

PRE-SUBMISSION SOUTH DOWNS LOCAL PLAN

Representations form for public consultation (Regulation 19)

26 September – 21 November 2017

Have Your Say!

The consultation period on this document runs from 26 September to 21 November 2017. All comments and completed forms should be returned to the Planning Policy team by 23:59 on 21 November 2017.

The document and accompanying evidence base, including the Sustainability Appraisal, is available on our website via www.southdowns.gov.uk/localplan. Paper copies of the Local Plan, the Policies Map, the Sustainability Appraisal, Habitat Regulations Assessment and Interim Consultation Statement are also available at the South Downs Centre, Midhurst and at a further six deposit locations. See our website via www.southdowns.gov.uk/localplan for further details.

Comments should ideally be made using the consultation website via www.southdowns.gov.uk/localplan. If you prefer to comment by email or post, comments can also be returned using this questionnaire, via email to planningpolicy@southdowns.gov.uk or posted to the following address:

South Downs Local Plan
Planning Policy
South Downs National Park Authority
South Downs Centre
North Street
Midhurst, West Sussex, GU29 9DH

Please note that comments received cannot be treated as confidential as all comments must be publicly available in accordance with Government regulations.

If you have any questions about the consultation please contact the National Park Authority on 01730 814810 or planningpolicy@southdowns.gov.uk. Please be aware that due to the likely volume of responses officers will be unable to provide a personal reply to representations made during the public consultation period.

If you would like to comment on any part of this document using the questionnaire then please complete the form overleaf. This form has three parts:

Part A - Personal Details

Please note that representations are not confidential and that they will be published on the Authority's website and copies made available for public inspection. However, personal details, other than the respondent's name and/or organisation will not be made public. Please also use Part A as appropriate to request to be notified of stages of the Local Plan examination and adoption, and to request to participate in the examination hearings.

Part B - Your Representation(s)

Please fill in Part B for **each** representation you wish to make i.e. individual representations will need to be made for each policy or paragraph of the Local Plan referred to. Alternatively, if you are commenting on the Sustainability Appraisal, Habitat Regulations Assessment or Policies Map, please complete the relevant box, clearly referencing the paragraph or part of the document, or the map, you are referring to. Boxes 4 and 5 may be used to write your comments in relation to any of these matters. Please request additional copies of this form if necessary or supply information on separate paper.

(continued overleaf)

Part C – Any other comments you wish to make

Please fill in Part C for any additional comments you wish to make, not covered under Part B.

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CONSULTATION

Representations form for public consultation (Regulation 19)

26 September – 21 November 2017

Part A

Contact Details

Title: [REDACTED].

Name: [REDACTED]

Organisation (if relevant): **Secretary, The Chichester Society**

Address: [REDACTED]

Post Code: [REDACTED]

Email: [REDACTED]

Tel: [REDACTED]

Do you wish to be notified at the email / address stated above* of any of the following:

- (1) That the Local Plan has been submitted for independent examination
- (2) That the Local Plan Inspector's Report has been published making recommendations on the South Downs Local Plan
- (3) That the South Downs Local Plan has been adopted

*Note that you will be notified by email rather than by letter if an email address is given.

Important Information:

- Please provide your name and full address. 'In confidence' representations cannot be accepted
- Please complete Part A and then Part B for each representation made. Please copy or download additional copies of Part B as required and Part C if necessary
- All representations are publicly available and can be viewed on request
- Please make your responses before the deadline of 23:59, 21 November 2017

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings.

Part B

Name or Organisation

The Chichester Society

1. To which part of the Local Plan does this representation relate?

Policy number
(SDxx) or section

✓

Sustainability Appraisal
(paragraph or table number)

Policies Map
(state map title)

✓

Habitat Regulations Assessment
(paragraph or table number)

For information about legal/procedural requirements and whether the local plan is sound, please see paragraph 182 of the NPPF and Planning Practice Guidance on Local Plans.

2. Do you consider the document is Sound?

Yes

No

If No, do you consider it is unsound because it is:

(1) Not positively prepared

(2) Not justified

(3) Not effective

(4) Not consistent with national policy

3. Do you consider the document complies with the legal/procedural requirements for preparing a development plan?

Yes

No

Continues over page

4. Please give details in the box below of why you consider the document is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.

N/A

(continue on a separate sheet if necessary)

5. What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

(continue on a separate sheet if necessary)

6. Do you consider it necessary to participate at the Examination in Public?

No



Yes

7. If you answered Yes to the last question, why you feel it is necessary to participate at the Examination in Public?

N/A

Signature:

Date: 21 November 2017

Part C

Additional Comments (note these should relate to all matters relating to the Local Plan other than the tests of soundness and legal compliance)

The Chichester Society supports this first landscape-led Local Plan for the South Downs National Park. We support the Plan's Core, Strategic, and Development Management policies.

We particularly commend policies SD4-SD8. (*SD4-Landscape Character, SD5-Design, SD6-Views, SD7- Relative Tranquillity and SD8-Dark Night Skies*).

We recognise that little development is proposed within the National Park in the vicinity of Chichester, but we support the small housing allocations in the adopted Lavant Neighbourhood Plan and the small housing site at West Ashling (Policy SD95). We are however concerned that major developments on the coastal plain outside the National Park boundary, particularly around Chichester, are likely to result in adverse impacts on the National Park. We hope that the duty to co-operate between the South Downs NPA and Chichester DC will be maintained, and that policies SD4-8 will be at the forefront of all negotiations between the two authorities so that the adverse impacts can be mitigated as far as possible.

Concerning the supply of housing (*SD 26 - Supply of Homes*), we recognise that National Park Authorities are not required to meet the 'objectively assessed need' (OAN) for housing. However, the strict policies limiting development within the South Downs National Park are already causing intense development pressures on areas outside the Park, especially on the West Sussex Coastal Plain which affect Arun and Chichester District Councils. The Society notes several adopted Neighbourhood Plans within the National Park have increased their provision for housing, greater than that allocated by the Park Authority. Local communities across the Park have decided they can accommodate increased numbers, especially if 50 percent of new housing is affordable. The Society would advance this argument by supporting as much housing in Downland communities as can be accommodated without damaging the wider landscape environment.

We are pleased that the Plan recognises that Chichester is the major gateway to the National Park from the coastal plain. We support Strategic Policy SD19c *Improvements to walking, cycling and bus connectivity*. The extension of Centurion Way to Midhurst, together with proposed linked footpaths/cycleways east of the City to East Lavant and The Trundle, will provide high quality sustainable access to the National Park.

We have one criticism of the *Local Plan Policies Map- Western Area: South*. The extensive brown stippling across much of this map to indicate 'Mineral Safeguarding area' detracts from the clarity and makes it challenging to read. Minerals are already covered by the joint West Sussex/South Downs *Minerals Local Plan*.