the Selsey Conservation Area Character Appraisal (Review) 2016 is inaccurate and needs updating as the Conservation Area context has changed since 2016, and an additional new Conservation Area (Old Selsey) was agreed for designation by the District Council in September 2017. This has yet to be formally confirmed. It would be more accurate to amend the third bullet point to read:</p> <p>'iii Other historic or locally significant buildings or structures including locally listed buildings as defined in the designated Conservation Areas in Selsey'.</p> <p><u>Page 5</u>: Reference to 'East Selsey Conservation Area' should be amended to state 'Old Selsey Conservation Area'.</p> <p><u>Page 8: Policy 004</u>: The site allocated by this policy (Land at Home Farm) is not supported by any site selection evidence. Further clarification is needed as to why it is the best site for temporary agricultural worker development, particularly where other sites may have been considered but then ruled out. Further, the supporting text under the heading 'Background' should clarify whether development beyond the settlement boundary would be temporary or permanent.</p> <p><u>Page 10: Policy 006</u>: This policy should provide clear criteria against which any proposal for the conversion of Selsey Hall to an alternative use can be considered. If housing is not a suitable alternative use, this needs to be made clear. Reference to Policy 38 and Appendix E of the Chichester Local Plan should be referred to.</p>
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			<p><u>Page 11: Policy 007:</u> the text refers to ‘open green spaces’ but there is no cross reference to Appendix II which shows recreational space. It is not clear if the intention is to designate these open space areas as ‘local green space’ in accordance with the requirements of the NPPF (paragraphs 76-78). It is not clear whether the intention is to protect Local Green Spaces which have a national designation or whether the policy aim to protect green open space. If it is the former the policy wording could be improved to be more consistent with the objectives of paragraphs 76-78 of the NPPF which allow for Neighbourhood Plans to designate land as Local Green Space, where local communities will be able to rule out new development other than in very special circumstances. If it is the intention to designate Local Green Spaces, then the Neighbourhood Plan should be supported by the necessary evidence. Paragraph 006 (ID: 37-006-20140306) of the NPPG advises on how such areas can be designated (i.e. identifying Local Green Space on a map).</p> <p><u>Page 12 – Transport Background:</u> Paragraph 3, - paragraph 3 of the text implies that the B2145 being a single road restricts development. While this may be a factor the road is not the only constraint on development for example economic and environmental constraints such the designation of Pagham Harbour as a Site of Special Scientific Interest, Ramsar Site, Special Protection Area and Local Nature Reserve) may also be a factor. The text could be amended to reflect this.</p> <p>It is unclear what is meant by the final bullet point; does an alternative route exist as this refers to ‘maintain’ or is the intention to try and provide an alternative route?</p> <p><u>Page 12 – Policy 008:</u> Selsey is well advanced as a community with the aspiration to deliver a segregated cycle route from Selsey to Chichester. A high level engineering appraisal has been delivered and agreement in principle has been received from the land owners. The route is intended to support utility cycling journeys and as such compliments West Sussex County Council’s Walking and Cycling Strategy. The Plan would benefit from including reference to this Strategy.</p> <p><u>Policy 009:</u> There is no indication in the policy as to what (if any) type of development should contribute to the cycle link, including possible funding of opportunities.</p> <p><u>Page 13: – Background -</u> The text needs updating (e.g. there are 3 supermarkets in Selsey (Co-</p>
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			<p>op x 2 and ASDA)).</p> <p><u>Page 13 – Policy 010:</u> This policy should include reference to the need for marketing in accordance with Appendix E of the Local Plan and reference to the need for viability appraisal work.</p> <p><u>Page 13: Policy 011:</u> This policy needs to take account of all other policies in the Local Plan and Neighbourhood Plan and should be strengthened by rewording as below:</p> <p>‘Proposals for the development of new employment floor space, refurbishment, upgrading or modernisation of existing premises employment land/sites, and/or proposals which make more efficient use of under used employment land/sites and premises will be supported subject to compliance with other policies in the Neighbourhood Plan and Chichester Local Plan.’</p> <p><u>Page 14 – Retail Centres Policy 012:</u> Paragraph 16.19 of the adopted Chichester Local Plan states that local centres for Selsey will be defined in either the Neighbourhood Plan or the Site Allocations Document associated with the Local Plan. The identification of three retail centres in Selsey by this policy is therefore welcome. It is, however, suggested that a cross reference to the Policies Map at Appendix II is included for accuracy and completeness...</p> <p>It is suggested the criteria listed in the second section of Policy 012 should be removed as it is a duplication of criteria listed in Policy 29 of the Chichester Local Plan. It may however, be helpful to include a cross reference to the Local Plan policy.</p> <p><u>Page 15: Policy 013:</u> The ‘Infrastructure Priorities List’ is referred to by the 3rd bullet point in this policy. This list is not explained in the supporting text and it is unclear as to what it is and how it relates to this policy. It is also not provided at Annexes A or B as background evidence. It is suggested that this policy should be amended to address the three key points set out in the original policy and remove reference to the Infrastructure Priorities List. CDC recommends amendments to the text as set out below:</p> <p>‘Proposals for new retail or commercial development will be supported where provided it is demonstrated that it complies with all other relevant policies contained in the Neighbourhood Plan, Policies 26 and 29 of the Chichester Local Plan and where:</p> <ul style="list-style-type: none"> • The provision development delivers employment opportunities across a range of skillsets
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			<p>likely to be available in the town; and/or</p> <ul style="list-style-type: none"> • The provision of such facilities development enhances the tourist offering; and/or • The provision of such facilities development delivers enhanced community facilities as identified in the Infrastructure Priorities list. <p><u>Page 16 – Summary:</u> The summary could be improved to provide a more accurate reflection of the Neighbourhood Plan (e.g. setting out key issues and objectives in terms of what it seeks to achieve, develop, enhance or protect) This could be achieved using headings or bullet points (e.g. Selsey as a Retail Centre, Selsey’s historic environment, transport aspirations, development priorities). Following any amendment the Plan may read better if the summary is at the beginning of the Plan after the Foreword.</p> <p><u>Page 18 – Appendix II:</u> See comments made above in relation to Local Green Space.</p> <p><u>Part 2 Comments on Annex A and Annex B:</u></p> <p>As set out above the Council does not consider that Annex A and Annex B form part of the Neighbourhood Plan; it is suggested that they should be removed from the main document as they form background evidence and hold no material weight in terms of decision-making.</p> <p>However if they are retained the comments and concerns raised below are included in this response for clarity and accuracy to assist the Examiner in his deliberations.</p> <p>Annex A: History, Design and Guidance – Background Evidence</p> <p><u>General:</u> The role of this documentation should be clear. As it stands this is not the case, for example, what is the intention of the Design Guidance considerations and are they to be progressed towards SPD or to remain as suggestions for developers/landowners etc.? Should there be cross references from the NP policy document to examples in Part 2?</p> <p>There is a need for the Part 2 document to be brought up to date. There is no longer a Design Code in the NP document beyond the requirements of Policy 001 and therefore some amendments will be required to Part 2 to take this into account. Also there is a need for updating in terms the various projects referred to in the text; the aspirations should be reflected in the list of projects identified by the Town Council for the CDC Infrastructure Delivery Plan (IDP) and</p>
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			<p>Infrastructure Business Plan (IBP).</p> <p><u>Page 9:</u> the date of the consultation findings should be included.</p> <p><u>Pages 11 and 12:</u> Date and source of map should be included. Is this the most up to date version?</p> <p><u>Page 13:</u> the date of this consultation should be included.</p> <p><u>Page 15:</u> reference is made to survey results from October 2012 which is now over 5 years ago. Some of the measures included in relation to road safety extend beyond the remit of the NP and should be explained/acknowledged as such. For example, Traffic Regulation Orders are legal documents that enable West Sussex County Council, the Local Highway Authority, to manage traffic. This is a function that is not delivered by the Neighbourhood Plan process.</p> <p><u>Page 16:</u> Access to the A27 and congestion on the A27- It is not clear what consultation this refers to; a date should be included for clarity.</p> <p><u>Page 18:</u> Question where evidence is of 'well documented congestion issues on the B2145?'</p> <p><u>Page 29:</u> There is a typo on the page under the title 'Development Considerations' where a number 1 lies under the O of development.</p> <p><u>Page 36:</u> <u>Live-work units:</u> It is not clear what the nature of live-work units proposed is. There is a lack of justification/evidence.</p> <p><u>Page 37:</u> Section 5,1st bullet point: 'Crime Impact Statements' and 'Design out Crime Assessments' are not required for applications.</p> <p><u>Page 43:</u> Appendix I – There is no date for this information. The notes (Page 45) suggest that it is not recent and may be sourced from somewhere other than to reflect the most up to date position in relation to the Town Council's projects identified to CDC as part of the CDC Infrastructure Delivery Plan (IDP) and Infrastructure Business Plan (IBP). Need to be clear as to the source and date.</p>
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			<p>Annex B: Audit – Background Evidence</p> <p><u>Page 7: The Selsey Conservation Area.</u> This section requires updating as it does not refer to the boundary of the High Street Conservation Area, nor does it mention the new Conservation Area (Old Selsey). There is a lack of information regarding the location of the Conservation Area which ideally should be shown on a map.</p> <p><u>Page 31, Listed Buildings:</u> This section needs to be updated as the buildings referred to in this section are listed by Historic England, not English Heritage.</p>
Paul Henry (008)	23/03/2018	Email	<p>This should include a requirement that all new developments have renewable energy facilities built-in so as to support efforts to alleviate climate change- sustainable development is a cornerstone of national and local plans and should be herein.</p> <p>I made this plea in my submission in 2017. Although the 2nd para rightly highlights the importance of renewable energy and reducing the carbon footprint, this is not included in Policy 001. I strongly submit that it should be included, perhaps even including all the points 1-5 of page 29 of Section 2, which are exactly the things that the council and any builders should be doing. Insisting on buildings having energy- efficiency built in (and not retro-fitted) through wall, floor and roof insulation, solar and heat sink sources etc is as important as ensuring they minimise the impact of flooding. Assuming the Council agrees as it seems to from elsewhere in the Plan sections, it should be included as part of Policy 001.</p> <p>The comment from the Council on this was: Noted as a concern, however this does not form part of the scope of the NBH Plan.</p> <p>As far as I can see from reading the National Planning Guidelines there is no such restriction on what of this nature can be included in the Local Plan. Thus the comment not only seems nonsense but a major failing by the Council when it espouses concerns elsewhere on such key issues as sustainable development, renewable energy. If it has a meaningful and deliverable policy on these matters and real commitment it should be an integral key policy in 001.</p>

			<p>Overall the Policies document is light or silent on many key points that should be included, most of which I included in my 2017 submission (attached again for reference, rather than me reproduce here. I have highlighted in yellow points I'd want to stress again).</p> <p>Whilst I wouldn't expect agreement to all my points, and other respondents would feel the same no doubt it does seem that little has been taken on board to be owned as Council policy. The fact that the Council has responded to many points made by respondents by saying merely 'Noted' or "Not part of the scope of NBH Plan" leads one to think it has gone for brevity rather than real committed policies so that the Town and District Councils do not have to enforce too many controlling policies in their adjudication on development proposals.</p> <p>On the other hand the Council has looked into the 2029 future, sometimes encouragingly, other times losing track of the requirement to be realistic. An example of the latter is on page 7 of the Annex A document where the Council talks of some national retail chains establishing in Selsey e.g Robert Dyas and M&S. This is daft. They are in Chichester, which has over 10 times the population of Selsey. Also Dyas would undermine the local hardware store(s) we already have as locally-run businesses, something the Council says it wants to protect and nourish. This should be changed.</p> <p>Rather than go through the Annexe A document in detail, as it may have little interest for you or effect on what is adopted finally, I'd merely say that with the exception of the above re Policy 001, the Policies are ok, as far as they go.</p> <p>Comments: Overall I think the Council has produced a good plan and it is well presented. I do think, however, that there should be some changes and improvements. I do not comment below on everything that I think is good and to be supported but concentrate on the most significant items.</p> <p>From what is said in the Foreword, it seems that the Policies in part 1, though to be read in conjunction with part 2, do have the greater weight in the Plan. Thus some need changing or strengthening. My detailed comments and suggestions are as follows.</p> <p>1) PART 1 Page 3. Although the 2nd para rightly highlights the importance of renewable energy and reducing the</p>
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			<p>carbon footprint, this is not included in Policy 001. I strongly submit that it should be included, perhaps even including all the points 1-5 of page 29 of Section 2, which are exactly the things that the council and any builders should be doing.</p> <p>Insisting on buildings having energy- efficiency built in (and not retro-fitted) through wall, floor and roof insulation, solar and heat sink sources etc is as important as ensuring they minimise the impact of flooding.</p> <p>Assuming the Council agrees as it seems to from elsewhere in the Plan sections, it should be included as part of Policy 001.</p> <p>The “Town Council’s Policy on renewable energy” is mentioned on Section 2 Page 13, but it is not clear to me whether this means the Council already has one (in which case why can’t I find it available on the Council’s website?) or it is actually the statements on Page 14 of Section 2. If it is the latter I suggest:</p> <p style="padding-left: 40px;">a) those statements should go further, by at least integrating with the points about building design set out in the first two paras above in Comment 1;</p> <p style="padding-left: 40px;">b) make it an explicit Policy in addition to the 13 set out. This might be especially important if the Council really means it when it says in Section 2 Pages 12 -14 that Selsey could and should be at the forefront in developing alternative renewable energy sources and behaviours in energy use, can be a testing ground etc</p> <p>2) Part 1 Page 3 Policy 001 – Building Height</p> <p>It is absolutely right for the Council to insist that no building should be more that 3 storeys high, but this should not be watered down elsewhere as it seems it might be by the reference on page 42 of Section 2 to “unless there are exceptional reasons”; this latter clause should be deleted from Section 2 page 42.</p> <p>3) Part 1 Page 4</p> <p>I suggest that the excellent point about maintaining Selsey’s semi-rural character mentioned in Section 2 Page 34 should also be included as part of the Policy and that, for new design and development and refurbishment of roads and paths, the planting of trees is promoted as policy. But I’d suggest further that, as in some other countries, we plant fruit trees such as apple trees that all the community can benefit from, rather than just ornamental trees.</p> <p>4) Part 1 Page 11</p> <p>I suggest that either as part of Policy 007 or an 007b, the Council should state that it’s policy is to</p>
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			<p>maintain the Village Green status of the Oval Field and not allow any building or infringement of it. The fact that this is not stated in unequivocal terms leads me to wonder if the proposal to set up “an educational yet entertaining solar and stellar observatory with auditorium” mentioned on Section 2 Page 7 and Section 2 Page 42 will be proposed again to be sited on the Oval Field as it was a while ago. This should not be re-proposed. If the Observatory is to be pursued, and I think it could be good for Selsey, then serious consideration should be given to siting it at either the east end of east Beach car park, where it could be raised on stilts to avoid flooding and get good vision, or on the east end of Lifeboat Green where the temporary Lifeboat shop and building has been placed, which has given no detriment to the field’s use. The advantages of either site would be that they would not involve losing any/much precious green recreational space and there is parking close by.</p> <p>But in the vicinity of Oval Field I would suggest that the Council works with RSPB to provide a Hide for Birdwatchers at the end of Grafton Road, where many birdwatchers congregate in all weathers as a good vantage point. Although a hardy lot, a hide would be welcome I’d think and Selsey should try and capitalise on having so many birdwatchers visit Pagham, Church Norton and Medmerry i.e. get them to feel welcome, stay and spend.</p> <p>5) Part 1 Page 12 Again I think the Council’s policies on Transport especially regarding the roads and cycling route need strengthening.</p> <p>Regarding the roads, if the Council’s views are only in the text and not in an actual Policy i.e. 009 or 009a/b, they are presumably less forceful. I would suggest it should be a numbered Policy that the Council will use all efforts to get the WSCC and Highways Agency to drop any plans to widen roads or create new ones and instead to concentrate on resurfacing the roads, especially B2145 and A27, and other cross-Manhood roads and create greater safety. The latter could be addressed (apart from cycle routes which I deal with below) by for instance using speed cameras, particularly in Sidlesham and Selsey’s main roads to actively discourage speeding and dangerous driving.</p> <p>Any money used to widen the B2145 or A27 for cars would be wasted and counterproductive, as drivers would speed more and risk more. The Council and others should do as is said elsewhere in the Plan and discourage use of cars.</p>
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			<p>The traffic flow from Selsey into Chichester is not that bad and the only real hold-ups are when there are cycles or farm vehicles backing up traffic. Buses do not cause a problem and we can all be more patient. Employers and employees could stagger start and finish times at work more to avoid traditional “rush- hours” more, otherwise it is something we should just continue to put up with if we use our cars. (Note: the same applies to the A27, a bit of delay is part of what you get for travelling at peak times; the M25 and other roads show the folly of just adding more width- lanes are not used properly, you get more traffic and no lessening of slow traffic blocks and delays, and as many, if not more, accidents. No more money into new/widened roads, please; let’s get good surfaces on the ones we have.)</p> <p>6) Part 1 Page 12 Policy 009 It is good to see that the Council will support a cycle route. I suggest that it is time to make this a priority to pursue with WSCC and Highways Agency.</p> <p>I suggest that also in this Policy should be the commitment that any new pathways are joint pedestrian- and cycle-paths. It is mentioned briefly elsewhere, e.g. Section 2 Page 42 under Design and Planning Guidance, but should be a Policy.</p> <p>People already want to commute to Chichester and more might if they could have a direct safe route. The Bill way is too out-of-the-way for commuting and even those wanting to use it need a safe approach along the B2145 to get to Pagham RSPB site (I have nearly been knocked off at least 3 times).</p> <p>I suggest more on the Cycle Route proposal and the suggested route should be available on the Council’s web-site. It is disappointing that it is not there but available only via the Selsey Information Exchange Community Forum web-site, which does not say, what the current progress is, other than the route proposal developed with Sustrans has been put to WSCC. I suggest the Council should push this issue now.</p> <p>But also it would be easy for WSCC to reject if it only has one option. I suggest a second option could be developed quickly in the form of creating a cycle lane alongside the north lane of the B2145 using existing footpaths (widened) and board –walks over ditches and obtaining land where there is no other option.</p> <p>I suspect this would not be too expensive, maybe less than the proposal that has been submitted, and certainly would be better use of public funds than widening the road or creating extra lay-bys.</p>
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			<p>(So I do not agree entirely with the vision regarding roads on Section 2 pages 6 and 17. Resurfacing, yes; widening, no, except for the bike route. And an absolute No to the idea of a flyover on the A27 mentioned on Section 2 Page 16; the visibility of Chichester and the cathedral must not be sacrificed.)</p> <p>We need more people on bikes and able to walk within and between villages, not more sunk into car use. I say this as a car user as well as cyclist and I fully acknowledge the need for people to drive to work and for other activities out of Selsey- two factors which will not change.</p> <p>(Despite good bus services people will still use cars. The Council's support of public transport in Section 2 Page 7 and elsewhere is good, buses especially. But I would not want the Council to spend any public money on even a feasibility study of a monorail or replacement tramway mentioned on that page and page 18, because it is highly unlikely the public will change travelling behaviour so massively by 2029 to make such operations more financially viable than buses. The Manhood does not have populations comparable to places where such schemes exist. It's good to be futuristic and challenging in our thinking but let's also be practical and realistic.)</p> <p>7) Part 1 Page 13</p> <p>It is right for the Council to push a policy of developing new employment space. In order to achieve Business Development and the vision of Selsey in Section 2 Pages 6 &7, the Council should consider promoting Selsey as, for example, a place where artists and artisans can have studios and workshops, perhaps using some of the frequently empty High Street premises which may require the Council to promote changes of use. Some flexibility within the general aim of Policies 010 and 011 may be required.</p> <p>Policy 011 could be strengthened in this sort of way to create more tangible options for businesses.</p> <p>(Note: I would suggest that getting a large number of working artists in studios and workshop spaces, with a link to display and retail outlets, would be better than what I imagine the concept of a Community Art Centre, listed at Section 2 Page 45, to be. Artists want cheap accessible working accommodation and living accommodation, rather than a "Community Centre". But the two are not mutually exclusive. I focus on the former as it relates to business and vibrancy.)</p> <p>Other areas of business the Council could perhaps promote are computer-based businesses, diving and similar activities of eco-tourism, sustainable building design and construction such as</p>
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			<p>eco-houses (Selsey has such mixed architecture and lots of new builds, as well as builders and architects. Some might be encouraged to go down a production route for modern eco-friendly housing.) No doubt the Council could come up with many ideas as to what businesses could help achieve the vision but I suggest it needs a policy to work with other agencies to promote Selsey as a place that will give them advantages for siting their businesses here.</p> <p>8) Part 1 Page 14-15 This is an essential Policy- to protect the High St and East Beach shopping areas. The retail centre which ASDA is developing is not shown on the Policies map on p15, but it is there as a retail centre and its effects on the High Street could run directly counter to the Council's avowed position of protection.</p> <p>I suggest the Council makes clear that it will oppose any extension of the retail facilities on this new site. Moreover it should add to the restriction regarding the effects on wildlife of any proposed new sites outside the area on arable or open fields the condition that such proposals must be guaranteed not to diminish the High Street or east Beach retail service to Selsey and will be fully opposed by the Council if there is a prospect of a negative effect.</p> <p>9) Part 1 Pages 11-16 I am surprised there is no mention of Broadband and Mobile connectivity in an actual Policy, either Infrastructure or Economy as the most likely Policies. Broadband is only mentioned briefly on pages 22 and 43 of Section 2.</p> <p>Section 2 Page 36 notes how many home-workers and businesses there are in Selsey and Section 2 Page 6 talks of Business Development.</p> <p>For these, as well as for other businesses especially new ones, fast reliable broadband and mobile telephone connections are vital. The Council could not only support the main developers and service providers but could examine a more localised service, perhaps a co-operative. There are some models to examine elsewhere in England.</p> <p>At the very least the Council should explore whether a mast to improve signals is necessary and whether one could be sited with minimal impact on people and the environment at, say, the Coastguard station or near the Fire station.</p>
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			<p>10) Aside from these points and suggestions I would support most of what is in Section 2.</p> <p>Obviously from all I have said I would not support the proposals to have a Supermarket, Petrol Station or Hotel or changing the B2145 other than regarding cycles. None are necessary when we have enough options already, and we do not want to drive existing businesses out (e.g. we have B&Bs and Selsey is ripe for people to do AirBnB so a hotel would have detrimental effect.)</p> <p>However I would want to emphasise the detailed comments I have made in 1 to 9 above.</p> <p>I hope they will be useful.</p> <p>Thank you for the opportunity to comment on the draft NP.</p>
QUOD obo Thawscroft Ltd (009)	22/03/2018	Email	<p>The Selsey NDP does not allocate additional housing sites other than those already granted planning permission, does not have regard for national policy or advice contained in guidance issued by the Secretary of State and is not in general conformity with the strategic policies within the CDC Local Plan.</p> <p>Extend the Selsey Settlement Boundary further to include sites which are suitable for housing so to help CDC meet its identified need for housing in the future.</p> <p>The draft Selsey NDP does not therefore meet the basic conditions required to allow the NDP to be put forward to a referendum.</p>