



Planning Policy
Chichester District Council
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PO19 1TY

R.E: Representation to the 'Local Plan Review: Preferred Approach 2016-2035 Consultation- Chichester District Council'

Dear Sir/Madam,

Homes England would like to thank Chichester District Council for the opportunity to comment upon the 'Local Plan *Preferred Approach 2016-2035*' consultation. Homes England acknowledges the crucial role of this local plan document in the evolution of forward planning policies pursuant to Chichester and in its intention in promoting positive sustainable growth in the wider District and principally, to achieve the sustainable development objectives set out within the National Planning Policy Framework (NPPF).

As a major landowner/delivery partner within the District, Homes England (formerly the Homes and Communities Agency) strongly support the redevelopment opportunities within Chichester Town Centre referred to as the 'Southern Gateway' (**Policy AL5**). This strategic allocation will help Homes England to fulfil its remit to facilitate delivery of sufficient new homes, where they are most needed and to deliver a sustained improvement in affordability. Homes England is committed to early delivery on this site and is keen to commence formal pre-application discussions when appropriate.

The following representations are related to matters of detail and should not be read as an objection to the plan as a whole. In most cases we are seeking minor modifications that will provide greater flexibility and clarity for the delivery of the site(s). The modifications proposed within this representation would help to make Policy AL5 sound and allow Homes England to meet our remit of increasing the number of new homes that are built in England and support the Government's objective of significantly boosting the supply of new homes in accordance with Paragraph 59 of the NPPF.

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Policy AL5- Retention of Open Space

As mentioned above, Homes England is a key landowner and delivery partner of the Southern Gateway allocation strategy. This includes the delivery of development opportunity 4: ‘**Land at the Police Station and High School**’, as referred to in the **Chichester Southern Gateway Masterplan 2017** document. The Masterplan details the development potential of the site(s), which has the capacity to deliver 144 residential units, with a mix of town houses and apartments.

The site includes a significant area of green ‘open space’ facing Kingsham Road, as outlined in the Masterplan (**paragraph 3.54**); this area of open space has been used by the Police as a playing pitch, but has not been in public use. Page 64 of the Masterplan details this by outlining that the pitch is now unused and is surplus to requirements by the Police. The eastern half of the site forms the now unused High-School buildings and all-weather pitch, which is owned by West Sussex County Council and is leased to the High School. The all-weather pitch is still in use and is used by the school and a number of sport clubs in Chichester.

Draft Policy AL5 details that a future planning application will need to provide an appropriate provision of open space, whilst also stating that the existing playing pitch should be retained or at least re-provided off-site (point 5);

- ***Provision of open space in accordance with Policy DM34, including retention of the existing playing pitch unless suitable re-provision is provided.***

Homes England is concerned that the wording within Policy AL5 doesn’t give planning certainty to the delivery of ‘Land at the Police Station’. Further to this, the Council’s ‘**Playing Pitch Strategy: Final Strategy 2018**’ document, which is part of the Council’s Local Evidence base for the Local Plan, states within **Paragraph 4.12**, ‘*the former police station playing field should be replaced by equivalent, appropriate provision when the site is redeveloped*’. This is despite the fact that the site has been left unused for a number of years and has not been available for public use. Homes England’s understanding is that the Council consider the Police playing fields, as open space not **public** open space. This is acknowledged in the supporting text of Policy AL5 **paragraph 6.41**, which refers specifically to the ‘all weather playing pitch’;

‘The site currently accommodates an all-weather playing pitch which has previously been accessible for public use. If this playing pitch is redeveloped, suitable re-provision should be made in accordance with Policy DM34 of this Local Plan Review.’

Consequently, Policy AL5 in its current format doesn’t give the clarity to Homes England that the principle of residential development on the Police playing fields is acceptable. When the proposal is progressed to pre-application and formal application stage local stakeholders, statutory undertakers and decision makers (including elected Members and development management officers) may take the view that loss of open space on the Police playing pitches would be contrary to Council’s local evidence base and Policy AL5 (in its current format).

For the avoidance of doubt, Homes England requests that Policy AL5 be amended to give greater clarity that re-provision is only applicable to the all-weather pitch. Accordingly, point 5 should be re-worded to the following;

- *Provision of open space in accordance with Policy DM34, including retention of the existing **all weather** playing pitch at **Chichester High-School** unless suitable re-provision is provided.*

Homes England considers the revised wording, albeit small, necessary to avoid any potential delays in the design, consultation, application stage and the delivery of the Southern Gateway. In addition, Homes England believes that the Council should also consider revisions to **paragraph 6.41** to include commentary on the reasons why the retention or re-provision of the lost open space on the Police site is not necessary. This would further support the re-development of the site and the delivery of up to 144 residential units.

Summary

In summary the proposed amendments would greatly assist Home England's efforts in delivering a key site that is within public ownership and capable of early delivery. Homes England would be pleased to discuss these representations in greater detail in advance of the formal commencement of the pre-application process and examination in public.

We trust that your Council will take these comments into account through the progression of this document through the course of the Local Plan consultative process.

Yours Sincerely,

Jonathan Alldis
Planning Manager