



Preferred Approach Representations Planning Note

On behalf of:

Heaver Homes Ltd.

In respect of:

Broadbridge

Land between the A27 and A259,

Bosham, Chichester



Date:

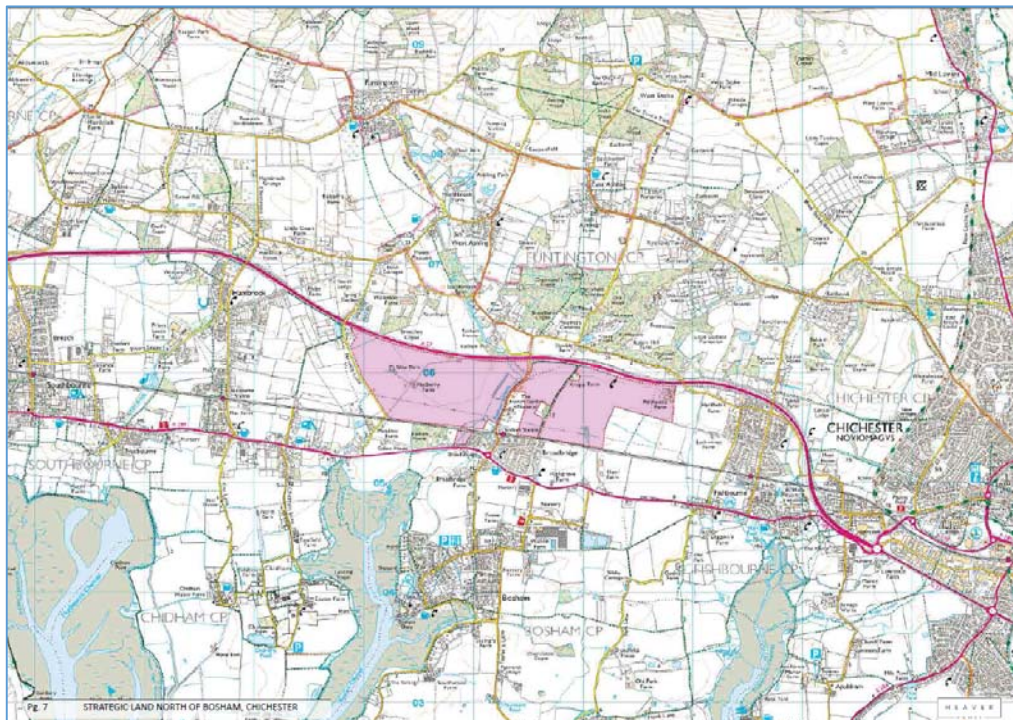
February 2019

Reference:

MA/HHL/002-1/R001

1.0 Introduction

- 1.1 These representations are submitted on behalf of Heaver Homes Ltd (“the Developer and Promoter”) on behalf of the Heaver family (“the Landowners”) to Chichester Borough Council’s consultation on the Local Plan Review 2016-2035 Preferred Approach.
- 1.2 These representations relate specifically to the Broadbridge land located between the A27 (to the north) and principally to the railway line (to the south). The extent of the subject land is circa 159 hectares and is shown “pink” on the plan below. The subject land is hereafter referred to as “the Site”.



- 1.3 The Site is located to the north of the village of Bosham. The Site is currently Greenfield agricultural land and it is bounded to the north by the A27, to the east by agricultural land to the west of Fishbourne, to the south by the West Coastway Railway Line and the northern village boundary of North Bosham / Broadbridge and to the west by Newells Lane. The Site is bisected by Ratham Lane (B2146), with Mudberry Farm and associated farm buildings located on the western parcel and various isolated farm buildings on the eastern parcel.
- 1.4 The premise of these representations is to respond to the Longer Term Growth Requirements set out at paragraphs 4.30-4.33 of the Preferred Approach draft. The subject land has been identified as an opportunity to meet longer term growth needs which can provide appropriate infrastructure to meet the needs of new residents and also provide

positive contribution to existing infrastructural requirements in the local area. The Site's Agent, Promoter and Landowners have been, and continue to be, working collaboratively in the formulation of this proposal.

1.5 The indicative development proposal considers the delivery of up to 3,000 homes inclusive of policy compliant affordable housing and specialist housing. The scheme also provides infrastructure and services appropriate to the nature of development, taking into consideration relevant opportunities and constraints. The following identifies the scheme proposed through the representations:

- Up to 3000 new homes (inclusive of affordable);
- Local centre (to provide local needs foodstore, creche and non-food facilities);
- B1(A) / B1 (C) / B8 employment space;
- 2 no. 2 form entry primary schools;
- 1 no. 4 form entry secondary school;
- Green infrastructure;
- Foul and surface water drainage;
- Managed open space and play space;
- Footways and cycleways (linking to the train station);
- Substantial access works (including grade separated access to the A27); and
- Other associated works.

1.6 The Heaver family has been active in Bosham since the 18th century (with records of their activities traceable back to 1767) and acquired Broadbridge Farm in 1860. Since that point, the Heaver family have owned and operated a number of large-scale businesses predominantly in the West Sussex and the Bosham area that have supported substantial local employment. The Heaver family is now looking to promote the subject land to deliver residential-led development to provide new homes, employment and all necessary infrastructure to meet the emerging needs of the area over the Plan period and beyond.

1.7 The representations demonstrate that the subject land is well considered and provides an ideal opportunity which are of a scale and form that can support residential development, accompanied by employment and all necessary infrastructure (including green infrastructure) which can be found acceptable in planning terms and suitable for allocation.

1.8 Heaver Homes Ltd have engaged a team of specialist consultants to advise on the project. The team comprises:

- Planning consultants: ATP;
- Masterplanning: King and Co;
- Flood Risk and Engineering: Pinnacle;
- Ecology advisors: BMD;
- Transport consultants: Transport Planning Associates;
- Agricultural land advisors: Tim O'Hare; and
- Countryside and Landscape advisors: BMD.

1.9 This Representations Statement is submitted as part of a suite of documents for these representations. The Agent would be delighted to discuss these matters and provide further clarification to the Council as may be helpful in due course.

1.10 It is also noted that Chichester's last published 5 year Housing Land Supply paper (December 2017) identifies a 5.3 year supply which is adequate, albeit that in subsequent decisions (including Appeals) this has been referenced as marginal and will of course change over time.

1.11 Given all of the above, we would hope that the identification of the land and the considerable evidence of its suitability would allow the Council to consider these proposals positively, to enable the accelerated development of the strategic allocation as envisaged by the Local Plan review in terms of Longer Term Growth Requirements.

2.0 Site and Surrounding Area

Location

- 2.1 The Site is bounded to the east by agricultural land to the west of Fishbourne, to the west by Newells Lane, and the southern boundary (as well as railway) adjoins the northern village boundary of North Bosham / Broadbridge. The Site is bisected by Ratham Lane (B2146), with Mudberry Farm and associated farm buildings located on the western parcel and various isolated farm buildings within the eastern part of the site.
- 2.2 The Site comprises a number of separate parcels of land that are contiguous with highway land. The Site is approximately 159 hectares in size and is located to the north of the village of Bosham and is predominantly Greenfield agricultural land with some irregular built form interspersed.

Existing Access

- 2.3 There are multiple existing vehicular access points into the Site, including those from
- Mudberry Lane;
 - Newells Lane;
 - Brooks Lane;
 - Ratham Lane; and
 - Clay Lane.
- 2.4 The access points mentioned above are all fit for their current purpose, but it is self-evident that a revised access and transport strategy will be required for any substantive form of development. This is taken forward through these representations and considered in more detail within Section 4 and the Masterplan.
- 2.5 There is currently no public access to the Site. However, Bridleway 3595 runs along the alignment of Brooks Lane – between two of the land parcels of the Site – between Broadbridge and the A27.
- 2.6 The Bridleway starts at the end of Brooks Lane with a non-vehicular level crossing of the West Coastway Railway Line before heading north-northeast along a farm track to the southern edge of the A27, at which point it has an east-west alignment along a farm track to Ratham Lane (B2146).
- 2.7 Bridleway 260 also lies close to the north-west corner of the Site, beyond Newells Lane and largely shielded in close proximity by existing intervening vegetation.

Existing Uses and Form

Uses

- 2.8 The site includes an important power line which runs north but broadly parallel to the West Coastway railway line. The retained agricultural land is managed principally as arable land with some smaller areas of pasture.
- 2.9 The site does include two areas of built form, these being Broadbridge Farm (to the west) and Polthooks Farm to the east. Broadbridge Farm takes access from Mudberry Lane. Polthooks Farm (largely in employment use) takes access from Clay Lane.
- 2.10 The built form at Polthooks Farm is largely in employment use. This is managed under leasehold and has been locally identified as Polthooks Farm industrial estate for marketing purposes. This takes access from Clay Lane.
- 2.11 The Polthooks Farm industrial estate is comprised of the former farm buildings which are now in use to support a range of businesses. The site as a whole comprises of 16 units that provides circa 2000m² of floorspace as well as external storage. The vast majority of this is in current occupation (circa 1750m²) and is understood to support a range of formats that include 10 smaller units that vary from 12m² to 65m², to 3 larger units which vary from 269m² up to 670m².

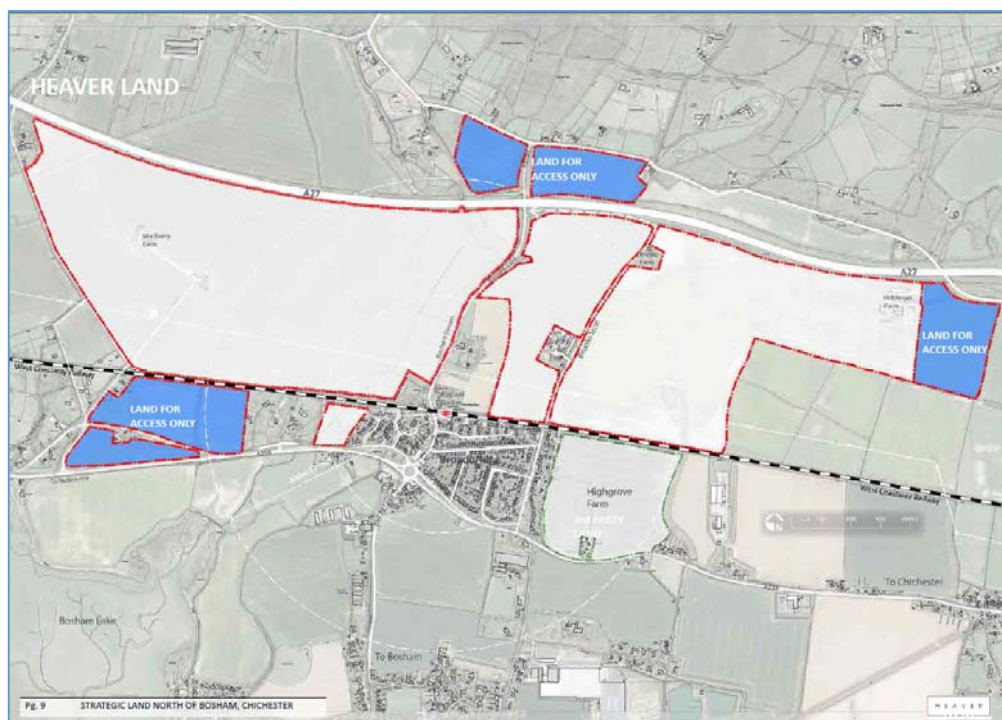
Form

- 2.12 The Site occupies a relatively flat landform with very gentle fall from its northern boundary towards the south, with the highest point being c. 12m AOD and lowest point at c. 8m AOD. In the wider area, the topography continues to fall gently southwards towards the south coast. To the north, the landform starts to rise gradually towards the South Down National Park forming a series of undulating hilltops and slopes. To the west and east, topography is similar to that of the Site. .
- 2.13 Bosham Stream and its tributary flow through the Site, to the west of the B2146. Some ditches and ponds are also present. Streams, ponds and ditches are frequently seen in the wider landscape.
- 2.14 Vegetation coverage on the east and west boundaries of the Site is very limited. Structural planting along the A27 is well-established, separating the Site from the wider landscape to the north. Planting along the southern boundary with the railway line is less dense. There are trees and hedgerows situated within the corridor of Bosham Stream and the B2146.

- 2.15 A very small copse lies within the eastern part of the Site, close to the southern boundary with the railway line. In the wider landscape to the north of the A27, there are a number of large-scale woodlands which are also interspersed by smaller woods or copse. To the south of the railway line, north of the A259, most fields are defined by well-established hedgerows (a number of which contain hedgerow trees), with an extensive wooded area surrounding the Hamblin Centre to the west of Broadbridge.
- 2.16 This is taken forward through these representations and considered in more detail within Section 4 and the BMD LVA Layout enclosed at **Appendix 4**.

Area being promoted for development

- 2.17 The plan below identifies the extent of the land being identified for development, specifically referencing those areas (tinted blue) which are being utilised solely for access rather than built development. The northern boundary is largely consistent with the A27 and the southern boundary is largely consistent with the West Coastway railway line.



- 2.18 The access area close to Polthooks Farm is for a secondary access, and it is important to note that there is no requirement to redevelop or otherwise impact upon the employment uses being supported at Polthooks Farm Industrial Estate.
- 2.19 We would also note that there are buildings at Mudberry Farm and these representations have no impact upon that land.

- 2.20 The area to the north of the A27 is only required by consequence of the junction works sought to the A27. It will not comprise new build development, other than the junction works themselves and any associated engineering works and landscaping schemes.
- 2.21 This is taken forward through these representations and considered in more detail within Section 4 and the TPA Technical Note enclosed at **Appendix 5**.

Historic Context

- 2.22 The site as a whole has been in long-established agricultural use. The Heaver family has been in occupation in Bosham since the 18th century (originally as tenant farmers) and have owned Broadbridge Farm since 1860. The many regional businesses also established by the Heaver Family have reflected economic trends of the time but have consistently supported extensive local employment and economic benefits for the Chichester area as a whole and the Bosham area more particularly.
- 2.23 A detailed review of this historic background to the use of the subject land and other Heaver interests in the Chichester area has been undertaken and is included at Appendix 2. Such interests include the Heaver's entrance into the milk and dairy sector through the immense success of Chichester Dairies, in addition to regional manufacture of bricks, gravel and other aggregates.

Planning History

- 2.24 We are not aware of any planning history for the wider site in terms of comprehensive proposals in terms of Plan promotion or development management decisions. We have had regard to development management decisions which relate to the pockets of built form on the wider site as described below.

Polthooks Farm

- 2.25 Polthooks Farm has been subject of numerous planning applications from 1989 onwards to secure the change of use of redundant agricultural buildings to support employment uses. This has also included a number of applications to both reconfigure and extend the buildings to support more substantive and flexible employment space.

Mudberry Farm

- 2.26 We are not aware of any detailed planning history for the wider farm holding in terms of development management decisions. We of course recognise agreed applications which pertain to the existing buildings in this area, namely Mudberry Cottage and Mudberry Barn.

Mudberry Cottage

- 2.27 There have been a number of applications in relation to the above property. These include a 1999 approval for a replacement of the former building, followed by applications for extensions and external works. The majority of these applications have been approved.

Mudberry Barn

- 2.28 Through reference to the planning file, there has been a Barn under leasehold to Heaver Farms Ltd by the freeholder since 1970. The barn was damaged by a fire in the late 1990s and then replaced circa 2001.
- 2.29 This replacement barn has been subject of numerous applications for change of use to both B1 and residential uses. The landowner has latterly secured a prior approval consent (under Class Q) for its conversion to create two dwellings (18/02067/PA3Q).

3.0 Relevant Planning Policy Position

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the Development Plan unless material considerations indicate to the contrary.
- 3.2 In this instance the Development Plan comprises policies from the 2015 Local Plan (entitled Local Plan: Key Policies 2014-29). Planning policy analysis would give principal weight to the Development Plan, and consideration of the NPPF and other material guidance including the emerging Local Plan. The NPPF is supplemented by guidance in the form of the NPPG, and this provides certain elements of express additional guidance which are directly pertinent to this proposal.
- 3.3 We also refer to the emerging Plan both in terms of the Site Allocations Development Plan which is not yet adopted but has been subject of Examination and with receipt of an Inspector's Report, as well as a Local Plan Review which is at an early stage and further consultation and Examination will follow in due course.

Development Plan

Local Plan

- 3.4 Bosham / Broadbridge is a long-established settlement which is identified as a Service Village in the Development Plan.
- 3.5 For areas sited outside settlement boundaries or strategic allocations Policy 45 supports proposals which meet a rural need or rural diversification, but other uses are largely directed to locations within settlement boundaries (other than those areas identified as Horticultural Development Areas).
- 3.6 The adopted Plan does identify a requirement for new housing for Bosham under Policy 5 and this is set out at 50 homes. Land has latterly been identified through the Allocations Document at Highgrove Farm (to the south-east of the village) to accommodate that requirement.
- 3.7 Policies 33 and 34 are concerned with residential development and the delivery of affordable housing (30% target), and Policy 42 then goes onto provide a framework in terms of development proposals in relation to flood risk, directing schemes towards areas of lower flood risk or securing flood resilient design as appropriate. The Agent and Promoter have placed fundamental importance on meeting these Policies and have created a masterplan

that incorporates significant buffers and other safeguards for compliance with these requirements.

National Policy Guidance

- 3.8 In addition to the Development Plan, other relevant adopted policy is provided at national level by the NPPF. Though not part of the statutory Development Plan, national planning policy is an important material consideration and the NPPF may supersede adopted local documents where these conflict with guidance set out within the NPPF. The revised NPPF superseded the 2012 NPPF when it was published in late July 2018.

NPPF: the National Planning Policy Framework

- 3.9 The NPPF sets out a general “golden thread” for sustainable development inclusive of new housing, set against aspirations and objectives which all planning applications for new housing development should be assessed against. Paragraph 11 of the NPPF sets out a clear policy direction to promote sustainable economic development and advises that local planning authorities should approve; *‘development proposals that accord with the development plan without delay’*.
- 3.10 Paragraph 124 of the NPPF requires that good design should contribute positively to making places better for people. Paragraph 127 advises that planning policies and decisions should aim to ensure that developments are well designed.
- 3.11 Paragraphs 189-190 of the Revised NPPF are concerned with the consideration of heritage assets in the development management context. It places an obligation upon LPAs to direct applicants to describe the significant of heritage assets which are affected, including reference to their setting. The level of detail should be proportionate to the importance of that asset and adequate to understand the potential impact of the proposal on significance.
- 3.12 LPAs are then obliged to consider the submitted information when considering the impact of the proposal upon a heritage asset. Paragraphs 191-199 advise in terms of the factors which would affect decision-taking in respect of proposals affecting designated heritage assets. The NPPF directs at paragraph 195 that proposals which would result in substantial harm should ordinarily be refused save for reference to specific criteria which weigh in favour of a scheme.

National Planning Policy Guidance (NPPG published March 2014)

- 3.13 The National Planning Practice Guidance (NPPG) was published on 6 March 2014 and

supplements the NPPF. In respect of heritage matters, the latest updates to the online tool were made in February 2018. We understand that it will be updated in light of the revised NPPF but the online tool has not been updated to date. Key guidance in terms of significance and setting are provided at paragraphs 010 and 013, and there is further cross-reference to the Glossary of the NPPF which defines setting and significance for decision-taking purposes. Guidance in terms of the assessment of substantial harm is provided at paragraph 017.

Emerging Policy

Local Plan Review

- 3.14 The Council has commenced work on a replacement Local Plan to provide a framework up to 2035, including current consultation on Issues and Options. Further consultation will be had in due course, seeking to ensure that the Development Plan can continue to seek to meet objectively assessed housing and employment land requirements, as well as the delivery of other planning objectives.
- 3.15 The Local Plan Review evidently has to consider opportunities to meet objectively assessed needs over a longer period than the adopted Plan (moving from 2029 to 2035) and it is no surprise that it seeks to identify additional land (or in some cases more intense use of land as at the Tangmere SDL) for housing and employment needs.
- 3.16 In the case of Bosham, the proposed allocation of Highgrove Farm (of 50 dwellings) is increased to allow a further 250 dwellings on the residual land to the east. This is on the strict requirement that the scheme would provide a primary school on-site.
- 3.17 The Local Plan Review notes that an application for 50 dwellings has been submitted for determination, and we can update that this was approved on 15/01/19 subject to legal agreement. This agreement secures:
- Affordable housing delivery (30%) by quantum and in terms of timing;
 - Contributions towards SPA mitigation (£29k); and
 - Contribution towards improvement works to the A27 (£90k).
- 3.18 The proposed extension land is seeking to secure sustainable growth for Bosham as set out at paragraphs 6.51-6.52 of the Local Plan Review. It states:

"The Local Plan Review identifies Bosham as being capable of accommodating further sustainable growth to enhance and develop its role as a Service Village. The village is host to a good range of facilities and

services, including a primary school, community facilities, local shops and a GP surgery

The Local Plan Review sets the requirement of around 250 dwellings for Bosham, to be provided over the Plan period. The preferred strategy for accommodating this requirement in the parish is through the allocation of a strategic site to the east of Bosham at Highgrove Farm.

3.19 It also identifies the following specific issues in relation to the site as a whole, and to inform the detailed planning and layout of any development management proposal. Paragraph 6.56 provides bulleted advice and it states:

"There are a number of specific issues that need to be taken into consideration when planning the development and site layout at Highgrove Farm. These include:

- Potential landscape sensitivities, particularly in terms of the open nature of the site and external views from surrounding areas especially the Chichester Harbour AONB and the South Downs National Park;*
- Integration with the existing allocation and development to the west;*
- Consideration of the potential impact of development in terms of recreational disturbance on the Chichester Harbour SPA/SAC/Ramsar;*
- Relocation of the existing primary school in Bosham onto the site to facilitate expansion of pupil capacity;*
- Protecting existing properties along Brooks Lane, in terms of visual amenity and overlooking;*
- Provision of community facilities and open space and playing pitch;*
- Establishment of a safe access onto the site from the A259;*
- Maximising the potential for sustainable travel links with Chichester City and settlements along the East-West corridor;*
- Account taken of the West Sussex Minerals Plan, and associated guidance, in relation to the site being within a defined Minerals Safeguarding Area."*

Longer Term Growth Requirements

3.20 The Local Plan Review is expressly concerned with a Plan period to 2035, but nevertheless takes a pragmatic approach and seeks to plan ahead for potential longer-term growth needs (which may thus extend beyond the end of that Plan period). This is explored in some detail at paragraphs 4.30 to 4.33 and these are expressed verbatim below:

"Although this Plan considers the development needs of the plan area up to 2035, some initial consideration has been given to the concept of a new settlement to accommodate potential longer term growth needs. This arises from some reservations about whether it will be appropriate in the longer term to continue to rely on existing sources of supply (e.g. urban extensions and urban intensification) indefinitely given the potential for ongoing increased levels of housing needs.

The planning and delivery of a new settlement is complex and given the significance a new settlement will have for future generations it is important that any such provision is planned carefully. Typically, a new

settlement may provide a minimum of 2,000 – 3,000 new dwellings. This scale of development would be consistent with the typical population threshold required to support the key services to be provided, although other factors such as proximity to public transport and the strategic road network would also need to be taken into account. Higher levels of development would, however, enable a wider range of services and facilities to be provided over time as the new settlement was developed and the population grew

Given the long lead in time required, and the identification of a ready supply of housing elsewhere within the plan area to accommodate identified needs during the plan period, this Plan is not dependent on the provision of a new settlement

However, in order to progress the longer-term identification of a possible site for a new settlement, the following considerations are set out to guide potential discussions leading up to the preparation of a future review of this Plan:

- sufficient scale to support potential long term development needs arising and support the provision of key infrastructure and community facilities;*
- comprehensively planned in consultation with existing communities and key stakeholders;*
- a sustainable, inclusive and cohesive community promoting self-sufficiency and with high levels of sustainable transport connectivity;*
- inclusion of on-site measures to avoid and mitigate any significant adverse impacts on nearby protected habitats;*
- provision of a mix of uses to meet longer term development needs and contribute towards its distinctive identity; and*
- A layout and form of development that avoids coalescence with existing settlements and does not undermine their separate identity; respects the landscape character and conserves and where possible enhances the character, significance and setting of heritage assets.”*

Retail

3.21 In terms of requirements for retail development, it sets out that there would be no basis for new convenience retail development for the Plan period based upon the proposed extent of housing delivery from a quantitative perspective. It does identify a requirement for comparison goods shopping, but the extent of that is only set out until 2026 given the dynamic nature of the retail market particularly in view of changes to shopping patterns.

3.22 Bosham is identified as a Village Centre in the Shopping Hierarchy, and proposals seeking more than 250m² of floorspace would be needed for proposals outside defined village centres. The village centre boundaries will need to be identified in a subsequent DPD. It goes onto state at paragraph 4.73 that:

“Village Centres provide services which can meet basic day to day needs. Additional development which will improve the sustainability of each will be supported.”

School Places

- 3.23 In terms of requirements for school places, this is explored at paragraph 4.85 which states:

"Provision for additional primary school spaces, where required, is expected to be provided for through the expansion of existing schools and delivery of new primary schools within the large scale development sites. Although there is currently capacity for additional secondary school children in the Chichester locality, with the planned growth of this Plan being capable of being accommodated within existing secondary school sites, this position will kept under regular review."

Countryside

- 3.24 There is no Green Belt within Chichester, with areas outside settlement boundaries instead identified as countryside. the framework for the countryside policy approach is set out at paragraphs 5.34-5.43 and then the development management approach is provided by draft policy S24. Key to this are paragraphs 5.35-5.36 and 5.42 which are expressed below.

"The methodology for determining the boundaries is set out in the Settlement Boundary Review Background Paper, which forms part of the Local Plan Review evidence base. Policy S24 sets a clear distinction between land within a settlement boundary and countryside. Within the settlement boundary, the principle of further development is established subject to other policies in this Plan.

Areas outside settlement boundaries are defined as 'countryside' which includes villages, hamlets, farms and other buildings as well as undeveloped open land. In order to protect the landscape, character, quality and tranquillity of the countryside it is essential to prevent inappropriate development. At the same time, it is necessary to provide for the social and economic needs of small rural communities, and enable those who manage, live and work in the countryside to continue to do so.

The countryside also performs an important role in providing a setting for the plan area's settlements. Maintaining the individual identities of communities is an important priority for the Council. The most obvious way of achieving this is keeping them physically separate from each other and areas outside of the plan area e.g. Emsworth to the west and the Coastal West Sussex Urban Belt to the east. Development over recent years has tended to cause some merging of settlements. The Council considers that designating areas between settlements as countryside gaps to be kept free of urbanising development may be an appropriate way of seeking to prevent further loss of local identity. A study of the potential for introduction of gaps between various settlements across the plan area is currently underway. Should the results of this study support the case for introducing such gaps, then this provision will be included within the next iteration of this Local Plan Review."

Other Material Considerations

Settlement Boundary Review Background Paper

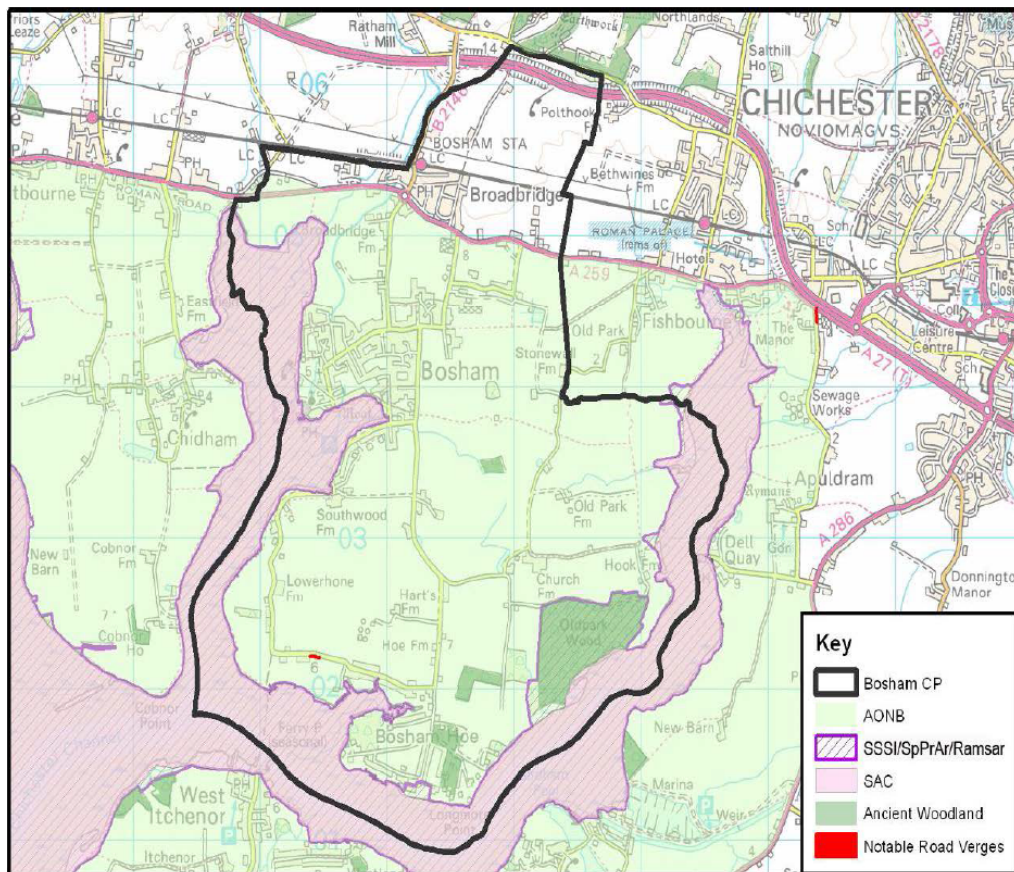
- 3.25 This document is cited at paragraph 5.34 of the draft Local Plan Review as being central to consideration of boundary changes. Through review of this evidence base document it sets

out that there is consideration of changes to five settlements but this excludes Bosham.

- 3.26 The Review does not appear to apply any mechanistic approach to identifying where it might be appropriate to release land from countryside on a consistent and evidence-based approach. It does set out within paragraph 4.2 that there may be a case for further reviews of settlement boundaries in due course, possibly in response to Neighbourhood Plan processes.

2016 Neighbourhood Plan

- 3.27 This document was adopted following protracted dialogue and a formal Examination process. The Neighbourhood Plan boundary is extracted below, and the northern-most section of the Plan partly covers the subject Site.



- 3.28 The Neighbourhood Plan cross-references the Bosham Village Design Statement that identifies and considers a number of parcels through a Character Area approach. None of these areas extend north of the railway line. The northern-most parcel is Broadbridge which has a contiguous edge with the railway line.

- 3.29 The Neighbourhood Plan includes reference to a number of ambitions and consultation

responses (which are not necessarily cohesive and internally consistent). Nevertheless, we do note a general statement at paragraph 3.4 that:

"Specifically there is firm evidence from the responses to consultations undertaken in the preparation of the Plan that any growth to the west or east of the existing settlement boundaries must be resisted. The distinctiveness of the Parish, as well as being part of an historic peninsula within Chichester Harbour, relies upon its separation from neighbouring settlements. The maintenance of this separation is strongly supported by residents as is evidenced from their responses to the various public exhibitions."

- 3.30 The Parish Plan boundary is extensive and encloses two settlements. The Neighbourhood Plan encourages that new development should be of an appropriate scale and located within or could not reasonably be located within the Settlement Boundary.
- 3.31 The subject site is located within the Neighbourhood Plan area but there are no specific recommendations or policy controls proposed for it by the Neighbourhood Plan.

4.0 Constraints and Opportunities

Overview

- 4.1 The subject site is designated as countryside, with pockets of built form and large tracts of land in use for arable farming. The Council have identified through the Local Plan Review that there is an ambition to secure and enhance the role of Bosham from its current position.
- 4.2 The proposed extension of the Highgrove Farm site (to occupy the remainder of that land holding) would provide another 250 dwellings and is identified to represent a strategic allocation. The proposed site policy then goes on to seek substantial infrastructure in terms of school, drainage, funding for the A27 improvements and other facilities to help to secure this sustainable growth of Bosham as a more strongly performing Service Village.
- 4.3 It is not clear that the proposed residential allocation would have sufficient critical mass in isolation to deliver that infrastructure, but nevertheless it would not represent an extent of growth that would have any discernible impact on the role of Bosham which has been in relative decline over the recent past.
- 4.4 The delivery of a proposal of this scale is a fundamentally different proposition. It can and demands the delivery of on-site and off-site infrastructure to mitigate its own impacts and provides the opportunity to redress existing deficiencies to secure sustainable economic growth of a scale that has the genuine prospect of securing and enhancing the role of Bosham in the settlement hierarchy.
- 4.5 It is accepted that this subject land is not being identified for inclusion as a site allocation in the Local Plan Review Preferred Approach consultation. Whilst the Promoter would be content for the site to be accelerated as might be thought appropriate, they are content and anticipate that the Site would be considered as the preferred option for a strategic-level development as anticipated by the Local Plan Review to make a substantial contribution towards Longer Term Growth Requirements.
- 4.6 The development as envisaged could support circa 3000 new homes alongside appropriate complementary employment and local needs services, as well as social and environmental infrastructure. It would be envisaged (and mandated in due course) that the scheme as tabled can provide the following in relation to the entirety of the development as proposed. The delivery of this infrastructure would require consideration in terms of phasing, but it is nevertheless accepted as a point in principle that mitigation needs to be in place at the point (and commensurate with) an impact is caused and otherwise be concluded as adverse.

4.7 The following table sets out in very basic terms the constraints and opportunities which are presented by the subject land. We then go on to discuss in Section 6 those constraints and opportunities, further to the detailed evidence that has been compiled by the Promoter.

OPPORTUNITY		CONSTRAINT	
Green Infrastructure	Masterplan ensure landscape-led approach based on SuDS and avoiding FZ3 land.	Flood Risk	A limited proportion of the site fall into flood zones 2 and 3
Proximity to the A27	Can deliver a new junction and to enhance route choices through Bosham	Proximity to the A27	Requires buffer separation and consideration of new access works.
Proximity to the rail station	Station provides residents option to move sustainably to employment hubs	Proximity to the rail line	The rail line requires buffer separation and crossings need to be considered
Employment Uses	The employment uses at Polthook set a marker that there is need for employment space to meet market signals.	Employment Uses	The existing employment uses at Polthook could constrain development options, or result in job losses if the uses cleared.
Landscape-led approach	Strong landscape led approach managed through Design Code	Countryside designation	The land is predominantly green fields and current policy does not support release.
Opportunity to improve Infrastructure	Critical mass to deliver infrastructure (including foul and surface drainage) without impeding design quality	Need for Infrastructure	There is a clear requirement from the IDP for substantial new infrastructure as there is limited residual capacity if any.
Opportunity to reduce flows through Bosham	Opportunity for a new route to divert flows from the A259 to the A27 without having to go through the village centre	Traffic in Bosham	Peak period traffic in Bosham can be congested. Partly a result of existing route choices from the A259 to the A27.
Opportunity to provide new schools on site	Development has the critical mass to deliver primary schools and a secondary school on site	School Places Provision	A development of this scale would require new school facilities. The existing primary school is at capacity.

4.8 It will be clear from Section 5 that the scheme clearly responds to these opportunities and constraints to provide the best opportunity for a successful scheme to secure substantial sustainable economic growth inclusive of effective infrastructural investment.

5.0 Proposed Development

- 5.1 This is a comprehensive scale development which is fundamentally Plan-led and seeks to deliver genuinely sustainable development. This is underpinned by seeking to provide new development which is located immediately adjacent to a public transport hub and with the ability to deliver significant improvements to the operation of the local highway network and direct access to the strategic road network.
- 5.2 The scheme has challenges insofar that it is presented on land with a countryside designation and includes areas which are of higher flood risk. It also includes pockets of built form which are in active use. The scheme will be underpinned by a landscape-led approach that ensures that built development gravitates away from areas that are more flood-prone and secures a legible green infrastructure network that includes sustainable urban drainage at its heart.
- 5.3 The critical mass of the development provides the opportunity to sustain new local schools on site (both primary schools and secondary school). The facilities proposed are designed to be more than adequate to meet the needs of the development, which also means that they can provide facilities for existing residents in the situation where school places are already at or near capacity. It is also noted that secondary school facilities are not currently available in Bosham which necessitates longer journeys, and this can be redressed.
- 5.4 Fundamentally, the proposed development provides homes and opportunities for employment without the need for excessive journeys by the single-occupancy private car. This is provided by identifying land for employment on the site, and by providing a development with ready access to the train station with connectivity to a range of major employment hubs.
- 5.5 The Promoter is neither a national developer nor a national housebuilder. The Heaven family has been operating from Bosham (and other parts of Chichester) for well over 200 years in a range of business interests which have provided substantial local employment and significant contribution to the local economy. It is their intention to deliver this development to provide further homes and employment to meet local needs and to deliver the catalytic boost which is sorely needed to enhance the role and performance of Bosham.
- 5.6 The indicative development proposal considers the delivery of up to 3,000 homes inclusive of policy compliant affordable housing and specialist housing. The policy requirement is for 30% affordable housing to be delivered on-site, inclusive of a range of type and tenure and

this will be met.

5.7 The scheme would also provide an appropriate mix and quantum of specialist housing, and this can be managed through Design Code and then through the development management process in due course. The scheme also provides infrastructure and services appropriate to this nature of development, reflective of site opportunities and constraints. The following identifies the uses and infrastructure which is proposed through these representations:

- Up to 3000 new homes (inclusive of affordable);
- Local centre (to provide local needs foodstore, creche and non-food facilities);
- B1(A) / B1 (C) / B8 employment space;
- 2 no. 2 form entry primary schools;
- 1 no. 4 form entry secondary school;
- Green infrastructure;
- Foul and surface water drainage;
- Managed open space and play space;
- Footways and cycleways (linking to the train station)
- Substantial access works (including grade separated access to the A27); and
- Other associated works.

6.0 Considerations for the Proposal

6.1 The following issues are considered relevant in the assessment of the development:

- Principle of Use;
- Quantum and Mix of Development;
- Comprehensive Delivery of Infrastructure;
- Countryside- Sensitivity and Capacity for Change;
- Landscape-led Approach;
- Transport;
- Flood Risk;
- Ecology;
- Agricultural Land;
- Arboriculture;
- Ground Conditions;
- Heritage;
- Impacts on Existing Uses;
- Providing for Local Needs;
- Economic Impacts; and
- Deliverability.

Principle of Use

6.2 The site is in the countryside and its allocation for this type of development would be justified where it was necessary to meet objectively assessed needs over the Plan period. We are not seeking to argue at this point that the site should be given a full allocation in this Local Plan Review, unless it became clear that housing requirements had been underestimated or that the deliverability of other sites became unclear.

6.3 The Local Plan Review does clearly state however that there is a Plan-led ambition to identify an opportunity for a strategic parcel of land and moots that this could perhaps be a new settlement. In that vein, the site represents a very strong fit and thus the principle of the use in such a location is appropriate in those terms.

Quantum and Mix of Development

6.4 The development will create circa 3000 family homes, including Plan compliant levels of affordable housing and a development mix broadly consistent with the advice of the SHMA.

- 6.5 The Council's published position on 5 year supply is provided by their Housing Land Supply paper from December 2017. This identifies a 5.3 year supply at that point in time in relation to the requirement set out in the adopted Plan. It is important to note that this is modelled on an annual provision of 435 net additional dwellings.
- 6.6 The Local Plan Review sets out an ambition for 650 homes per annum over a Plan period to 2035. It is noted that the Housing Land Supply paper is somewhat dated, but if the same supply position existed today and was modelled in reference to the proposed annual target (650 dpa) then the housing supply position would be somewhere in the order of 3.5 years which would not be acceptable. It is reasonable to conclude that the existing land supply position is marginal in terms of the 5 year Housing Land Supply test based on the adopted Development Plan, and would be inadequate in reference to what is understood to be objectively assessed need.
- 6.7 The Local Plan Review does propose a number of measures and strategic allocations to contribute towards these increased housing requirements. The largest of these (numerically) is Land West of Chichester which is planned to deliver 1600 homes amongst other uses.
- 6.8 The Local Plan Review expressly sets out an ambition to identify opportunities for a considerably more strategic development (minimum 2000 homes) to meet Longer Term Growth Requirements. It then goes on to give broad advice in terms of key considerations and objectives. Through reference to this it is clear that development which can be capable of meeting its own infrastructure requirements and with strong links to the transport network will be preferred. In this vein, and with reference to those timescales, this proposal represents a very strong fit.

Comprehensive Delivery of Infrastructure

- 6.9 The quantum and mix of development is both appropriate and fundamentally necessary to deliver the scale of infrastructure which is sought to both meet the needs of the development but also to redress some existing deficiencies.
- 6.10 This infrastructure is broad-based and includes social infrastructure, environmental infrastructure and economic infrastructure. It includes:
- New employment;
 - New homes;
 - New schools;
 - Local centre to meet local needs;

- Major transport investment;
- Sustainable urban drainage;
- Upgrades to foul and surface water sewer network;
- Power and utilities upgrades;
- Green Infrastructure; and
- Affordable housing.

Countryside- Sensitivity and Capacity for Change

- 6.11 The Promoter has had regard for the Council's evidence base in terms of the 2011 Landscape Capacity Study but it is concluded that it is no longer fit for purpose.
- 6.12 The 2011 Assessment is based upon a methodology which is concluded to be somewhat coarse, and BMD have acted for the Promoter to undertake a revised analysis based upon a methodology which follows current industry practice. It is concluded that:

*"...the landscape of the Site and local character area is of **Medium** sensitivity at most to mixed use development of the Site. The extent of containment, particularly to the north and south, limits the potential for development of the Site to interact with the surrounding landscape. As reflected in published county and national character assessments, existing settlements provide an urbanising influence on the character of the landscape and this is also reflected by the settlements in the vicinity of the Site. Combined with reduced levels of tranquillity as a result of the transport corridors of the A27 and railway in particular, this part of the landscape has a **Medium to High** capacity to accommodate development.*

*In visual terms, the value of views is varied however, their sensitivity is also considered to be **Medium** at most, aside from residential receptors facing the Site. As for the landscape, the degree of containment limits the potential for views of development on the Site, including those from the Chichester Harbour AONB and South Downs National Park. Overall, in visual terms the Site is considered to have a **Medium to High** capacity to accommodate development."*

Landscape-Led Approach

- 6.13 BMD do make a series of design recommendations to further mitigate the potential for harm, thereby reducing sensitivity and increasing residual capacity for change.
- 6.14 These include:
- *Retain all existing mature trees and hedgerow and supplement with additional planting, particularly around boundaries of the Site to enhance visual containment;*
 - *Provide a well-connected, multi-functional green infrastructure network, improving connectivity in terms of access, amenity and biodiversity (providing a diverse mosaic of habitats), whilst integrating drainage requirements;*

- *Use of native woodland, species-rich hedgerows and grassland with wildflower and enhanced aquatic / marginal planting to maximise ecological value;*
- *Provide a buffer along Bosham Stream corridor, utilising associated flood zone to create a key area of public open space;*
- *Pull built form away from boundaries where possible to provide suitable landscape buffer (integrating noise mitigation where required);*
- *Location of large-scale built form away from boundaries to minimise influence on surrounding landscape and settlements;*
- *Design to respect local character and vernacular in terms of layout, scale, density, massing and materiality; and*
- *Minimise lighting where possible and design to reduce light spill, ensuring no increased impacts on dark skies of South Downs National Park or Chichester Harbour AONB."*

6.15 BMD then conclude to state:

"With sensitive design and masterplanning of this Site, it is considered that the Site and its surrounding context has the capacity to accommodate a predominantly residential mixed use development, in compliance with national and local planning policies and guidance, including the requirements outlined in the respective Management Plans of the South Downs National Park and Chichester Harbour AONB."

6.16 It is confirmed that these recommendations are accepted and will inform the Design Code which will be developed in due course.

Transport

6.17 The site is immediately adjacent to Bosham train station which provides direct services from Southampton to Brighton and a range of employment hubs on that route. It also provides connection to the strategic rail network.

6.18 This connectivity to key public transport hubs is extremely positive and analogous to the broader Government driven agenda of "good growth" where development in accessible locations with strong public transport credentials should be supported and given priority in terms of delivering significant contributions to housing land supply. This concept has been given substantial importance through the London Plan as well as a range of other authorities which partly act as commuting hubs for the larger regional employment centres.

6.19 The submitted transport note considers the existing situation and concludes that the site is reasonably accessible with proximity to bus services and a train station. It also considers the range of facilities and services available within Bosham which is reasonable. The Note does make observations in terms of the local network and states:

"Site observations of the A259 and B2146 roundabout are that the roundabout suffers peak period

congestion and queuing problems, which are not helped by elements of the roundabout not being design standard compliant. Further network capacity problems are also reported at the Bosham Level crossing during peak periods.”

6.20 The Note does provide an analysis of trip generation and distribution and concludes that the impacts of same will not be materially adverse to the operation of the local highway network.

6.21 The Transport Note goes on to state as follows within the Summary section:

“A new spine road will provided access between the site and both the strategic and local highway network, with all roads and junctions being designed with reference to appropriate design guidance.

A site wide package of transport infrastructure will be delivered as part of the development proposal to ensure the site is highly accessible by a range of transport modes.

An estimate of the quantum of vehicular trips that may be associated with the proposed development has been made and it has been determined that the development will have a negligible impact on the operation of the surrounding network.

It is concluded that there are no reasons on highways or transport grounds to refuse planning permission for development at this location.”

Flood Risk

6.22 The site is located largely within Flood Zone 1 and therefore those areas represent very low flood risk. Areas of higher flood risk (flood zones 2 and 3) are present in limited parts of the site, but the promoter is content to agree that no residential or any other built development would be promoted in those areas.

6.23 The promoter is committed to implementing SuDS both as an engineering solution but also to add to the landscape approach to any future development.

6.24 The promoter is aware of commentary in terms of foul and surface water drainage issues in the local area. The promoter recognises this and will ensure that the scheme does provide an appropriate solution in terms of surface water and foul water drainage so that sufficient capacity is provided.

6.25 Neither flood risk nor drainage will represent a residual development constraint.

Ecology

6.26 The Site itself does not lie within any statutory designated sites of nature conservation importance. The Site does lie within the Impact Risk Zone (IRZ) of Chichester Harbour SSSI

and Kingley Vale SSSI, and the scale of development would necessitate that the potential effects of the scheme upon those assets should be tested.

- 6.27 There are no Priority Habitats upon the Site, save for deciduous woodland on the south-eastern boundary. This would be retained in situ so no adverse impact would arise.
- 6.28 There is an historic reference to Protected Species on the subject site comprised of great crested newt on a site pond (from 2009). This will be assessed further in due course, but in any event there are no proposals to impact upon existing ponds and indeed there is a design preference to increase green infrastructure which secures the opportunity to deliver net measurable benefit in accord with express policy guidance.
- 6.29 It is also noted that the site is located within the buffer zone for the coastal SPA and by consequence there is a requirement to deliver mitigation (to offset loss of habitat to breeding birds) by way of replacement habitat or through financial contributions. The Promoter notes this and confirms that their preference would be to mitigate on-site as necessary or failing that to do so through the contributions route. In either scenario, mitigation is provided and this does not impede a future allocation.

Agricultural Land

- 6.30 The promoter has secured feasibility advice from Tim O'Hare Associates, which includes desktop analysis. The report states as follows:

"From published information on climate geology and soil above, it is predicted that the quality of agricultural land within the Study Area is a mixture of Grade 2 (very good quality) and Subgrade 3a (good quality) due to soil droughtiness during the growing season (January to June) and / or by soil wetness during the autumn and winter months. It is likely that wet ground flanking the Bosham Stream will be limited by soil wetness and / or flood risk to Subgrade 3b (moderate quality) or Grade 4 (poor quality).

*As shown on map given as **Appendix 5**, MAFF has not carried out a detailed (Post 1988) ALC survey of agricultural land within the Study Area but has carried out Post 1998 ALC surveys at Highgrove Farm, Broadbridge (see **Appendix 6**) and at Bethwines Farm, Fishbourne (see **Appendix 7**). The MAFF Post 1988 ALC information in the Broadbridge area substantiates the prediction made in this desktop study, i.e. that the quality of agricultural land within the Study Area is likely to be a mixture of Grade 2 and Subgrade 3a. Wetter ground flanking the Bosham Stream is likely to be of Subgrade 3b quality or below.*

*From MAFF Provisional (Pre 1988) ALC information in Table 4.1, Chichester District is well supplied with high quality agricultural land, with high proportions in Grade 1 and Grade 2. As shown on the Pre 1988 ALC map given as **Appendix 4**, the West Sussex Coastal Plain to the south of Broadbridge has a high proportion of Grade 1 and Grade 2. Therefore, the occurrence of some high-quality agricultural land within the Study Area to be expected, as Grade 1 and Grade 2 agricultural land is widespread around*

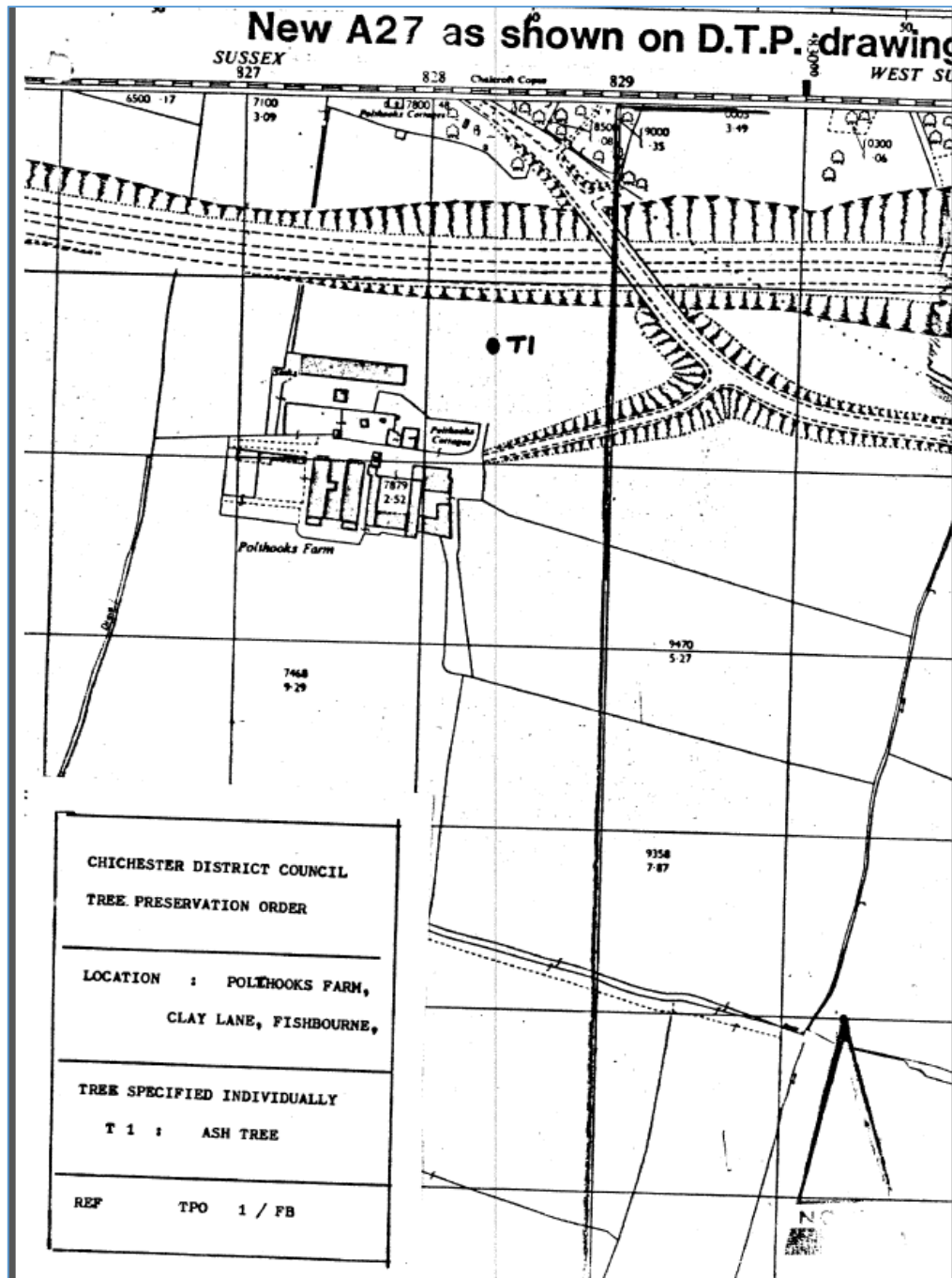
Broadbridge. The occurrence of some Grade 3 within the Study Area represents some of the lowest quality agricultural land in the area.

Therefore, the development of agricultural land within Study Area to the north of Broadbridge, West Sussex, would not significantly harm national agricultural interests in terms of paragraph 170 of the National Planning Policy Framework (NPPF) (2018) or adopted Chichester Local Plan Policy 48, or Chichester Local Plan Review (2035) Policy S28. The high likelihood of Grade 3 agricultural land within the Study Area represents some of the lowest quality agricultural land in the Broadbridge/Bosham area. In this regard, the Study Area would be suitable for allocating as a site for residential development in the Chichester Local Plan."

- 6.31 It is noted that the report notes that the site does include BMV land but nevertheless this is typical for the vast majority of land in Chichester. We would also note that there are a number of other sites identified in the Local Plan Review which also include areas of BMV land.
- 6.32 The O'Hare report also notes that the site is likely to include areas of poorer quality soil and that its loss would not represent a degree of loss of agricultural land that would present any material impediment to the site's future allocation.

Arboriculture

- 6.33 The promoter has secured feasibility advice which includes desktop analysis. The site is a relatively open area of land that contains a mixture of indigenous and boundary planting.
- 6.34 It is understood that there is one protected tree within the site (this being an ash tree located just north-east of Polthooks Farm close to the A27 and the junction with Clay Lane. This Order was confirmed in 1989 (TPO/1/FB) and an extract from the Order is included overleaf.



6.35 Whilst there may be some clearance of poorer quality trees and hedging, this will be limited in scale and the intention is to provide a much more substantial and diverse landscape approach including specimen trees. It is confirmed that this protected tree will be retained in situ and works within the root protection area will be avoided.

6.36 In summary, arboricultural considerations are not felt to present any material impediment to the site's future allocation.

Ground Conditions

- 6.37 The promoter has secured feasibility advice in respect of land contamination and other matters pertaining to adverse ground conditions. Subject to additional surveys, there may be a requirement for mitigation but the promoter is confident that the site will be suitable for residential use in due course. To that extent, there is no further substantive requirement for mitigation and the scheme should be acceptable in these terms.

Heritage

- 6.38 The application site is not within a Conservation Area and there are no other designated or non-designated heritage assets within the site.
- 6.39 The nearest edge of Fishbourne Conservation Area is circa 700m to the south-eastern edge of the Site. It is understood that there may be distant views of development on the Site from this Conservation Area but the influence is considered to be negligible. We would thus confirm that there are no material setting relationships with designated and non-designated heritage assets.
- 6.40 There appear to be no effects on any heritage assets (designated or otherwise) that would approach the threshold of substantial adverse. As such, there is no conflict with relevant Development Plan policy requirements in relation to the preservation of heritage assets.

Impacts on Existing Uses

- 6.41 These representations have noted that there are existing uses within the built form at both Mudberry Farm and Polthook Farm. The latter has been developed out over time as a local employment hub and has proved successful, providing a range of formats between 12m² and 670m². The proposal as submitted would leave the existing uses at Mudberry Farm and Polthook Farm in situ and unaffected.
- 6.42 There would therefore be no material adverse impact on those uses and users. However, the proposed improvements to access and the delivery of local services does provide an opportunity to improve connectivity to those existing uses and to improve the facilities for current and future employees.

Providing for Local Needs

- 6.43 The scheme as promoted would support circa 3000 homes and this would equate to circa 7000 residents. It is of course the case that the future occupants of these properties could be attracted from outside or within the district, but in net terms the supply of housing in the

district should mean that the population of the district (but Bosham specifically) would increase by circa 7000 over the life of the development.

6.44 We have already set out that the scheme will seek to meet local needs in that locality.

School Places

6.45 The Council's standing advice on school places requirements sets out the typical yield of school age children from new housing development based upon the housing format provided.

6.46 Through that analysis, we conclude that the modelled yield for school places requirements would be circa 95 children per year group. This would equate to a 3.2 form entry facility. In practice, we think it more practical and effective to deliver 2 no. 2 form entry primary schools and 1 no. 4 form entry secondary school. In both instances, the new facilities would provide opportunities for further growth but also to recognise that existing facilities are already under pressure in terms of residual capacity versus demand.

Retail Facilities

6.47 A new population of 7000 people will generate new resident spend to meet their shopping needs in terms of convenience and comparison spend.

6.48 With reference to the base data included within the Council's 2018 Retail Study, the addition of 7000 population in this area (assuming the same design year and per capita expenditure levels) would generate a convenience shopping spend of circa £16m and comparison shopping spend of circa £31m.

6.49 It will inevitably be the case that the majority of comparison spend shopping will be undertaken in higher order centres so there will be considerable leakage in those respects. However, it would be anticipated that the majority of convenience spend would be retained.

6.50 That extent of residual convenience goods spend would support circa 1400m² net of new floorspace which would be comparable to the trading formats of Aldi or Lidl in terms of store size. However, there may be a view in terms of whether that would represent a genuinely local needs format.

Local Centre

6.51 The development should provide land capable of accommodating local needs retail facilities of between 1000m²-2000m² (in total for food and non-food). The retail impact

considerations of that development are largely dictated by phasing, as its early delivery would mean that the initial impact on existing facilities would be greater but their turnover levels would also improve as new residents took occupation.

6.52 In addition to retail facilities, the local centre should provide opportunities for other facilities to meet everyday needs of new residents. This will be subject to market signals and detailed investigation, but it would instinctively include:

- Creche;
- GP Surgery / Dental Practice;
- Public house;
- Cafes;
- Post Office; and
- Community hub.

6.53 Given the above and the requirement for retail facilities, we would envisage that we should plan for circa 3500-4000m² of mixed built form with flexibility to respond to market signals.

Employment Space

6.54 Clearly the new occupants would require employment and the Site provides the opportunity for a range of employment in both the local centre but also for the more traditional employment uses which would comprise offices, light industry and modest B8 operations.

6.55 Having reference to NOMIS data for Chichester in terms of the proportion of the resident population which is economically active in employment, it equates to circa 51%. Given the modelled population of 7000 that would result in circa 3570 people seeking employment.

6.56 With reference to existing Travel to Work data, it is understood that circa 44% of existing residents undertake their employment locally (in Chichester) with the remainder going further afield, the key alternate destinations being Havant and Portsmouth (30% in total).

6.57 By consequence of the above, we would estimate that the new population of 7000 would require local employment facilities adequate to sustain circa 1571 new jobs. Clearly not all of these would be accommodated on the Site itself, and there are ambitious Plan-led objectives for new employment land elsewhere in the district- it would be appropriate at this point to plan for circa 800 jobs.

6.58 The uses within the local centre identified above would support circa 150 jobs based upon typical employment densities.

6.59 Through application of typical plot densities (circa 40%) against employment densities it is feasible to estimate the extent of land that would be necessary to meet those residual employment requirements. This assumes a blend of B1 offices and other employment uses which are typically less intensive in terms of employment generation.

6.60 We would estimate that it will be prudent to identify circa 2.5 hectares of land for employment use in the first instance, and this could then be reconsidered in response to market signals.

Economic Impacts

6.61 We have already set out that a development of this scale will generate substantial latent requirements for new employment and facilities to provide the goods and services they need. The delivery of 3000 homes would generate a New Homes Bonus payment of circa £19.7m to Chichester Borough Council.

6.62 The scheme would also provide circa 800 jobs on-site and would result in significant construction employment. The new employment on site would also provide opportunities for Business Rates payments to Chichester Borough Council.

6.63 The additional employment in the area would create multiplier effects in the remainder of the district, partly because it is envisaged that there would be leakage of available resident expenditure and also because it supplements the performance of other services in those larger existing centres.

Deliverability

6.64 The promoter has set out a development scenario largely to assist the assessment of potential levels of countryside harm and also to assess the extent of infrastructure that would require. This necessarily impacts upon the extent to which the development site would seek to utilise land closer to more sensitive development edges, and impact upon the potential development yields which can be accrued and contribute towards district level housing needs. Through this scenario the site would yield 3000 dwellings.

6.65 In terms of delivery profile, we would envisage that the Site would be developed out in parcels and that speed of delivery would be optimised by it being completed by up to three different housebuilders in tandem. It would of course be important to adopt a binding Design Code (or similar) to ensure that expeditious delivery did not impact upon scheme quality.

- 6.66 On this basis, we would envisage that it would be feasible to complete between 200-250 dwellings per annum which would mean that the scheme would be completed in circa 12-15 years. That could of course be accelerated subject to market signals.
- 6.67 This Text demonstrates, there is a clear and credible opportunity to deliver all of these new dwellings over the relevant period. For the purpose of clarity, there is no legal impediment or development constraint that would prevent commencement immediately albeit it is not envisaged that this route would be adopted in practice.
- 6.68 The site as a whole is under singular ownership and is free from legal impediment. The principal of the use of the land for residential purposes is agreed with the landowner. The land is therefore available now, with no associated legal impediment to delivery of housing in the first five years of the Plan period, and completion of the development as a whole as soon as the land is allocated and then with planning permission in place.
- 6.69 We would thus set out for completeness that King and Co would be pleased to adopt their preferred approach which is consultative and seeking to provide design solutions which have a stronger emphasis in their locality (though local engagement and attention to local design cues) than is the case for some regional practices. We would be delighted to work with the Council to shape these proposals, and there is an inherent flexibility to best reflect ambitions to deliver new homes in the early part of the Plan period.

7.0 Conclusion

7.1 The Broadbridge scheme would also provide an appropriate mix and quantum of specialist housing, and this can be managed through Design Code and then through the development management process in due course. The scheme also provides infrastructure and services appropriate to this nature of development, reflective of site opportunities and constraints. The following identifies the uses and infrastructure which is proposed through these representations:

- Up to 3000 new homes (inclusive of affordable);
- Local centre (to provide local needs foodstore, creche and non-food facilities);
- B1(A) / B1 (C) / B8 employment space;
- 2 no. 2 form entry primary schools;
- 1 no. 4 form entry secondary school;
- Green infrastructure;
- Foul and surface water drainage;
- Managed open space and play space;
- Footways and cycleways (linking to the train station)
- Substantial access works (including grade separated access to the A27); and

7.2 The scheme provides infrastructure which is broad-based and includes social infrastructure, environmental infrastructure and economic infrastructure. It includes:

- New employment;
- New homes;
- New schools;
- Local centre to meet local needs;
- Major transport investment;
- Sustainable urban drainage;
- Upgrades to foul and surface water sewer network;
- Power and utilities upgrades;
- Green Infrastructure; and
- Affordable housing.

7.3 The Local Plan Review expressly sets out an ambition to identify opportunities for a considerably more strategic development (minimum 2000 homes) to meet Longer Term Growth Requirements. It then gives advice in terms of key considerations and objectives.

7.4 Through reference to this it is clear that development which can be capable of meeting its

own infrastructure requirements and with strong links to the transport network will be preferred. In this vein, and with reference to those timescales, this proposal represents a very strong fit.

- 7.5 The quantum and mix of development is both appropriate and fundamentally necessary to deliver the scale of infrastructure which is sought to both meet the needs of the development but also to redress some existing deficiencies.
- 7.6 It is also noted that there is an imperative for the Council to identify land for new housing that can genuinely be delivered. Whilst the published position on 5 year supply identifies a 5.3 year supply at December 2017, this is modelled on the Plan requirement of 435 dwellings per annum which is considerably below the objectively assessed need which is integral to the Local Plan Review ambition for 650 homes per annum. There is a clear need to identify more land for housing and to focus on sites with a clear path to delivery.
- 7.7 The Promoter is neither a national developer nor a national housebuilder. The Heaver family has been operating from Bosham (and other parts of Chichester) for well over 200 years in a range of business interests which have provided substantial local employment and significant contribution to the local economy. It is their intention to deliver this development to provide further homes and employment to meet local needs and to deliver the catalytic boost which is sorely needed to enhance the role and performance of Bosham.
- 7.8 We respectfully reserve the right to add to these comments as and when the Council do make any further comments on this Statement and our submissions as a whole.