

# Chichester District Council

## Regulation 19 Local Plan Consultation

Representations on behalf of Barratt David Wilson

Site: Land at Stubcroft Farm, East Wittering

March 2023

The logo for Henry Adams, featuring a stylized white triangle icon above the company name.

Henry Adams

## **1 Introduction**

- 1.1 This representation provides a response to the Regulation 19: Local Plan Consultation on behalf of our client Barratt David Wilson. The submission covers the general principles of the Local Plan, but has a focus on Land at Stubcroft Farm, East Wittering, which is in our clients control. The land is shown on the attached location plan included at **Appendix 1** and hereon referred to as the site.
- 1.2 This representation will provide a written responses in relation to the Regulation 19 Local Plan Consultation which directly relate to the promotion of our client's land for future development.

## **2 Comments on Specific Questions/Tests**

- 2.1 In response to the national planning legislation, this Regulation 19 Local Plan Consultation invites comments on three specific questions, and is the final consultation phase, before the Regulation 19 version of the Local Plan is submitted for Examination.
- 2.2 This representation will respond on these specific questions, and then highlight how our client's site could help fulfil the full housing requirement for the District. This could be through an allocation within the Council's Local Plan, or at least through an allocation of numbers to the Parish, who in turn would select sites through a Neighbourhood Plan allocation.

### ***Is the plan 'sound'?***

- 2.3 Paragraph 35 of the National Planning Policy Framework defines the tests for soundness which requires the plan to be positively prepared, justified, effective and consistent with National Policy. These matters will now be considered in further detail in relation to the current consultation on the Regulation 19 version of the Local Plan.

### ***Is the plan positively prepared and justified?***

- 2.4 Policy S1 of the Draft Local Plan sets out the spatial development strategy for the District and how the Council will achieve sustainable growth over the plan period. Policy H1 sets out the housing target in response to the strategy. Both policies have been informed by the Sustainability Appraisal (SA) dated January 2023 and the Plan objectives, which are set out at paragraph 2.5.2 of the SA and the Council's HEDNA (April 2022).
- 2.5 The SA then goes on to discuss the potential growth scenarios and confirms two points:
  - Standard method housing figure for Chichester (excluding SDNP) is 638 dwellings per annum, or 11,484 in total over the Plan period
  - The above figure is capped at 40% above the baseline need and that the uncapped figure is significantly higher than this at 884 dwellings per annum (dpa)
- 2.6 Of particular note is that point ii. seeks to cap the overall housing increase by no more than 40% above the previously adopted LP housing figure of 435 dpa. The Local Plan then goes on to constrain housing numbers due to an alleged capacity concern along the A27 strategic road network. The Council therefore result in a constrained housing figure by virtue of the standard method 'steps' and also due to infrastructure capacity.
- 2.7 It should be noted that the 435 dpa figure within the 2015 Local Plan was similarly constrained and an early review was the only basis for accepting this reduced housing figure. This early review did not take place.

- 2.8 In terms of the influence of the A27, this is the key matter that constrains growth within the southern part of the District. This is based on the Transport Study (2023) concludes that the road network cannot accommodate an annual housing figure of more than 535 dpa. This is a fundamental point and one that BDW do not agree and believe there is capacity to accommodate at least the local housing need within the highway network, alongside potential improvements identified for the following reason.
- 2.9 The Transport Study (January 2023) is the key document on which the Council rely upon to constrain their housing figure to 535 dpa. On review of this document, it is clear that the Council's consultants undertook a sensitivity analysis as to whether the core scenario that supports the 535 dpa position in the local plan could accommodate a higher level of growth. The conclusion in paragraph 5.6.5 and 11.2.3 of the Transport Study appears to be that 700 dpa could be accommodated (in the southern plan area) by the mitigation proposed for the 535 dpa, with some additional (as yet undesigned and not costed), mitigation works beyond those highlighted for the Bognor and Fishbourne roundabouts.
- 2.10 Accordingly, the Council's own evidence base has undertaken the assessment and concluded that a higher growth figure could be accommodated on the A27, subject to appropriate improvement works. Given the testing of the higher growth figure in Transport Study, the exceptional circumstances to constrain growth, as set out at paragraph 60 on the NPPF, do not appear to exist and the Plan could be considered unsound on this point alone.
- 2.11 As a result of the above, the SA does not consider a scenario where the Council would meet its local housing need, nor a scenario where it exceeds its local housing need, which is of relevance given scale of development expected for adjoining authorities, including the highly constrained SDNP.
- 2.12 It should also be noted that the draft Plan does not therefore address any requirements in relation to unmet housing need of neighbouring authorities. Nor does it contain evidence to suggest that these matters have been discussed with the adjoining Authorities. Notably, Arun District Council have confirmed that they will be objecting to the Plan and currently proposed on the basis that they have a significant housing need themselves. This is likely to be further influenced by unmet need from Chichester, who again are seeking to constrain housing requirements, which was the case in 2015. The subsequent knock on from that was for Arun to address some of that need in their 2018 Local Plan.
- 2.13 Given that BDW do not accept that the A27 capacity matters present a ceiling in terms of housing delivery (based on the Council's Transport Study comments and that of its own consultants), it is not accepted that the Plan and associated SA demonstrates reasonable alternatives have been considered and it is not therefore positively prepared, nor is their approach to housing figures justified.

***Effective?***

- 2.14 On the basis of the 535 dpa figure, it is considered that the selected areas for growth and figures are deliverable over the Plan period, however, as set out above, the plan area could accommodate a greater level of growth.
- 2.15 It should also be noted that the plan does rely on the delivery of Neighbourhood Plan and / or Small site allocations DPD. This is set out under Policy H3 in the draft document. This states the following in terms of delivery:

*If draft neighbourhood plans making provision for at least the minimum housing numbers of the relevant area have not made demonstrable progress the council will allocate sites for development within a development plan document in order to meet the requirements of this Local Plan.*

- 2.16 The above is not precise and does not provide any clear timetable for delivery within the Plan period. Whilst my comments are noted above that the Plan could be effective, the Local Plan needs to give a clear timescale for completion of the supplementary Development Plan documents in order to give a clear timescale for this to be completed.

***Is the plan consistent with National Policy?***

- 2.17 On the basis of the comments above, the approach to selected sites for allocation based on the 535 dpa figure is considered to be consistent, however, due to the lack of evidence to demonstrate that the 535 dpa figure should be capped due to the A27 capacity points raised, the draft Plan does not appear to meet the exceptional circumstances allowed for at paragraph 61 of the NPPF to justify their alternative approach. The Plan as proposed is therefore inconsistent with NPPF when read as a whole.

**3 Development in the Manhood Peninsula**

- 3.1 Our clients land is located within East Wittering and Bracklesham, which comprise villages on the Manhood Peninsula. The peninsula is one of three distinct sub-areas in the District, which are highlighted at paragraph 1.9 of the draft Local Plan. The currently adopted Local Plan highlights East Wittering and Bracklesham as area for Strategic Development under Policy 24. The policy includes provision for at least 180 homes, employment land, community facilities and infrastructure. It expects this provision to be as an expansion to the villages. The following is set out in the supporting text to Policy 24:

*13.10 East Wittering and Bracklesham form a single large village which is a defined 'settlement hub' located on the coast to the west of Selsey. The village has a good range of everyday facilities, including a central shopping area at The Parade, and local services such as doctors, banks etc. serving a wider area. However, it lacks a secondary school and leisure centre. It also provides relatively limited local employment opportunities, although there are industrial premises at Hilton Park on Church Farm Lane*

...

*13.12 The village has reasonable road and public transport access to Chichester city and elsewhere. However, there are concerns about the accessibility to employment and facilities and the potential impact of further traffic increase on local roads.*

*13.13 The Local Plan sets the requirement of around 180 homes at East Wittering / Bracklesham. This modest scale of development takes account of the traffic and transport issues affecting the Peninsula, capacity constraints at the Sidlesham WwTW and potential impacts on local designated sites. East Wittering and Bracklesham Parish Council is preparing a neighbourhood plan for the parish, which will identify potential development site(s). The Council is working with the Parish Council in the neighbourhood planning process.*

*13.14 It is intended that additional local employment opportunities should be planned in conjunction with new housing development. The Employment Land Review Update (2013) concludes that commercial demand for further employment space at East Wittering/Bracklesham is likely to be largely restricted to a very local market. However the study considers there is potential for modest provision of small office and workshop units on flexible terms, focused on local businesses. Further work will be undertaken to identify suitable employment sites or options.*



*13.15 Being located on the coast, tourism provides a major employment opportunity for the area; our aim of development on the Peninsula is to sustain and enhance tourism provision. The settlement has particular potential to develop water-based recreational activities, such as sailing and kite surfing. The need for improved disabled access to the beach has also been highlighted. The facilitation of improved access to the seafront through development will be encouraged as will improved linkages between the village centre and the coast.*

3.2 Accordingly, as a sub area within the plan, absent from the constraints of AONB and SPA, this area comprises a suitable and sustainable location for housing, which would result in wider benefits to local services and facilities, which the Council currently support in their adopted Local Plan. The main employment does of course rely on tourism in the area, however, the knock on affect is the absence of housing stock (market and affordable) for those who live and work locally. This is acknowledged by the identification of the area for Strategic Growth in the current Local Plan, but is ruled out in the proposed Local Plan.

3.3 Paragraphs 2.43 – 2.45 of the draft Plan set out the reasoning, which relates to the need to protect the semi-rural nature of ‘some’ settlements and in recognition of the important wildlife habitats such as Pagham Harbour and Medmerry. These highlighted areas are subject to international wildlife designations and are very different to say our clients land at Stubcroft Farm, which has no heightened landscape or wildlife designations. On the contrary, land at Stubcroft Farm comprises relatively ordinary open arable land, which is intensively farmed. It is not extraordinary in any form and a blanket approach suggested by the Council, highlighting landscapes or habitats of national or international importance is not reflective of the entirety of the Manhood Peninsula. This should not be taken as a reason for not allowing further development, which is suitably located, on the Manhood Peninsula.

3.4 The draft Plan goes on to state the following:

*2.44 The coastal settlements of Selsey and East Wittering and Bracklesham will thrive as centres for commercial and social activities that meet the needs of local residents, businesses and visitors alike. Opportunities for regeneration that arise in these settlements will support their role as tourist resorts. The local visitor economy will develop niche markets including green tourism, reflecting the area’s natural assets and shift from a day trip destination to one which encourages short stay breaks. In particular, places such as the Medmerry Compensatory Habitat and Pagham Harbour will serve to extend the tourism season.*

3.5 The above claim is not supported by any evidence or strategy and the absence of any development in these areas will be a barrier to what is a positive ambition, but lacks any substance that it can be achieved. Mixed use development will be required to help achieve the Local Plan objective and the land at Stubcroft Farm has the opportunity to do so, as set out in section 6 below.

#### **4 General Policy requirements**

##### ***Policy H11 Meeting Gypsies, Travellers and Travelling Showpeoples’ Needs - object***

4.1 The above policy sets out a requirement for 124 pitches across the Plan period, which is to be provided for by allocation of pitches on strategic allocation sites proposing 200+ homes.

4.2 Whilst we understand that there may be a district wide need, we understand that the underlying rationale underpinning this strategic approach is that insufficient sites came forward as part of the Council’s Call for Sites process. However, whilst this tells us about availability of sites, it doesn’t dictate the appropriateness of locations for gypsy traveller provision. It should also be noted that the proposed allocations would not accommodate the overall need and there is no

clear quantifiable policy requirement to deliver this need. Accordingly, the approach is not considered to be robust.

- 4.3 What is clear is that plots are currently available in other areas of the district that have not been taken up by the Council for allocation (namely HELAA ref. HBI0028).
- 4.4 From our understanding there appears to be a clear absence of information regarding the requirements for pitch provision in localities and the site specific needs that are required to be met. We have not yet seen any evidence from the Council in respect of engagement with the gypsy traveller community in respect of a desire to be located on suburban residential sites – which we consider would contradict with the typical locations of gypsy traveller pitches which are located on rural sites on the periphery of rural settlements.
- 4.5 Due to the scale and form of the site and specific access names (larger HGVs for static homes and touring caravans) it makes it very difficult to design and suitable means of access that does not appear overly engineered, within a residential housing estate. No consideration appears to have been given to how this can be accommodated within such a site.
- 4.6 At this time, we consider it would not be appropriate to include such provision until further evidence has been provided on suitability of the approach, need in this specific location and suitability as part of housing allocation of this scale, with a single point of access.
- 4.7 On the basis of the above, we object to the proposed policy requirement for schemes exceeding 200 homes.

***Policy NE4 Strategic Wildlife Corridors – object***

- 4.8 The policy is considered to be unsound, inconsistent national policy and is unjustified.
- 4.9 BDW object to these Strategic Wildlife Corridor (SWC) locations. The Council has not published its evidence base in the Regulation 19 consultation version for applying this new constraint layer. It states 'significant habitat surveys, data collection and evidence gathering to enable the mapping of the proposed corridors' has been undertaken, but it is not available to review for the Regulation 19 consultation.
- 4.10 Nor do the Council state the current use of these corridors, some are arable farmland and therefore do not necessarily present the best place for blanket 'additional layer of planning restraint' wildlife corridor. The Council have also not considered that these sites could have future development potential and maybe some of the better and more sustainable (with minimal other constraints) for future development in terms of sequential testing and are therefore precluding sustainable future development in these locations without having undertaken a proper assessment of all sites in the District.
- 4.11 The built environment and nature can work in unison and doesn't require blanket policy designations. Furthermore, the Council have not fully set out the methodology for applying a blanket 'strategic wildlife corridor' at the locations it proposes in the changes to the policy map. The Council have not fully consulted those affected by SWC and other stakeholders. The Council is further applying yet another restrictive 'additional layer of planning restraint' in a District which is already highly constrained, for example AONB, extensive areas covered by a National Park, the District contains large numerous ecological designations SSSI/SPA, Local Nature Reserves/National Nature Reserves and Nutrient Neutrality applies.

- 4.12 Accordingly, this further constraint, which appears to be located in areas adjacent to the existing settlements, where logically future periods of Plan growth would be located, appears unjustified and inappropriate in its current form.

**Policy P5 Spaces and Landscaping – comment**

- 4.13 The draft policy sets out 12 criteria to consider in the design of open spaces and landscaping. Whilst the majority of the requirements appear reasonable, criteria 7 states:

*7. Uses permeable materials for proposed and replacement hard surfacing or ensures surfacing can drain to sufficient adjoining permeable land within the site;*

- 4.14 The wording of this criteria is inconsistent with the drainage hierarchy set out in national Planning Practice Guidance (PPG). In this instance, the PPG states:

***What sort of sustainable drainage systems can be considered?***

*The types of sustainable drainage system which it may be appropriate to consider, will depend on the proposed development and its location, as well as any planning policies and guidance that apply locally. Where possible, preference should be given to multi-functional sustainable drainage systems, and to solutions that allow surface water to be discharged according to the following hierarchy of drainage options:*

- *into the ground (infiltration);*
- *to a surface water body;*
- *to a surface water sewer, highway drain, or another drainage system;*
- *to a combined sewer.*

*Particular types of sustainable drainage features may not be practicable or appropriate in some locations, such as the use of infiltration techniques from potentially polluting development in areas where groundwater provides a potable supply of water (e.g. Groundwater Source Protection Zone 1). Local planning authorities may find it helpful to set out those local situations where they anticipate particular sustainable drainage features:*

- *being inappropriate; or*
- *delivering the greatest benefits.*

*Local planning authorities may wish to encourage the incorporation of rainwater harvesting in sustainable drainage systems. Such systems are likely to be most appropriate for larger commercial or industrial applications and/or for development in areas with a current or likely future Water Stressed Area Classification. Refer to [Water Efficiency Standards](#) and consider such features as part of a [Water Cycle Study](#).*

*Consideration of sustainable drainage systems early in the design process for development, including at the pre-application or master-planning stages, can lead to better integration, multi-functional benefits and reduced land-take.*

*Paragraph: 056 Reference ID: 7-056-20220825*

*Revision date: 25 08 2022*

- 4.15 Accordingly, the policy is unreasonably restrictive and fails to recognise the above guidance which allows for a hierarchy of options for the management of surface water drainage. The reason being is that it will not be possible to achieve infiltration drainage solutions on all sites,

which Policy P5 would currently require. It is recommended that this be addressed with an amendment to follow the recommendations of the PPG.

***Policy E2 Employment Development – comment***

- 4.16 Policy E2 sets out support for new employment development. It sets out criteria for expansion of existing employment sites and for new sites. This comments relates to the provision for new sites. The Policy sets out that new provision will be allowed for in existing settlements, but it is silent in relation to new build development outside of the settlement boundary.
- 4.17 Reference is made in the policy wording for the sequential test to be followed (as set out at paragraph 87 of the NPPF). However, it should be explicit in saying that development outside settlement boundaries, would be supported, subject to the sequential test being completed and suitable scale and form responding to edge of settlement character.

***Policy NE17 – water neutrality – comment***

- 4.18 The policy sets out water efficiency requirements along with a requirement to mitigate impacts. The policy also sets out an onerous restriction on water use per person per household per day. This is potentially achievable, however, it is restrictive and not attractive to future residents. Accordingly, its introduction without flexibility, may limit the desirability of future properties. The policy should therefore allow a housebuilder flexibility to allow high water usage, set against greater off-site water saving measures. The knock on effect could be an increase in housing values for existing stock not subject to restrictive water use.
- 4.19 Our client also considers there to be a need for a strategic mitigation to be provided alongside the Plan. At present, there is no evidence of this being prepared.

***Policies P1-P4, P6 and P8 – design / character / amenity etc. - comment***

- 4.20 The above policies provided detailed design criteria, but from review do not appear to require 6 separate policies. It is felt that this could be addressed by one overriding design policy, which would avoid repetitive criteria and more effective and usable policy wording.

**5 Strategic Flood Risk Assessment (SFRA)**

- 5.1 In response to the Strategic Flood Risk Assessment, which comprises an evidence base document, BDW have instructed Floodline Development Ltd. to review this document. In response they have provided a Technical Note, which is included at **Appendix 3**. This concludes that the approach taken in preparation of the SFRA departs from advice from the Environment Agency and therefore must be approached with care. Its current form raises significant issues for existing communities and also potentially prevents future development taking place to support settlements affected by the flood mapping changes, to their detriment.
- 5.2 The Council appear to be using this document as a tool to prevent / limit development in the Manhood Peninsula. The implications of the SFRA do not appear to have been taken in to account by officers in terms of existing residents. The SFRA infers that the Council / the Environment Agency will not maintain or uphold their Shoreline Management Plan, the result of which could be significant increased flood risk to existing property, which would have a value in the region of £1billion. The Council cannot take a siloed approach to this and must consider in the context and the fact that the existing properties would have to be protected and therefore development on land within these areas is also feasible. There does not appear to be any engagement with the

Environment Agency, which is evident from the SFRA conclusions and absence of balanced conclusion on the matter of flood risk.

- 5.3 Our position is therefore that this is not a robust evidence base document and together with the A27 constraints the Council believe they have, should not be a barrier to development in around the coastal villages on the Manhood Peninsula.

## **6 Suitability of land at Stubcroft Farm, East Wittering & Bracklesham**

- 6.1 The land within BDW control site covers an area of approximately 51.2 hectares of arable land and is located on the north of the settlements of East Wittering and Bracklesham. The land is identified on the location plan included at **Appendix 1**. It comprises a number of fields, extending from Church Road to the west and Bracklesham Lane to the east. Part of the southern parcel bounds the existing built-up area of East Wittering where it abuts the residential roads known as Barn Road, Meadows Road and Wessex Avenue as well as the rear of properties fronting onto Church Road to the west. To the south-east lies a recreation ground with football pitch, bowling green and play area.
- 6.2 The land to the western side is subject to a live planning application for 280 homes and 45 sheltered homes. A copy of the proposed site plan is included at **Appendix 2**.
- 6.3 The north-western parcel is bounded by Church Road to its west, the watercourse to its east and commercial development in Hilton Park to the north-east. The site is relatively flat with hedgerows and hedgerow trees to some outer perimeters. A pedestrian footway bounds the land on the Church Road and Church Farm Lane frontages. The eastern parcels comprise a mix of arable fields extending up to Bracklesham Lane.
- 6.4 East Wittering is a settlement which provides a range of services and facilities including primary school, pre-school, churches, pharmacy and various pubs, restaurants and shops (including Tesco Express).
- 6.5 The site has the potential to deliver a host of different land uses, including for employment, tourism, housing, community facilities and key infrastructure, as listed below and also highlighted on the indicative land use plan (**Appendix 4**). The overall site (including the live application proposals) could provide the following:
- Employment land
  - Potential park and ride for visitors to relieve parking pressures in the village centre and seafront car parks
  - Overnight tourist accommodation
  - Pedestrian and cycle connectivity, comprising safe off road routes into and across the village
  - Provision of around 600 homes across overall land in BDW control
  - Elderly persons accommodation
  - Biodiversity net gain
  - Extensive areas of publicly accessible open space
  - Formal children's play provision
  - Extension to school playing fields and improved drop off / pick up areas
  - Network of pedestrian and cycle routes connecting the footpath network
- 6.6 One of the key objectives for the manhood peninsula is to encourage sustainable tourism, increase access to the coastline and encourage local employment. The proposed site offers this and also assists with the local ambition to have off-road east to west connectivity, with the wider

ambition to have a pedestrian and footpath network between Medmerry and West Witting (parish council strategy). The land at Stubcroft Farm provides an important gap current in the east –west connectivity, for both longer distance leisure routes, but also importantly for improved safe access to and from the school, for all users.

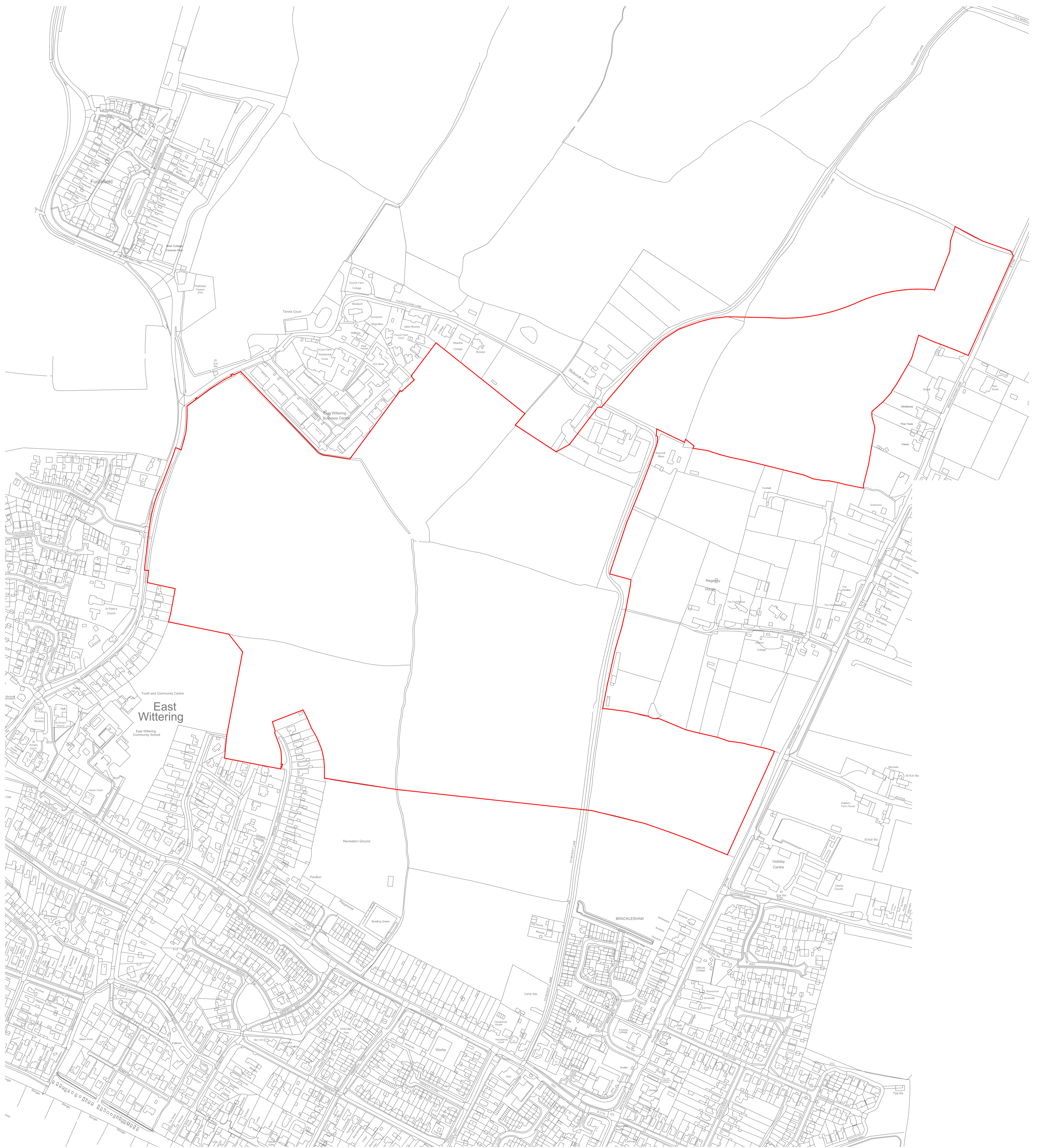
- 6.7 The site is suitably located to deliver a host of benefits to the local area and help achieve objectives of the wider Manhood Peninsula, without harm to the key attractions for visitors, such as the coastline, Medmerry, Pagham and Chichester Harbour's.

## **7 Conclusion**

- 7.1 Whilst we understand the approach the Council has taken in terms of the selection of sites to meet the 535 dpa figures, we consider that the Plan area is capable of accommodating a greater housing quantum. This will facilitate development and help villages in particular to flourish and meet the objectives of the Local Plan. The Council have failed to provide sufficient justification for not meeting its housing need in full and have not suitably considered unmet need from adjoining authorities. The latter is particularly relevant given constraints of the SDNP. The Council's position of growth is predicated on the basis of the A27 not having sufficient capacity to accommodate a higher growth of 535 dpa. Its own evidence base (Transport Study 2023) contradicts this position and therefore the Council should at least be meeting their local housing need and also considering what part it can play with meeting unmet needs for the adjoining authorities.
- 7.2 This is particularly important for villages such as East Wittering and Bracklesham, for which the Local Plan has a high expectation, but no development or strategy appears to be proposed to facilitate this. Accordingly, the Council should consider the allocation of additional housing sites, to meet a full, or higher housing provision within the plan area.
- 7.3 At present, the Plan fails to be positively prepared and is inconsistent with the NPPF. On the basis that the Council don't reconsider their position, we wish to be present at the relevant Examination hearings to represent our clients' interests and further discuss the views set out in this submission.

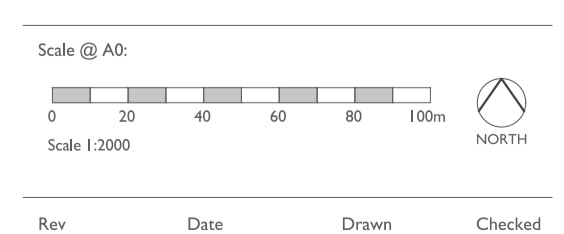
**Appendix 1: Site Location Plan**





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Site Boundary  
126.653ac / 51.254ha



Rev:      Date:      Drawn:      Checked:

**09.03.23**

Draw: MARCH 2023  
Drawn by: BL      Checked by: BB  
Dwg No: CB\_15\_075\_PAAH\_000      Rev:

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**PRELIMINARY**

Project: STUBBCROFT FARM, EAST WITTERING.  
Title: SITE LOCATION PLAN

Client: **BARRATT** **DAVID WILSON HOMES**





**Appendix 2: Site Layout Plan (live Planning application)**





CHURCH ROAD EAST WITTERING											280
REF	NAME	DESCRIPTION	HEIGHT	OCCUPANCY	INTERNAL (GROSS) SQFT	INTERNAL (NET) SQM	NO	SQFT TOT (NET)			
<b>DAVID WILSON</b>											
4 BED											
CLL (N44P)	CLIVER	4 BEDROOM HOUSE	2.0	487P	1135	1417	156	3594	14	21004	
WFC (N64)	WYCHWOOD	4 BEDROOM HOUSE	2.0	486P	1140	1421	167	3647	15	22042	
LYN (N417)	LYRFORD	4 BEDROOM HOUSE	2.0	487P	1134	1414	159	3613	3	4248	
WN (N442)	WINTERTON	4 BEDROOM HOUSE	2.0	486P	1134	1414	137	3421	8	10496	
3 BED											
BLA (N46)	BLA ENY	3 BEDROOM HOUSE + STUDY	2.0	385P	1143	11740	145	11573	3	3735	
RA (N319)	RAMPTON	3 BEDROOM TOWN HOUSE	2.0	385P	1137	10476	109	10111	18	19962	
POW (N441)	POWELL	3 BEDROOM HOUSE	2.0	385P	1116	10274	101	10259	9	9909	
ALD (N383)	ALDER	3 BEDROOM HOUSE	2.0	385P	964	8976	951	8839	25	33735	
2 BED											
PR (N224)	PRINCE	2 BEDROOM HOUSE	2.0	383P	718	7138	754	7011	3	2342	
WH (N224)	WHINCHAM	2 BEDROOM HOUSE	2.0	383P	719	7235	757	7034	2	1514	
<b>SUB TOTAL</b>									<b>100</b>	<b>119250</b>	
<b>BARRATT</b>											
4 BED											
ROX (N)	ROXAN	4 BEDROOM HOUSE	2.0	486P	1137	12234	1300	30255	9	11700	
3 BED											
ALL (N)	ALLERTHORPE	3 BEDROOM HOUSE + STUDY	2.0	385P	1135	11380	1207	12116	6	7340	
PER (N)	PERCHAMOND	3 BEDROOM HOUSE	2.0	384P	1101	10284	1061	10084	17	22045	
HOP (N)	HOPTON	3 BEDROOM HOUSE	2.0	384P	1017	9449	1002	9308	30	20040	
NEV (N)	NEVTON	3 BEDROOM HOUSE	2.0	384P	910	9012	935	8872	19	18145	
MAT (N)	MATLOCK	3 BEDROOM HOUSE	2.0	384P	970	9023	935	8923	15	14322	
2 BED											
ELW (N)	ELW	2 BEDROOM HOUSE	2.0	383P	785	7301	777	7218	10	3700	
<b>SUB TOTAL</b>									<b>96</b>	<b>97667</b>	
<b>FIRST HOMES</b>											
2 BED											
ELW (N)	ELW	2 BEDROOM HOUSE	2.0	383P	785	7301	777	7218	7	3439	
1 BED											
61	61	1 BEDROOM APARTMENT	2.0	182P	377	3339	348	3280	4	2222	
60	60	1 BEDROOM APARTMENT	2.0	182P	348	3027	339	3010	4	2154	
59	59	1 BEDROOM APARTMENT	2.0	182P	414	3686	424	3759	3	1822	
58	58	1 BEDROOM APARTMENT	2.0	182P	349	3076	340	3010	3	1400	
<b>SUB TOTAL</b>									<b>21</b>	<b>13359</b>	
<b>AFFORDABLE RENT</b>											
4B4	T54	4 BEDROOM HOUSE	2.0	486P	1102	10238	1085	10084	3	3255	
3B4	T55	3 BEDROOM HOUSE	2.0	385P	954	8885	938	8717	3	2814	
3B4	T53	3 BEDROOM HOUSE	2.0	385P	927	8615	911	8447	3	2733	
3B4	T5	3 BEDROOM HOUSE	2.0	384P	839	7797	825	7447	3	2425	
3B8	BEYON	3 BEDROOM BUNGALOW	1.0	383P	933	8775	913	8429	2	404	
61	61	1 BEDROOM APARTMENT	2.0	182P	377	3339	348	3280	2	1136	
60	60	1 BEDROOM APARTMENT	2.0	182P	349	3027	339	3010	2	1078	
<b>SUB TOTAL</b>									<b>18</b>	<b>14917</b>	
<b>SOCIAL RENT</b>											
3B3	T55	3 BEDROOM HOUSE	2.0	385P	954	8885	938	8717	3	2814	
3B4	T55	3 BEDROOM HOUSE	2.0	385P	937	8615	911	8447	3	4361	
3B4	T53	3 BEDROOM HOUSE	2.0	384P	839	7797	825	7447	15	12375	
61	61	1 BEDROOM APARTMENT	2.0	182P	377	3339	348	3280	3	2425	
60	60	1 BEDROOM APARTMENT	2.0	182P	348	3027	339	3010	2	1078	
59	59	1 BEDROOM APARTMENT	2.0	182P	414	3686	424	3759	1	624	
58	58	1 BEDROOM APARTMENT	2.0	182P	349	3076	340	3010	1	500	
<b>SUB TOTAL</b>									<b>29</b>	<b>23122</b>	
<b>AFFORDABLE SHARED</b>											
3B3	T55	3 BEDROOM HOUSE	2.0	385P	954	8885	938	8717	2	1876	
3B4	T55	3 BEDROOM HOUSE	2.0	385P	937	8615	911	8447	8	7288	
3B4	T53	3 BEDROOM HOUSE	2.0	384P	839	7797	825	7447	6	4950	
<b>SUB TOTAL</b>									<b>16</b>	<b>14114</b>	
<b>GRAND TOTAL</b>									<b>280</b>	<b>282429</b>	

Scale @ A1:  
0 10 20 30 40 50m  
Scale 1:1000

Rev Date Drawn Checked  
G 19.07.22 MAH BB  
FIRST HOMES, AFFORDABLE AND MARKET UNIT MIX  
UPDATED TO CDC POLICY AS INSTRUCTED BY CLIENT.  
F 21.06.22 MAH BB  
PBA COMMENTS INCORPORATED PLOTS 10-21.

Date: AUGUST 2021  
Drawn by: MAH Checked by: SJC  
Dwg No: CB\_15\_075\_P1\_001 Rev: G

Project: STUBCROFT FARM EAST WITTERING

Title: LAYOUT LAYOUT

Client: BARRATT HOMES DAVID WILSON HOMES

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## **Appendix 3: Flood Risk Technical Note**



## Technical Note – Chichester District Council Interim SFRA

14 March 2023

The Strategic Flood Risk Assessment is primarily a planning tool. It is a pragmatic, risk-based assessment of flood risk to inform the spatial planning process. It is also an evidence-based document which supports the implementation of Supplementary Planning Guidance, Environment Agency Flood Risk and Coastal Erosion Risk Management Policy and other policies within the Local Plan.

The methodology followed in the preparation of an SFRA is designed to comply with the National Planning Policy Framework and the accompanying Technical Guidance as well as guidelines from the Environment Agency (EA).

Chichester District Council are updating their Level 1 Strategic Flood Risk Assessment from December 2018 prepared by JBA Consulting with an Interim SFRA as a result of the more recent changes to the climate change guidance, NPPF and Planning Practice Guidance.

The Environment Agency's standing advice for the preparation of strategic flood risk assessments is to assess both the higher central and upper end climate change allowances for tidal flood risk and when assessing fluvial flood risk advise using the central allowance for 'more vulnerable' development in flood zone 2 or 3a.

For nationally significant infrastructure projects, new settlement or significant urban extensions they advise you may also need to assess the flood risk from a high impact climate change scenario. In these circumstances you should use:

- the H++ climate change allowances for sea level rise
- the upper end allowance for peak river flow
- the sensitivity test allowances for offshore wind speed and extreme wave height
- an additional 2mm for each year on top of sea level rise allowances from 2017 for storm surge

This should be treated as a 'sensitivity test'. It will help assess how sensitive the proposal is to changes in the climate for different future scenarios. This will help to ensure the development can be adapted to large-scale climate change over its lifetime.

They will want to see if the authority have considered whether it is appropriate to apply the [H++ allowances](#) for a strategic flood risk assessment. Where applicable the authority should do H++ allowance assessments as well as assessing the sea level rise allowances in table 1 of the guidance – 'Flood Risk Assessment: Climate Change Allowances'. [www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances#credible-maximum-scenarios](http://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances#credible-maximum-scenarios)



The Environment Agency, in their role as statutory consultee for the authority, recognise that areas on the south coast benefits from significant sea defences which protect an increasing number of properties in the area and Chichester District Council, Arun District Council and Environment Agency's Coastal Management Plan which monitors the existing sea defences as well as recommending a strategy to maintain or improve these defences. This is also confirmed in the SFRA, however, flood risk assessment should be made against their undefended model with an appropriate allowance for climate change.

Their recent advice when responding to planning applications in areas potentially at risk of flooding in Flood Zone 3, as well as offering advice with regard to finished floor levels, is limited to delivering the planning practice guidance to the National Planning Policy Framework which states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development (19/02136/FUL - Chichester District Council)

The current draft of the Interim SFRA departs from the EA standing advice which refers to the how climate change should be applied to urban and significant urban extensions and when to apply H++ climate change allowances. It guides, except in certain circumstances, the H++ allowance should be used as a 'sensitivity test' in addition to the primary test of 'higher central' or 'upper end' allowances. The results from the undefended 0.5% AEP + H++ climate change scenario, (see Interim SFRA Appendix E) shows the very significant changes to assessing flood risk in these coastal areas which raises sea level from between 300mm to 700mm above the guided climate change allowances. The strict interpretation of applying the H++ Climate Change allowance may cause blight to existing communities as well as restrict and stifle sustainable development in these areas, especially at a time when the Environment Agency are advocating increased resilience and adaptation to development.

Ends.

**Appendix 4: Potential Land Use Plan**





## PH2 LAND USE PLAN STUBCROFT FARM, EAST WITTERING

REF	COLOUR	ACRES (AC)	HECTARES (HA)
<b>PHASE 2 BOUNDARY</b>			
		85.952	34.784
Residential		26.690	10.801
Open Space		31.374	12.697
Infrastructure		2.265	0.916
Equipped Play		0.329	0.133
SuDS		0.118	0.048
Potential Care Home		1.663	0.673
Commercial		5.906	2.390
Park, Sports and Recreation Grounds		3.517	1.423
Potential Tourist Accommodation		13.212	5.347
Allotments		0.880	0.356
<b>GRAND TOTAL</b>		<b>85.952</b>	<b>34.784</b>

- Key**
- Site Access
  - Pedestrian Access
  - Proposed Vehicular Connection
  - Proposed Pedestrian/Cycle Way Connection
  - Stubcroft Lane

Scale @ A0  
0 10 20 30 40 50  
Scale 1:1250

Project: STUBCROFT FARM, EAST WITTERING  
Title: PH2 - PARAMETER LAND USE PLAN  
Client:

Date: MARCH 2023  
Drawn by: MC  
Checked by: BB  
Dwg No: CB\_15\_075\_PARAM\_PH2\_001

Rev: A

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