

Boxgrove Neighbourhood Plan Pre Submission (Regulation 14)

Chichester District Council Response – October 2017

The Parish Council and Neighbourhood Plan Working Group should be commended for the significant hard work that has been put in to this plan to date. The Council recognises there have been a number of challenges for the NP group to address as work has progressed to this stage.

Page 5: Amend title of Chichester Local Plan to read Chichester Local Plan: Key Policies 2014-2029 (CLPKP). Reference also needs to be made the NP being a joint plan with the South Downs National Park Authority (SDNPA) and that currently the development plan also includes the saved policies from the Chichester Local Plan – First Review (April 1999) for the SDNPA area. (Similarly section 2.1.2 on Page 9 also needs amending to include these references).

Page 10: Section 3 About Boxgrove

The NP is to be commended for its identification of community facilities, the asset register, reference to the Community Infrastructure Levy (CIL) and how the Parish wishes to spend the allocation. However, the NP does not appear to support or value Boxgrove Village Hall as it does other community buildings. The Parish Council may need to reconsider this for consistency in the NP.

Page 16: Section 3.5 Getting Around

It is noted that the NP is generally positive with regard to encouraging non-car modes of transport. The document may benefit from clarity and more detail about where any such related infrastructure is desired. For example this could be by way of a marked plan etc. Such an approach might be of assistance where Neighbourhood Plans for neighbouring/abutting parishes seek to sensibly interrelate so as to support and build upon one another's aspirations.

Page 22: Section 4.2 Core Objectives - 3 Community

The text states to 'create new and improve and maintain Parish facilities by retaining the facility of a village shop and pub'. The NP goes on to set out the wish to enhance and extend existing play and exercise facilities, provide opportunities for activities and support services but does not mention anything about protecting, supporting, extending, improving the village hall and the services it provides or the St Blaise Centre. The text may need some minor rewording on this basis.

Page 23: Para 4.2 Core Objectives

States 'Issues that are not relevant to the NP, will be dealt with via a Community Action Plan'. It is not clear where this plan is and it would be helpful if this was referenced or if some indication as to when/where/how it will be drafted was included in the text.

Page 24: Section 4 – Housing

As the site at Hainaker Crossing has been removed from the NP the text in the first bullet point may no longer be required.

Page 27: Policy SB1 –Settlement boundary/recognised village envelope

The map showing the settlement boundary at Boxgrove (Map G) has not been updated in accordance with the amended settlement boundary identified in the Site Allocations DPD. This amendment identifies how the parish is meeting the housing numbers set out in the CLPKP. It would also be helpful if the policy made reference to the map where the boundary is set out.

Map F indicates the 'Recognised village envelope' for Halnaker but it is not clear what the intention of this boundary is or what is meant by this terminology. No settlement boundary has previously been identified by CLPKP for Halnaker and it does not form part of the settlement hierarchy identified in the CLPKP. Is the intention that the recognised rural envelope boundary fulfils the role of a settlement boundary? If not then what role does this boundary fulfil and how does this relate to the determination of planning applications?

CDC also questions how this boundary has been defined as there are some quite large open areas included if the intention is that this is a settlement boundary. Equally if the purpose of the boundary is to identify an area where windfall sites will be considered acceptable in principle then again there are a number of areas that are opened up to potentially speculative development. Suggest that this is carefully considered again and clarified.

The bullet point criteria need to comply with CLPKP Policies 45 and 46.

Page 29: Policy EH3 Reinstatement and restoration of land at Boxgrove and Eartham Quarries

Suggest the wording clarifies when this would happen, at the end of the quarrying for example. The original planning permission will have specific conditions relating to this that would need to be complied with.

Page 29: Policy EH5 Development on Agricultural Land

Need to state which grades are included in 'best and most versatile land' as the maps shows all grades.

Need definition of what is meant by 'other land-based rural business'. It is not clear what this means; suggest this is checked for compliance with CLPKP.

Page 30: Policy EH6 Landscape Character and important views

There needs to be a map identifying clearly the 'important views' that are considered relevant to the NP. In addition the second paragraph is not clear and may benefit from some rewording.

Page 31: Policy EH7 Dark Skies

Street lighting may be required for highway safety and/or crime/security reasons. The last sentence is unlikely to be a realistic requirement.

Page 31: Policy EH8 Conserve and Enhance the Heritage Environment

1st bullet point – it may be more appropriate to include 'natural beauty and wildlife' in other policies (for example ecology etc.) rather than in this specific policy aimed at the heritage environment.

Last bullet point – unclear what is meant by 'existing designed or natural landscapes'.

Page 32: Policy EH9 South Downs National Park

Suggest this is brought more in line with the SDNPA wording.

Page 32: Policy EE1 Support existing employment and retail

Suggest that the policy wording is checked to mirror and include reference to Chichester Local Plan: Key Policies Appendix E Appropriate Marketing Guidance which expands on the intention of the policy as worded.

Page 33: Policy EE2 Tourism activities

Second para - is the intention that this relates to built facilities? This is not listed as a use that is currently acceptable in Policy SB1? The policy states that the proposed use should be sustainable but in this context this is not a justification for building outside the settlement boundary. Suggest some further thought is given to the wording of the policy.

Page 34: Policy EE3 Communications Infrastructure

Suggest the policy may read better if a new para starts after the end of the first sentence. The policy appears to support approval for all communications masts, is this the intention? May need to consider this further in terms of the wording of the policy. Also need to consider the potential impact on wider views and the landscape etc.

Page 34: Policy EE4 Agricultural/Horticultural/Equine/Vinicultural employment

The policy as currently worded is inflexible; suggest the inclusion of criteria (for example in relation possibly to marketing, viability etc).

Page 34: Policy EE5 Rural Buildings

This should comply with CLPKP Policy 46; also need to be clear what is meant by tourism purposes (for example, holiday lets or other use?)

Page 36: 5.6 Leisure and Community

Policy LC1 Support Independent Living

The definition of 'independent living' needs to be clear.

Policy LC3 Protection of assets of community value

CDC welcomes the identification of The Anglesey Arms as being included on the Asset Register. The other policies in this section refer to the village shop and Boxgrove School but make no mention of the village hall. Suggest the text may need some minor rewording on this basis.

Page 36: Policy LC2 Healthcare facilities

Suggest the inclusion of the words 'subject to the other policies in the Boxgrove Neighbourhood Development Plan' in the policy.

Page 37: Policy LC6 Village Shop and Policy LC7 Boxgrove School are referred to but there is no reference to the village hall? Suggest some rewording on this basis.

Policy LC6 does not currently provide flexibility and it may be helpful to relate this to when and under what circumstances any alternative use may be considered, for example as with the employment and retail policies above, by including reference to Chichester Local Plan: Key Policies Appendix E. Appropriate Marketing Guidance.

Page 37: Policy LC7 Boxgrove School

Suggest the inclusion of the words 'subject to the other policies in the Boxgrove Neighbourhood Development Plan' in the policy.

Page 38: Policy H1 Quality of Design

Some of the criteria may not be achievable (for example, criterion 2, 6 and 9). Suggest some of the wording is reconsidered and checked to be deliverable and enforceable.

Page 40: Policy H3 Windfall Sites

Need to be clear what is meant by 'recognised village envelope', is this intended to be a settlement boundary or is the intention that countryside policies are relevant inside the envelope? Suggest careful consideration is required of this policy as this could potentially lead to unsolicited development.

Criterion vii) – all land in the settlement boundary is acceptable in principle so this may need to be reworded.

Criterion viii) – suggest adding the words 'as appropriate' at the end of the sentence.

It is not clear from the wording whether these sites are to be allocated as the wording only refers to 'support' for development.

Site 7 Land at The Old Granary

There is currently no overriding requirement for the parish to identify any further housing allocations. This is a sensitive site in close proximity to various recognised heritage assets. However, it is noted that a detailed heritage impact assessment has been compiled in relation to the proposal for this site. If the Parish considers there is sufficient local community support for the inclusion of this site, and subject to any comments made by key statutory bodies, it is suggested that it may be helpful to include additional criteria to protect the characteristics of the site and mitigate any potential impact development proposals may have. Any such policy, for example, could use the findings of the heritage impact assessment to inform a more detailed and robust policy that would seek to enhance and not detract from the significance of the identified heritage assets in this sensitive location.

In this respect it is also suggested that it may be clearer if the site is set out in a policy in its own right rather than as part of the windfall policy.

Site 8 The Old Coal Yard, Halnaker

This site already has planning permission and therefore there is no reason to include this proposal.

Site 10 – Brambles at Crockerhill

CDC questions the evidence to support the inclusion of this site. There does not appear to be any justification for this proposal for a single dwelling in the countryside.

Page 41: Policy GA1 Footpath and cycle path network

Second para makes reference to seeking developer contributions directly from new housing; however, these cannot be sought unless they are required to make the development acceptable, in other cases contributions will be covered by CIL.

Page 42: Policy GA2 Parking in new development

It may help to reference that the standards are West Sussex County Council standards.

Page 43: Policy GA3 Streets and Access Ways to serve new residential development

What is meant by 'access ways' in first para? Second para – why are only informal play areas included? Third para – need to check that this is acceptable with the Highway Authority.

Page 43: Policy GA4 Promoting sustainable movement

Question if the intention is as written as in all likelihood an 'increase in travel demand' would be generated by new housing, is the intention to support more housing development?

First bullet point – this needs to be reconsidered as the mechanisms set out cannot be used in the way suggested by the policy.

Last para of policy – is this intended to relate to the Parish Council portion of CIL? It may be more appropriate to include this within the text of the NP rather than the wording of the policy.

The policy states ‘Funds collected under the provisions of CIL, will be targeted at the following schemes’

- Traffic calming and public realm schemes
- Road improvements, including new cycle routes and facilities, safer pedestrian crossings
- potential remodelling of Halnaker crossing.

CDC’s Infrastructure Business Plan (IBP) for Boxgrove Parish identifies three projects which refer to transport and one project (IBP/649) identified in the NP. It would be helpful for the parish if the NP text was expanded and cross referenced to the IBP for consistency.

Exercise of Delegated Authority - Head of Planning Services

I hereby exercise my delegated power in accordance with Chichester District Council’s Constitution:

‘to make formal comments on a draft Neighbourhood Plan at Pre-Submission stage and Submission stage’

AND DETERMINE THAT, the above comments are the formal response made by Chichester District Council on the **pre submission stage** of the **Boxgrove Neighbourhood Development Plan** in relation to comments made under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended by The Neighbourhood Planning (General) (Amendment) Regulations 2015).

Signed:

A handwritten signature in black ink that reads "Andrew Frost". The signature is written in a cursive style with a horizontal line under the name.

Head of Planning Services

Date: 26 October 2017