

Submission to the Local Plan Review consultation

From Stephen Johnson

The principal objection is to Policy AL10, with reference to the following policies: S1, S3, S26, S29, S30, D3, DM32 and the evidence of the Sustainable Appraisal and the current HELAA study.

Objection to Policy AL10: The allocation of housing for Hambrook, part of the Council's Local Plan preferred option, is disproportionate, and contrary to its policies and inconsistent with its evidence. The CDC preferred option housing allocation of 500 homes is not consistent with the sustainability evidence. CDC may have underestimated the land required in the parish to meet the Local Plan preferred option housing allocation. CDC has not fully considered the impact on local character of the parish, the landscape and wildlife corridors.

A quote from the 'Sustainability Appraisal for the Chichester Local Plan Review – Preferred Approach' referring to the proposal for Chidham & Hambrook:

"The scale of the development will completely alter the existing development.
There would be significant impact to the existing historic village"

1 Sustainability Appraisal – the evidence and decision making

The Local Plan review has failed to make a proper distribution of housing in the district. In particular its evidence and decision making process for arriving at its allocation of housing to Hambrook is flawed.

The distribution strategy.

How carefully has the Council arrived at the housing allocation for Hambrook? When comparing Hambrook with other nearby parishes the number of houses CDC estimated that could be accommodated in Hambrook on its HELAA study preferred sites is not consistent with the study evidence. Meeting the allocation may require the parish to propose development of previously rejected sites.

The Council considered alternative numbers for housing in the parish

In comparing different housing allocation scenarios, the Council looked at different numbers of houses for the various parishes. In many cases these varied significantly.

eg

Southbourne	Min	250	Max	1250
East Wittering	Min	0	Max	750
Selsey	Min	0	Max	750
Fishbourne	Min	250	Max	1000
Bosham	Min	250	Max	700
Hunston	Min	0	Max	1000

Hambrook	Min	500	Max	750
-----------------	------------	------------	------------	------------

Unlike other parishes, it did not consider scenarios requiring fewer than 500 houses in Hambrook, setting it apart from these other parishes.

Sustainability – the evidence

In considering the proposed parish allocation, the evidence of the Council's Sustainability Assessment says
"The scale of the development will completely alter the existing development.
There would be significant impact to the existing historic village"

This is a substantial change of policy from the previous Local Plan where 25 homes was the indicative housing number for Hambrook. This policy change came very much out of the blue. In fact Chidham & Hambrook accommodated 130 homes under the previous local plan despite the Local Plan indicative number, mainly because the delayed Local Plan allowed developers unfettered rights to develop (before the Local Plan and NP were adopted).

How suitable is Hambrook?

The distance to the nearest town centre (Emsworth or Chichester) is further for Hambrook residents than for other nearby parishes.

Of 31 categories of sustainability,

Hambrook is judged inferior for development compared with Fishbourne (for example) in 7 categories

The categories where Hambrook is less suitable for development than Fishbourne are

“Does the option...”

- reduce levels of water pollution?
- reduce the need to travel?
- improve networks for cyclists and pedestrians?
- meet local housing needs?
- provide access to services and facilities?
- ensure that economic opportunities are accessible to all?
- avoid the loss of the Best and Most Versatile agricultural land?

and superior in only one category -

Does the option require new waste water treatment capacity? (It is not clear how this distinction has been made. On the face of it the judgement could well be neutral.)

In the Council's preferred option:

Fishbourne is asked to supply 250 homes, compared to Hambrook which is asked to supply 500.

2 Other sustainability issues -

Landscape. Policy S26 refers

The views of the Downs from the area of the Bus stop on the A259 near Broad Rd looking northeast past Flat Farm have been omitted from the Landscape Capacity Study 2018, East West Corridor, Fig 84 (p507)



The views of the Downs from the area of the Bus stop on the A259 near Broad Rd looking northeast

However the area is judged to have Medium/Low capacity for Landscape change. The view northwards from between Broad Road and towards Drift lane towards the South Downs makes a considerable contribution to the local landscape, but in the HELAA study this is land considered to be suitable for development.

Wildlife Corridor Policy S29, S30, DM 32 refer

Located between the SDNP and the Chidham peninsula and Chichester Harbour, the wildlife corridor through Hambrook linking important Green Infrastructure, is of special sensitivity.

A variety of species commute or forage between the harbour area and the SDNP including mammals, both deer, and bats of which 10 or more species have been recorded. Badgers, while not normally found on the peninsula, have been seen. Smaller species like Hedgehogs, stoats, weasel, moles, and small prey species, and slowworms, toads and frogs use the corridors to extend their access to foraging habitat. Birds including tawny and barn owls, grey heron and migrant species such as Fieldfare and Redwing use these corridors.

Development in Hambrook should be constrained by proximity to the wildlife corridor identified by CDC. Furthermore there is an important wildlife corridor on the west side of Hambrook, running north south, following the Ham stream.

By comparison, the Wildlife corridor in Fishbourne is away from the development area.

3 The Capacity of Preferred Sites The current HELAA study and Policy DM3 refer

CDC may have underestimated the land required to meet the parish housing allocation.

The proposed allocation of 500 houses is linked to the HELAA study which shows preferred sites in the parish of 15 hectares with a capacity for 565 houses.

However this capacity calculation is based on developer estimates.

The Local Plan Preferred Option policy DM3 indicates a density benchmark of 35 houses/hectare but with exceptions eg

“locations adjacent to sensitive locations (i.e. nationally designated areas of landscape, historic environment or nature conservation protection) where a lower density may be appropriate.”

A lower density is appropriate in Chidham & Hambrook because of its semi-rural character, the existing low density nature of development in the parish, the desire to provide green space and landscape views, the perceived need for Bungalows for the ageing population, and the proximity of the Chichester Harbour AONB. The CDC benchmarks mentioned in the HELAA study (a ‘living document’) which identifies available sites are: housing densities (30/ha) and developable areas (80%)

This would mean the preferred sites identified would be adequate for 360 houses. That is, the preferred sites identified by the Council are inadequate to provide the parish allocation of houses.

It is not clear how much land the Council anticipate will be required to meet the allocation of 500 homes, or how, or on what basis this figure was finalised.

If this allocation stands, preferred sites (15Ha) will be inadequate. A further 6 Ha of sites, rejected in the HELAA study, may have to be developed. So the impact on Chidham and Hambrook will be greater than envisaged in the Local Plan preferred option.

4 Conclusion

The allocation of 500 homes for Hambrook is excessive, and is not supported by the Council’s Sustainability Appraisal. The low provision of amenities, the proximity of the AONB and Wildlife Corridors, limits the development capacity of the land. The HELAA report suggests there is land suitable for development, but the report appears to have misjudged the suitability and capacity of the preferred sites. We are confronted with choosing not just all the preferred sites but in addition, some unsuitable sites and unsuitable housing densities to provide for the houses required by the plan.

From experience we know that housing development comes at the front end of the plan development period, making absorption of these numbers especially problematic. Equally we know that promised amenities frequently do not materialise as envisaged, if at all.

If we build 500 homes in Hambrook, the number of homes in the village since 2010 will have effectively doubled, reducing the openness of the landscape increasing congestion of local roads and schools, and putting pressure on biodiversity and the green spaces that we do have, with little benefit for residents.

“The scale of the development will completely alter the existing development. There would be significant impact to the existing historic village”