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Chichester District Council,
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PO19 1TY

BY POST AND EMAIL (planningpolicy@chichester.gov.uk)

24195/A3/EF/COM/slh

7th February, 2019

Dear Sir/Madam,

**CHICHESTER LOCAL PLAN REVIEW PREFERRED APPROACH 2016-2035 CONSULTATION:
REPRESENTATIONS SUBMITTED ON BEHALF OF MARTIN GRANT HOMES LTD**

We are pleased to submit the following representations on behalf of our client, Martin Grant Homes Ltd., in relation to the Chichester Local Plan Review 2035: Preferred Approach consultation. These representations follow, and should be read in conjunction with, our response to the earlier issues and options consultation in August 2017.

These representations relate specifically to the proposed Spatial Strategy as set out in Section 4 of the Plan.

Policy S2: Settlement Hierarchy

The Local Plan Review identifies a settlement hierarchy across the Plan area which promotes the largest levels of growth in the Sub-Regional Centres, Settlement Hubs and Service Villages. This is unchanged from the adopted Local Plan and has been reviewed and reinforced as part of the evidence base through the preparation of a Settlement Hierarchy Background Paper (December 2018). This forms an update to the Settlement Capacity Profiles completed by the Council in 2013.

The hierarchy focuses and encourages development in locations which support access to services and facilities and where there is a choice of transport modes noting, in particular, that housing delivery will be encouraged where it will enhance or maintain the vitality of rural communities. As a result, the hierarchy focusses development at settlement hubs, the east-west corridor and locations with good transport accessibility and proximity to Chichester.

Through an analysis of the supporting evidence base, Birdham is identified as a Service Village that has 'a reasonable range of everyday facilities and range of everyday facilities and reasonable road and public transport access north to Chichester city'. It is ranked 13th in population size and is noted to have 10 local facilities/services including public transport links and good road accessibility.



Martin Grant Homes supports the identification of Birdham as a Service Village which is defined as a suitable location to accommodate new housing, well located to other uses and serviced by a choice of transport modes.

Policy S3: Development Strategy

Policy S3, Development Strategy, identifies the broad approach to providing development in the Plan area. Whilst it seeks to disperse development to help achieve sustainable growth the policy notes that new residential development will be distributed in line with the settlement hierarchy, with a greater proportion of development in the larger and more sustainable settlements and the east-west corridor.

To meet the uplift in housing requirement, the Local Plan Review now proposes strategic development allocations to the service villages of Bosham, Fishbourne, Hambrook/Nutborne and Hunston. These are justified because of their accordance with the settlement hierarchy, relationship and proximity to Chichester and transport accessibility through benefiting from access to railway stations or the even distribution of a location anticipated to generate traffic onto the A27.

Whilst it is acknowledged that moderate levels of growth at Bosham, Fishbourne and Hambrook would be appropriate, given their position on the east-west corridor, relationship with Chichester and existing rail links, the strategic allocation of 200 dwellings to Hunston is inconsistent with the settlement hierarchy when compared to the proposed growth of Birdham identified in Policy S5.

Hunston is identified to have fewer facilities and is ranked 17th in the Council's Settlement Hierarchy Background Paper compared to 13th for Birdham. The settlement capacity profile of the Parish further notes the village lacks a primary school and that traffic congestion on the A27 is a constraint to development. The capacity profile of the settlement from the 2013 study only identified an indicative housing allocation of 25 dwellings to the Parish based on its size, services and constraints to development.

Birdham by comparison benefits from being a larger and more established village within the Manhood Peninsula with a greater number of facilities. At 6km from Chichester it is only 3km further from the City than Hunston so also benefits from a comparable relationship and access to the A27.

As demonstrated through the Housing and Economic Land Availability Assessment (HELAA) (August 2018), potential site allocations to accommodate 262 dwellings were identified in Birdham yet a 'non-strategic' allocation of 125 dwellings is identified in Policy S5. The HELAA however only identifies potential site allocations to accommodate 176 dwellings in Hunston yet the Parish is allocated to deliver 200 homes as part the Local Plan Review in Policy S3 and A11. No quantifiable justification is provided in the supporting text or policy wording to demonstrate why the housing allocation to Hunston has been substantially increased contrary to the settlement hierarchy and over and above an arguably more sustainable location such as Birdham.

New housing at Hunston is set to be delivered through the Neighbourhood Plan which is at an early stage of preparation. However, it is evident from a review of the Parish Website that the scale of housing proposed is strongly resisted at a local level. Delivery of the housing through the allocation of sites in the Neighbourhood Plan will therefore be controversial and protracted.

It is furthermore unclear why the Local Plan Review includes a specific strategic policy for Hunston (Policy A11) and not for Birdham given that both villages are identified to accommodate a moderate scale of development and rely on the delivery of homes through sites identified in the Neighbourhood Plan process.

Martin Grant Homes supports the objective of dispersing sustainable development across the Plan area to maximise the ability to deliver homes early in the Plan period whilst enhancing the vitality and viability of existing communities.

Whilst an uplift in the allocation of new dwellings to Birdham is welcomed, objection is raised regarding the disparity between the quantum of development allocated to Hunston contrary to the conclusions of the Settlement Capacity Studies, settlement hierarchy and findings of the HELAA.

Concern is also raised regarding the inconsistency of allocating a quantum of development through specific strategic Local Plan Review Policies (to be delivered ultimately via a Neighbourhood Plan) but leaving the delivery of others, in the case of Birdham, solely to a Neighbourhood Plan review process. For consistency, Martin Grant Homes request that any allocation for the delivery of more than 100 homes is identified as strategic allocation for the purpose of Policy S3.

Policy S4: Meeting Housing Needs

Martin Grant Homes supports the uplift in the provision of an additional 12,350 dwellings during the Plan period (650 dwellings per annum (dpa) 2016-2035). We note that this reflects the identified objectively assessed housing needs of the Plan area identified in the Chichester Housing and Economic Development Needs Assessment (609 dpa) and makes an allowance for accommodating a proportion of the unmet need arising from the South Downs National Park Authority.

Policy S5: Parish Housing Requirements 2016-2035

Draft Policy S5 identifies the indicative housing requirements to be provided for strategic and non-strategic allocations, via either specific site allocation policies or via a Neighbourhood Plan or subsequent Development Plan Document.

Martin Grant Homes supports the allocation of additional growth to Birdham but for the reasons set out above in the response to Policy S3 considers that the Service Village has the capacity to accommodate a greater sustainable level of growth beyond the identification of 125 dwellings in Policy S5.

Birdham is recognised, through the evidence base supporting the Local Plan Review, as one of the larger and more sustainable service villages in the District. Proportionate levels of growth will enable the village to continue to grow to meet housing need and provide opportunities to expand and support existing facilities or enhanced access to public transport options.

Whilst the Council has provided an update to the Settlement Hierarchy Background Paper, the Settlement Capacity Profiles completed in 2013 is now out of date based on the results of the latest HELAA and development and infrastructure improvements that have taken place since its first publication.

To provide a sound platform upon which to accurately identify Parish housing requirements and the capacity of existing settlements the key documents cited by the Council should be updated and the findings used to inform an increased allocation of housing to Birdham. The additional allocation to Birdham, which has a good range of local facilities, good accessibility and is unconstrained by wastewater treatment capacity would ensure the continuing vitality of the village.

Without an update to the settlement capacity profiles as part of the evidence base, the allocation of housing to the Service Villages and Hunston, in particular, is not considered sound. Increasing the allocation of housing to Birdham a larger Service Village with greater access to facilities/services would better accord with the settlement hierarchy and increase flexibility of the Plan to deliver housing from a range of small, medium and larger sites which could provide a greater contribution towards the short-term supply of housing.

As set out in the response to Policy S3, it is considered for consistency and expediency in delivery that any allocation of over 100 homes to a Parish should be recognised as an allocation through the Local Plan Review. Failure to do so means the responsibility for identifying appropriate sites suitable for moderate scale housing is at Parish level and contingent on the delivery of a Neighbourhood Plan,

within 6 months or the delivery of a Development Plan Document. This is an ambitious timescale when considering the emotive subject of the delivery of 100+ homes to a Parish.

The Birdham Parish Neighbourhood Plan was made in July 2016. The Neighbourhood Plan does not allocate housing sites but identifies within Policy 12 that sites with extant planning permission are estimated to be capable of delivering 79 dwellings in the Plan period 2014-2029. The Neighbourhood Plan, as made, does not currently identify sufficient sites to meet the Local Plan Review requirement, which as set out above, Martin Grant Homes consider should be increased to better reflect the sustainability of the Village. Whilst the Neighbourhood Plan makes an allowance for windfall development (schemes of 5 or less dwellings within the settlement boundary area (Policy 14)), the Local Plan Review at paragraph 4.29 specifically notes that schemes of less than 6 dwellings will not count against the Parish housing requirements.

In accordance with National Planning Policy Framework (NPPF) paragraph 29 (July 2018), Neighbourhood Plans must be in general conformity with the strategic policies contained in any Development Plan covering their area. It is also noted that Neighbourhood Plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.

In accordance with the current wording of Policy S5, Martin Grant Homes therefore notes that additional sites will need to be allocated through either a review/update of the Birdham Neighbourhood Plan or a DPD prepared by Chichester District Council in order to meet and deliver the Parish housing requirement as established by Policy S5. To address this shortfall and the necessary further uplift, Martin Grant Homes request that land to the south of the B2179 and west of Bell Lane is identified as an available and suitable site to deliver housing for Birdham.

Land to the south of the B2179 and west of Bell Lane, Birdham

Land to the south of the B2179 and west of Bell Lane in Birdham is a 3.9ha site that has been promoted through the 'Call for Sites' as part of the Council's Local Plan Review. The extent of the site is shown on the enclosed Site Boundary Plan (drawing reference RG-M-01A – **Appendix 1**).

The site was rejected at Stage 2 of the Housing and Economic Land Availability Assessment (HELAA) 2018 with reason for rejection given as 'detached from the settlement boundary'. However, land at Rowen Nursery adjoining the site to the east has been approved for residential development for 27 dwellings in 2014 (LPA Ref: 13/00284/FUL) with a revised application for the same quantum of development subsequently approved in January 2018 (LPA Ref: 17/00316/FUL). Policy 13 'Settlement Boundary' of the made Birdham Parish Neighbourhood Plan confirms that the settlement boundary for Birdham has been reviewed, revised and extended to now include the land at Rowen Nursery where housing development has been permitted. As illustrated by the enclosed Site Location Plan (drawing reference RG-M-04A – **Appendix 2**), the site is, therefore, now located adjacent to, and contiguous with, the revised settlement boundary and in close proximity to a range of local services and bus services to Chichester.

The Council's draft Landscape Capacity Study (November 2018) identifies that the site is located within sub-area 101 (Birdham-Somerley Settled Coastal Plain). This sub-area is noted as having a medium to high capacity for landscape change. Other sub-areas bordering the settlement boundary of Birdham are identified as having a medium, medium to low or low capacity for landscape change. In this regard, the Council's evidence demonstrates that the site is located within the sub-area which has the greatest capacity for change in landscape terms.

The enclosed Land Use Plan (drawing reference RG-M-02 - **Appendix 3**) illustrates a residential 'developable' area of 2.95ha, with accompanying areas of formal and informal open space. The Concept Plan (RG-M-03 - **Appendix 4**) identifies how the site could be accessed via the B2179 to the north and reflect a logical extension to the settlement in this location by limiting the extent of development to the adjacent physical boundaries. The proposed development would furthermore facilitate a transition between the extended settlement boundary and the countryside landscape that

extends to the south and west. The proposed development has the potential to deliver an additional 59-89 homes for Birdham at a comparable density of 20-30dph.

The site represents a logical and sustainable extension to the south-west of Birdham and a suitable site for allocation to contribute towards meeting an increased strategic Parish housing requirement in Policy S5 that better accords to the settlement hierarchy identified in Policy S2.

These representations are accompanied by a completed representation form which are provided at **Appendix 5**.

We would be grateful for confirmation that these representations have been received and registered as having been 'duly made'.

Yours faithfully,



CHARLOTTE O'MAHONY
Associate

cc: H. Payne, Esq. - Martin Grant Homes
S. Hammant, Esq. - Martin Grant Homes

Enc.