

## Appendix 2 – Summary of representations to the Interim Policy Statement

### 1 Background

- CDC must clarify how it has calculated housing figure of 628
- CDC must challenge government on housing requirement
- Housing figure is too high given environmental constraints
- Reconsider statistics underpinning this statement
- Request that 628 is maximum figure per annum
- Consider Neighbourhood Plans that have reached Regulation 14 status
- Parishes with made NP should be treated as less than 2 years old as cannot progress due to uncertainties surrounding Local Plan Review
- Explain that large proportion of District in National Park which has displayed need to Chichester
- 1.2 is Spring 2021 a bit ambitious?
- Make clear that 628 is minimum

### Changes to

### 2 Approach to boosting housing supply

- Clarify statements relating to prioritising progress on known sites and inviting developers to intensify development – what evidence or actions will be required?
- 2.1 housing supply should not be boosted other than for affordable housing and starter homes for key workers on brownfield sites
- There are many unimplemented planning permissions and local plan allocations which should be developed before further land is released.
- 2.1 and 2.3 make clear that 628 is the minimum figure
- 2.1 no new second homes
- 2.2 does not allow for cohesive development
- Hope that forthcoming applications do not pre-empt the proposed allocation sites in the Local Plan Review
- 2.2 Reference to NPPF in entirety
- 2.3 explain where more sustainable locations are likely to be found
- 2.3 no indication by what criteria 'appropriate development is judged
- 2.3 should include brownfield sites
- 2.3 rule out sites in Flood Zone 3
- Amend para 2.3 to “This statement aims to provide interim guidance which will apply until the adoption of the Local Plan Review, with a clear intention that it will enable the Council to show that it Council considers it has a five year supply of housing in line with Government guidance. The intention is for the Council to be able to guide development to appropriate and sustainable locations

using this document to assist in the consideration of planning applications. It will *be given considerable planning weight* to help to ensure that housing proposals that may be submitted in advance of the Local Plan Review are assessed in a consistent manner against national and local planning policies, with the aim of ensuring that the most appropriate development comes forward in the most suitable locations.”

- 2.4.1 how will ‘prioritising be carried out?’
- 2.4.2 how does inviting developers to speed up change anything, what incentives will be offered?
- 2.4 delete reference to priorities
- 2.4 actions do not seem to carry weight except to negatively impact the area
- 2.4.3 add wording to state that developer must provide costed infrastructure plan to be developed with infrastructure providers and must be in place prior to first occupancy
- 2.4 should be concerned with sites that are approved or allocated
- Amend 2.4 to “The Council intends for this Interim Statement to form one part of the Council’s proactive approach to the delivery of housing whilst the LPR progresses towards adoption. Other approaches being taken to boost housing supply and delivery include:
  1. Prioritising progress on delivery of *allocated known* sites, including West of Chichester, progressing the Tangmere Compulsory Purchase Order, and testing more long term sites, *such as Southern Gateway; and*
  2. Inviting developers to intensify and speed up development, on sites already underway; *and*
  3. *Encouraging residential development on accessible brownfield sites (including those identified or subject of submissions for the Brownfield Land Register*”
- Sites should be sustainable in the long term
- Priority should go to sites which can deliver quickly in sustainable locations
- Will the Council consider publishing an Annual Position Statement alongside this?

### 3 Planning Policy Context

- No confidence that this policy will enable CDC to exert any control of development
- 3.1 no new development on sites which could be inundated due to rising sea levels within next 100 years
- 3.2 sites within 1 mile of coast should be precluded from development
- 3.4 how well will this stand up to scrutiny?
- 3.4 amend to make clear that out of date housing policies should not apply to applications for housing
- Amend 3.4 to include “...planning applications for development within the Plan area. *Weight will also be given to the extent of unmet housing need (measured by reference to five year supply and HDT performance) and regard will be had to leading case law where shown to be relevant.*”
- 3.5/3.6 applications should not prejudice the emerging local plan
- Include broad site allocation strategy in Local Plan Review

#### 4 Local Context

- Relies too heavily on the settlement hierarchy
- Important that the tests of suitability are robustly applied
- Is environmental infrastructure included in definition of significant off site infrastructure?
- Scale and density of current sites goes against wording of IPS
- Provide a formula for estimating an appropriate number of dwellings per parish
- Place limit on distance between new development and location of existing infrastructure
- Need for off-site infrastructure does not impede delivery of new homes and should not be used as a reason to refuse permission
- Reconsider or revise wording inviting developers to 'speed up' or 'intensify'
- 4.1 include reference to NPPF
- 4.2 consider appropriateness of a completion date for all or phases of a development justified by the special circumstances under which these developments are permitted if justified on grounds of meeting urgent housing need
- 4.2 concerned that by not making approval contingent on off-site infrastructure will result in unfit/compromised roads and amenities
- 4.2 provision of infrastructure needs to be in parallel with housing development
- 4.2 make clear that only implementation of the permission of a scheme is required rather than delivery in entirety.
- 4.3 clarify that applications will be considered on a case by case basis having regard to the ability to deliver meaningful levels of housing within 5 years
- 4.3 make reference to encouragement of hybrid applications for detailed first phase to ensure prompt delivery with subsequent phases shown with illustrative layouts
- 4.3 use of time restricted condition should be justified for each individual development
- 4.3 2 year start date should be from grant of planning permission
- 4.3 clarify consequences should a developer fail to deliver housing within time frame. E.g. if the site was sold onto another development would the 2 year period start again?
- Amend para 4.3 to "Applicants will also be expected to show that they intend to develop sites promptly so that completed dwellings will begin to be delivered within a short period [up to a maximum of 2-3 years]. The Council will apply strong positive weight to proposals which can accept a planning condition such that any planning permission to commence within 2 years and also to require the early completion of dwellings to maximise the likelihood of delivery of housing within the Local Plan Area. Demonstration of deliverability<sup>3</sup> and a binding requirement the intention to develop (for example, through the requirement to submit a phasing plan) will be required to support planning applications and to help enable the Council to resist applications for less suitable sites."
- 4.4 consider whether outline applications are appropriate – or seek indicative layouts and firm development parameters and time limits to reduce land banking
- 4.4 include wording to state that "where outline planning permission has been granted, submission of the subsequent reserved matters will be required within 2 years."
- 4.5 development should be well away from the water to allow rollback of coast and creation of saltmarsh habitat

- 4.5 adjust settlement hierarchy to reflect climate change induced flood risk to coastal settlements
- 4.5 question Kirdford's location in settlement hierarchy
- 4.5 add wording "all infrastructure development must be in place to support the development before first occupation"
- Amend para 4.5 to "Policy 2 of the CLPKP, and emerging policy S2 of the LPR, sets out the anticipated settlement hierarchy which will inform consideration of any proposed site as part of a broader analysis of ensuring that growth is directed to sustainable locations with good access to public transport hubs and a range of shops and services."
- Amend para 4.6 to "Sites should be of a scale and density appropriate to the adjoining settlement and its ability to provide local services to sustain growth. Smaller scale sites, that provide for the gradual growth of settlements, are more likely to be suitable than sites that would significantly change the character of a place. Developments adjoining smaller settlements which are less locationally sustainable will be expected to be smaller in scale than those that might be suitable for the extension of Chichester or other settlements which have access to public transport hubs and are of larger size with a broader range of facilities (including the Settlement Hubs), ~~with their larger sizes and range of facilities.~~ The Council may support higher density development in settlements with greater facilities and accessibility<sup>4</sup>."
- 4.6 clarify that smaller sites are sites no larger than 1 hectare
- 4.6 only agree to sites that do not change the character of a place
- 4.6 concerns about increasing density with regards to character of the area and flood risk
- 4.6 density should reflect physical ability of site to absorb/drain floodwater
- 4.6 include explanation of what constitutes a small site in relation to individual settlements
- 4.6 should be applied to control development of housing in Lavant Road
- 4.7 include reference to access to/facilities for public transport
- 4.7 – include reference to biodiversity
- 4.8 take account of emerging policies and guidance relating to climate mitigation
- 4.8/4.9 provide broad locational strategy
- 4.9 include reference to AONB, SPAs, SACs and SSSIs
- Amend para 4.9 to "... the Water Quality Study and the Infrastructure Delivery Plan. Strong weight will be given to an emerging report in regard to the Locational Sustainability of Settlements which will focus upon proximity to services and public transport hubs. Where settlements have considered Neighbourhood Plan or Parish Plan processes, regard will also be had to those processes and their background material which were subject of consultation."

## **5 Purpose of the document**

- Provide appropriate balance to NPPF presumption to indicate need for a demonstration of social, economic and environmental benefits in all cases together with a demonstration all material considerations have been applied, assessed and mitigated
- Include explanation as to status of the document
- Question need for document given national policy provides sufficient detail regarding decision taking in current circumstances

- Additional layer of policy is unnecessary
- 5.2 not clear how the IPS will be used in decision-making e.g. are developments scored? And what level of compliance is acceptable
- Amend para 5.2 to "...the NPPF, and other material considerations. The IPS will seek to secure additional opportunities for housing development in locations which are sustainable and where it can be demonstrated that there would be early delivery of new homes."
- 5.2 include reference to made Neighbourhood Plans
- CDC can only apply limited weight to this document.

## 6 Interim Housing Policy Statement

- Criteria for 'good quality housing development' must be published, with examples
- Words 'should' and 'shall' are not strong enough – replace with 'must'
- Amend wording to "...in accessible and safe locations"
- Should be recognition that some criteria are from emerging policy and therefore should not be afforded full weight
- Should every single relevant policy be listed under the relevant policy and relevant evidence sections?
- Entire section should be restructured to make clear that purpose is to provide framework for accelerated delivery in locations which can be acceptable in planning terms and would generally be concluded to represent good quality development.
- Amend para to read "...and evidence. Applicants are encouraged to submit their own evidence in addition to the Council's evidence base."
- The criteria are overly restrictive and instead should reflect the requirements of the NPPF
- Criteria should be clarified as having varied importance subject to site characteristics/location especially where a development would deliver wider benefits that support the grant of planning permission

## Criteria 1

- Amend policy wording to: "The site boundary whole or in part is contiguous with an identified settlement boundary (i.e. at least one boundary must adjoin the settlement boundary or be immediately adjacent to it) and not result in apparent coalescence with another settlement."
- Amend wording to ""The site boundary in whole or in part is contiguous with an identified settlement boundary as approved in the relevant made Neighbourhood Plan or the Site Allocations Development Plan Document (ie at least one boundary must adjoin the settlement boundary or be immediately adjacent to it)"
- Wording requires precision in terms of definition of 'adjoins' and 'adjacent to'
- Use parish boundaries not settlement boundaries
- Amend wording to include "Where a proposal is separated from the SPA by road, railway, cycle path etc it will meet this test where it is shown to be sustainable and integrated with the settlement it adjoins."
- Criteria is overly restrictive
- Amend wording to "The site boundary in whole or in part is contiguous with an identified settlement boundary or the land abuts built

development that is adjacent to an identified settlement boundary

- Combine criteria 1 and 2
- Amend wording to “The site boundary in whole or in part is contiguous with the built form of a settlement (i.e. at least one boundary must adjoin the existing development or be immediately adjacent to it) and the scale of development proposed is appropriate having regard to the settlement’s location in the settlement hierarchy.
- Amend to include “...Sites that adjoin housing development that separate them from an existing settlement boundary and are otherwise well related to the existing settlement pattern will be considered on a case by case basis.”
- Criteria should acknowledge that proposals that would make better use of land within an existing SDL will also be considered to meet this criterion.
- Amend wording to “The site boundary in whole or in part is contiguous with an identified a settlement boundary identified in either the adopted Local Plan or a made Neighbourhood Plan...”
- Amend wording to “...with an identified settlement boundary and/or a Strategic Development Location boundary (i.e. at least one boundary must adjoin the settlement/Strategic Development Location boundary or be...)”
- Amend wording to “...contiguous with either an identified settlement boundary, established built form, or a committed site allocation...”

#### Criteria 2

- Amend wording to “adopted and emerging Local and Neighbourhood Plan policy and evidence.”
- Make clear that the HELAA is not a material planning consideration
- Combine criteria 1 and 2
- Amend wording to “...hierarchy and the range of facilities which would make it a sustainable location for new development. Proposals that can provide walkable links to public transport hubs (particularly train stations) prior to first occupation will be given strong positive weight.”
- Include the Conservancy Priority Views Study as relevant evidence

#### Criteria 3

- This criteria should prevent coalescence between Summersdale and Lavant
- Landscape Gap Assessment should not be given weight
- Criteria should provide flexibility as to whether a full LVIA is required
- Amend criteria so that proportionate assessment is required (LVA) and that LVIA is only required when it is reasonable and can be assessed by someone suitably qualified
- Amend to read “...settlements, or as part of # areas identified...”
- Medmerry must be considered as an SPA
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#### Criteria 4

- Wording should be more explicit in prioritising development on brownfield land
- Amend wording to: "...the artificial sub-division of larger land parcels OR INDIVIDUAL PLOTS will not be encouraged, NOR WILL ARTIFICIAL PROPOSALS TO CREATE MORE THAN ONE ACCOMMODATION BUILDING ON AN EXISTING PLOT"
- Add reference to existing SDLs
- Amend to read "...appearance of the nearby settlement....and the Settlement Hubs or other locations close to railway stations).....will not be encouraged. The re-use of land with existing built form (or otherwise PDL and sites on the Brownfield Land Register) for homes will be given strong positive weight.
- Include reference to Brownfield Land Register
- Amend to include "...Piecemeal development of land within the existing Strategic Development Locations which fails to deliver comprehensive development will not be acceptable."
- Include CLPKP Policy 7 Masterplanning Strategic Development in list of relevant policies
- Amend wording to "of the land, whilst respecting taking into account the desirability of maintaining the character and appearance of the settlement or of promoting regeneration and change."
- Provide clarity as to wording of final sentence – artificial sub division should be considered against constraints such as land ownerships.
- Amend wording to "Arbitrarily low density or piecemeal development such as the artificial sub-division of larger land parcels will not be encouraged that does not respect the character and appearance of the area and does not make best and most efficient use of the land in terms of boosting housing supply, will not be supported. Sub-division of larger land parcels must be justified by evidence (including land ownership details, commercial or environmental constraints) and should be supported by an overall framework plan/masterplan for delivery. Applications that are arbitrarily sub-divided without such justification will not be supported."

#### Criteria 5

- Include wording at end of criteria "and the Chichester Harbour AONB. Land within the Chichester Harbour AONB has the highest status of landscape protection, and proposals must also be shown to contribute to and enhance the quality of its biodiversity that has been recognised by international, national and local designations."
- Include reference to Conservancy Priority Views Study
- Make clear that some development in AONB is acceptable
- Strengthen criteria to ensure that proposals have no adverse impact on the openness of views and setting of the SDNP
- Reference to Section 62 of the Environment Act 1995
- Include "...Harbour AONB. Proposals within the AONB that are sustainably located and do not materially impact long-distance views and intervisibility will be given positive weight."
- Intervisibility is a new policy requirement and this criteria should be deleted
- Amend criteria to include "...demonstrate consideration of the impact of development beyond reasonable doubt that the development will have no material impact on the..."
- What policies will be put into place to protect the AONB, Medmerry and Pagham Harbour from developments within zones of influence

### Criteria 6

- This criteria is at odds with the development at Whitehouse Farm and contradicts the Council's declared Climate Change Emergency
- Include reference to requirement to 'safeguard and provide a net gain to biodiversity'
- Include CLPKP Policy 49 and LPR DM29 in relevant policies
- Include Local Biodiversity Action Plan in relevant evidence
- Scale of protection should be 500m
- Mature trees should be protected whether in corridor or not
- Should be blanket protection within corridors and a commitment to a strong buffer zone around them
- Consider emerging Chichester Coastal Plan Nature Recovery Area
- New policy in emerging plan and should not be given weight/should be deleted
- Amend wording to "...that they will not *adversely* affect the...."
- Reference to policy requirements relating to SPAs and SACs
- Add data to include what is meant by 'potential or value'
- Amend criteria to include "...should demonstrate *beyond reasonable doubt* that..."

### Criteria 7

- Reference the Chichester 'Approach to securing development contributions to mitigate additional traffic impacts on the A27 Chichester Bypass' SPD
- Require further detail here regarding wastewater treatment
- Reference Surface Water and Foul Drainage SPD
- Reference CDC endorsed joint EA/SWS Statement for Apuldram Catchment
- Reference to constraints on wastewater as overcoming these can slow down development
- Capacity of sewerage system should be taken into account
- Infrastructure should include flood mitigation and flood defence infrastructure  
Infrastructure should be provided ahead of development
- Include "...highways improvements. *Proposals that can commit to the delivery of any necessary infrastructure prior to first occupation will be given strong positive weight.*"
- Should apply critical analysis to evidence supplied by Southern Water giving their track record of managing infrastructure
- Should be recognised that proposals are only required to make provision for infrastructure that is necessary for the development to be acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind of development.
- Amend criteria to include "...be secured, *and that the necessary financial resources have been committed and ring fenced* including..."
- Add text after Infrastructure Delivery Plan to say "*should be fully costed and implemented prior to the start of development or first*

occupancy

### Criteria 8

- Introduces new policy and should be deleted (bullets 2, 3, 4)
- Criteria does not go far enough
- Solar panels/solar tiles/solar glass should be fitted as a minimum (for which government funding may be available)
- Standards should be defined and should exceed the minimum
- Maximum priority should be given to enabling development which reduces CO2.
- Include reference to the West Sussex Cycling Design Guide
- Include facilitation of renewable community supplies and banning of individual home boilers
- Include trees in every development
- New dwellings should have water meters
- Give recognition to role of increased insulation in well-designed buildings
- Developers must include in the sustainability statement evidence that the site will be free from flood risk until 2065
- Development should respect dark sky policy
- Include "Proposals that would secure the re-purposing of existing built form in sustainable locations to deliver new homes will be afforded strong positive weight"
- Include "...Parking Standards Guidance. Proposals that can commit to delivery of EV charging infrastructure that exceeds policy requirements will be given strong positive weight."
- Include access to/facilities for public transport
- Amend wording to include "Where appropriate, development proposals should apply sound sustainable design, good environmental practices, sustainable building techniques and technology, including the use of materials that reduce the embodied carbon of construction and the use of re-used or recycled materials."
- Amend wording to include "Energy consumption will be minimised and the amount of energy supplied from renewable resources will be maximised to meet the remaining requirement, including the use of energy efficient passive solar design principles where possible;"
- Remove following wording: ~~"Minimising energy consumption to achieve at least a 19% improvement in the Dwelling Emission Rate (DER) over the Target Emission Rate (TER) calculated according to Part L of the Building Regulations 2013. This should be achieved through improvements to the fabric of the dwelling;"~~
- Remove the following wording: ~~"Maximising energy supplied from renewable resources to ensure that at least 10% of the predicted residual energy requirements of the development, after the improvements to the fabric explained above, is met through the incorporation of renewable energy; and"~~
- Include following wording: "Flexibility - The standards achieved as detailed above may be a matter for negotiation at the time of the planning application, having regard to abnormal costs, economic viability, the feasibility of meeting the standards on a specific site and other requirements associated with the development."

- Add wording “Use of fossil fuels within new developments of more than 10 units shall not be permitted.”

#### Criteria 9

- How will you achieve high quality design and creating places of high architectural build and quality? Design Protocol has not been updated since 2013
- Design & Access Statements should account for needs of less mobile/disabled people
- Amend to “respect or enhance”
- For designated heritage assets it should be “preserve or enhance”
- Amend to accord with national policy
- All dwellings should have sufficient off street parking in line with number of beds per property

#### Criteria 10

- Emphasis importance of footpaths, cycle paths and public transport infrastructure
- Design roads to include sheltered bus stopping zones and design houses with better provision for secure storage and access for bicycles
- Substitute ‘should’ with ‘will’
- Remove ‘where appropriate’ from wording
- Development should be located with reliable vehicular and public transport or cycle accessibility to Chichester/nearest secondary settlement
- Pedestrian/cycle routes should be fully protected from motor vehicles
- Make reference to supporting network of PRow and seek opportunities to join up existing and/or improvements to the network
- Include access to/facilities for public transport
- Include WSCC Walking and Cycling Strategy 2016-2026 as relevant evidence
- Include reference to the Chichester LCWIP
- Amend wording to include “...upgraded linkages. For the sake of clarity pedestrian and cycle links should be sufficiently wide e.g. walkways need to be wide enough for families with small children walking together so that they do not come into conflict with vehicular traffic.”

#### Criteria 11

- Reference the West Sussex LLFA Policy for the Management of Surface Water
- Could take opportunity to set out locations where development would not be supported due to high flood risk and impacts of climate change on flood zones
- Section does not distinguish between sources of flood risk and may be useful to do so
- Reference to Strategic Flood Risk Assessment

Reference to EA Climate Change allowances

- FRAs should be informed by most recent climate change allowances and sea level rises
- Sites less than 7m AOD should not be developed
- Amend wording to “...to ensure that the new houses are #is safe, that... would not constrain the effective-natural function of the flood plain.”
- Amend wording to include “...residual risks are safely managed. Development in areas at risk of flooding as identified by the Environment Agency flood risk maps will need to be supported by a site specific flood risk assessment to demonstrate the development will be safe, including the access and egress, without increasing flood risk elsewhere, and where possible, will reduce flood risk overall. This also includes...”

#### Criteria 12

- Strongly encourage CDC to progress a strategic nitrate mitigation scheme
- Give weight to proposals that will not impact nitrates (e.g. I north)
- Define ‘where appropriate’
- Off-sets for nutrient emissions from new developments should not be dealt with by remote re-balancing. Any off-sets must be within the catchments defined by Natural England for the Solent (March 2020). Assessments of nitrate budgets for new developments must be independently performed by qualified parties.
- Amend wording to “...Development proposals that discharge to the Solent catchment of Chichester Harbour shall demonstrate how they achieve mitigated nitrate neutrality taking account of Natural England’s guidance on achieving nutrient neutrality for new housing development where relevant”
- Amend to include “new housing development. Proposals that can commit to this approach prior to first occupation will be given strong positive weight.”
- Amend to include “...housing development. Mitigation arrangements should be legally detailed as part of the planning application, deliverable, and financial arrangements should verifiable and independently ring fenced.”

#### Additional suggested policies

- New policy as follows: 13. In the context of development proposals that are not contiguous with a defined settlement boundary (such as washed over settlements or freestanding built form) then it will be necessary that the site boundary in whole or in part is contiguous with existing built form, or currently supports built form on the site itself. Those proposals would be acceptable subject to demonstration that the location is otherwise sustainable and would not materially impact upon the character of the countryside.  
Relevant policies include:
  - CLPKP Policy 2 Development Strategy and Settlement Hierarchy
  - CLPKP Policy 45 Development in the Countryside

• LPR Policy S4 Countryside

Relevant evidence includes:

• Local Plan Policies Map

• HELAA

- New policy as follows: 14. In the context of development proposals located close to settlements, evidence of engagement with local stakeholders will be encouraged. Where there is evidence that proposals have been developed through iterative dialogue and can demonstrate (full or partial) support with stakeholders that will be afforded very strong positive weight.

Relevant evidence includes:

• Neighbourhood Plans (adopted and working papers)

• Parish Plan (adopted and working papers)

- Include a criteria allowing infill development

#### **Other suggested comments/amendments**

- Concerned at number of houses built recently
- Infrastructure (sewerage, transport, education, doctors) cannot cope
- Additional housing at Birdham is unsustainable
- Refer to interaction of housing and education and employment provision
- Focus on affordable housing should be on affordable housing for rent
- No development in areas with present or future flood risk
- No development without northern bypass
- Make better use of existing housing stock instead of building new houses
- No additional residential development on Manhood Peninsula
- Do not destroy high quality agricultural land
- Concerns over further development in Bosham
- No proposals to improve infrastructure
- Prioritise brownfield sites
- Provision of bungalows for elderly
- Give parish council planning committees more power
- Housing distribution should be equitable across parishes
- Include an executive summary to explain the purpose and general concept of the document
- Seek assurances that the determination of future planning applications recognises the potential increased cumulative impacts on biodiversity and natural environment
- Does not take account of climate change and EA predictions for flood levels
- Proposes construction of houses in an unsustainable manner

- Will negatively impact on chalk streams
- Ignores requirement for all development to be nutrient neutral
- Ignores need for effective place-making
- Criteria are what we expect but we do not see any of these things in new developments
- More information on how CDC intend to implement and control this policy if it is to be effective
- No room between AONB and the National Park to accommodate new development
- Any permitted development must concentrate on needs of local families and residents
- Proposed increase in development contradicts goal of sustainability
- No consideration of impacts of Covid 19 or Brexit - revisit HEDNA
- Council should proactively brownfield seek sites in Chichester city e.g. the car parks, The Tannery, House of Fraser
- Hope that levels of facilities and services are taken into account
- No consideration of Chichester Harbour
- Align this document with the Committee on Climate Change Green Recovery document
- Proposed allocation at Highgrove Farm is not to scale with Bosham
- Suggest encouragement of local water treatment through constructed reed beds.
- Restrict amount of market housing provided
- No more development on Manhood Peninsula until A287 has been widened to allow for footpaths and cycle lanes
- Concerned at proposal for development on Pottery Field, Nutbourne
- Include a policy to prevent overdevelopment e.g. of Westhampnett
- Reference dates of all relevant policies and evidence documents
- Include reference to the Sustainability Appraisal
- Clarify how IPS will be applied to existing local plan allocations
- Include statement that IPS is applied to greenfield and brownfield sites outside of settlement boundaries
- Issue new housing land supply position statement
- CDC should list which Local Plan policies the Council considers to be up to date
- The Council must allocate more sites in order to avoid being in this position in the future
- Clarify that where housing policies in the Local Plan are out of date, those relevant to housing delivery in Neighbourhood Plans are also considered to be out of date
- Include statement to say that the Council will encourage coordination of production of next tranche of Neighbourhood Plans to follow the Local Plan Review