



Head of Planning Policy and Development
East Pallant House
Chichester
West Sussex,
PO19 1TY

17th March 2023

Dear Sirs,

**Chichester Local Plan 2021 - 2039
Proposed Submission (Regulation 19) Consultation
Ifold Settlement Boundary Extension – Land to Rear of Felside, Chalk Road, Ifold, Billingshurst,
West Sussex, RH14 0UD
Representations on Behalf of Mr Robin Neville**

We are instructed by our client, Mr Robin Neville, to submit representations to the Regulation 19 Consultation on the Chichester Local Plan 2021 – 2039. In particular, we comment on the soundness of the Plan and, therein, its capability of meeting the identified housing needs of non-strategic settlements (Policy H3).

Whilst we are wholly supportive of the policy's ambition to deliver new homes through small-scale housing sites, we raise concern with the approach proposed and its over reliance on sites being identified through the neighbourhood/community planning process.

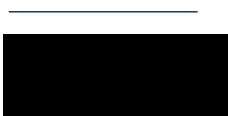
There is no guarantee that neighbourhood plans will come forward for the respective parishes in a timely manner, if, indeed, at all. We, therefore, contend that the housing needs will not be met in an appropriate timeframe resulting in further delays to delivery. Whilst, it is accepted that the policy proposes the production of a Development Plan Document to allocate sites in parishes where no demonstrable progress has been made, this, too is a lengthy process.

In this regard, we would encourage the Local Planning Authority to consider alternative options to successfully meet the identified housing needs for non-strategic settlements including, the allocation of small scale sites and the logical redrawing of development boundaries to catalyse small scale windfall development.

In particular, we respectfully request that the settlement boundary of Ifold be reconsidered and extended to include land to the rear of Felside, Chalk Road, RH14 0UD.

A site Location Plan is enclosed at **Document 1**.

As currently drawn, the settlement boundary, is illogical and has little regard to the residential curtilage of the Hornbeam, Heidiway, Felside, the Brambles and Toad Hall. The existing/proposed boundary is shown on an extract from the emerging Local Plan Policies Map at figure 1 below.



London office



Birmingham office



Cardiff office



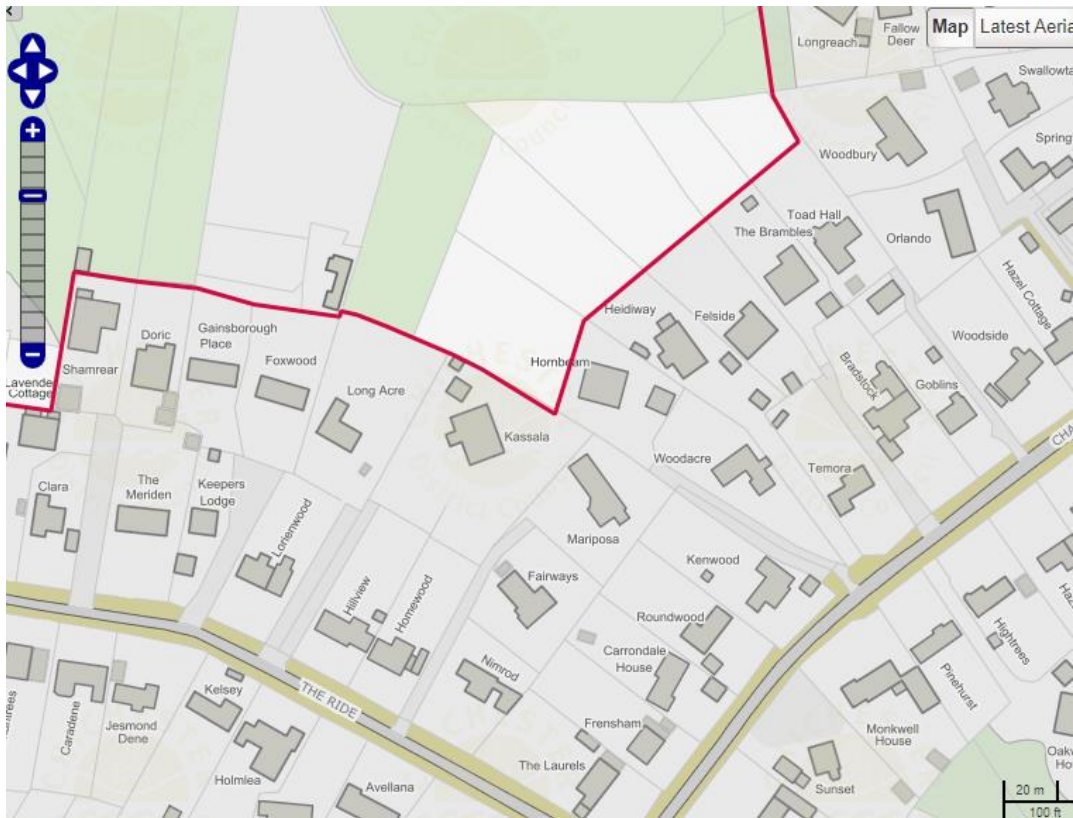


Figure 1 – Extract from Policies Map showing settlement boundary illogically dissecting the residential curtilage of the aforementioned properties.

The redrawing of the boundary represents a logical extension of the settlement, taking the boundary up to the extent of existing rear gardens, wholly consistent with the limits of the boundary elsewhere. The northern boundary of the site comprises natural woodland (shaded green) and thus, acts as a clear and definitive physical feature which marks a logical hard edge and transition of the settlement. Put simply, it presents a far more logical boundary.

Appropriateness of Approach and Suitability of the Site

In the interest of completeness we set out detailed comments as to why the our recommended approach is appropriate in the context of the local plan and why the site is suitable for development.

Approach

Settlement Boundary Amendments

The Council has reviewed the settlement boundaries for all settlements in the Chichester Local Plan Review Plan area. The methodology for determining the boundaries is set out in the Settlement Boundary Review Background Paper. This forms part of the Local Plan Review evidence base (December 2018).

In the context of these representation the introductory paragraphs of the Settlement Boundary Review Background Paper are helpful. Notably, paragraph 1.2 notes that settlement boundaries are recognised , and generally accepted, as an essential tool for the management of development, principally to prevent the encroachment of development into the countryside.

Paragraph 2.1 continues:

“The concept of settlement boundaries is to draw a policy line which separates built-up areas (within which development is, in principle, acceptable) from the countryside (within which, with limited exceptions, it is not).”

Paragraph 3.1 of the Background Paper acknowledges:

“Settlement boundaries have previously been drawn close to buildings but may be redrawn to include the whole curtilage of homes and other buildings where they relate well to the existing built up area.”

It also indicates that the review of settlement boundaries should take the following into consideration: built form, land-use, landscape character, woodland cover, field pattern and settlement pattern.

Amendments to a number of settlement boundaries were proposed through the Regulation 18 version of the Plan. In this regard, the principle of extending settlement boundaries is acceptable and well established.

Reconsidering Settlement Boundaries

As set out at paragraph 3.5 of the Chichester Settlement Boundary Review Methodology, key requirements for reconsidering and re-drawing settlement boundaries include:

- *Settlement boundaries should be expanded to include new development adjacent to the existing settlement boundary. This includes sites that have been developed following allocation in the adopted Local Plan, and the allocations in the related Site Allocation DPD, sites that have planning permission, built exception site housing, minor extensions and other areas adjacent to but outside the current settlement boundary that relate more to the built environment than to the surrounding countryside. (Our emphasis).*
- *Settlement boundaries need not be continuous, it may be appropriate given the form of a settlement to define two or more separate areas.*
- *Isolated or sporadic development which is clearly detached from the main settlement should be excluded and, where possible, settlement boundaries should follow a defined feature e.g. field boundary, road, stream, wall or fence. (Our emphasis).*
- *New schools, existing and proposed peripheral playing fields, environmental space, allotments, car parks, local green space and community gardens should not be included within the settlement boundary. The exception to this will be if they occur within settlements and are not adjacent to the settlement boundary. In these circumstances, these spaces are often protected from development by existing national and local policies.*
- *Agricultural buildings may be included in settlement boundaries if they are well related in terms of scale and positioning to the rest of the settlement. Account will also be taken of the availability of defensible boundaries and the age of the building (i.e. how established the building is in the settlement).*

Suitability of the Site

Relationship to the Built Environment

The land subject to the proposed boundary extension has a close relationship to the built settlement of Ifold. It is not considered to form part of the open countryside. The existing gardens are dissected by an historic arbitrary settlement boundary line which fails to follow any physical defined feature. As a result, the existing dwellings are

considered to fall within the settlement boundary, yet their curtilage, despite being well related to the settlement boundary, falls within open countryside.

As per the image below, the northern boundary of the site comprises natural woodland (shaded green) and thus, acts as a clear and definitive physical feature which marks a logical hard edge and transition of the settlement. Put simply, it presents a far more logical boundary.



The presence of the woodland also acts as a natural barrier to any future settlement boundary expansion. In this regard, the proposed settlement boundary amendment cannot, reasonably be considered to encourage future encroachment of the built environment upon the wider countryside beyond. The woodland is afforded appropriate planning policy protection in its own right.

As currently drawn, the settlement boundary, is illogical and has little regard to the residential curtilage of the aforementioned properties.

The extension as proposed represents a logical 'rounding off' of Ifold and wholly accords with the key requirements set out within the boundary review methodology.

Meeting Housing Need

Policy H3 is clear in identifying a need to deliver 25no. homes within Plaistow and Ifold. In redrawing the development boundary the site will be suitable for new residential development, and would make a small, but no less, important contribution towards meeting this target.

The site is immediately available and could be progressed comfortably within 0-5 years.



Conclusions

Whilst we maintain our support for the provision of new homes in non-strategic settlements we contend that Policy H3 has an over reliance on sites being brought forward through the neighbourhood planning process.

We would respectfully request that the Local Planning Authority consider the redrawing of the settlement boundary of Ifold and/or allocation of the site to address the immediate need in the short term.

As currently presented, we raise concern that the approach to Policy H3 will not deliver the required housing needs for non-strategic settlements.

Yours faithfully,



James Hodgkins

Associate