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For and on behalf of  
**Devonshire Developments Ltd**

**RESPONSE TO CHICHESTER DISTRICT COUNCIL'S LOCAL PLAN REVIEW  
PREFERRED APPROACH CONSULTATION DECEMBER 2018**

**Land South of the B2166, North Mundham**

**Prepared by  
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## **1.0 INTRODUCTION**

- 1.1 This consultation representation has been prepared by DLP Planning Ltd (DLP) on behalf of Devonshire Developments Ltd. These representations are in response to the Chichester District Council Local Plan 2035 Preferred Approach Consultation Document and the associated evidence base and supports the promotion of land that Devonshire Developments Ltd have interests in at Land South of the B2166, North Mundham.
- 1.2 The site that Devonshire Developments Ltd have an interest in has previously been put forward by as a suitable location for housing as part of the 2016 Call for Sites/Housing and Economic Land Availability Assessment (HELAA) processes (HELAA site references HNM0005 and HNM0012).
- 1.3 The site is adjacent to the settlement of North Mundham and extends from North Mundham Parish into Hunston Parish to the west. It is anticipated to be capable of providing around 200 dwellings.
- 1.4 Devonshire Developments Ltd support the Council's approach to the preparation of the Local Plan in response to their increased housing required up to 2035 and welcome the identification of North Mundham Parish as a suitable place to accommodate new development up to 2035. However, there are a number of issues which they believe that the Council needs to address, clarify or reconsider in order to ensure their Local Plan is sound including:
- The proposed housing distribution strategy;
  - Clarity on the future delivery of residential sites; and
  - The adequacy of the Sustainability Appraisal in assessing the housing distribution.
- 1.5 Devonshire Developments Ltd welcome the identification of North Mundham as a parish with a specific housing requirement, currently 50 dwellings. However, they think it is important that the Council increases the housing requirement in the Parish, to provide flexibility of supply and ensure suitable sites can come forward for development. Further they would like the Council to allocate sites within the Local Plan, in preference to relying upon the future allocations made through a Neighbourhood Plan for North Mundham or site allocation by the Council in a subsequent DPD. This is to ensure the Council is not overly-reliant on allocations being made through a Neighbourhood Plan process, which in the case of North Mundham

was designated on 16 January 2019 and will now be prepared over a short period of time. Local Plan allocations have the benefit of being related to the suitability of available sites to meet the requirements for further growth in a sustainable way. They offer certainty to the community, the Council and to the landowners rather than the uncertainty of whether sites can be found and whether the Neighbourhood Plan will be produced and adopted. Notwithstanding this concern, should the Neighbourhood Plan continue to be progressed Devonshire Developments Ltd are keen to support and work with the Neighbourhood Plan group.

- 1.6 Chapter 3 of this report sets out Devonshire Developments Ltd's consideration of the overall Chichester District Council Local Plan 2035 Preferred Approach Consultation Document. Devonshire Developments Ltd consider there to be significant questions surrounding the potential distribution of strategic locations/allocations outlined in the emerging Local Plan Review and whether these have been appropriately justified and appraised.
- 1.7 Chapter 4 discusses the constraints and opportunities for Land South of the B2166, North Mundham in further detail, to illustrate that the site is deliverable and has no absolute constraints.
- 1.8 Chapter 5 reviews the alternative sites within the vicinity of the villages of North Mundham and Hunston that have been highlighted in the HELAA as potentially achievable.
- 1.9 Chapter 6 considers and South of the B2166, North Mundham in further detail to discuss the potential scale of development and how it could appropriately respond to its situation in relation to the village of North Mundham.
- 1.10 A Site Location Plan and Constraints Plan have both been provided as part of this submission (see Appendices).

## **Background**

- 1.11 Chichester District Council has been preparing the Local Plan Review 2035 since 2017. The Local Plan will fulfil the requirement of the currently adopted Local Plan which stated a review was to be carried out within 5 years from July 2015. The review will replace the 2014-2034 Local Plan and update the level of growth in the district over the next 20 years up to 2035 setting out to identify:

- an appropriate spatial strategy to guide future growth;
- the amount of development needed, including 650 new homes per annum;
- strategic allocations to contribute to meeting the housing requirement;
- guide Neighbourhood Plans by setting minimum housing requirements for areas, to contribute to meeting the housing requirement;
- development opportunities and infrastructure required to support and foster business enterprises and entrepreneurship;
- opportunities to create new dwellings and jobs for present and future generations, with accessible facilities that support the needs of strong, vibrant and healthy communities; and
- protecting and enhancing the unique and special qualities of the environment.

1.12 The emerging Local Plan sets the housing requirement at 12,350 homes from 2016 - 2035 and makes provision for the supply of at least 12,478 new homes in this period. The consultation document states that as at 31<sup>st</sup> March 2017 that there were 439 dwellings already completed and existing known commitments amounting to 6,444 dwellings.

1.13 The future growth that the new Local Plan Review is therefore seeking to identify is 5,604 dwellings. According to the meeting housing needs policy (S4) these will be made up of:

- 4,400 Proposed strategic allocations locations/allocations.
- 695 Windfall (small site allowance, i.e. developments of less than 6 units).
- 500 Parish Housing Requirements.

1.14 In December 2017, the Council stated they could demonstrate a Five Year Supply of Housing Land. However, since that time the Council have stated that the annual housing requirement it is planning for will increase from 435 dwellings to 650. It is therefore imperative that the Council looks to allocate further sites for residential development that can be delivered in the short term to deliver this step change in housing delivery Land south of the B2166, North Mundham, is available for development now and has the potential to make a significant

contribution to the overall housing requirements and to maintaining the Five Year Housing Land Supply.

1.15 As highlighted in the following sections, Devonshire Developments Ltd consider that Land South of the B2166, North Mundham is:

- A sustainable option for suitable growth adjacent to North Mundham village and its associated facilities, including education, community and leisure.
- Located adjacent to a settlement that is identified within the Council's overall settlement hierarchy and named as a service village and is therefore more suitable for growth than other less sustainable locations.
- More accessible to Chichester City than some settlement hubs and other service villages currently proposed for greater levels of growth in the Manhood Peninsula, through Proposed Strategic Allocations/Locations.
- Capable of being delivered without impacting upon a Conservation Area, as opposed to other locations currently proposed for strategic housing growth.
- A suitable development site capable of delivering around 200 new dwellings and has the potential to utilise, in part, a previously developed site.
- Able to be developed in a sensitive way which does not impact on the nearby ancient woodland, enhances the landscape and hedgerow network and maintains the separate identities of the villages of North Mundham and Hunston.
- Capable of providing open space and recreation benefits, including new open space, play space and enhancements to existing public rights of ways.
- Capable of delivery in the short term at an appropriate scale and density to ensure heritage and environmental assets are fully considered.
- A site that is unconstrained in viability terms, ensuring that proposals will provide much needed affordable homes and ensure a mixed and balanced development.

## **2.0 CHICHESTER DISTRICT PLANNING POLICY CONTEXT**

### **Local Plan 2014-2029**

- 2.1 Chichester District Council (CDC) adopted the Local Plan: Key Policies 2014-2029 on 14th July 2015. It should be noted that this plan does not cover the area of CDC washed over by the South Downs National Park (SDNP), for this area the Local Plan 1999 should be referred to.

### **Local Plan 1999**

- 2.2 As mentioned above, the Local Plan 1999 should be used for areas located within the SDNP. An interim statement for affordable housing accompanies this plan, where the Council have acknowledged that that plan is markedly out of date.

### **Site Allocation Development Plan Document**

- 2.3 This Development Plan Document (DPD) was adopted by Chichester District Council on 22 January 2019. The Site Allocation DPD represents the second and 'daughter' document to the adopted Chichester Local Plan: Key Policies 2014 . 2029 and forms part of the Adopted Development Plan for the area.

### **Local Plan Review 2035**

- 2.4 The Local Plan review aims to review the 2015 Local Plan within 5 years of adoption to ensure that sufficient housing is planned to meet the needs of the area. The current timeline estimates that the plan will be formally adopted sometime in 2020. This Plan is currently at its informal consultation stage; the Council has published its Preferred Approach consultation document and welcome comments upon it from 13 December 2018 to 7 February 2019.



### **3.0 REPRESENTATIONS ON THE LOCAL PLAN REVIEW**

- 3.1 Devonshire Developments Ltd welcome the preparation of the Local Plan Review Preferred Approach and whilst they are supportive, they do have significant questions surrounding the housing need, the proposed distribution and allocation process outlined in the current Preferred Approach and whether these have been appropriately justified and appraised. The following sections look at the emerging Plan in detail.
- 3.2 Devonshire Developments Ltd welcome the opportunity to comment on the Local Plan Review Preferred Approach and want to take this opportunity to highlight the interest they have in bringing forward development on the site at North Mundham. They are keen to work with Chichester District Council and North Mundham Parish Council to realise the potential this site has. They would like to ensure that their site is fully considered in this emerging plan both in the context of the currently proposed 50 dwellings set out in the Preferred Approach but also through a change to increase the amount growth in North Mundham to around 200 dwellings.

#### **Housing Need Buffer**

- 3.3 In accordance with national policy, there is a need for Councils to include a buffer of between 5-20% within their 5 Year Housing Land Supply and it is also important that there is contingency built into the Local Plan.
- 3.4 Currently the preferred approach provides for just a 1% buffer of 128 units. This should be increased to build in greater flexibility and ensure housing requirements can be met throughout the plan period, but significantly in the earlier years when the step change is needed in the supply of deliverable sites to meet the Local Plans housing objectives.
- 3.5 In order to address any increase in the housing requirement; further allocations should be made within the Local Plan.

#### **The Proposed Spatial Strategy**

- 3.6 The Spatial Strategy for new residential development in Chichester District detailed in the Local Plan Review Preferred Approach Consultation document is made up of 3 elements:
- 10,056 dwelling, East-West corridor;

- 1,933 dwellings, Manhood Peninsula; and
- 489 dwellings, North of Plan Area.

3.7 The proposed housing requirement is made up of 5 elements, to deliver 12,478 dwellings from 2016-2035:

- 439 housing completions (1 April 2016 to 31 March 2017).
- 6,444 known commitments.
- 4,400 proposed strategic locations/allocations.
- 695 windfall (small site allowance, i.e. developments of less than 6 units).
- 500 Parish Housing Requirements.

3.8 Devonshire Developments Ltd's focused comments relate to the distribution and selection of specific elements of both the Proposed Strategic Location/Allocations and the Parish Housing Requirement and how these relate to the Spatial Strategy.

3.9 The most significant element of future growth is focused on the East-West corridor, close to Chichester City. The role of Chichester City as a sub-regional centre is planned to continue and develop, providing higher and further education and health facilities and a broad range of employment, retail and entertainment and cultural opportunities for a wide catchment area extending outside the plan area. It is therefore appropriate to comment that residents from the Manhood Peninsula will continue to look to Chichester City for employment, retail, services and facilities befitting a sub-regional City. The plan's spatial strategy acknowledges the following in paragraph 4.21:

*"...As indicated in the settlement hierarchy, Chichester City possesses a wider range of shop, services and employment opportunities than other settlements. Locating a significant proportion of development in or around Chichester City reduces the need to travel to facilities."*

3.10 The strategy is therefore expressing that the nearer a development is to Chichester City the less need there is to travel. It therefore follows that in accessibility terms, growth nearer the Chichester City is preferable to new developments which are further away. This is corroborated within the Sustainability Appraisal (SA) through the commentary against the

different spatial options for growth and the options for strategic housing locations, where proximity and the relationship with Chichester City is stated as a consideration.

3.11 Whilst it is both recognised that:

- it is not possible to sustainability appraise every possible combination of growth location; and different housing requirements; and
- the published 2018 Sustainability Appraisal (SA) does seek to examine more focused growth at Chichester as one scenario tested.

3.12 We would note that there has been no testing in the 2018 SA of the specific option that appraises strategic levels of growth at North Mundham in preference to, or in combination with, other locations/settlements which are the same distance or further from Chichester City, within the defined spatial area of the Manhood Peninsula. Given the availability, suitability and locational proximity to Chichester City of the land that Devonshire Developments Ltd have an interest in, this should be tested in the next version of the Sustainability Appraisal (SA). This would ensure that the SA has considered this reasonable alternative, which offers the benefits set out in chapter 4 of this response.

### **The Manhood Peninsula Proposed Housing**

3.13 The Parish and village of North Mundham are located in the Manhood Peninsula. The Plan's emphasis for the Manhood Peninsula is upon protecting and enhancing the special qualities of the coast and its rural hinterland. The Local Plan Review states that the provision of new dwellings and workplaces will help make the area more self-contained and reduce the area's dependence on Chichester City. The spatial distribution of growth in the Manhood Peninsula is proposed as:

Proposed Strategic Allocations / Location -

- 100 dwellings, Apuldram Parish
- 350 dwellings, East Wittering Parish
- 200 dwellings, Hunston Parish

- 250 dwellings, Selsey Parish
- Proposed Parish Numbers -
- 125 dwellings, Birdham Parish
  - 50 dwellings, North Mundham Parish
  - 25 dwellings, West Wittering Parish

3.14 The total proposed number of new dwellings for allocation in the Manhood Peninsula is 1,100 for the period 2016-2035, combined with completions, commitments and windfall to create a total of 1,993 dwellings for the Peninsula. However, the Sustainability Appraisal correctly acknowledges that new development in this area will have a relationship with Chichester City, given its draw as a sub-regional centre.

3.15 It should be noted that both Selsey and East Wittering are further from Chichester City than the village of North Mundham, by over 9.6km and 8km respectively (source: Google driving routes). Therefore, housing requirements for these two Parishes, amounting to 600 dwellings, will be located considerably further from Chichester City than the available site at Land south of the B2166 at North Mundham village.

3.16 Hunston and North Mundham villages are both classified as service villages in the settlement hierarchy (Policy S2); however there is little explanation in the Local Plan Review Preferred Approach consultation document as to why Hunston is to accommodate a strategic level of the growth (200 dwellings) and North Mundham has a non-strategic housing requirement (50 dwellings). Paragraph 4.14 states the following:

*“4.14 The starting point for housing development at Service Villages is that in principle, they are suitable place to accommodate new housing. However, consideration has been given to other factors in determining whether a settlement is a suitable location for additional housing growth, including infrastructure capacity, the existence of suitable sites and consultation responses.”*

3.17 However, the other factors taken into account to arrive at the difference in the scale of the housing requirements for these two villages is not expanded upon in any published background paper and neither is the appropriateness of the housing requirement. It is unclear

why 50 dwellings is the appropriate figure for North Mundham. An explanation of this would be beneficial. Details set out further below and, in **Appendix 1**, draw out the comparison of selected Parishes in Manhood Peninsula proposed for strategic housing growth, with Land south of the B2166 at North Mundham village, utilising the details in the published SAs in 2017 and 2018.

3.18 The Council's Housing Background Paper (January 2019) states the following:

*“4.22. Sites identified in the draft Local Plan Review for allocation for development have principally been identified through the preparation of the Housing and Employment Land Availability Assessment (HELAA) but also supplemented through additional information becoming available through discussions with landowners and site promoters.”*

3.19 Therefore, the proposed strategic sites have been selected from the HELAA along with further discussions with landowners and site promoters; however the details of these discussion have not been articulated in the Local Plan Review document or the supporting evidence base. There is only one site specifically proposed for allocation in the Manhood Peninsula, at Land North of Park Farm, Selsey.

3.20 In respect of the remaining 850 dwelling requirement in the Manhood Peninsula the responsibility for identifying site has been delegated to neighbourhood planning groups. The Housing Background Paper states:

*“4.23. Where the responsibility for identifying sites has been delegated to neighbourhood planning, this provision has again been informed by the evidence base prepared to inform the Local Plan Review, including the HELAA and Sustainability Appraisal.”*

3.21 However, there is no clear reasoning set out in the Plan or the current supporting evidence as to why the specific housing numbers have been selected for the each identified location/Parish. It is therefore requested that the content of these representations and the potential of the Land South of the B2166 at North Mundham village be considered in the preparation of the submission version of the Local Plan Review.

## Sustainability Appraisal

- 3.22 The comments above have stated that there is a need to test strategic growth at North Mundham given the availability of the Devonshire Developments Ltd land interest and its relatively sustainable location within the Manhood Peninsula. Details below expand on why this land performs well in respect of the Sustainability Appraisal and is a credible reasonable alternative that should be fully tested and considered.
- 3.23 A comparison of three Manhood Peninsula parishes: Selsey, East Wittering and Hunston has been carried out in **Appendix 1**. An appraisal has also been set out for the site at North Mundham, in comparison to these three parishes. The following points can be concluded from this appraisal:
- The North Mundham site overall performs better than the two parishes of Selsey and East Wittering that are a greater distance from Chichester City.
  - The North Mundham site overall performs better than the Hunston Parish which is the same distance from Chichester City.
  - The Council's SA has not identified the potential impact on the Hunston Conservation Area that additional development at Hunston may present.
  - The Council's SA has not adequately recorded that there are areas of Flood Risk impacting Hunston village and its available HELAA sites.
- 3.24 The conclusion of this comparison is that the strategic site in North Mundham performs better than alternative locations/sites which have been identified for strategic scale growth. It would appear that discussions with land owners / site promoter may have influenced the discussion as to why strategic housing requirements have been targeted at certain locations and not North Mundham. To reiterate the point made above, the North Mundham site is available and capable of delivering 200 dwellings, it should therefore be given full consideration as a strategic site allocation.

## Hunston Strategic Allocation

- 3.25 Given the proximity of the two villages of Hunston and North Mundham, the fact they are the same distance to Chichester City and have a different housing requirement proposed, it is helpful to seek the Council's clarification for why a different approach is being pursued.
- 3.26 As is stated above, there is no statement in the Local Plan or supporting evidence that explains the difference. From reviewing material available on the two Parish Councils' Neighbourhood Plan websites and from the minutes of the meeting of Chichester District Council's Cabinet on 14<sup>th</sup> November 2018<sup>1</sup> the following has been established.
- 3.27 There was a meeting held on 23 July 2018 between Chichester District Council (CDC), Hunston and North Mundham Parish Councils. The Parish Councils were told that 250 houses would be allocated between the two parishes. The split was to be left to the two parishes to decide upon. Both Hunston and North Mundham then decided to produce their own Neighbourhood Plans, so that they could consult with residents as to how many houses should be built and where. This work has started.
- 3.28 14 weeks later, the Parish Councils were then advised that the CDC Officers had decided to recommend individual allocations to the parishes of 200 to Hunston and 50 to North Mundham. The chair of Hunston Parish Council raised concern that these amounts conflicts with the Housing and Economic Land Availability Assessment (HELAA) published in August 2018, which demonstrates deliverability of 176 houses in Hunston and 375 in North Mundham. The chair also stated that Planning Officers have been unable to justify to the Parish Council why, when North Mundham parish could clearly accommodate the entire allocation on its own, Hunston Parish Council is being told it will have to take the lion's share of the proposed housing.
- 3.29 Additionally, the Parish Councils were warned that if their Neighbourhood Plans are not a draft stage by June 2019 then the District Council will allocate the designated land for development. Confirmation of this approach is sought from the Council and further clarity is requested to ensure there is no impact on the Local Plan timetable.

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<sup>1</sup> <http://chichester.moderngov.co.uk/mgAi.aspx?ID=6807>

3.30 The response from CDC was that:

- Firstly, the Housing and Economic Land Availability Assessment needs to be updated with respect to land at Hunston that is being promoted on behalf of, the Church Commissioners.
- It is the availability and, in the view of officers, suitability of this [the Church Commissioners] land that has informed the officers' recommendation with regard to the numbers of dwellings proposed for Hunston and North Mundham.
- They also noted that the HELAA is only part of the evidence base when considering land availability and its main purpose is to demonstrate that there is sufficient land available to meet the development needs of the plan area.

3.31 The difference in the housing split between the two villages, appears to have been solely down to the availability of the Church Commissioners' land. The HELAA has not been updated and despite requests made to the Council, the information on the Church Commissioners' land has not been made available for review.

3.32 From reviewing the achievable sites listed in the available HELAA, it is clear that the total number of dwellings capable of delivery is less than 200 dwellings and thus insufficient to meet the strategic requirement.

3.33 The location of the Church Commissioners' land is in Flood Zone 2 and is therefore, in accordance with national policy, sequentially less preferable to sites in Flood Zone 1, such as the Devonshire Developments Ltd's site in North Mundham, which is entirely in Flood Zone 1. The Church Commissioners' land is also located close to the Hunston Conservation Area, and if it is expanded, is likely to adjoin or cover part of the Conservation Area. North Mundham village does not have a Conservation Area.

3.34 The Council's Settlement Hierarchy Background Paper sets out details of the population, services and facilities of settlements across the plan area. It is notable that both villages appear to have very similar populations and levels of services, and appear next to one another in the ranking. The population difference in 2011 was 56 people and there is a



difference of one facility between the two villages. Since 2011 there have been new homes constructed in North Mundham which is likely to have increased the population to exceed that of Hunston.

- 3.35 Clarification is sought on the whether the settlement of Hunston has a primary and secondary school within it. The nearest primary school to Hunston appears to be at North Mundham village. The nearest secondary school appears to be Chichester Free School (for ages 4-18), which is the same distance from North Mundham, however North Mundham has not been recorded as having a secondary school within it, whilst Hunston has.
- 3.36 It can be concluded that the villages are very similar in their proximity to Chichester City, their population sizes and the level of facilities (with Hunston having a shop and North Mundham having a school). The availability of the Church Commissioners Land appears to have influenced the difference in housing requirements for the villages. However, this land is more constrained by flood risk and heritage impact (upon the Conservation Area and its associated listed buildings). The site in North Mundham therefore overall, performs better as a potential allocation and therefore a request is made of the Council to look again at the distribution of growth in the Manhood Peninsula and the amount of growth proposed for North Mundham.

### **Delivery of the Housing Requirement**

- 3.37 The current approach for bringing forward most of the housing requirement (850 dwellings) in the Manhood Peninsula is through Neighbourhood Plan allocations. There is considerable risk to this approach, and one which the Council is conscious of as detailed in its response to the question on the timeframe for bringing forward the NP in draft by June 2019 at the 14<sup>th</sup> November 2018 Cabinet meeting, where is stated:

*“I note your concern about the timing of the neighbourhood plan. However, if Chichester District Council (CDC) is to be able to put forward a convincing case as to how development needs can be met and facilitate neighbourhood planning, then rapid progress on those plans will need to be made, or CDC may not be able to demonstrate a five-year housing land supply and development will take place in an unplanned way through the appeals system.”*

- 3.38 Both Hunston and North Mundham Parishes have only recently started the formal process

for bringing forward their Neighbourhood Plans. The average time for production and adoption of a Neighbourhood Plan (NP) is 18-24 months, and some are considerably longer. Additionally, there is less certainty of adoption of a NP.

- 3.39 Devonshire Developments Ltd welcome the identification of North Mundham as a parish with a specific housing requirement, currently 50 dwellings. However, they think it is important that the Council increases the housing requirement in the Parish, to provide flexibility of supply and ensure suitable sites can come forward for development. Further, they would like the Council to allocate sites within the Local Plan in preference to relying upon the future allocations made through a Neighbourhood Plan for North Mundham. This is to ensure Chichester District Council is not overly-reliant on allocations being made through a Neighbourhood Plan process, which in the case of North Mundham was designated on 16 January 2019 and will now be prepared over a short period of time.
- 3.40 Local Plan allocations have the benefit being related to the suitability of available sites to meet the requirements for further growth in a sustainable way. They offer certainty to the community, the Council and to the landowners rather than the uncertainty of whether sites can be found and whether the Neighbourhood Plan will be produced and adopted. Notwithstanding this concern, should the Neighbourhood Plan continue to be progressed Devonshire Developments Ltd are keen to support and work with the Neighbourhood Plan group.
- 3.41 Devonshire Developments Ltd have the experience to bring forward development on their North Mundham site within the first 5 years of the Plan. They have a broad range of development experience, including establishing and running residential and commercial portfolios and progressed a range of residential development schemes. Utilising this experience will ensure a high-quality development can be achieved in the short term given the unconstrained nature of the site.

## 4.0 SITE CONSTRAINTS AND SUSTAINABILITY

- 4.1 The proposed site, outlined in red on the enclosed site location plan (**Appendix 2**) is located immediately to the south of the B2166, North Mundham, to the west of the village. The site extends to an area of approximately 7.6 hectares. The site location plan also indicates, as outlined in blue, the full extent of land controlled by Devonshire Developments Ltd.
- 4.2 The land being promoted by Devonshire Developments Ltd is located in close proximity to centre of the village's community assets (e.g. the school, village hall, playing field and church) and benefits from being an unconstrained location which can re-use a brownfield site.
- 4.3 The site largely comprises grassland, a disused nursery with associated greenhouses, overgrown hedgerows and mature trees. There is currently a 33kv pylon crossing the site, north to south. This is the only on-site constraint and is within the energy providers, SSE, future committed programme for undergrounding in 2020/21. Devonshire Developments Ltd are in discussions with SSE to find a solution to bring the undergrounding forward sooner. Therefore, this is not considered to be a significant constraint to the site.
- 4.4 The site is bounded to the north by the B2166, with a former canal and agricultural fields further to the north. To the west of the site are agricultural fields, which borders on the village of Hunston.
- 4.5 The site is bounded to south and west by agricultural fields. Further to the south-west, beyond the development site, is an ancient woodland called Hunston Copse, which is also a Site of Nature Conservation Interest (SNCI). North Mundham village is to the east, including the Grade II\* listed St. Stephens Church. Within the site ownership boundary, there is the grade II listed residential property of Pidgeon House Farmhouse; this is outside the proposed development site.
- 4.6 The following parts of this section looks at the constraints and opportunities associated with Land South of the B2166. A Constraints Map is provided in **Appendix 3** submitted with these representations.

## Constraints and Opportunities

4.7 By considering the potential site constraints and opportunities below, we are able to highlight how development in this location would be achieved. The development site is affected by the following constraints:

- There is a disused nursery on the site.
- Onsite there is a 33kv pylon crossing the sites. This is due to be undergrounded in 2020/21 with the working assumption that this can be brought forward sooner. Discussions with SSE on this matter are underway.
- Within the landownership to the east of the site is the Grade II listed farmhouse, Pidgeon House.
- A public footpath runs along the southern site boundary.
- The Hunston Copse SNCI and Ancient Woodland is to the south-west of the site.
- Beyond the eastern boundary of the site there are two trees with preservation orders on them.
- Beyond the eastern boundary is the Grade II\* listed Church, St. Stephens.

4.8 The site presents the following opportunities:

- the site is very well located to centre of North Mundham and services and facilities (discussed further below);
- leading on from the above comment, development of the site could help sustain the village's facilities;
- the site would adjoin the existing built up area;
- the site would utilise a previously developed site;
- the site is capable of delivering housing in the short-term;
- the site is largely flat, low lying and well-contained by mature vegetation, which could be enhanced through sensitive boundary treatment;
- the southern area of the site provides opportunities for enhancements to the setting of the public footpath and there are opportunities to provide walking and cycling routes through the site;
- the site has the potential to be planned to ensure open space, planting and the siting of buildings respect the nearby listed church;

- there is an existing bus stop located close to the site on the B2166, with a dedicated tarmacked footpath from the site;
- the site is unconstrained in viability terms, ensuring that proposals will provide much needed affordable homes and ensure a mixed and balanced development; and
- land within the control of Devonshire Developments Ltd is adjacent the ancient woodland, Hunston Copse; however, development is not proposed to take place in this part of the field. Rather a new landscaped edge would follow the red line boundary of the enclosed plan (**Appendix 3**), thereby enhancing the hedgerow network, providing a clear separation of the site from the ancient woodland and maintaining and enhancing the separate identities of the villages of North Mundham and Hunston.

## **Sustainability and Infrastructure**

4.9 The sustainability of North Mundham has been assessed in the Council's Settlement Hierarchy Background Paper (December 2018) as part of the Local Plan Review evidence base. It states the availability of the following services and facilities in the settlement of North Mundham:

- a place of worship;
- a community building, the village hall;
- a primary school;
- a public house (located in Runcton village);
- outdoor community recreation space; and
- a more than hourly bus service.

4.10 North Mundham village is also located the same distance from the Chichester Free School (catering for ages 4-18) as Hunston village.

4.11 It can be seen from the evidence above that the site is located in a sustainable location. It is therefore considered that it is suitable to deliver residential development and can make a significant contribution to addressing and boosting housing supply in Chichester District.

- 4.12 Given the unconstrained nature of the site it is considered capable of providing affordable housing in accordance with the Council's adopted policy requirement.
- 4.13 It should also be noted that the site will be capable of providing the full CIL payment in accordance with the Council's adopted requirements which can be used to support the relevant infrastructure provision.

### **Transport and Access**

- 4.14 A separate report dealing with Highways and Transportation has been prepared by Transport and Infrastructure Consultants Matrix Ltd and has been submitted with representations. In summary, that report highlights the following:
- The main site access is from the B2166, with the centre of North Mundham approximately 400m to the east.
  - A footway is provided on the southern side of the B2166 between the existing site access junction and North Mundham approximately 400m to the east.
  - An existing Public Right of Way (PRoW) bounds the site to the south and links the site to Church Road in North Mundham to the east and to Hunston to the west.
  - The closest bus stops to the site are located on the B2166 approximately 400m to the east of the existing site access junction.
  - A signalised pedestrian crossing is provided immediately to the west of the east bound bus stop which facilitates pedestrian movements from the footway on the southern side of the B2166.
  - The bus stops are served by route number 600 which provides frequent (every 20 minutes during peak times) services to key destinations including, but not exclusively, Bognor Regis to the south and Chichester to the north.
  - The proposals could generate around eight additional vehicle movements every five minutes during peak periods. This is not considered to be material.

- 4.15 The potential development traffic would not have a severe residual impact on the surrounding road network. As such, it is considered that the proposed allocation site is appropriate for residential development in highways and accessibility terms.
- 4.16 Land South of the B2166, North Mundham is an unconstrained site being actively promoted in a sustainable location, immediately adjacent to the village, near to existing facilities and benefitting from good existing public transport services. It offers an opportunity to sustainably address the housing requirement.

## 5.0 ALTERNATIVE SITES

5.1 This chapter reviews the alternative sites within the vicinity of villages of North Mundham and Hunston which have been highlighted in the Council's published HELAA as being achievable.

### North Mundham sites:

HELAA Site Ref:	Council's Site Description	Summary of the Council's position on why the sites is achievable	Council assessment of capacity (number of dwellings)	DLP observation of the site
HNM0007	Land north of Brook Cottage and south of Lagness Road:  Agricultural land to the east of Runcton, adjacent to the settlement	There is a reasonable prospect that development would be achievable during the Plan period.  The land is available.	15	This site is not capable of delivering 50 units
HHN0020	Vinnetrow Business Park  Vacant business units and site of Chichester Free School	The site is unsuitable for housing as it is too remote but the site is considered to be suitable for employment use once the Chichester Free School has relocated.	N/A	This site is disconnected from the existing settlement, and is not suitable for housing.
HNM0012, controlled by Devonshire Developments Ltd	Land at Lowlands  Disused nursery with residential dwelling on site south of main road	The site is considered available and potentially suitable.  There is a reasonable prospect that development would be achievable during the Plan period (in the first 5 years of the plan)	74	The site is adjacent to the B2166, and adjacent to the existing settlement and suitable for development. It contains a previously developed land on the disused nursery.  It is capable of delivering more than 50 units.



HNM0005, controlled by Devonshire Developments Ltd	Land to the south of Lowlands (Pigeon House Farm)  Large open area of farmland south- west of North Mundham. Small element of residential to the south-east corner. Glasshouses to the south.	The site is considered available, and potentially suitable subject to access and landscape.  There is a reasonable prospect that development would be achievable during the Plan period. (Phased over 10 years of the plan)	278	This site is adjacent to the village boundary and a nursery to the south. The availability and suitability of HNM0012 would allow the provision of access to the site.  This site is capable of delivering circa 200 units in combination with HNM0012.
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**Hunston Sites:**

<b>HELAA Site Ref:</b>	<b>Council's Site Description</b>	<b>Summary of the Council's position on why the sites is achievable</b>	<b>Council assessment of capacity (number of dwellings)</b>	<b>DLP observation of the site</b>
HHN0003	Reedbridge Farm  The site comprises an area of agricultural land with a large barn. Selsey Road to the north and west. Agricultural land to the east and Reedbridge Farm to the south.	The site is considered available, and potentially suitable.  There is a reasonable prospect that development would be achievable during the Plan period.	6	This site is not capable of delivering 200 units proposed for Hunston.  HHN0003 and HHN007 are adjacent. HHN0005 also adjacent is allocated, in the Site Allocations DPD.
HHN0007	Land east of Foxbridge Drive  Large area of flat, open	The site is considered available and potentially suitable.	80	This site is not capable of delivering 200 units proposed for Hunston.

	agricultural land. Selsey Road lies to the north. The site lies to the east of Hunston	There is a reasonable prospect that development would be achievable during the Plan period		
HHN0008	Land south of Meadow Close  The site lies to the east of Hunston, comprising an open agricultural field with the land sloping gently to the east. Selsey Road is to the west, residential to the north. There is an arbitrary boundary to the east and south.	The site is considered available, and potentially suitable.  There is a reasonable prospect that development would be achievable during the Plan period	90	This site is not capable of delivering 200 units proposed for Hunston, although it is understood that the landowner, the Church Commissioners, have made the Council aware that more land is available.  This current HELAA site is in proximity to the Hunston Conservation Area. Traffic generated by a development here will need to travel through the village unless a further access can be gained through Site 0007, further to the north, subject to more land being made available.

- 5.2 From the above it is noted that the HELAA site HNM0012, controlled by Devonshire Developments Ltd, at North Mundham is the only site capable of accommodating the proposed 50 units currently proposed for the village.
- 5.3 Sites at North Mundham HNM0012 and HNM0005, controlled by Devonshire Developments Ltd in combination, are the only sites within the villages of Hunston and North Mundham that are identified as available and suitable that are capable of delivering 200 units.
- 5.4 Sites at Hunston are not capable of delivering 200 units alone, nor in combination. The proximity to the Conservation Area of HHN0008 is a constraint that is not found at North Mundham. Accessing the site HHN0008 from the north would generate traffic through Hunston Village to the detriment to existing local residents.

- 5.5 As noted above, it is understood more land has been made available to the Council at Hunston since the HELAA assessment, but the detail of this information has not been made publicly available. Therefore, based on the information and evidence base available for public consultation, the North Mundham site, controlled by Devonshire Developments Ltd, is the only site within the two villages of Hunston and North Mundham which has the capacity for the 200 units.
- 5.6 The Council is requested to fully consider the identification of increased housing growth at North Mundham and the allocation of Land south of the B2166.

## **6.0 POTENTIAL DEVELOPMENT DESIGN**

- 6.1 Land south of the B2166, North Mundham covers an area of approximately 7.6 hectares and has the potential to deliver a residential development that responds positively to the Site's constraints and opportunities outlined in Section 4. The following chapter includes outline information on the site if it were to come forward for residential development.
- 6.2 Development on the Site would utilise the disused nursery and much of the field to the south, with an area to the west remaining undeveloped and thus development would be kept away from the nearby ancient woodland. This would also provide a separation for the villages of North Mundham and Hunston. The western and southern boundaries will be enhanced by careful landscaping. The site has the potential to provide around 200 dwellings (subject to detailed master-planning). There would be careful planning of development in the eastern area of the southern field, to reflect the nearby listed buildings near to this area of the site. This would most likely include appropriate buffers, lower density housing and comparable materials/built form so as not to detract from the local character.
- 6.3 It is envisaged that the development would largely consist of two storey building consistent with the predominant building height of the existing village of North Mundham. The Site's vehicular access would be from the B2166.
- 6.4 There is potential for the development to enhance the footpath to the south of the Site and provide routes through the Site.
- 6.5 In terms of ownership, Devonshire Developments Ltd benefit from a signed Option to acquire the Site, ensuring a flexible approach. The land is considered available for development and deliverable within the next five years.

## 7.0 CONCLUSION

- 7.1 This consultation response has set out to highlight that whilst Devonshire Developments Ltd is generally supportive of the delivery of the Local Plan Review they have concerns over key a number of issues which they believe the Council needs to address, clarify or reconsider in order to ensure their Local Plan is sound, such as the proposed housing distribution strategy, clarity on the future delivery of residential sites and the adequacy of the Sustainability Appraisal in assessing the housing distribution.
- 7.2 Devonshire Developments Ltd welcome the identification of North Mundham as a parish with a specific housing requirement, currently 50 dwellings. However, they think it is important that:
- the Council increases the housing requirement in the Parish, either through redistribution of the growth in Manhood Peninsula or through increased allocations, to provide flexibility of supply and ensure suitable sites can come forward for development.
  - the Council allocates sites within the Local Plan, in preference to relying upon the future allocations made through a Neighbourhood Plan for North Mundham. This is to ensure the Council is not overly-reliant on allocations being made through a Neighbourhood Plan process, which in the case of North Mundham was designated on 16 January 2019 and will now be prepared over a short period of time.
- 7.3 These representations have set out that there is an inherent need to reconsider housing number distribution to appropriately support additional strategic scale development at North Mundham village and justify this will clear evidence.
- 7.4 Land south of the B2166, North Mundham is an available site being actively promoted which is sustainably located, immediately adjacent to the village with good access to the village's existing facilities and good public transport services. In order to meet the housing numbers required and to provide sufficient contingency, to provided greater flexibility in terms of delivery, Devonshire Developments Ltd would suggest this sustainable site should be allocated in the Local Plan Review. Notwithstanding this:

- They have also demonstrated that the Site is more suitable for development than others in the village and the Manhood Peninsula.
- The Site offers the potential to deliver both open market and affordable homes and it is considered that the Site could accommodate a sensitively designed development without causing significant harm to the nearby listed building, the surrounding landscape or Hunston Copse Ancient Woodland.
- It would maintain the separate identities of the villages of North Mundham and Hunston. The Site also provides the opportunity to enhance the existing footpath and ecological networks with the provision of improved ecological/ landscape areas. Based on this Site's sustainable location and ability to potentially deliver enhancements to the area in terms of recreation and leisure improvements, it is requested that this Site should be considered suitable for a housing allocation in the Local Plan Review.



**Appendix 1: Comparison of selected Parishes in Manhood Peninsula**

		Extracted from Preferred Approach SA 2018						Adapted from Issues and Options SA May 2017		
								Below is an adapted and updated appraisal for North Mundham, based on its appraisal from the Councils Issues and Options SA, now brought in line with the approach to assessment of the neighbouring Hunston in the 2018 Preferred Approach SA, for a consistent comparison.		
SA Assessment Criteria		AL8 East Wittering Parish		AL12 Selsey Parish		AL11 Hunston Parish		N19 North Mundham Parish (relevant to Devonshire Developments Ltd' site to land south of the B2166, North Mundham)		Commentary on adaptations made to SA scoring or wording
1A	Does the option prevent biodiversity loss and habitat fragmentation?	-	Water vole and Barn owl records from the ditch networks to the north. Area to the east very close to Medmerry and the fields to the west sustain wading birds	-	Development would cause disturbance Pagham Harbour Special Protection Area. Fields North West towards Church Norton sustain breeding wading birds	-	Within the zone of influence for Pagham and Chichester Harbour. Close to the Canal and Hunston Copse SNCIs. Potential impact on components of ecological networks	0	Some protected species habitat potential but these could be avoided through careful site selection	No change to the scoring, but it is noted that the site is in the impact risk zone of Pagham Harbour SSSI, and close to the Hunston Copse - as is the case for Hunston Parish.
1B	Does the option allow for movement of habitats with climate change?	-	Could cause habitat fragmentation by developing adjoining habitat to Medmerry and impacting on corridors/stepping stones used by protected species	-	Could cause habitat fragmentation by developing adjoining habitat to Pagham Harbour and impacting on wildlife corridors used by protected species	-	Could impact on wildlife corridor used by protected species. However, opportunities for enhancements to improve connectivity	-	Could impact on wildlife corridor used by protected species. However, opportunities for enhancements to improve connectivity	No change to the scoring, however text changed to align with the assessment of Hunston Parish in the Preferred Approach SA
1C	Does the option enhance and/or restore biodiversity opportunities and create new habitat?	+	Some potential for ditch and rife corridor enhancements within larger site or sites	+	There is the potential to enhance Pagham Harbour SPA	+	Opportunities for strengthening Green Infrastructure linked to new development	+	Some opportunities for creation of new habitat or green infrastructure linkages with new development	
2A	Does the option protect water resources	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	0	Not location specific depends on overall housing numbers	
2B	Does the option maximise the use of waste resources?	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	



SA Assessment Criteria		AL8 East Wittering Parish		AL12 Selsey Parish		AL11 Hunston Parish		N19 North Mundham Parish (relevant to Devonshire Developments Ltd' site to land south of the B2166, North Mundham)		Commentary on adaptations made to SA scoring or wording
2C	Does the option make efficient use of energy?	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	
3A	Does the option reduce air pollution from industrial processes and transport?	-	Without major improvement on the A27 large scale development here will exacerbate existing problems at the Stockbridge roundabout where the A286 links in	-	Likely to increase pressure on the B2145 and ultimately the A27, however Selsey has its own shops and facilities for everyday use	-	Added congestion on the A27 likely to have a negative impact on air quality	-	Added congestion on the A27 likely to have negative effect on air quality	
3B	Will the option assist the remediation of contaminated land?	0	N/A not PDL	0	West and south-west of Selsey - small areas of potentially contaminated land that could be remediated	0	Small area of potentially contaminated land on NE side of Hunston and land to north of B2140 within influence of closed landfill	0	No areas of potential contaminated land adjacent to settlement area	
3C	Does the option reduce levels of water pollution?	-	Waterways run through the settlement to the sea - these are the most likely route for runoff	0	Sites are outside the groundwater protection zones and there are no watercourses	0	Sites are outside the groundwater protection zones but potential for discharges into Chichester Canal and Bremere Rife	0	Sites are outside the groundwater protection zones but potential for discharges into Chichester Canal	Changed scoring to align with the assessment of Hunston Parish in the Preferred Approach SA, 2018.
3D	Does the option require new waste water treatment capacity?	+	Connects to Sidlesham WWTW. Head room here approx. 800 dwellings but not in combination with S5 - Selsey	+	Connects to Sidlesham WWTW. Head room here approx. 800 dwellings but not in combination with S4 - East Wittering/Bracklesham	-	Negative impact until WWTW is upgraded or new capacity is found	-	Negative impact until WWTW is upgraded or new capacity is found	

SA Assessment Criteria		AL8 East Wittering Parish		AL12 Selsey Parish		AL11 Hunston Parish		N19 North Mundham Parish (relevant to Devonshire Developments Ltd' site to land south of the B2166, North Mundham)		Commentary on adaptations made to SA scoring or wording
4A	Does the option maximise the use of renewable and low carbon energy sources?	+	Large area with potential for low or zero carbon technologies to be fully incorporated within it	+	Large area with potential for low or zero carbon technologies to be fully incorporated within it	+	Opportunities for on-site low carbon technologies	+	Opportunities for on-site low carbon technologies	
4B	Does the option reduce the need to travel?	-	Strategic development would be on a scale to meet needs across the district and beyond. Inevitably development on the south of the Manhood would add to increased commuter journeys and also need to travel for the facilities of Chichester city that are not available elsewhere	-	Strategic development would be on a scale to meet needs across the district and beyond. Inevitably development on the south of the Manhood would add to increased commuter journeys and also need to travel for the facilities of Chichester City that are not available elsewhere	+	New facilities could reduce need to travel in to the city centre	+	New facilities could reduce need to travel in to Chichester	
5A	Does the option reduce the risks of coastal, fluvial surface water and groundwater flooding?	-	Flood zones to the east and the north of the existing settlement, although the latter are avoidable	-	Selsey is low lying and has drainage problems. There are large flood zones along the coast and Broad Rife. These are avoidable if the eastern side of Selsey is developed towards Church Norton	-	Sites to the South East of Hunston likely to increase flood risk and other potential sites located close to flood-zones	0	No significant effect as the site is in a Flood Zone	No change to scoring but note that this site is in Flood Zone 1 - ref. SFRA Appendix D Map Tiles. P14.  There is Flood Zone 2 on land promoted for development on the edge of Hunston village.
5B	Does the option increase the use of SUDS and provide opportunities for restoring natural function to rivers and coastal systems?	+	Land available for deploying full range of SUDS techniques	+	Land available for deploying full range of SUDS techniques	+	Land available for deploying full range of SUDS techniques	+	Large sites can accommodate SUDS	

SA Assessment Criteria		AL8 East Wittering Parish	AL12 Selsey Parish	AL11 Hunston Parish	N19 North Mundham Parish (relevant to Devonshire Developments Ltd' site to land south of the B2166, North Mundham)		Commentary on adaptations made to SA scoring or wording
6A	Does the option achieve modal shift to more sustainable forms of transport, integrating bus and train networks?	-	-	0	0	0	
		There is a good bus service, but this is restricted by the access across the A27. No train service. Car travel more likely	Potential for improved bus services, walking/cycling routes, however access will be restricted by the A27. No train service. Car travel more likely	No train station but served by bus links which may improve with further development	No train station but served by bus links which may improve with further development	No train station but served by bus links which may improve with further development	
6B	Does the option improve networks for cyclists and pedestrians?	0	+	+	+	+	
		Potential to improve local links to East Head and Medmerry, but longer distance links would require an off-road route to be identified	For larger developments, could increase the likelihood of the proposed Chichester to Selsey Cycle Route being implemented	May help bring forward WSCC proposed cycle route	May help bring forward WSCC proposed cycle route	May help bring forward WSCC proposed cycle route	
6C	Does the option reduce congestion?	-	-	-	-	-	
		Will add congestion to the A27 and potentially city centre via Stockbridge roundabout	Larger development at Selsey still likely to increase pressure on B2145	Likely to add congestion on the A27	Likely to add congestion on the A27	Likely to increase congestion on the A27	
7A	Does the option encourage sustainable land management practices to conserve landscapes?	-	-	-	0	0	
		Local impact significant but unlikely to affect the AONB	Larger development likely to impact on Pagham Harbour and Church Norton	Local impact is likely to be significant	No significant effect	No significant effect	
7B	Does the option ensure protection of traditional urban forms?	-	-	-	-	-	
		The scale of the development will completely alter the existing development. There would be significant impact to the existing historic village	Negative impact as would expand an already overdeveloped area from its historic village form	Negative impact on village form	Negative impact on village form.	Negative impact on village form.	Changed to remove reference to loss of distinction between North Mundham and Runcton as the site does not affect this.

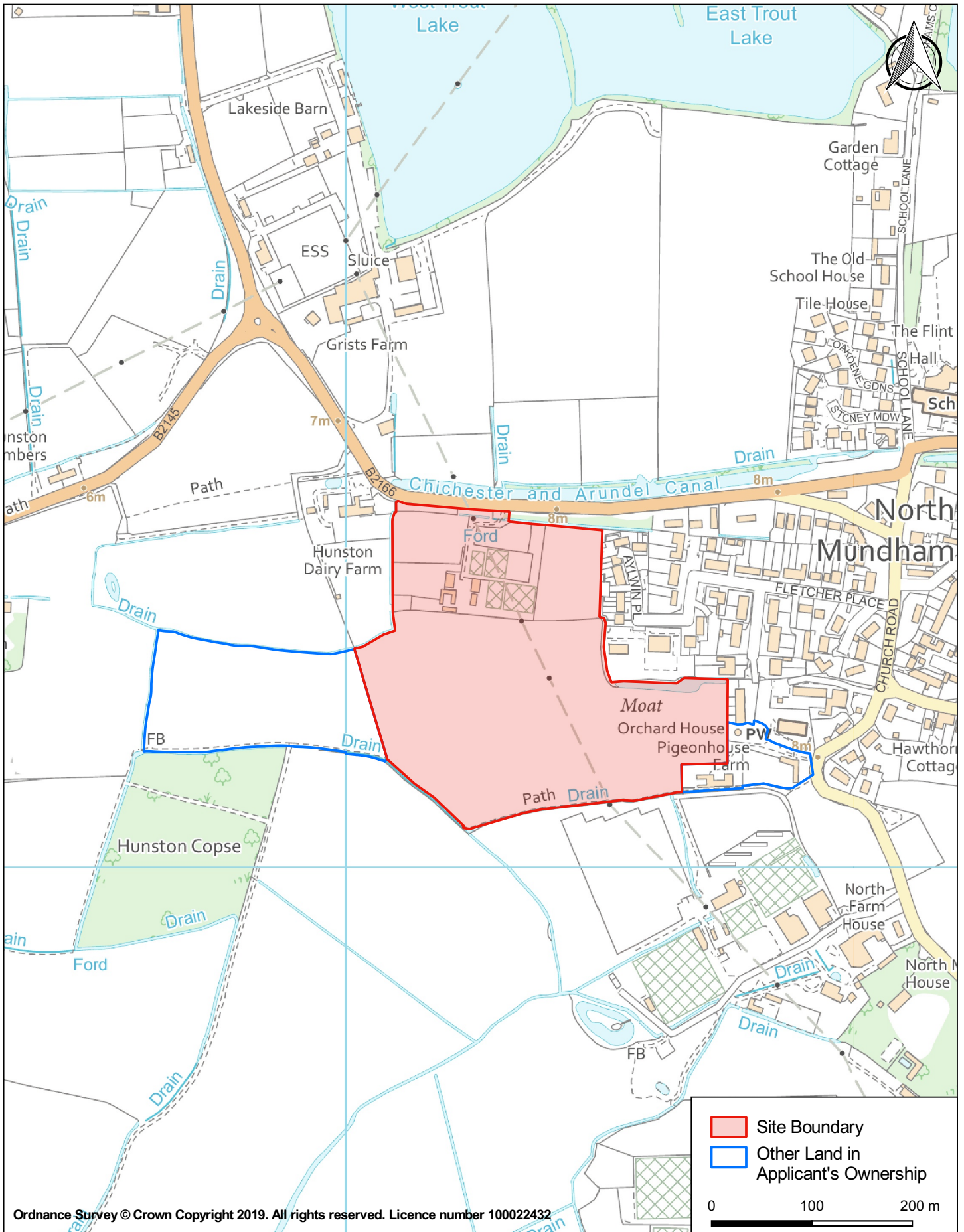
SA Assessment Criteria		AL8 East Wittering Parish		AL12 Selsey Parish		AL11 Hunston Parish		N19 North Mundham Parish (relevant to Devonshire Developments Ltd' site to land south of the B2166, North Mundham)		Commentary on adaptations made to SA scoring or wording
7C	Does the option ensure conservation and enhancement of the historic environment, heritage assets and their settings?	0	Few if any heritage assets but archaeology may be present	0	Unlikely to impact on heritage assets but archaeology may be present	-	Potential negative impact on Archaeological Priority Area	-	Potential negative impact on the Archaeological Priority Area	Note: Mapping for the Archaeological Priority Areas has not been located. However there is no Conservation Area designated in North Mundham, whereas there is a conservation area for Hunston. This has not been acknowledged in the 2018 or 2017 SAs. This merits a scoring that reflects the greater negative impact on the Hunston through impact on the Conservation Area - Hunston Parish should therefore be score a " - ". North Mundham site would have a less impact on heritage.
8A	Does the option meet local housing needs?	+	Land availability slightly more restricted at this location but would still be able to deliver a fair proportion of the district's needs	+	Land availability slightly more restricted at this location but would still be able to deliver a fair proportion of the district's needs	+	Helps meet the local housing need	+	Has the potential to meet all the local housing needs	
8B	Does the option provide the right housing mix of size and tenure and the continuation of a sustainable mix of people within communities?	++	Strategic development should be able to deliver a wide mix of size and tenure	++	Strategic development should be able to deliver a wide mix of size and tenure	+	Opportunity to provide a mix of tenure	+	Opportunities for providing a mix of tenure	
9	Does the option provide access to services and facilities?	-	Some local shops but access to secondary school, hospital and further education worse than some other options as settlement would be greater distance away from these amenities	+	Good access to existing local facilities (including secondary education) but still a need to access Chichester for major facilities	+	Development likely to increase access to services locally	+	Development likely to increase access to services locally	

SA Assessment Criteria		AL8 East Wittering Parish		AL12 Selsey Parish		AL11 Hunston Parish		N19 North Mundham Parish (relevant to Devonshire Developments Ltd' site to land south of the B2166, North Mundham)		Commentary on adaptations made to SA scoring or wording
10A	Does the option ensure that economic opportunities are accessible to all?	+	Further from the A27 and the city but still a positive contribution to the local economy	+	Increase in some opportunities locally but also problems accessing Chichester for greater opportunities	+	Potential for increased opportunities locally but also reasonably easy access to City Centre	+	Potential for increased opportunities locally but also reasonably easy access to City Centre	
10B	Does the option ensure that value added is retained in the District?	+	Further from the A27 and the city but still likely to support local economic development. Location means that residents are unlikely to commute out of the district	+	Further from the A27 and the city but still likely to support local economic development. Location means that residents are unlikely to commute out of the district	+	Significant development here, relatively close to the City Centre, is likely to bring economic benefits to the District	+	Significant development here, relatively close to the City Centre, is likely to bring economic benefits to the District	
11A	Does the option encourage innovation?	0	Less likely than city based locations to support businesses of this type relocating to the Manhood Peninsula	0	Less likely than city based locations to support businesses of this type relocating to the Manhood Peninsula	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	Changed to align with the assessment of Hunston Parish in the Preferred Approach SA, 2018
11B	Does the option develop knowledge based economy locally?	+	Further from the A27 and the city but is still likely to support local economic development and the creation and retention of skilled high-value jobs	+	Further from the A27 and the city but still likely to support local economic development and the creation and retention of skilled high-value jobs	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	Changed to align with the assessment of Hunston Parish in the Preferred Approach SA, 2018
12A	Does the option ensure skills are enhanced to increase access to work?	+	Further from the A27 and the city but is still likely to support local economic development and the creation and retention of skilled high-value jobs	+	Further from the A27 and the city but still likely to support local economic development and the creation and retention of skilled high-value jobs	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	Changed to align with the assessment of Hunston Parish in the Preferred Approach SA, 2018

SA Assessment Criteria		AL8 East Wittering Parish		AL12 Selsey Parish		AL11 Hunston Parish		N19 North Mundham Parish (relevant to Devonshire Developments Ltd' site to land south of the B2166, North Mundham)		Commentary on adaptations made to SA scoring or wording
12B	Does the option ensure a skilled workforce is available locally to allow business development?	0	Problems with access limits attractiveness to skilled workforce	0	Problems with access limits attractiveness to skilled workforce	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	+	Development will provide housing to support and encourage a skilled workforce	
13A	Does the option promote a prosperous and diverse rural economy?	0	No significant effect	++	Development could support the agricultural and horticultural businesses. Close to the Horticultural Development Areas in Sidlesham	+	Provide housing to support the rural workforce	+	Provide housing to support the rural workforce	
13B	Does the option avoid the loss of the Best and Most Versatile agricultural land?	+	Compared to other options this is likely to be development on Grade 3 land but going too far north would encroach on Grade 2 land	-	Potential loss of Grade 1 and Grade 2 agricultural land	-	Potential loss of Grade 2 agricultural land. However some options for developing Grade 3 land	-	Potential loss of Grade 2 agricultural land. There is some Grade 3 land to the North of the site.	Changed to add reference to the presence of Grade 3 Land to the north of the site.



**Appendix 2: Site Location Plan**

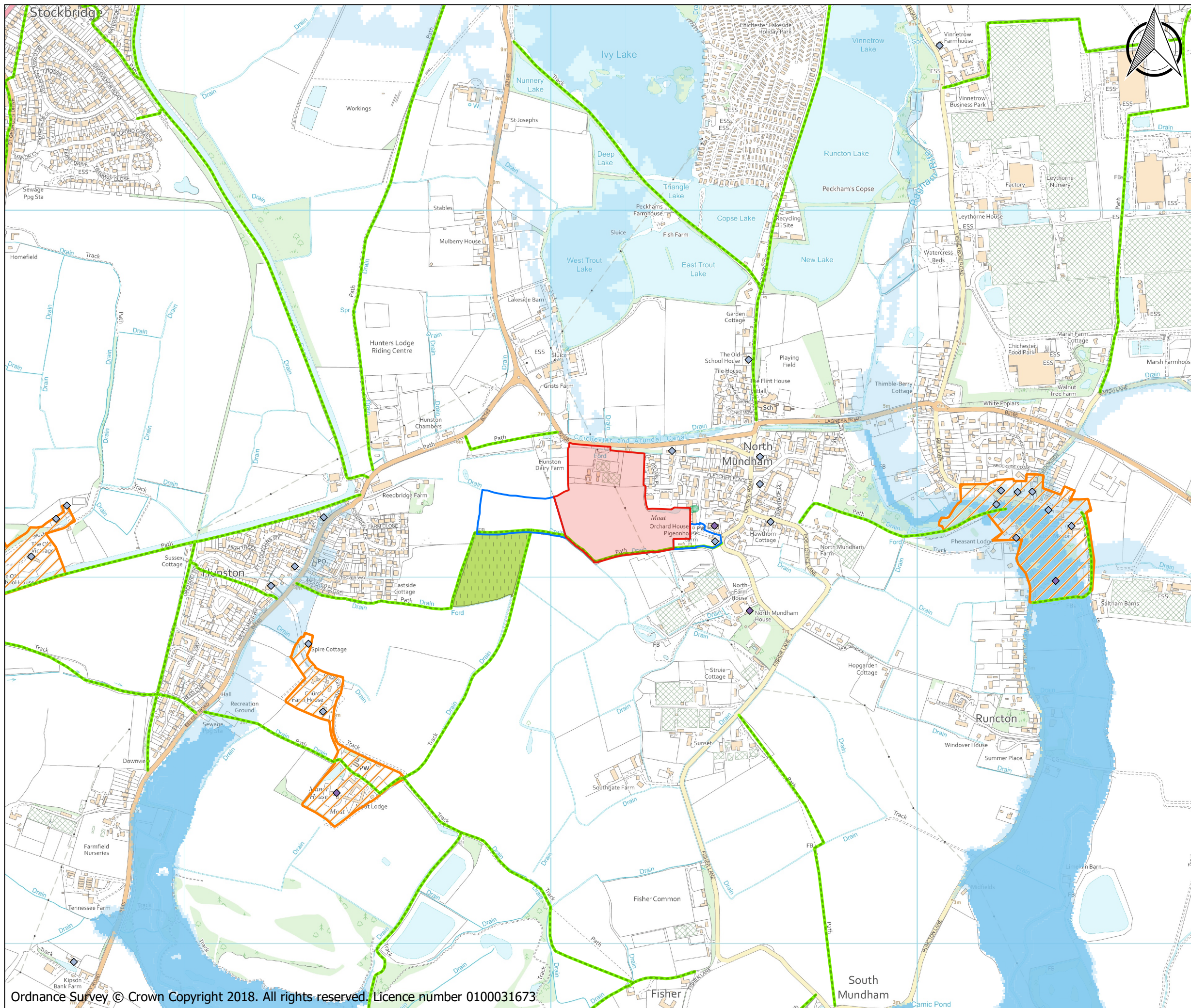


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	SCALE 1:5,000 @ A4	DRWG NO. D03	Checked SW		
	JOB NO. SX5021	REV.			
PROJECT Land at North Mundham Chichester	DRWG TITLE Location Plan	Offices also at: Bedford, East Midlands, Leeds, London, Milton Keynes, Rugby and Sheffield			





**Appendix 3: Constraints Map**



**KEY**

- Site Boundary
- Other Land in Applicant's Ownership
- Statutory Listed Building**
- Grade I
- Grade II\*
- Grade II
- Conservation Areas
- TPO's
- PRoW
- Ancient Woodland
- Flood Zone 2
- Flood Zone 3

Scale

1:10,000

0 250 500 m

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CLIENT

**Devonshire Developments Limited**

PROJECT

**Land at North Mundham  
Chichester**

DRAWING TITLE

**Constraints Plan**

Date

04.02.2019

OS Ref: 487147, 102178

Drawn By

PMG

Scale

1:10,000@A3

Drawing No: D04

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Chartered Town Planner



**RICS**<sup>TM</sup>