
**Supporting Documentation
Consultation Response on the
Chichester Local Plan 2021-39**

**DMH Stallard Planning on Behalf of
Rydon Homes Ltd**

March 2023

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Introductory Questions.

- Please indicate if you support or object:

Support Object

- Do you consider the plan to be legally compliant?

Yes No

- Do you consider the plan to be sound?

Yes No

- Does it comply with the duty to co-operate?

Yes No

1.1. The current *Chichester Local Plan: Key Policies* was adopted in 2015. Chichester District Council (CDC) is now required to produce a new Local Plan which will plan and manage development up to 2039. It does not include that part of the District within the South Downs National Park (SDNP). A separate Local Plan covering the National Park has been prepared by the South Downs National Park Authority (SDNPA).

- **What changes do you think need to be made to the plan? Please try to be clear and concise as to what you would like this part of the plan to say.**

Overall, we feel that CDC should be meeting their identified housing need and we disagree with the Council's justification on meeting a sub-identified need that there is insufficient capacity (due to constraints) within parts of the District.

Furthermore, we feel that the Plan is unsound. It does not adequately meet current housing need. House prices in the Chichester District are 14 times the average earnings for those working within it and there is a need for 200 social and affordable rented houses per annum for the Plan period to 2039. Reducing the supply of new homes below the District wide housing requirement, as the draft Plan does, will exacerbate affordability further, which is unjustified and should be assessed again.

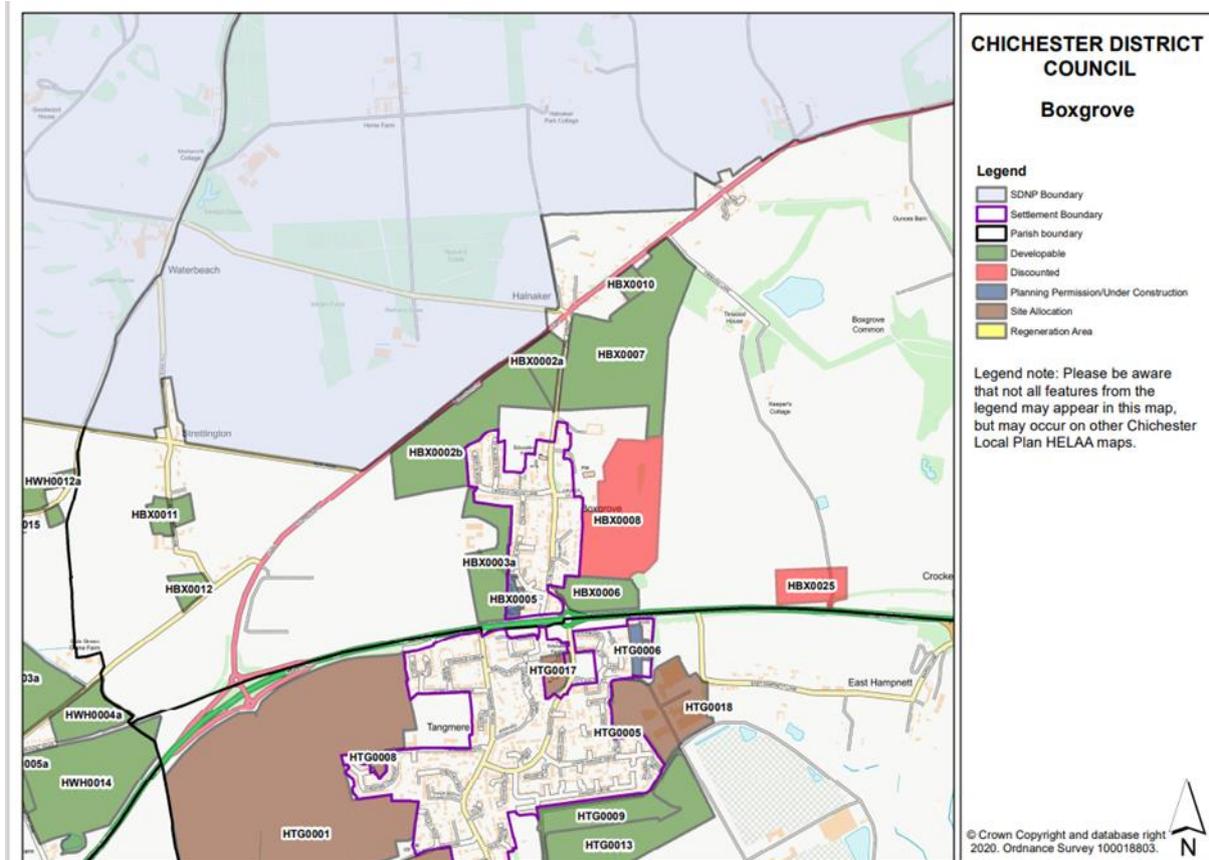
In more detail, currently the Plan proposes 10,354 total new homes over the Plan period (575.2 homes p.a). However, using the Standard methodology, the actual housing needed in the District is 11,484 homes. The 11,484 figure is calculated using data from the ICENI Chichester Housing and Economic Development Needs Assessment (HEDNA) Report from April, 2022. Indeed, using this data, CDC is currently 1,131 homes short of it's need over the 18-year period.

This housing need shortfall is exacerbated by the fact that the Plan fails to take account of the full potential of all of the new strategic locations within the District, such as Boxgrove. Indeed, there is an evidence base that supports the case that Boxgrove has the potential to accommodate a strategic level of housing growth, rather than the conclusion that it has limited capacity due to constraints – or the 50 homes proposed by CDC in Plan Policy H3.

This strategic level of growth could amount to at least 200 homes, significantly greater than that proposed in Plan Policy H3, which states that, as a 'service village', 50 dwellings could 'come forward through the neighbourhood planning process'. Paragraph 3.19, Page 38, of the Regulation 19 document cites some of the reasons for this limited growth within non-strategic Parishes, such as Boxgrove, as being:

- *Land Availability.*
- *Landscape Considerations.*
- *Settlement Patterns.*
- *Available Infrastructure.*

Indeed, CDC's Local Planning Authority (LPA) has an evidence base which does not support the comments made in Paragraph 3.19, Page 38. CDC's Housing and Economic Land Availability Assessment (HELAA) assessed 9 submitted sites as available, suitable and deliverable for Boxgrove, with a Total Identified Capacity (TIC) for housing of 610 potential plots. Please see below for the specific information about Boxgrove and potential sites contained within the 2021 HELAA.



More specifically, the Boxgrove Parish HELAA sites in 2021, as shown in the above map, were as follows:

- 1) **HBX0002a** – Land north of Boxgrove Primary School – 2.33 ha – CDC deliverable 2ha net – 50 homes.
- 2) **HBX0002b** – Land north west of Boxgrove Primary School – 11ha – CDC deliverable 8 ha – 224 homes.
- 3) **HBX0003a** – Land south of Crouch Cross Lane – 4.7ha – CDC deliverable 4.7ha – 115 dwellings.
- 4) **HBX0006** – Land east of The Street – 3ha – CDC deliverable 1.25ha – 30 dwellings (Current undetermined outline application 50 homes validated October 2021 – The Brook Family).
- 5) **HBX0007** – Land north of Boxgrove Priory – 16.9ha – CDC deliverable 3ha – 72 homes.
- 6) **HBX00010** – Stane Street, Halnaker – 0.87ha – CDC deliverable 0.87 ha – 24 homes.
- 7) **HBX0011** – Farm Buildings North (north of Temple Bar Business Centre) Strettington 0.96ha – CDC deliverable 0.96ha – 30 homes.
- 8) **HBX0012** – Land south of Corner Cottage – 1.2ha – CDC deliverable 1.21 ha – 42 homes.
- 9) **HBX0013** – Land east of Strettington Lane – 0.71ha – CDC deliverable 0.71ha – 25 homes.

Indeed, the table below further confirms that the 610 potential plots total for Boxgrove was the same number for the year before, in 2020.

Parish	Settlement total 2021 HELAA	Settlement total 2020 HELAA	Difference from 2020	Reason for change
Apuldram	864	864	0	No change
Birdham	580	580	0	No change
Bosham	3324	3324	0	No change
Boxgrove	610	610	0	No change
Chichester	1506	1506	0	No change
Chidham and Hambrook	1265	1475	-210	HCH0027 excluded from HELAA assessment as unable to confirm availability
Donnington	0	0	0	No change
Earnley	307	318	-11	Yield reduced due to climate change constraints
East Wittering and Bracklesham	517	0	+517	Corrected climate change data shows sites in East Wittering which were previously discounted due to climate change, are not now affected
Fishbourne	1036	1164	-128	HFB0026 and HFB0027 not considered suitable as stand-alone sites due to flood risk as a result of climate change.
Funtington	2784	2784	0	No change
Hunston	483	619	-138	Yield reduced due to climate change constraints
Kirdford	242	242	0	No change
Lavant	0	0	0	No change
Loxwood	1157	1157	0	No change
Lynchmere	0	0	0	No change
North Mundham	821	601	+226	HNMO019 omitted from 2020 HELAA in error. Site considered suitable
Oving	3342	3342	0	No change
Plaiستow and Ifold	795	795	0	No change
Selsey	678	902	-224	Yields reduced/sites discounted due to climate change constraints
Sidlesham	93	93	0	No change
Southbourne	4092	4092	0	No change
Tangmere	906	906	0	No change

We therefore feel that the above evidence should be factored into the Plan and that the figure of 50 homes proposed for Boxgrove should be looked at again.

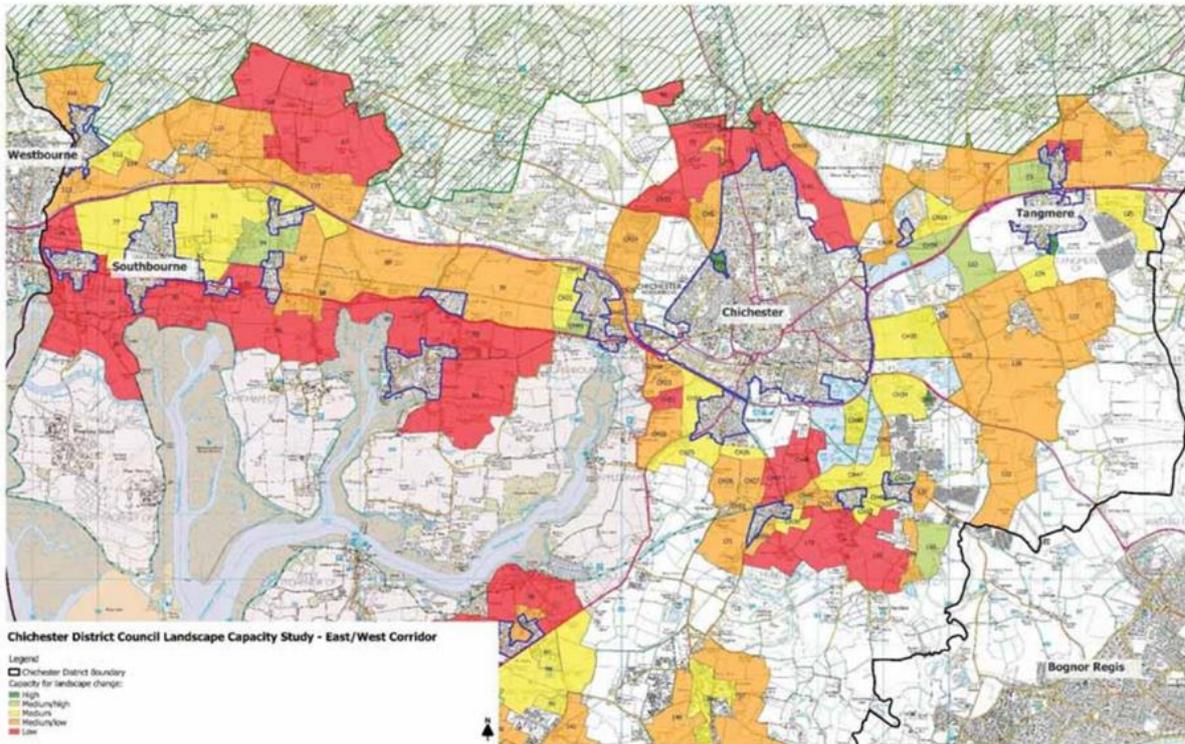
➤ **Chapter 3 – Comments on Spatial Strategy.**

This re-assessment of Boxgrove as a site for strategic level residential development should also take into account Plan Policy 21 regarding the Spatial Development Strategy. We object to the exclusion of Boxgrove from accommodating a strategic level of housing and feel that it should be included in Tier 3, as a settlement to accommodate a strategic development location. However, we do agree with the settlement hierarchy, as outlined in Plan Policy S2, with Boxgrove listed as one of 17 'Service Villages'.

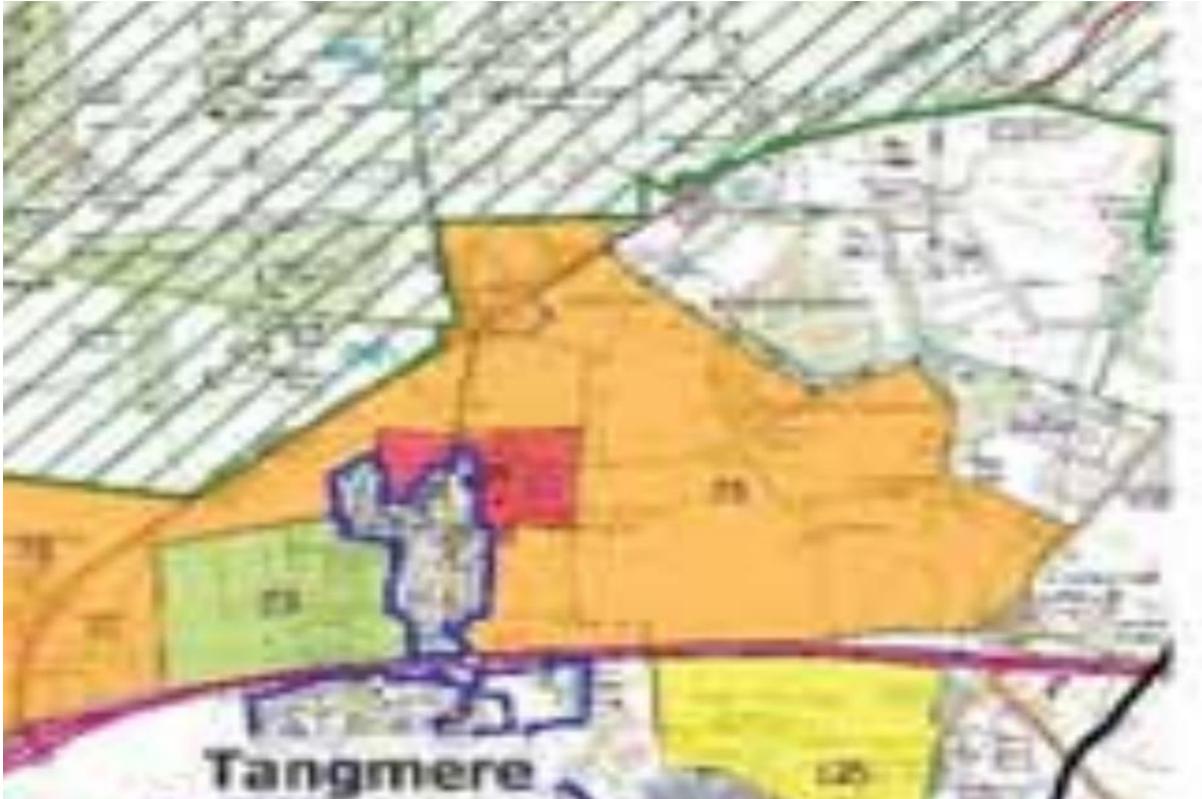
➤ **Chapter 4 – Comments on Climate Change and the Natural Environment.**

We feel that Plan Policy NE2 on Natural Landscape has a too narrow wording, whilst Policy NE3 on Landscape Gaps Between Settlements is overly restrictive for all sites outside of the settlement boundaries. In relation to the Plan focus on Landscape Considerations and the Chichester Landscape Capacity Study from March, 2019, we feel that development within the Boxgrove Parish, and, in particular, the 9 HELAA sites and the four settlements outlined earlier in this document, do not involve areas which are so geographically close as to prevent strategic gaps from being safeguarded, and thereby

secure their individual settlement characteristics. Please see the 2 maps below for an illustration of this.



Extract, above, from Chichester Landscape Capacity Study – March 2019, terra firma Consultancy Ltd.



Extract, above, Boxgrove Parish within Chichester Landscape Capacity Study – March 2019, terra firma Consultancy Ltd.

➤ **Chapter 5 – Comments on Housing.**

In regards to Plan Policy H2 relating to Strategic Locations/ Allocations 2021 – 2039, we object to the exclusion of Boxgrove Parish from Policy H2. Boxgrove Parish should be listed as a Parish with the potential to accommodate strategic locations for residential development, where Neighbourhood Plans are anticipated to be prepared to identify the site(s) required, alongside the 3 strategic locations currently listed in draft Policy H2 (namely Chichester City, Nutbourne and Hambrook and Loxwood).

Nutbourne/ Hambrook and Loxwood are both defined as ‘Services Villages’ under Policy S2 (Settlement Hierarchy). The Boxgrove settlement is within same settlement category (Service Village) as Nutbourne/ Loxwood and Hambrook. The 2021 CDC HELAA assessed the 9 submitted sites as available, suitable and deliverable for Boxgrove Parish (with 6 suitable sites adjacent to the Boxgrove settlement boundary) and 3 further sites at settlements within Boxgrove Parish, totalling 610 potential plots, as outlined earlier in this document.

In regards to Policy H3 regarding a Non-Strategic Parish Housing Requirement, we object to the proposed quantum of homes (50 homes) for Boxgrove Parish. We feel that the quantum of homes should be significantly higher, as outlined in our comments on Policy H2 above. Policy H3 references ‘non-strategic parish housing requirements’, referring to

'small scale housing sites'. The largest quantum of homes within Policy H3 is 75 additional homes for Wisborough Green. In contrast the lowest quantum of new homes under Policy H2 is 220 new homes at Loxwood. We feel that if Policy H2 defines a strategic level of growth as a minimum of 220 new homes, then Policy H3 should plan for a higher quantum of growth than 75 additional homes.

In regards to Policy H4 on Affordable Housing, house prices in Chichester District are 14 times the average earnings for those working within it and there is a need for 200 social and affordable rented houses per annum for the Plan period (to 2039). Rydon Homes Ltd agrees that more affordable homes need to be built in the District in order to meet this need.

➤ **Chapter 8 – Comments on Transport and Accessibility.**

In regards to Policy T1 and Transport Infrastructure, we support efforts to secure 'the timely delivery of transport infrastructure on the A27 and elsewhere on the network, needed to support new housing, employment and other development identified in this plan'. Furthermore we note that it is proposed that all new dwellings (except for West of Chichester SDL and Tangmere SDL) contribute £7,728 (plus indexation) towards the schemes recommended to be provided within the Local Plan period via developer contributions. However, we would like to ask when will this be applicable from (i.e from what date does the indexation commence).

➤ **Chapter 9 – Comments on Infrastructure.**

Boxgrove Church of England (CoE) Primary School currently has capacity for just 70 pupils, 3 classes over 7 years. However, a typical 1 Form of Entry (FE) Primary School in England has a pupil capacity of 210 pupils. Boxgrove is a 1/3 FE School. However, the existing school site has the potential to increase its size/ pupil capacity, with the adjoining land under the ownership of West Sussex County Council (WSSCC) and Boxgrove Parish Council (BPC).

On the other hand, as set out in Plan Policy A14, the Land West of Tangmere includes the safeguarding of land 'to accommodate a new two-form entry primary school and associated development, including provision for an early years setting and a special support centre'. The Policy goes on to say, 'Further land shall be safeguarded to facilitate the potential expansion of the two-form entry primary school to three-form entry'. Further 'open space' has been safeguarded for 'green infrastructure', including a 'community orchard', 'playing pitches', and a 'sport pavilion'.

However, the same infrastructure is not being provided for in the Plan for Boxgrove Parish and we would like to see this area of the Infrastructure section re-assessed. For further context, the table below, from Planning School Places 2022 (WSSCC), shows the current policy for Primary School provision.

Chichester – primary provision

There are several strategic developments planned (some are in build) across the district including 500 dwellings each at Westhampnett and Shopwhyke, 1,000 in **Tangmere** and up to 1,600 West of Chichester. Financial contributions have been sought for all sectors of education as well as primary school sites on the **Tangmere** and West of Chichester development sites, each for a 1FE (210 place), expandable to 2FE (420 place) primary school.

The table below shows how WSCC will be providing additional accommodation in the school planning areas to cater for the increase in pupil numbers in the longer term (6-15 years).

School/ scheme	Year project commenced/ proposed implementation date	Project Type	Additional places per year group	New PAN	New Capacity
Primary education provision Chichester East	Dependent on the housing delivery timescale	School expansion	15-30 places per year over 7 years	tbc	tbc
Primary education provision Chichester North	Dependent on the housing delivery timescale	School expansion	15 places per year over 7 years	tbc	tbc
Primary education provision Chichester South	Dependent on the housing delivery timescale	School expansion	15 places per year over 7 years	tbc	tbc
West of Chichester	Dependent on the housing delivery timescale	New primary school	30-60 places per year over 7 years	30 60	210 420
Tangmere Village	Dependent on the housing delivery timescale	New primary school	30-60 places per year over 7 years	30 60	210 420

Further context is provided below, with the 2 WSCC pupil catchment maps, which is for the 2014 Education Catchment for Boxgrove CoE Primary School.

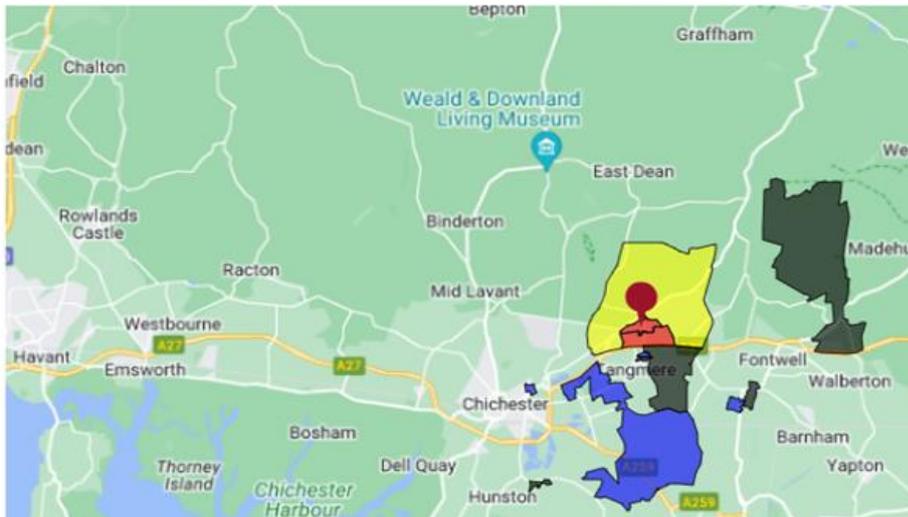
Admission year ⓘ

2013

Interpreting catchment maps

The maps show in colour where the pupils at a school came from*. Red = most pupils to Blue
Where the map is not coloured we have no record in the previous three years of any pupils to
options chosen.

For help and explanation of our catchment maps see: [Catchment maps explained](#)



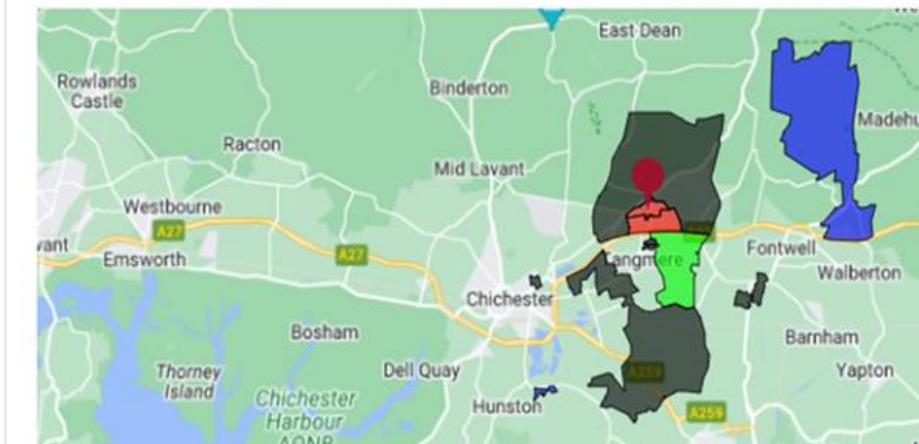
Admission year ⓘ

2014

Interpreting catchment maps

The maps show in colour where the pupils at a school came from*. Red = most pupils to Blue
Where the map is not coloured we have no record in the previous three years of any pupil
options chosen.

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Lastly on Infrastructure and educational facilities, evidence shows that 1000 new homes generate circa 210 new Primary School pupils. The proposed 2FE Primary School at Tangmere Parish would accommodate circa 2,000 new pupils.

The proposed Strategic Allocation for Tangmere (including the existing adopted Local Plan allocation) proposes 1,300 additional homes at Tangmere, therefore leaving a residual capacity for the proposed 2FE Primary School to accommodate an additional 700 homes within the Tangmere and surrounding Parishes. The pupil catchment map confirms that WSCC have accepted pupils to Boxgrove CoE Primary School from the Tangmere Parish and visa versa.

Education infrastructure cannot therefore be cited as a constraint to Boxgrove Parish accommodating a higher (strategic level) of growth, with the existing Boxgrove CoE Primary School having the potential land to extend on-site and/ or there being adequate capacity at the proposed 2FE Tangmere Primary School to accommodate a strategic level of growth within Boxgrove Parish.

➤ **Comments on the Sustainability Assessment.**

The Sustainability Assessment (SA) assessed the 9 suitable HELAA sites but only tested one scenario of 50 homes for Boxgrove Parish. We think that this is inadequate. The SA states that there are 'broad strategic arguments for directing a proportion of growth to this area (e.g nutrient neutrality and waste water treatment). However, the SA also states that there are limitations to potential residential growth in Boxgrove, outlining how the village is 'distanced from a railway station and there is an extensive Conservation Area, including the ruins of Boxgrove Priory, alongside a Grade 1 Listed Parish Church'. The below table outlines this information in more detail and we feel that the overall approach is inconsistent.

Table B: GIS analysis of all developable HELAA sites

HELAA ref.	Parish	Broad area	Size (ha)	ACMA	SPA	SAC	SSSI	LWS	Ancient woodland	Priority habitat	TPO	Wildlife corridor	Conservation area	G1 listed building	G2* listed building	G2 listed building	RPG	Scheduled monument	Archaeological Record	National park	AONB	Landscape capacity	Flood Zone	SWFR	Agricultural land	Minerals safeguarding	Primary School	Secondary School	Doctors Surgery	Train Station	Bus stop	IMD
HBO0025	Bosham	East-west corridor	159																													
HBO0009	Bosham	East-west corridor	19.8																													
HBO0002a	Bosham	East-west corridor	12.6																													
HBO0011	Bosham	East-west corridor	3.3																													
HBO0003	Bosham	East-west corridor	1.6																													
HBO0023	Bosham	East-west corridor	0.4																													
HBX0007	Boxgrove	East-west corridor	16.9																													
HBX0002b	Boxgrove	East-west corridor	11.2																													
HBX0003a	Boxgrove	East-west corridor	4.7																													
HBX0006	Boxgrove	East-west corridor	3.1																													
HBX0002a	Boxgrove	East-west corridor	2.3																													
HBX0012	Boxgrove	East-west corridor	1.2																													
HBX0011	Boxgrove	East-west corridor	1																													
HBX0010	Boxgrove	East-west corridor	0.9																													
HBX0013	Boxgrove	East-west corridor	0.8																													

Overall, we feel that the broad strategic arguments identified in the SA for directing growth to Boxgrove Parish can be accommodated for a greater number of homes than the 50 homes proposed. The 9 HELAA sites, already identified earlier on in this Consultation response, have a combined total of 610 residential plots and are:

- Located outside the Nutrient Neutrality Requirement Zone.
- Located outside the Water Neutrality Zone.
- Located outside the proposed Strategic Wildlife Corridors.
- Located outside Strategic Flood Zones.
- Located outside Groundwater Source Protection Zones.
- Well served by principal Highway Networks.
- Well served with proposed additional educational capacity.
- Well served with adequate wastewater capacity (please see below for details).
- Lastly, the landscape capacity of Boxgrove Parish has potential to accommodate additional housing growth.

Overall, we feel that the Plan has the potential to accommodate a strategic level of growth within Boxgrove Parish of between 200 – 600 new homes. This is significantly more than the 50 new homes proposed within the current Reg 19 Submission Draft.

Wastewater – Boxgrove drains to Tangmere Wastewater Treatment Works (WWTW). The evidence base submitted with Reg 19 confirms that Tangmere WWTW had (as of 01.01.22) remaining dwelling capacity for an additional 3556 new homes (with an

Environment Agency discharge licence for 3,000 additional homes). The proposed housing allocation (to include the adopted Local Plan provision) totalled an additional 1,300 new homes west of Tangmere and would leave a residual capacity of over 2,000 new homes to be accommodated at Tangmere WWTW. Wastewater infrastructure is therefore not a constraint to Boxgrove Parish accommodating a strategic level of growth (i.e circa 200 homes plus).

➤ **Comments on the Infrastructure Delivery Plan – 2021 – 2039.**

As outlined below, we agree with the allocation of £100,000 CIL funding for the creation of a bridleway linking Boxgrove Parish to Tinwood Lane. We also support the allocation of £150,000 for the upgrade to bridleways, in conjunction with the Tangmere development.

	Boxgrove - Create bridleway along footpath 284 with			£100,000	CIL	West Sussex	Essential
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Infrastructure Category	Scheme (what)	Justification/Rationale	Phasing (when)	Total Estimated Infrastructure Cost	Sources of funding	Delivery Lead (who/whom)	Priority in delivering Local Plan
	links to the village and to Tinwood Lane (IBP/1065*)					County Council	
	Boxgrove - In conjunction with Tangmere development, FP 284 (approx. 1.45km) opposite Easthampnett Lane connecting A27 (northwest of site) from Boxgrove - upgrade to bridleways (IBP/1214*)			£150,000			
	Chichester city	Tangmere		£100,000	CIL	West	Essential