

Introduction - General comment (page 5)

The Draft Local Plan Policies Preferred Approach, is a well-produced and detailed document; however the Summersdale Residents Association, whilst accepting many elements of the document has significant reservations on aspects of policy which could cause long term damage to the essence of the City and would have a detrimental impact on this “special place”.

The CDC response process whilst encouraging the use of technology is tedious and laborious and does not encourage the engagement of public or local societies. The system seems designed more for the easy compilation of responses, rather than for a resident wishing to make a valuable point. It would have been more beneficial to have provided a short summary for residents and groups to comment on.

Targets and how we've arrived at them - Housing Provision (page 6)

The plan target of 395 homes per annum for the period 2012-2029 are derived from SHMA predictions of population growth that are out of date and do not take into account the latest census. Population growth in Chichester is driven by migration to the area. A significant number of homes become second homes and the area is a very attractive location for retirement. A better understanding of the demographics and factors driving the housing demand from the population moving to the area is required. We believe the number of new dwellings could easily be reduced further towards 300-325 per annum.

We disagree that the "evidence" suggests that 395 homes is reasonable.

Infrastructure changes (page 7)

The Draft Local Plan policies assumes major investment in the A27 and the sewage works, however without this being proven to be deliverable. The A27 around Chichester is already very congested and the Apuldram sewage treatment works at capacity. The plan must allow improvements to infrastructure to be completed before any significant new housing is allowed in Chichester. The impact of unimplemented planning approvals at Graylingwell, Roussillon Barracks (including the care home), Hunters Rest and other schemes on the existing infrastructure has to be fully appreciated.

Policy 2 Development Strategy and Settlement Hierarchy

The development at Shopwhyke has now been approved. The major extension to the west of Chichester needs to be phased and land not made available for development until the requisite improvements to the A27 and the Apuldram sewage works have been completed.

Whist Tangmere can be expanded as a well integrated settlement hub, the planned development of services is required as part of the major expansion.

The expansion of west Chichester and at Westhampnett should only be contemplated if the updated SHMA supports the need for further housing growth in the later years of the plan.

Policy 7 Housing and neighbourhoods (pages 46-57)

In accordance with the National Planning Policy Framework (NPPF) the Local Plan is required to meet needs not demand.

The SHMA assumes continued in-ward migration to the area. The demographics of the high inward migration need to be understood, where are the new residents working and how does the new technology and home working impact on housing numbers and attraction of living in Chichester and working in London or further away a few days per week. The existing retired demographic impacts housing demand and the influence of life expectancy of residents on housing demands need to be considered.

The SHMA is out of date and needs to be revised in accordance with 2011 census, having regards to demographics and a more detailed analysis of motivation for migration.

The Local Plan should require regular reassessments of the SHMA. As stated previously the existing SHMA is outdated.

The plan refers to outstanding planning permissions, these includes Graylingwell and the Barracks however slow housing sales caused by the poor economic situation have put these large projects on a much longer timeline. The impact on the phasing of large new developments needs to be carefully managed. While market conditions will dictate, when developers start the next phase of developments in these current times of economic uncertainty the likely tail of unimplemented approvals will increase.

The table at **7.1** should allow more windfall sites ie 1 house being demolished and being replaced with 3-4 dwellings in some locations, will produce significantly more than 350 homes in the East West corridor over the period of the plan.

The earliest date of 2019 for the development of West Chichester seems optimistic and a later date for a phased development needs to be stated, having regards to timing of the adoption of the plan and acquisition of land, planning and development of related extensive infrastructure works required.

As stated previously the SHMA needs to be continually updated to reflect changes in demographics, the economy, technology and transport.

- **Shopwhyke** may have scope for increased development including housing and business/employment uses adjacent to the A27. This would allow Shopwhyke to develop the adequate services needed to support viable sustainable settlement ie shops, school, community facilities Doctors surgeries, while remaining within close proximity to the City.
- **Tangmere** may have further scope for development to the South East, however the need to avoid coalescence with Oving and Shopwhyke need to be resisted.

- **Southbourne** and the **Manhood** peninsular can take more development could as suggested in the Local Plan, particularly when access to the A27 is improved together with the upgrading of local roads.

The table at **7.2** needs to be laid out in phases of developments with realistic dates or periods over the life of the plan and set out below the requirements that need to be achieved before the phase can be delivered.

The overall policy fails to make any reference to a mix of housing types. The use of a variety of house types should be encouraged, not all new developments should be town houses. Mixed housing including bungalows, smaller developments of flats with private garden space and larger detached houses should be built. New forms of housing ie student housing and studio/1 bedroom flats to meet the needs of first time buyers should be encouraged. Too many of the recent developments have featured cramped three storey terraced houses with limited private garden space.

Policy 8.0 Transport (page 63)

The plan recognises the importance of the upgrading of the A27. This needs to be completed in an efficient and sympathetic manner using the most effective engineering and not a cheap short term solution.

Bus travel needs to be well funded from infrastructure levy, both in terms of frequency and early morning/late nights and routes that serve more than just the new community.

Cycle routes need to be planned into all new developments, together with upgrading of many routes. Cycle routes should adopt best practice and not be constrained by funding issue.

A new road to serve the College, hospital and possibly create a new shared car parking area for both facilities, with a short walk to the City Centre could provide a solution to traffic delays on Westhampnett road. By encouraging commuters to park in such a location would remove some on street car parking and avoid the requirement for a Park and Ride scheme.

The transport plan fails to mention the impact of new retail development planned at Barnfield Drive and a possible third supermarket on the Eastern site of the City, where a change of use for the existing Homebase store to a foodstore has yet to be implemented. This together with the recent arrival of John Lewis will significantly change traffic flows across the City.

Traffic congestion on the level crossings within Chichester needs to be part of policy, reducing congestion, better lane configuration, moving the entrance to the station, creating a combined bus and rail transit point, relining the traffic flows over the existing crossings and even considering providing a third crossing point, somewhere between the exit to Waitrose/gravel storage areas and the cinema complex. Better signage of anticipated delays at the barriers could be made around the neighbouring roads.

The plan needs to take account these changes in habits, service delivery and technology. Three years ago you would not have walked around with an IPAD or tablet device, able to order groceries wherever you are located. An 3G phone can receive live information on availability of the next bus, traffic congestion at the traffic lights, availability of parking spaces at each car park. Where is the mention of the impact of such technology?

Policy 9 Development and infrastructure provision (page 67)

The concern of the SRA is that whilst the Local plan talks about infrastructure improvements that these are slow to implement.

The upgrading of the Tangmere WWTW is not guaranteed until after 2019.

New schools are linked to certain housing numbers being developed and occupied, in the current market Graylingwell has been much slower to develop than anticipated, the proposed school site remains vacant and parents have to travel distances across town to Central and Jessie Young-Husband schools. Whilst a school cannot be opened, when the first house is sold, the requirements and lengthy lead in time to develop will result in local schools being at capacity, before the new school is delivered. The needs to be considered in relation to all new developments, to ensure that truly sustainable communities can be developed.

Community sites should be allocated in new areas of development for a range of services ie convenience store, takeaway, community facility, school and land for development of other services ie church, doctor and nursery school.

The plan needs to consider how these services are changing. The range of services now being offered by doctors within Primary Care is increasing requiring larger sites, however no allocation of such sites is provided.

Chichester has an undersupply of under 5 nursery provision. The plan needs to take into account the requirements for these and other new services.

Public transport needs to be well funded from the infrastructure levy both in the short and long term and allow new bus routes not just to serve the new developments, from whom the short term funding was delivered, however across communities.

Policy 16 West of Chichester Strategic Development location (page 89)

The SRA is concerned about the development of White House Farm if no proven need exists for development of the number of homes required by the Draft Local Plan.

- As expressed elsewhere the overall housing target proposed for the Local Plan area in Chichester District is excessive at 395 per year.
- The development is not deliverable until A27 improvements and access available through the land to the South to join the A27.
- The Centurion Way is a logical boundary for the western edge of Chichester, if the need for new housing cannot be justified then the housing should not be developed.
- Waste water disposal issues which cannot be resolved simply, swiftly and at reasonable cost. The need for expensive alternative waste water solutions with consequential impact on a wide geographic area of additional disruption as adequate capacity cannot be provided locally, further highlight the difficulties and limitations of White House Farm.
- If proven that need exists then any development should start from the South and not the Northern boundary. Development from the North would result in nearly all traffic having to go through the City to reach the A27, with no future guarantee that a southern access could ever be achieved.
- Development only should only be allowed to the South of the B2178, to prevent impact on Brandy Hole Copse.
- Traffic mitigation measures would be required to eliminate rat running through the narrow Brandy Hole Lane and improvements are required to the junction of Sherbourne road/ Norwich road with St Pauls Road, the Northgate Gyratory and the existing roundabout at the junction of Sherbourne Road and Westgate,
- If a proven need exists for additional housing, the neighbourhood should be allocated sufficient land to accommodate a range of services including in addition to the services listed in the plan, a church, doctors surgery and other uses ie nursery school.
- Cycle tracks should be provided throughout the development to enable good linking with the City Centre and the Centurion Way.
- If a proven needs exists for the development, areas of open space, jogging tracks, together with childrens play areas should be provided throughout a development of such scale.

Policy 17 Shopwhyke Strategic Development location (page 99)

An outline scheme for Shopwhyke was approved on the 1st May 2013.

The plan needs to demonstrate that a sustainable urban extension can be provided. The community hub needs to be of adequate size to support the new community and expected services required. Once again no mention is made of school, church or medical services being a requirement. Adequate green spaces and well provided children's play areas should be provided throughout the new developments.

The Shopwhyke site has further land available for development to create more sustainable centre with adequate facilities around a neighbourhood centre, reducing the need to travel to shop, go to school or access medical services. The possible addition of a further 500 homes could take pressure off greenfield sites.

The Local Plan should take account of the concerns of residents expressed in the approval of the application and look to provide more detail in the local plan of the required improvements prior to the detailed approval of future elements. The site offers opportunity for future development of employment, businesses and hotels adjacent to the A27.

Policy 18 Westhampnett Strategic Development location

The SRA is concerned about the development of Westhampnett, if no proven need exists for development of the number of homes required as envisaged by the draft local plan.

- As expressed elsewhere the overall housing target proposed for the Local Plan area in Chichester District is excessive at 395 per year.
- If the proven need does exist, the land should be reserved for development at the later part of the local plan period.
- The proximity of the site to the established activities of Goodwood will impact on the residential amenity of the site. The large area of flood plain and the impact on Westhampnett are also significant concerns.
- The development of 500 homes will be insufficient to support a new sustainable community and it may be better to expand Shopwhyke lakes in preference to Westhampnett.

Policy 19 Tangmere Strategic Development location

The SRA supports the development of Tangmere as a Strategic Development Location as a scheme at Tangmere could allow the use of brownfield land. However any needs a detailed development brief worked up with local residents, parish council and other stakeholders. The CDC need to take into account the experiences of the development of Graylingwell in delivering a master plan on a brownfield site.

The major expansion needs to be well integrated to build a vibrant sustainable and welcoming community. The significant expansion of housing in Tangmere will enable a greater range of services to be delivered within the expanded village and the local plan should seek to allocate sites for new and relocation of existing services as required, to meet the needs of the enlarged community.

The development of Tangmere needs to be constrained by avoiding coalescence with Oving and Shopwhyke lakes development.

It is essential that good and frequent public transport is provided, including live travel information and other initiatives embracing new technology, to encourage use of public transport.

An expanded Tangmere will need safe and secure cycle paths linking with Chichester City.