



Representation Form

Local Plan Review: Preferred Approach Consultation

The consultation on the Local Plan Review: Preferred Approach will run from 13 December 2018 to 7 February 2019. The document and more information on the consultation can be viewed on our website www.chichester.gov.uk/localplanreview

All comments must be received by 11.59 pm on Thursday 7 February 2019.

There are a number of ways to make your comments:

- Comment on the document on the internet using our online consultation website www.chichester.gov.uk/localplanreview (**Recommended**)
- Complete this form on your computer and email it to us at planningpolicy@chichester.gov.uk
- Print this form and post it to us at: Planning Policy Team, Chichester District Council, East Pallant House, 1 East Pallant, Chichester, West Sussex, PO19 1TY

How to use this form

Please complete Part A in full. Please note anonymous comments cannot be accepted, a full address including postcode must be provided.

Please complete Part B overleaf, using a new form for each separate policy or paragraph that you wish to comment on. Please identify which paragraph your comment relates to by completing the appropriate box.

For more information, or if you need assistance completing this form, please contact the Planning Policy Team by email at planningpolicy@chichester.gov.uk or telephone 01243 785166.

PART A	Your Details	Agent's Details (if applicable ¹)
Full Name	Kia Trainor	
Address	CPRE Sussex Brownings Farm, Blackboys, Uckfield, East Sussex	
Postcode	TN22 5HG	
Telephone	01825 890 975	
Email	Kia.trainor@cpresussex.org.uk	
Organisation (if applicable)	CPRE Sussex	
Position (if applicable)	Director	

Is this the official view of the organisation named above? Yes ☒ No ☐

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	S30: Strategic Wildlife Corridors
----------------------------	--	-------------------	--

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☒

Have Comments ☐

Enter your full representation here giving details of your reasons for support/objection:

Generally, welcome the inclusion of strategic wildlife corridors within the plan in what is an important area for wildlife biodiversity, including both native and migrating species. We believe there may be other important wildlife corridors that need to be considered, particularly east west across the Manhood Peninsular. We would request further research into this aspect, or at least an acknowledgement that further corridors may need to be incorporated in due course. We support the views expressed by the Chichester Harbour Conservancy that the suggested corridors need to be extended further south and strengthened and with an east-west corridor.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

We would like a commitment to review Wildlife Corridors and for the results of this review to be built into the plan.

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	S32: Design Strategies for Strategic and Major Development Sites
----------------------------	--	-------------------	---

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☐

Have Comments ☒

Enter your full representation here giving details of your reasons for support/objection:

We welcome this Policy but would like it to better reflect the NPPF (2018) requirement that "Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics" (para 125) and "Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot" (para 128)

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Point 2 could read "how early, proactive and effective consultation with the existing community has been incorporated"

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	DM4: Affordable Housing Exception Sites
----------------------------	--	-------------------	--

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☐

Have Comments ☒

Enter your full representation here giving details of your reasons for support/objection:

We strongly support significant inclusion of affordable housing in the plan, but this is not strong enough as a general policy..

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

We seek stronger assurances about the levels of affordable housing in each allocation, which would in turn reduce the need for exception sites.

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	DM8: Transport, Accessibility and Parking
----------------------------	--	-------------------	--

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☐

Have Comments ☒

Enter your full representation here giving details of your reasons for support/objection:

In terms of point 7, it is not enough to simply require an air quality assessment. The policy should also require any necessary air quality management and mitigation measures arising from the development, and identified in the AQ assessment, to be carried out and secured by planning condition or by legal agreement

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

The policy should also require any necessary air quality management and mitigation measures arising from the development, and identified in the AQ assessment, to be carried out and secured by planning condition or by legal agreement

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	S13: Chichester City Development Principles
----------------------------	--	-------------------	--

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☒

Object ☐

Have Comments ☐

Enter your full representation here giving details of your reasons for support/objection:

We support the requirement to protect views of the Cathedral (but please see response to AL6).

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	S12: Infrastructure Provision
----------------------------	--	-------------------	--

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☐

Have Comments **X**

Enter your full representation here giving details of your reasons for support/objection:

We are concerned that there is a real risk that development and supporting infrastructure will continue to be out of step in some places.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

We will be monitoring the Infrastructure Delivery Plan.

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	AL14; Land West of Tangmere
----------------------------	--	-------------------	--

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object

Have Comments ☒

Enter your full representation here giving details of your reasons for support/objection:

We are concerned at the lack of any reference here to biodiversity or wildlife which, compared with other policies, suggests it will have no priority in this part of the plan

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Revise this proposal to include measures to protect and enhance biodiversity.

(Continue on separate sheet if necessary)

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Page/ Paragraph Number:		Policy Reference:	S14: Chichester City Transport Strategy
----------------------------	--	-------------------	--

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☐

Have Comments ☒

Enter your full representation here giving details of your reasons for support/objection:

Whilst we welcome plans to improve public transport, walking and cycling, and to protect existing footpaths and cycleways, we do not feel that these proposal are strong or clear enough to contribute to the much needed reduction in use of private cars in the Chichester area. Assurances are needed that well established routes will be protected and improved, such as the Centurion Way adjacent to the Western development. Clear cycleway routes need to be identified and these need to be safe for general use. These routes must enable people to cycle and/or walk from developments on the fringe of the city into the City Centre as well as giving easy access to the countryside

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Assurances are needed that well established routes will be protected and improved, such as the Centurion Way adjacent to the Western development. Clear cycleway routes need to be identified and these need to be safe for general use. These routes must enable people to cycle and/or walk from developments on the fringe of the city into the City Centre as well as giving easy access to the countryside

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Page/ Paragraph Number:		Policy Reference:	DM32: Green Infrastructure
----------------------------	--	-------------------	---------------------------------------

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☐

Have Comments ☒

Enter your full representation here giving details of your reasons for support/objection:

It might be helpful if this Policy had a slightly different name to avoid confusion with S29 which seems to refer to the Strategic Sites. We welcome the protection and improvement of green infrastructure in the plan, as well as the requirement not to dissect the linear network of cycle ways, rights of way and ecological corridors, subject to our comments on S14.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

(Continue on separate sheet if necessary)

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PART B

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<http://www.chichester.gov.uk/dataprotectionandfreedomofinformation>.

To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	DM29: Biodiversity
----------------------------	--	-------------------	---------------------------

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☐

Have Comments ☒

Enter your full representation here giving details of your reasons for support/objection:

DEFRA Net Gain Consultation: This plan review coincides with the recent government consultation on a proposal for a statutory approach to net gain of biodiversity in new housing and other developments. There is a brief mention of this in Policy DM29 (Biodiversity). However, this seems to be in conflict with the individual policy statements for each major development, which refer to mitigation measures and local protections but do not appear to require a net gain in biodiversity. We are disappointed that Chichester DC does not appear to want to take a lead on this topic and set a standard for other authorities. Given the time scale of the plan (to 2035) it is very likely that the statutory requirement for net gain will be in place, and we would wish to see the principle more firmly established in this plan. This would also be consistent with the statements made in Section 5 on Design Standards and Policy DM18 on Sustainable Design and Construction.

We will not support development that damages biodiversity in this sensitive area. If planning permission is granted under this policy, the tests need to be challenging. We are pleased to see net gain included here. We are concerned that item 6 suggests developments where “the benefits of development outweigh any adverse impact on the biodiversity of the site”. This seems to be an open door for anyone to argue their development is so important that biodiversity is irrelevant. Of course the net gain proposal would over-ride this approach. In many ways this statement is contradictory to many other statements in this plan.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Remove the statement that suggests that biodiversity can be damaged legitimately under your policy. Such damage should be considered only in very exceptional circumstances. Net gains in biodiversity should be written into every policy for every site allocation.

(Continue on separate sheet if necessary)

Declaration

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Name (<i>print</i>):	Kia Trainor
Date:	05/02/2019



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How to use this form

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PART A	Your Details	Agent's Details (if applicable ¹)
Full Name	Kia Trainor	
Address	CPRE Sussex Brownings Farm, Blackboys, Uckfield, East Sussex	
Postcode	TN22 5HG	
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Email	Kia.trainor@cpresussex.org.uk	
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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	S11: Horticultural Needs
----------------------------	--	-------------------	-------------------------------------

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☐

Have Comments ☒

Enter your full representation here giving details of your reasons for support/objection:

This policy supports a large amount of new glasshouse development (in excess of 200,000 square metres) over the plan period. This activity is particularly exposed to the impacts of Brexit (both +ve and -ve) and the overall amount of new development required will need to be kept under review.

We are concerned about the impact of light pollution on the AoNB arising from such developments. This topic has been the subject of research by CPRE, See CPRE 'nightblight maps' (www.nightblight.cpre.org.uk page 153).

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

We would like clarification on this issue and an amendment to the Policy, for example, linking the amount of glasshouse development to the identified need, which could change following a review.

We would seek proper investigation into the light pollution implications of all these developments.

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	S21: Health and Wellbeing
----------------------------	--	-------------------	----------------------------------

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☒

Have Comments ☐

Enter your full representation here giving details of your reasons for support/objection:

This policy is pretty bland and it is difficult to see how it would be applied in a way which makes a real difference to health and well-being.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

We would like greater alignment with Government Guidance:

<https://www.gov.uk/guidance/health-and-wellbeing>

At the very least, this policy should indicate the types of development where some health and wellbeing issues might arise, such as:

- Provision for walking and cycling in larger housing developments
- Avoiding some forms of development (health and education) in areas with poor air quality
- Fast food outlets near schools
- Mitigating the impacts of climate change

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	DM31: Trees, Hedgrows and Woodlands
----------------------------	--	-------------------	--

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☐

Have Comments ☒

Enter your full representation here giving details of your reasons for support/objection:

We welcome the inclusion of this issue and trust that the 'exceptional circumstances' will be extremely rare. Item 2 is unacceptable. The myth that you can replace protected trees, non-protected trees, woodlands and hedgerows is truly unsustainable, and therefore in conflict with your policy statements. The timescale to replace these features properly is much longer than the timescale of your plan.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Remove references to replacement of mature and protected trees, hedgerows etc, or include clarification that this will be permitted only in very exceptional circumstances, and that a net biodiversity gain will be required in any such process.

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	DM23: Lighting
----------------------------	--	-------------------	-----------------------

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☐

Have Comments ☒

Enter your full representation here giving details of your reasons for support/objection:

This policy restricts development where it has a harmful impact on the wider landscape, but would benefit from an explicit reference to protecting the AONB.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Add an explicit reference to protecting the AONB.

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	S3 Development Strategy
----------------------------	--	-------------------	--------------------------------

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☐

Have Comments **X**

Enter your full representation here giving details of your reasons for support/objection:

This is the formal response of the Campaign to Protect Rural England Sussex Branch (CPRE Sussex) to the Chichester District Council (CDC) public consultation on the Chichester Local Plan Review 2035 Preferred Approach - December 2018 ('the Local Plan Review.')

CPRE Sussex is a charity which works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. We encourage appropriate and sustainable land use, farming, woodland and biodiversity policies and practice to improve the well-being of rural communities. It is our position that local planning authorities should seek to ensure that the negative impacts of development on the countryside, both direct and indirect, are kept to a minimum and that development is sustainable in accordance with national planning policy.

CPRE Sussex seeks to protect the Sussex countryside. At the same time, we acknowledge the pressures from Government on local authorities to deliver (often unrealistic) housing targets that are bound to threaten rural environments. We support a plan-led approach to development that supports localism and gives local people a role in shaping the place where they live.

Use of Green Spaces: We believe that the destruction of green spaces for housing and other development should be a policy of last resort. We are concerned at the level of greenfield development specified in this plan and the scope for further such development outside of settlement boundaries. The document hardly mentions the use of brownfield sites, or the possibility of creative ideas to make brownfield sites available for housing development. The Glossary describes a '**Sequential Test**' as '*A planning principle that seeks to identify, allocate or develop certain types or locations of land before others. For example, brownfield land before greenfield sites, town centres before out of centre and sites at less risk of flooding before others*'. But there are no obvious policies within the document which show how that sequential test has been used in relation to brownfield sites, other than a general approach of guiding development towards larger towns. The NPPF (2018) requires that (para 117) "Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land⁴⁴." No reference is given to the Council's Brownfield register and it is not clear how this fits into the overall strategy for development.

We are concerned about the amount of development planned for the Manhood Peninsular and the impact of this on the AONB, RAMSAR sites and infrastructure. How does the strategy for the

Manhood peninsula reinforce “its role as home to existing communities, tourism and agricultural enterprises”?

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

CPRE has developed a ‘Brownfield Toolkit’ which local people can use to help identify brownfield sites (<http://www.cprelancashire.org.uk/resources/housing-and-planning/item/2483-cpre-lancashire-brownfield-land-register-toolkit>) We suggest that the plan needs greater and more explicit support for brownfield development and to plan for brownfield development in a “positive and creative way” (NPPF 2018, para 38.)

We would like clarification as to how the strategy for the Manhood peninsula reinforces “its role as home to existing communities, tourism and agricultural enterprises”? We would like further evidence that the AONB and EU protected sites will not be harmed by this level of development as we disagree with the findings of the Sustainability Appraisal.

(Continue on separate sheet if necessary)

Declaration

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Name (<i>print</i>):	Kia Trainor
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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	AL1: Land West of Chichester
----------------------------	--	-------------------	---

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☒

Have Comments ☐

Enter your full representation here giving details of your reasons for support/objection:

We understand that this is a key aspect of the plan, but we are concerned at the loss of green fields and agricultural land involved. If there is such a development, we welcome the protection of named sites and the suggestion of possible enhancements (net gain). We also welcome the recognition of the need for mitigation in relation to special protection areas,

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

We believe that Chichester DC should challenge the unreasonable housing targets on the grounds of its special position in which major developments will inevitably have a disproportionate impact on greenfield sites. Such appeals have been successful in many authorities such as Wealden, Brighton and Hove and Adur. On this basis, development on this scale may be unnecessary.

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	AL6: Land South West of Chichester
----------------------------	--	-------------------	---

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☒

Have Comments ☐

Enter your full representation here giving details of your reasons for support/objection:

We are strongly opposed to the inclusion of this policy, which was excluded by the Inspector from the previous Local Plan. This major development is directly adjacent to the Area of Outstanding Natural Beauty (AONB) and it is inevitable that it will have both a direct and indirect negative impact on this protected landscape. In addition the construction of the proposed link road will add considerably to the negative impact through air, soil and light pollution. We also believe it falls within the SSSI impact zone. Protected areas of such significance require a substantial buffer zone which is not part of your proposal. There is also construction planned on a flood plain. We further understand that proper consultation has not taken place with the Harbour Conservancy on this proposal. The proposal contains some assurances about environmental and wildlife protection but this is simply not strong enough to give the protection that an AONB is entitled to receive in the plan. No evidence is presented of an environmental audit of this area adjacent to the AONB, which is essential before any such proposal can be considered properly. Your policies state the importance of protecting the iconic views of the cathedral. Two of those site lines cross this area and it is hard to see how those views will not be interrupted by a large housing development and a raised relief road.

In addition **we fully endorse all the objections and comments submitted by the Chichester Harbour Conservancy** and in particular those relating to the impact on the AONB.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Remove this allocation from the Plan

(Continue on separate sheet if necessary)

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Position (if applicable)	Director	

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PART B

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	S24: Countryside
----------------------------	--	-------------------	-------------------------

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☒

Object ☐

Have Comments ☐

Enter your full representation here giving details of your reasons for support/objection:

We welcome Policy S24 in relation to development in the countryside and agree with para 5.37 that "The plan area's countryside is an important and diminishing resource."

Should para 5.41 not also refer to the AONB?

We note the comments in paragraph 5.42 concerning establishing and protecting green gaps between communities that retain a clear identity for those communities. We strongly support this approach in an area where these identities have already been severely eroded.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

We suggest that the last para should read "Defined settlement boundaries may be altered by a development plan document and/or a neighbourhood plan if supported by evidence to demonstrate that this is acceptable." Or similar wording.

(Continue on separate sheet if necessary)

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Name (<i>print</i>):	Kia Trainor
Date:	05/02/2019



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How to use this form

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PART A	Your Details	Agent's Details (if applicable ¹)
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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	AL8: East Wittering and Bracklesham
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Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☒

Have Comments ☐

Enter your full representation here giving details of your reasons for support/objection:

Concerns have been raised by our members in this area about the proposals. There has already been major development around East Wittering which residents see as having a negative impact on the area. They are aware of many more potential planning applications in this area, in addition to the substantial increase in numbers proposed in the Local Plan. There are reassuring words in this policy about the impact of developments and mitigation, but it is not clear how these worthy aims can be achieved in this location. The plan also refers to "promoting sustainable transport options". Anyone who uses this area in the summer will be very familiar with the transport chaos between Chichester and the Witterings, which is of course a single road route in and out. They are concerned about access for emergency vehicles in peak summer periods. Additional housing in this area can only exacerbate that problem. Short of everyone using the cycleway, it is hard to envisage how this area can cope with yet further residents. We are also aware that many new houses in the area are purchased as second homes. Any development here should, we suggest, be strongly slanted towards affordable homes for local people. The policy does not promote that approach.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Remove this from the plan

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	S26: Natural Environment
----------------------------	--	-------------------	---------------------------------

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☐

Have Comments ☒

Enter your full representation here giving details of your reasons for support/objection:

Whilst we support the intentions set out in this section, we are concerned about the references in most allocation policies to mitigation measures. Our experience is that mitigation measures are often ill thought through and of limited, short-term benefit. They become a means of developers buying out their responsibilities towards your plan. As an organisation we would want to see realistic mitigation measures which can be seen to have a very long-term effect, and that these will be used only as a last resort. Avoidance of the damage referred to in your policy documents is the top priority. We will be monitoring closely any planned mitigation in new developments.

Should this policy not include the setting of the AoNB?

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

The plan should be worded to clarify a genuine commitment to using mitigation measures only where they are essential, and then in a way that is open, transparent and achieves genuine gain in biodiversity.

This policy should include the setting of the AoNB

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	DM20: Development Around the Coast
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Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☐

Have Comments ☒

Enter your full representation here giving details of your reasons for support/objection:

It is hard to relate this policy DM20 (development outside settlement boundaries on the coast) to policy S24 (policies for development outside settlement boundaries in the countryside) . Please can you explain how S24 and DM24 sit together and whether they provide a consistent approach to the control of development outside settlement boundaries?

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Please can you explain how S24 and DM24 sit together and whether they provide a consistent approach to the control of development outside settlement boundaries?

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	AL7: Development at Bosham
----------------------------	--	-------------------	---------------------------------------

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☒

Have Comments ☐

Enter your full representation here giving details of your reasons for support/objection:

We are similarly (re AL6) concerned about this proposal and its proximity to, and negative impact on, the AONB.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

A proper assessment is needed of the impact of this proposal on the AoNB.

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	DM30: Development and Disturbance of Birds
----------------------------	--	-------------------	---

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☐

Have Comments ☒

Enter your full representation here giving details of your reasons for support/objection:

We are pleased to see the inclusion of this important issue in such an important bird area. However, we are puzzled by the suggestion that mitigation strategies are realistic in this context. There is no indication of what the package of measures (b) might be. Some examples might be helpful. Any such proposal will be very carefully monitored by many organisations and local people. Transparency in these processes is essential.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Further details should be provided of any mitigation measures deemed to be acceptable, and stronger statements made that the need for such mitigation will be avoided.

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:	38/para 4.30	Policy Reference:	Spatial Strategy
----------------------------	---------------------	-------------------	------------------

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☒

Have Comments ☐

Enter your full representation here giving details of your reasons for support/objection:

We are very concerned by the indication here of a future plan to create a major new settlement in the area. The District has 75% of its area as designated land and any such development could not be achieved without creating an unsustainable level of damage to the natural environment, as well as creating an unsustainable car-dependent development.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Remove from the plan and challenge the housing targets on the basis of having a special case because of high levels of designated land.

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	DM19: Chichester Harbour AoNB
----------------------------	--	-------------------	--

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☒

Have Comments ☐

Enter your full representation here giving details of your reasons for support/objection:

This policy needs to be much more closely linked to national policy as set out in NPPF , particularly paragraph 172 which states :

“great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONBs, which have the highest level of protection in relation to these issues” and that “The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest”.

As currently drafted, the policy fails to explain the purpose of the AONB designation and the implications this has for the control of new development, particularly the tests for “major development” which may be acceptable in exceptional circumstances.

We agree that “The flatness of the landscape makes the AONB particularly vulnerable to visual intrusion from inappropriate development, both within or adjacent to the boundary, which can often be seen from significant distances across inlets, the main harbour channels, or open countryside.” And it is therefore right that the District Council will have particular regard to these characteristics in determining development proposals affecting the AONB.”

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

The policy should explain the purpose of the AONB designation and the implications this has for the control of new development , particularly the tests for “major development” which may be acceptable in exceptional circumstances.

Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	S4: Meeting Housing Needs
----------------------------	--	-------------------	--------------------------------------

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☐

Have Comments **X**

Enter your full representation here giving details of your reasons for support/objection:

Please can you confirm as to whether further stages of plan development will use the new national formula for calculating housing need?

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

We would like clarification on this issue.

(Continue on separate sheet if necessary)

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