



15 March 2023

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Planning Policy
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Dear Sir or Madam

Response to Chichester Local Plan 2021-2039 – Proposed Submission Stage Consultation (Regulation 19)

Former Tangmere Airfield

1. Introduction

We write in response to the consultation on the Chichester Local Plan 2021-2039 Proposed Submission (2023) document as it relates to the former Tangmere Airfield.

2. Site and Surrounding Area

The site comprises agricultural land that was formerly used as an extension to the runway at Tangmere Airfield, a second world war RAF base. The boundaries to the site are formed by Church Lane to the south, a road to the east and well-established field edges to the north and west. Surrounding uses include a horticultural development area, further agricultural fields and a wastewater treatment facility.

3. Chichester Local Plan 2021-2039 Proposed Submission

These representations seek two changes to the Proposed Submission plan:

1. The plan should include a firm commitment to an early review, within three years of adoption; and
2. That this site at the former Tangmere Airfield should be identified as a potential location for further housing growth that can be assessed as part of that early review.



Figure 1: Site Location Plan

Early review of the plan

Paragraphs 5.1–5.2 of the Proposed Submission plan set out the plan’s approach to addressing housing need. The objectively assessed housing need for the district is stated to be 638 dwellings per annum (dpa), plus an allowance for accommodating unmet need arising from the Chichester district part of the South Downs National Park. The plan does not look to meet this need in full, as the capacity of the A27 is considered a limiting factor. Instead, the plan looks to deliver 575dpa (535 in the southern plan area, 40 in the northern plan area).

This approach is directly contrary to national planning policy. Paragraph 11 of the National Planning Policy Framework (NPPF) states that *“all plans should promote a sustainable pattern of development that seeks to: meet the needs of their area...”* Strategic policies are required – as a minimum – to provide for objectively assessed housing needs. This is unless there is a strong reason for restricting the scale of development or the adverse impacts of meeting need would demonstrably outweigh the benefits. In other words, the NPPF places a very strong emphasis on meeting housing need. This is reinforced at paragraph 60 which confirms that it is Government policy to significantly boost the supply of homes.



The failure to plan for sufficient housing growth to meet identified needs may be justified by infrastructure constraints. However, in circumstances where a Local Plan's growth ambitions fall short of identified need, the Planning Practice Guidance (PPG) states that a review may be required earlier than the statutory minimum of five years:

*There will be occasions where there are significant changes in circumstances which may mean it is necessary to review the relevant strategic policies earlier than the statutory minimum of 5 years, for example, where new cross-boundary matters arise. Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, **on the basis of a number that is significantly below the number generated using the standard method**, or has been subject to a cap where the plan has been adopted using the standard method. This is to ensure that all housing need is planned for as quickly as reasonably possible.¹ (Our emphasis.)*

The Proposed Submission plan makes no commitment to such an early review. Instead, it identifies the West Sussex and Greater Brighton Strategic Planning Board as a potential forum for addressing future housing growth, noting that this “*may provide a strategic context in which to plan for the district's future after 2039...²*” The plan also suggests that the Council will “*continue to work bilaterally with neighbouring authorities in seeking to find cross boundary strategic solutions to future growth requirements.*”

This is insufficient to address the very serious issue of unmet housing need. The West Sussex and Greater Brighton Strategic Planning Board does not appear to be active – it published its Local Strategic Statement in January 2016 and there are no minutes of any meetings since July 2016. It does not appear likely to address the urgent issue of unmet housing need. With regard to the council's commitment to work with neighbouring authorities, paragraph 5.3 of the Proposed Submission plan confirms that such discussions (under the Duty to Cooperate) have only confirmed that those authorities are unable to help. It is disingenuous to then claim that further discussions might lead to a solution.

The PPG is specific in stating that where a plan is adopted on the basis of planned housing growth that is significantly below the standard method-generated number, a review earlier than five years is warranted. This is exactly the situation that would arise should the Proposed Submission plan be adopted. It follows that the plan should include a firm commitment to a review earlier than five years. We suggest that a review should be completed within three years of the plan's adoption.

Furthermore, given the emphasis that the NPPF places on meeting needs in full and significantly boosting housing growth, the implications of the plan's failure to meet the development needs of the area must be fully understood. Specifically, that unmet housing need will increase, housing affordability issues will increase, mobility of labour will be restricted and consequently economic activity and economic growth in the area will be harmed.

Former Tangmere Airfield

It is clear that there is a need for further housing growth in the district and regardless of the infrastructure constraints, sites should be identified that can address that need. The Tangmere Strategic Development Location (TSDL) forms a major part of the Proposed Submission plan's spatial strategy and it is logical to

¹ PPG Plan-making, paragraph 062, reference ID: 062-20190315

² Paragraph 5.13.



build on that strategy as part of an early review of the plan. The former Tangmere Airfield is well-placed to be a natural extension to the TSDL, for the following reasons:

- The site will, when the TSDL is complete, be adjacent to the urban area.
- The TSDL will bring public transport routes past the Tangmere Airfield site, making it highly accessible.
- The site is accessible via the existing road network.
- The site is close to existing local services in the village, including shops and schools.
- Ample opportunities exist to extend green infrastructure and active travel links.
- The site is well-located to utilise recently improved drainage systems.

Appended to these representations is Heaver Homes' submission document for the Housing and Economic Development Land Availability Assessment (HELAA) Review of September 2018. This document provides detail that remains relevant and sets out the merits of the site for strategic housing development. Heaver Homes' intention is to build on this early work, within the forum of an early Local Plan review, to assess the site for its ability to deliver badly-needed new homes. This work would include technical assessment of the land, including:

- Ecological assessment
- Ground conditions survey
- Agricultural land classification assessment
- Archaeological assessment
- Flood risk and drainage assessment
- Utilities feasibility assessment

This work would inform our understanding of the site's constraints and would lead to production of a concept masterplan. That masterplan would be underpinned by a set of development principles that would include:

- High quality design, to be controlled by design code (to be the subject of engagement with local stakeholders).
- Continuing the "One Village" approach that has underpinned the masterplanning of the TSDL via the Neighbourhood Plan.
- Continuation of the green links network connecting the site to the South Downs National Park and Chichester city.
- Promoting sustainable transport options including active travel.
- Respecting the second world war heritage of the airfield.
- Maintaining a settlement gap between the site and Oving village.

These draft principles would be the subject of engagement with Chichester District Council and the Parish Councils of Tangmere and Oving.

Soundness

Paragraph 35 of the NPPF sets out the requirements of Local Plans if they are to be considered "sound". These requirements include the need to be consistent with national policy. For the reasons set out above,



Heaver Homes has concerns about the Proposed Submission plan, specifically its lack of commitment to an early review. Without this commitment, the plan would be inconsistent with national policy and therefore unsound.

Heaver Homes recommends that the plan is amended to include a firm commitment to an early review and that that review should include exploration of high-growth options that might address existing infrastructure constraints and the growing unmet housing need.

Paragraph 22 of the NPPF states that:

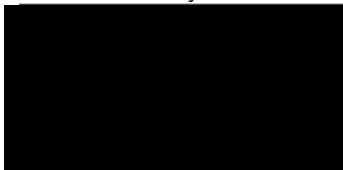
“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”

The former Tangmere Airfield is an opportunity to which the strategic policies of the Proposed Submission plan should respond. This is particularly so given the recent improvements to wastewater infrastructure in the immediate vicinity and the potential major improvements to road infrastructure, specifically the A27, that may arise in the long term. Policy A14 Land West of Tangmere is a strategic policy that should look ahead to the 15 year time horizon advocated in the NPPF. It can do so by identifying Tangmere Airfield as a broad location for development (as advocated by NPPF paragraph 23).

This approach would make the strategic policy consistent with national policy, which is a requirement of the tests of soundness set out at NPPF paragraph 35. At present, draft Policy A14 makes no provision for responding to long-term requirements and opportunities and is therefore inconsistent with national policy. This is a risk to the soundness of the plan.

Heaver Homes recommends that draft Policy A14 be amended to include a paragraph and key diagram that identifies the former Tangmere Airfield as a broad location for future housing growth.

Yours sincerely



**John P Heaver, MRICS
Director**

Enc: Submission Document for Tangmere Airfield Gamecock Terrace, Tangmere, Chichester PO20 2ER for the Chichester District Council Housing and Economic Land Availability Assessment (HELAA) Review (September 2018)