

Representations to the Chichester Local Plan 2021-2039
Proposed Submission
Regulation 19 Consultation
February 2023

made on behalf of

Beechcroft Developments Limited

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Appendices

Appendix 1	Chichester Local Plan 2021-2039 - Representations to Proposed Submission Draft by Pegasus Group.
Appendix 2	Statement of Representations – A27 Mitigation Contributions by Bellamy Roberts LLP

1 INTRODUCTION

- 1.1 These representations to the Chichester Local Plan 2021-2039: Proposed Submission (Regulation 19) Consultation (hereafter referred to as the “Reg 19 Plan”) have been prepared by Genesis Town Planning, in conjunction with Pegasus Group and Bellamy Roberts LLP.
- 1.2 The representations are submitted on behalf of Beechcroft Developments Limited (“Beechcroft”) and should be read in conjunction with the following standalone reports attached as appendices as referred to below: .
- Appendix 1 “*Chichester Local Plan 2021-2039 - Representations to Proposed Submission Draft*” by Pegasus Group. These consider the proposed housing requirement and supply position of the Reg 19 Plan and the accompanying Sustainability Appraisal.
 - Appendix 2 “Statement of Representations – A27 Mitigation Contributions” by Bellamy Roberts LLP which considers the proposed mitigation and contributions towards improvements to the A27.

2 LEGAL COMPLIANCE

- 2.1 One of the requirements for the preparation of a Local Plan as set in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) is the publication of a Sustainability Appraisal (SA) that shows how the SA has been carried out, the information that is used as part of the process and what the outcomes were. The SA is a tool for assessing how the plan, when judged against other reasonable options, will help achieve environmental, economic and social objectives.
- 2.2 As set out in Section 2 of the accompanying representations by the Pegasus Group, the SA suggests that there is little or no argument for setting a housing requirement above the minimum local housing need of the 638 dwellings per annum (dpa) as set by the standard method (763 dpa minus 125dpa for South Downs National Park area). This approach is contrary to paragraph 11a) of the National Planning Policy Framework (NPPF) in that it requires all plans to promote a sustainable pattern of development that seeks to meet the development needs of their area.
- 2.3 It is noted that paragraph 11b) confirms that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas unless this is demonstrated to be unsustainable. The background evidence base for the Reg 19 Plan does not clearly demonstrate the reasons for restricting the overall scale, type and distribution of development in the plan area or that the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 2.4 It is noted that the standard method requirement of 638dpa for the plan area is arrived at by removing 125dpa for the part of the district that falls within the South Downs National Park. The lack of any meaningful assessment for providing sufficient housing to meet the standard method figure is a significant error. Without such an assessment, the SA disregards the possibility of providing for sustainable development at the outset and does not therefore accord with the regulatory requirements referred to above.
- 2.5 Paragraph 2.5 of the Pegasus Report refers to Table 5.3 of the SA which identifies a range of development scenarios with dwelling requirements for the plan area ranging from 567dpa to 606dpa. These figures result in a shortfall of between 32dpa and 71dpa when compared to the standard method requirement of 638 dpa. As neither of these figures is significantly above the standard method figure, it is not unreasonable to expect the SA to also test a housing requirement /scenario of 638dpa so that it reflects the confirmed minimum housing need of the plan area. This would be a reasonable alternative and should be tested. Only when this has been carried will it be possible to fully understand the likely implications of meeting housing needs in full. In doing this, the Plan will then comply with the Legal and Procedural Requirements.

3 SOUNDNESS

3.1 As set in paragraph 35 of the NPPF when local plans and spatial development strategies are examined they should be prepared in accordance with legal and procedural requirements to ensure that they are sound. It goes on to state that:

“Plans are sound if they are:

- a) **Positively prepared** – providing a strategy which, as minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”

3.2 As set in Section 1 Legal Compliance above, the Reg 19 Plan does not provide a strategy that seeks to meet the area’s objectively assessed housing need and the SA does not test all the reasonable alternatives. On this basis the plan has not been positively prepared and is not justified. As a result it is contrary to paragraphs 35a) and 35b) of the NPPF.

3.3 In addition to this, and as made clear in Section 3 of the Pegasus Group representations, there is no clear evidence of effective and on-going working with neighbouring authorities as part of the statutory duty to cooperate. The SoCG should be made publicly available throughout the plan making process to provide transparency.

3.4 Based on paragraph 1.25 of the Reg 19 Plan this requirement has not been carried out. This refers to the preparation of a SoCG and that this currently being prepared and will be made available for review on the council’s website. As a result the SoCG should have been made available on the LPA’s website at the time the Reg 19 Plan was published for consultation. This does not appear to have been the case which means that this part of the plan making process does not meet the requirements set out in paragraphs 27 and 35c) of the NPPF. As such the effectiveness test has not been complied with in full.

3.5 As set out in paragraph 3.4 of the Pegasus Group representations the lack of a fully detailed SoCG on Duty to Cooperate is particularly important in Chichester District as there is substantial unmet need for housing arising in neighbouring authorities and other nearby authorities across the same sub-region. As yet the evidence base of the Reg 19 Plan does not explain or demonstrate how the unmet housing need will be met.

- 3.6 This is an important omission as it does not accord with the procedural requirements. Until the outcome of this process is known and fully understood it is difficult to know if or how the strategy in the Reg 19 Plan is appropriate or needs modification.

4 COMMENTS ON THE REG 19 DRAFT PLAN

Policy H1 – Meeting Housing Needs

- 4.1 Commentary on this policy and the housing needs of the plan area are set out in full in the representations by the Pegasus Group which are contained in Appendix 1 of these representations.
- 4.2 As set out in paragraph 7.1 of those representations no exceptional circumstances exist in Chichester District to justify an alternative approach that deviates from the standard method figure of 763dpa. Taking account of the South Downs National Park requirement of 125 dpa results in a minimum need of 638dpa for Chichester District.
- 4.3 In addition to this paragraphs 7.3 to 7.15 of the Pegasus Group representations considers the housing needs of particular groups which are not reflected by the current standard method requirement of 638dpa. These include the following groups:
- Students – which creates a need for an additional 29dpa;
 - people who require affordable housing- which generates a need of 433 affordable dpa (based on this figure and the thresholds set out in draft Policy H4: Affordable Housing it would be necessary to deliver 1,083 homes per annum to meet affordable housing need in full); and
 - the unmet housing needs of neighbouring authorities and/or authorities in the same sub-region which at best are between 10,141 and 10,620 homes.
- 4.4 When the needs of students are added to the standard method figure the minimum need dwelling requirement would be 666dpa or 11,988 dwellings over the 18-year plan period 2021-2039.
- 4.5 When the full affordable need of 1,083dpa is factored in this results in a need for at least 19,494 dwellings over the plan period.
- 4.6 In addition to the above figures there is also an unmet need for over 10,000 homes in related authorities over the plan period.
- 4.7 Based on the above there is clearly a need for significantly more homes than is suggested by the minimum standard method figure.

Infrastructure Capacity

- 4.8 Whilst it is noted that there are long-standing highway capacity issues on the A27 Chichester Bypass and more intermittent capacity problems with Waste Water Treatment facilities in the southern part of the district these could be resolved if the emerging Reg 19 Plan made provisions to improve their capacity through proper long-term planning.

- 4.9 This approach is supported by paragraph 22 of the NPPF which confirms that plan-making should respond to long-term infrastructure requirements; and by paragraph 059 Ref ID 61-059 of the Planning Practice Guidance (PPG) which requires local planning authorities and policies that set out infrastructure deficiencies and how these will be addressed.
- 4.10 Existing capacity problems on the A27 are referred to throughout the Reg 19 Plan and its evidence base. Paragraph 5.2.11 of the SA refers to the southern plan area (i.e. the east-west corridor and Manhood Peninsula) as being highly constrained by capacity on the A27 and to detailed discussions with National Highways and West Sussex County Council (WSCC) over the course of 2019-2022 that led to a resolution that there is capacity for no more than 535dpa in this area. The background evidence does not however make it clear as to how the 535dpa figure was arrived at or the implications/infrastructure improvements that would be required to accommodate a higher dwelling provision in this part of the plan area.
- 4.11 It is important to note the *“Chichester Transport Study - Local Plan Review Transport Assessment” (January 2023)* prepared by Stantec is mainly focused on testing a single Local Plan spatial scenario for the period to 2039. Section 5.6 confirms that in addition to testing the 535 dpa in the south of the plan area that a sensitivity test for the delivery of 700 dpa in this part of the plan area was also carried out. Paragraph 5.6.1 confirms that higher levels of Local Plan development would enable higher levels of developer contributions to be raised towards funding the required Local Plan mitigation; and, paragraph 5.6.3 comments that generally the proposed Strategic Road Network (SRN) mitigation can accommodate in the most part, additional increase in development to 700dpa. This is reiterated in paragraph 5.6.5 where it concludes *“that in the main, the 700dpa (southern plan area) demands can generally be accommodated by the mitigation proposed for the 53 dpa core test although at the Portfield roundabout and Oving junction, capacity issues get worse with the 700dpa demands, with additional mitigation being required”*.
- 4.12 Paragraph 8.5 of the Reg 19 Plan comments that in 2021 National Highways confirmed that the A27 Chichester By-Pass major improvement scheme is included in the Road Investment Strategy Pipeline for the period 2025-30 (RIS3) but at this stage funding is not guaranteed. This situation is not uncommon as are many infrastructure projects which are considered necessary to support the emerging Local Plan. This is demonstrated by Table 3 of the Infrastructure Delivery Plan (January 2023). As made clear in paragraph 7.22 of the Pegasus Group representations the fact that the funding has not yet been secured towards certain types of infrastructure such as healthcare this should not be used to constrain the level of housing proposed in the emerging Local Plan. This approach also applies to transport infrastructure.
- 4.13 The approach of the Reg 19 Plan to impose limits on the amount of development over the Plan period because of existing infrastructure capacity issues is inconsistent with the objectives of national policy and could undermine the prospects of securing funding necessary to improve infrastructure capacity. The approach of the emerging plan is negative as it has the effective of constraining the level of housing below the minimum level needed and does not accord with

the PPG or the objectives of national policy. A better, and more positive approach, would be to plan for the necessary infrastructure which in turn will maximise the prospects of securing the required infrastructure instead of deferring it.

- 4.14 The emerging Local Plan advocates a “monitor and manage” approach such that the funding for the necessary improvements to the A27 will be monitored which itself will jeopardise that funding, and if the funding is secured, then presumably the corresponding level of housing will be released to address some of the housing need. Instead of this approach, the emerging plan should pursue a “plan, monitor and manage” approach to meeting housing needs in full by committing to the delivery of the infrastructure improvements and if necessary, phasing the housing requirements towards the end of the plan period.

The Proposed Housing Requirement

- 4.15 Paragraphs 7.27 of the Pegasus Group representations confirms that the housing needs of the plan area will not be met by the proposed 10,350 dwelling requirement set out in Policy H1 of the Reg 19 Plan.
- 4.16 According to the standard method the minimum housing need is 11,484 dwellings (638 x 18). When the growth of the student population (28dpa) is factored in the minimum housing need increases to 11,988 homes, and when the full affordable housing needs (433dpa) are taken into account the overall need increases to at least 19,485 dwellings. Finally, there is a need for excess of 10,000 more homes to address the unmet needs of the sub-region.

Suggested Modification

- 4.17 Based on the above it is clear that the Policy H1 requirement needs to be reconsidered and increased. This can be achieved if the Local Plan seeks to address infrastructure requirements including the capacity constraints on the A27 as required by paragraph 22 of NPPF.
- 4.18 In setting a revised housing requirement, the District Council must take into account the needs of particular groups (i.e. students and persons in need of affordable homes) and complete the Duty to Cooperate process by preparing a SoCG in respect of the unmet needs of the sub-region and then consider how/whether the Local Plan can provide for some of these unmet needs.

Strategic Locations, Strategic Allocations and Non-Strategic Parish Housing Requirements 2021-2039

- 4.19 An increased housing requirement could have implications for the broad spatial distribution across the different plan areas/sub-areas i.e. the East-West Corridor, Manhood Peninsula, and the North of the Plan Area as provided by Policy H1.
- 4.20 It will also have potential implications for the Policy H2: Strategic Locations Allocations, and Policy H3: Non-Strategic Housing Requirements.

Policy S1 - Spatial Development Strategy

- 4.21 Chapter 3 and Policy S1 of the Reg 19 Plan sets out the spatial strategy of the emerging plan. These seek to disperse development across the plan area by:
1. Focusing the majority of planned sustainable growth at Chichester city and within the east-west corridor;
 2. Reinforcing the role of the Manhood Peninsula as home to existing communities, tourism and agricultural enterprise; and
 3. Where opportunities arise, supporting the villages and rural communities in the North of the Plan Area.
- 4.22 An increased dwelling requirement (as suggested in the context of Policy H1 above) could be accommodated without the need to significantly alter the proposed spatial strategy of the Reg 19 Plan.
- 4.23 In addition to Chichester city and the east-west corridor being the primary focus of growth, additional development could be accommodated at some of the less constrained Service Villages in the northern parts of the Manhood Peninsula.
- 4.24 It is noted that paragraph 3.20 of the Reg 19 Plan refers to a specific set of planning challenges for the Manhood Peninsula. These include:
- significant areas at risk from coastal erosion and flooding;
 - environmental designations;
 - poor road accessibility and problems of traffic congestion from limited road connections to the north including issues with the A27 junction; and
 - a high reliance on Chichester city for employment.
- 4.25 It is important to note however that not all of the Manhood Peninsula is affected by the above challenges. Hunston is a good example of this and is relatively unconstrained compared to other parts of the Manhood Peninsula. It is one of three Service Villages in the northern part of the Manhood Peninsula (the others being Stockbridge and North Mundham/Runcton) which are not affected by tidal erosion or increased tidal flood risk unlike East Wittering/Bracklesham and potentially at Selsey given that the only road in and out of the Selsey is severely affected by tidal flood risk. This is confirmed by the updated Strategic Flood Risk Assessment (SFRA) published in late 2022.
- 4.26 Hunston is not directly affected by any specific environmental designations such as the Chichester Harbour Area of Outstanding Natural Beauty (AONB); Special Protection Areas (SPA); Special Area of Conservation (SAC); or Sites of Special Areas of Interest (SSSI), unlike the western and southern parts of the peninsula.

- 4.27 Hunston has good accessibility to the road network being located on the B2145 with two direct vehicular access routes to Chichester via the A286 (to the west) and the B2145 (to the east). It is also within walking distance of Chichester via the dedicated public footpath network to the north (PRoWS 184 and 190) and a permissive cycleway alongside the Chichester canal. A regular bus service (Route 51) also operates between the village and Chichester. As such residents have a range of sustainable transport options which will assist in reducing congestion on A27 and its junctions. In this respect, additional development at Hunston would be consistent with Policy T1(1.) and paragraph 8.5 of the Reg 19 Plan, the latter of which confirms that *“In the first instance, development will be directed to the most sustainable locations where the need to travel is reduced or there are suitable alternatives to the car.”*
- 4.28 Another potential constraint for the Hunston/North Mundham/Runcton is identified on pages 29 and 103 of the SA. This refers to the primary school capacity at Hunston/North Mundham with no potential for expansion. The SA however goes on to confirm that there is some uncertainty in this respect, and there is need to recognise that pupil forecasts are changeable, and increased school capacity elsewhere could serve to free up capacity at North Mundham Primary School. An example of this relates to the proposed 680 home urban extension to the east of Chichester (draft Policy A8a) that would include a new one form entry primary (with potential to provide two forms).
- 4.29 In addition to this, planning permission (20/01686/FUL) was granted for 39 dwellings at the former Lowlands Nursery, North Mundham in August 2021; and there is resolution to grant planning permission (20/02989/FUL) for up to 66 dwellings on adjoining land to the south of Lowlands, North Mundham. WSCC Education had originally objected to the later application because of a lack of capacity and potential expansion space at the primary school but later withdrew this objection in May 2022 on the basis that there was sufficient capacity to accommodate the proposed development.
- 4.30 The above demonstrates that this is a fluid situation which, like the congestion on the A27, has the potential to be remedied by planning for improvements to these infrastructure constraints by proper plan-making.
- 4.31 The principle of additional growth at Hunston has been accepted in the recent past. The adopted Site Allocation DPD of 2019 allocates land south of Reedbridge Farm (Policy HN1) for housing. At the draft Local Plan Preferred Approach stage in December 2018, the District Council was proposing to meet its full Local Housing Need and suggested that about 300 dwellings should be provided at Hunston/North Mundham/Runcton with a particular focus on Hunston. Draft Policy AL11 of the Preferred Approach proposed a minimum of 200 dwellings within Hunston Parish. This figure was then used by Hunston Parish Council in preparing its Neighbourhood Plan. This proceeded to Examination but was withdrawn in June 2022 following the Examiners report. The Examiner was concerned that the emerging plan was not in general conformity with the strategic policies contained in the development plan. It therefore did not meet Basic Condition (e). He also agreed with the District Councils advice to the Parish Council that it should not submit a revised Neighbourhood Plan in advance of the adoption of the Local Plan Review.

Suggested Modification

- 4.32 Based on the above it clear that Hunston has been, and continues to be, a sustainable location for new development. Previous work on the emerging Local Plan and the now withdrawn Neighbourhood Plan demonstrate that it is capable of delivering at least 200 homes during the Plan period. This potential could either be reflected by:
- 1) making a strategic scale allocation as part of *Policy H2 – Strategic Locations/Allocations 2021-2039*; or
 - 2) by setting a housing figure of at least 200 homes for Hunston in *Policy H3 - Non- Strategic Parish Housing Requirements 2021-2039* which could be delivered as part of the Neighbourhood Plan process.

Policy T1 – Transport Infrastructure and Paragraph 8.21

- 4.33 Appendix 2 of this representations report comprises a “*Statement of Representations – A27 Mitigation Contributions*” (March 2023) prepared by Bellamy Roberts LLP. This has been prepared for Beechcroft in respect of the suggested A27 mitigation contributions as set out in Chapter 8 of the Reg 19 Plan.
- 4.34 This refers to various parts of Policy T1 including the delivery of a coordinated package of infrastructure improvements to the junctions on the A27 Chichester Bypass; and to the Community Infrastructure Levy (CIL) which may be used to contribute towards the costs of improvements to the local transport network.
- 4.35 Paragraph 2.5 of the report confirms that the Fishbourne Road Roundabout; and the Bognor Regis Roundabout are the schemes recommended to be funded by residential developer contributions as they have the greatest priority. The upgrade schemes for these two junctions are included in the adopted Chichester Local Plan: Key issues 2014-2029 as well as the Reg 19 Plan. Although various upgrades to the A27 Chichester Bypass are being considered for inclusion in the third Road Investment Strategy (RIS3), National Highways (NH) has yet to confirm when and whether funding will be made available for the A27 improvements. As such, no detailed plans or cost information is available for these schemes at present.
- 4.36 In the meantime the costs of the proposed improvements to the Fishbourne Road Roundabout and Bognor Road Roundabout are to be secured from developer contributions associated with the development planned for in the Reg 19 Plan. It is important to note however that both roundabouts form part of the Strategic Road Network (SRN) and the A27 is a Trunk Road. Improvements to the A27 are the responsibility of NH and as such funding for improvements should be received from the Department of Transport (DfT) i.e. central government.
- 4.37 Paragraph 8.21 of the Reg 19 Plan quotes a per dwelling contribution of £7,728 for the southern part of the plan area (excluding the two Strategic Development Locations (SDLs) West of Chichester and at Tangmere). The developer contributions being sought for the improvements

to these two roundabout junctions are from residential development and exclude contributions from other use types such as industrial, retail, leisure, education etc which all generate traffic movements during the network peak hour periods but do not appear in the assessments. development. No reason or justification for omitting contributions from other use types has been given.

- 4.38 Paragraph 3.25 of the Bellamy Roberts report refers to The Chichester Transport Study (2023) which comments that given forecast growth is likely to be lower than currently predicted within the model, and that the mitigation identified “may not be required in the future”. Given this uncertainty, the SATURN modelling outputs cannot be relied upon to determine the impact of Local Plan development traffic on the SRN and any improvements that may or may not be required at these junctions.
- 4.39 As set out in paragraph 4.11 above, and paragraphs 3.27 to 3.34 of the Bellamy Roberts report, the Chichester Transport Study confirms that a Sensitivity Test for the delivery of 700 dpa has been undertaken which would provide 12,600 additional homes over the plan period. The outcome of this assessment indicates that the additional traffic demands from this scenario can generally be accommodated on the SRN by the mitigation identified for the 535 dpa scenario. Reference is however made to a deterioration at the Portfield roundabout and the Oving junctions which would require additional mitigation. This could be achieved through better linking of the signals, or metering flows at the Bognor Road junction.
- 4.40 In summary the Reg 19 Plan seeks to constrain the amount of development over the plan period because of capacity constraints on the A27 Chichester Bypass. However, the modelling data provided in the Chichester Capacity Study does not provide any justification for the Reg 10 Plan to impose such a limit. No justification for how the figure of 535 dpa was arrived at has been provided, and the SATURN modelling clearly shows that a figure of 700 dpa can generally be accommodated on the SRN
- 4.41 This situation, combined with the issues identified in the Bellamy Roberts report concerning the forecast background growth suggest that further additional dwellings, over and above the 700 dpa sensitivity test, could be accommodated on the SRN with the mitigation proposed. This needs to be tested by undertaking further SATURN modelling using the most recent DfT growth figures which in turn will determine an appropriate housing figure..

Suggested Modification

- 4.42 Based on the above, the approach to securing financial contributions towards improvements to the A27 Chichester Bypass is flawed. Firstly. the A27 is a Trunk Road and the funding for improvements to it are received from the DfT/central government. Secondly. The Chichester Capacity Study needs to be updated so that it uses the latest traffic growth modelling (i.e. Version 8.0 of the SATURN modelling which has lower levels of background growth) this will establish the capacity of the roundabout junction improvements and the extent of the funding required to carry out the necessary improvements. If it is decided that the funding should come

from the planned development in the Local Plan the level of financial contributions should also take into account other types of use such as industrial, retail, leisure, education etc in addition to residential.

5 LAND AT HUNSTON VILLAGE DAIRY

- 5.1 Beechcroft owns 2.5 hectares of land at Hunston Village Dairy which is edged red on the plan below:



- 5.2 This land comprises a group of vacant buildings previously used for the storage and sale of milk that formed part of the village dairy complex. A static caravan is also located within this part of the site. As a result this part of the site is previously developed land (PDL). The remaining parts of the site comprise open fields laid to grass.
- 5.3 Access is obtained via an existing access road onto the B2145. This also provides access to adjoining land to the south known as Farmfield and Ridgeway Nurseries. Two bus stops on the B2145 are located within 180m walking distance of the site. Stagecoach operates Service 51 (Chichester to Selsey) along this route with four buses per day Monday to Friday.
- 5.4 The northern, southern and western boundaries of the site comprise a mix of trees and hedgerows which help screen it when viewed from these directions. The eastern boundary abuts the rear gardens of residential properties called Oak View which face the B2145 Selsey Road. Overall the site is well contained in the landscape. Additional landscaping within the site and along its boundaries could form part of a residential development which will help assimilate the development into the wider landscape setting of the village.
- 5.5 The site is not constrained by flooding as it falls within Flood Zone 1 and is not directly impacted by other potential constraints such as:
- SPA, SAC or SSSI designations
 - Chichester Harbour AONB or South Downs National Park
 - Ancient Woodland or Tree Preservation Orders (TPOs)
 - Priority Habitat, Local Wildlife Sites or Wildlife Corridors

- Conservation Areas, Listed Buildings or Registered Parks and Gardens
 - Scheduled Monuments
 - Surface Water Flood Risk
- 5.6 Overall the site is relatively unconstrained. This is reflected by the Housing and Employment Land Availability Assessment (HELAA) - under Ref No. HHN0015 - which confirms that there are no known constraints that would make development unachievable in principle. The HELAA estimates the site capacity to be about 60 dwellings.
- 5.7 The potential of this land, plus the horticultural land to the south (Farmfield and Ridgeway Nurseries) was recognised by Policy H1 of the Regulation 16 Hunston Neighbourhood Development Plan 2019-2039. This policy proposed the allocation of these land parcels for a minimum of 200 homes. Although the emerging Neighbourhood Plan was eventually withdrawn in June 2022 the potential of this land for housing was clearly recognised and supported by the Parish Council and the local community.
- 5.8 As a result of the above, and in conjunction with Beechcroft's comments on *Policy H1 – Meeting Housing Needs* of the Reg 19 Plan, there is clearly a need to increase the housing provision figure for the district. The allocation of Beechcroft's land at Hunston Village Dairy, plus horticultural land to the south, would assist in meeting the increased requirement. It is not unduly constrained and would deliver sustainable development.

Suggested Modifications

- 5.9 It is therefore recommended that Reg 19 Plan is modified so that it either:
- a) Allocates the Beechcroft land and neighbouring land to the south (Farmfield and Ridgeway Nurseries) as a strategic scale allocation for at least 200 dwellings as part of *Policy H2 – Strategic Locations/Allocations 2021-2039*; or
 - b) Includes a housing figure of at least 200 homes for Hunston in *Policy H3 - Non- Strategic Parish Housing Requirements 2021-2039* and that this will be delivered as part of the Neighbourhood Plan process.
 - c) Should option a) be followed the Settlement Boundary for Hunston as shown on the Proposals Map should be modified so that the land is included in the Settlement Boundary.

6 SUMMARY AND CONCLUSIONS

6.1 These representations have been prepared on behalf of Beechcroft Developments Limited and consider various matters including the tests of soundness, the housing requirement, and the development strategy of the draft Reg 19 Plan.

6.2 In summary:

- a) The draft Reg 19 Plan does not provide sufficient housing to meet the objectively assessed needs for housing (minimum of 638dpa) and other uses and does not clearly demonstrate the reasons for restricting the amount of development in the district.
- b) The SA does not test all reasonable alternatives.
- c) As set out in paragraphs 3.2 to 3.6 of this representations report, the draft Reg 19 Plan has not been positively prepared, is not justified, and is not effective or consistent with national policy. As such it fails these tests of soundness as set out in Paragraph 35 of the NPPF.
- d) The £7,728 per dwelling contribution being sought for the improvements to Fishbourne Road and Bognor Road Roundabouts is inconsistent with CDC's adopted CIL charging schedule. No reason or justification is given for omitting contributions from retail developments and there is uncertainty as to whether the identified mitigation will be required in the future.
- e) the *Chichester Transport Study (January 2023)* assesses the delivery of 535dpa in the southern part of the plan area and refers to a sensitivity test for the delivery of 700dpa in this part of the plan area and concludes "*that in the main, the 70 dpa (southern plan area) demands can generally be accommodated by the mitigation proposed for the 535dpa....*". The background evidence does not however clearly demonstrate what other development scenarios were tested and why National Highways and CDC chose 535dpa as a figure that should not be exceeded for this part of the plan area.
- f) Policy H1 of the draft Reg 19 Plan does not meet the minimum housing need of the district which as a starting point is at least 634dpa and is significantly higher than this when the needs of specific groups (students and affordable homes) and the unmet needs of neighbouring authorities are taken into account. The dwelling requirement proposed in Policy H1 needs to be re-assessed and increased to meet the true housing need.
- g) Some areas in the northern part of the Manhood Peninsula (particularly Hunston) are less constrained than other parts of the peninsula and are capable of providing additional housing. This is supported by the Local Plan Preferred Approach (2018) which proposed a minimum of 200 dwellings within Hunston Parish. The provision of additional housing at Hunston could be achieved by:

- 1) making a strategic scale allocation as part of *Policy H2 – Strategic Locations/ Allocations 2021-2039*; or
 - 2) by setting a housing figure of at least 200 homes for Hunston in *Policy H3 - Non-Strategic Parish Housing Requirements 2021-2039* which could be delivered as part of the Neighbourhood Plan process.
- h) Land at Hunston Village Dairy and horticultural land to the south (Farmfield and Ridgeway Nurseries) is relatively unconstrained and can be developed to provide at least 200 dwellings. The potential of these sites was recognised and supported by Hunston Parish Council and local residents by their proposed allocation in the draft Hunston Neighbourhood Plan.