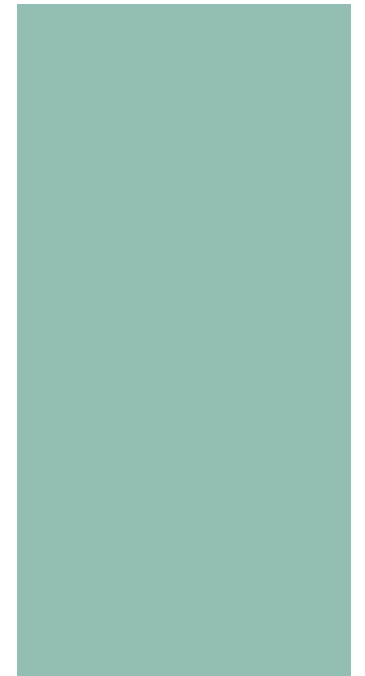
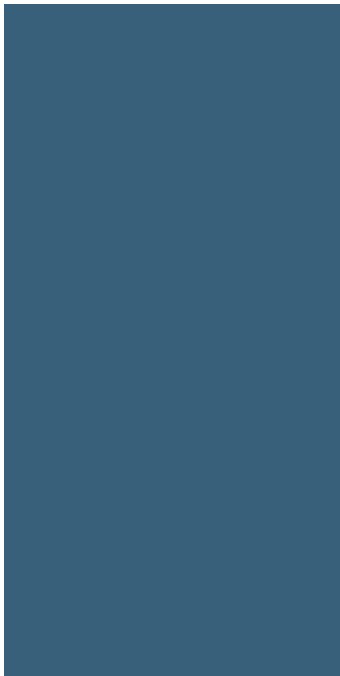




Madgwick Lane, Westhampnett

Promotional Statement

February 2019



1 Introduction

This Statement has been prepared by WYG on behalf of the landowners to promote the allocation for residential development on land south of Madgwick Lane (HELAA Ref HWH0009 and HWH0010) in the Chichester Local Plan Review 2035.

This Statement responds to the Local Plan Review 2016-2035: Preferred Approach consultation and contains the representations made on various proposed policies. Separate forms have been submitted for each policy that we would like to comment on but this Promotional Statement also contains all of his information.

It concludes that suitable and deliverable sites in and surrounding Chichester, which is the most sustainable settlement in the district, should be allocated for residential development before making allocations in Settlement Hubs. These villages should take some new homes but not the volume that has been proposed.

This promoted site provides the opportunity to deliver 100 new homes in a sustainable location that is walking distance from the centre of Chichester. This assessment is corroborated by the HELAA assessment which states that this site is **suitable, available and achievable**. As a medium sized site it can also make an important contribution to meeting the Chichesters housing requirement and can make a valuable contribution to the current 5 year housing land supply.

The Statement also considers the characteristics of the site and surroundings; existing and emerging planning policy context; and other key material considerations as an assessment of the site's prospects for being allocated in the emerging Local Plan.

This 3.75 hectare site adjoins the Westhampnett/North East Chichester Strategic Development Location (Policy 17 in the Adopted Chichester Local Plan: Key Policies 2014-2029). As can be seen on the 'Site Location and Context Plan' opposite, the site is located on the eastern boundary of the strategic allocation and therefore it is a logical place to allocate land for residential use in the Local Plan Review.

To the south of the site is an established residential area and to the east is The March Church of England Primary School. Beyond the primary school is the Rolls Royce Motor Car facility. The Westhampnett/North East Chichester Strategic Development Location (Policy 17 in the Adopted Chichester Local Plan: Key Policies 2014-2029) also wraps around the northern boundary of the site.

It is clear that the land is almost exclusively surrounded by existing and future development, effectively constituting infill land.



2 Site Context and Analysis

Site Location

The site is located just outside the settlement boundary of Chichester, with the main settlement to the south east and a small pocket of development within the settlement boundary further to the west.

Surroundings

The site is located less than 300m north west of a large commercial area; this includes shops such as Sainsbury's, Lidl, John Lewis, Currys PC World, Wickes, Iceland, Halfords and other facilities such as restaurants and hotels. These commercial uses are within an easy walk from the proposed site, making it a very sustainable location for development.

This commercial area also provides many opportunities for employment, as do the town centre, the Rolls Royce facility (which adjoins the north eastern corner of the proposed site) and Goodwood Race Circuit (600m north of the site).

The Rolls Royce Goodwood plant serves as the headquarters, design, manufacturing and assembly centre for Rolls-Royce Motor Cars. Officially opened on 1 January 2003, the plant is situated on a site covering 42 acres (17 ha) and has been expanded since. Over 1,700 workers are currently employed at Goodwood and in 2017 the plant was producing approximately 20 cars a day.

Directly adjoining the eastern boundary of the site is The March Church of England Primary School. This primary school has over 200 children and its most recent Ofsted inspection rated the school as 'good'.

Westhampnett/North East Chichester Strategic Development Location (SDL)

The proposed development site adjoins land allocated under Policy 17 of the Chichester Local Plan, which was granted outline planning permission (15/03524/OUTEIA) for residential development comprising up to 300 residential dwellings in June 2016. Approval of reserved matters was subsequently granted in October 2018 (18/01024/REM).

Work on site has commenced and when complete will have a significant effect on the character of the area, which will feel much more urban than it does currently. When it is complete, it will mean the promoted land will be enclosed by development on three sides and will effectively constitute infill development.

The Strategic Development Location also wraps around the northern boundary of the proposed development site.

Surface Water Flood Zone

There is a small area of the site that is at risk of surface water flooding, however this is isolated to the north-eastern corner of the site as can be seen on the Site Context Plan opposite.

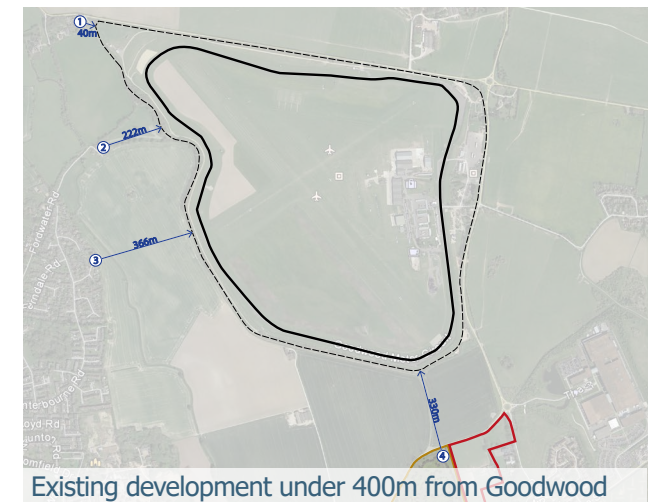
This will not effect the proposed development as this area can be used as open space to facilitate the delivery of housing on the rest of the site.

Proximity to Goodwood Motor Circuit

Part of the proposed development site is located within 400m of the boundary of Goodwood Airfield and Motor Circuit, the same distance away as the SDL. The Local Plan Policy 17 text for the SDL states that:

"It may be possible for limited development to occur within 400m of the Circuit, subject to any proposal demonstrating that there would be no adverse noise impact on the occupiers of proposed housing development".

As can be seen on the Site Context Plan opposite, a number of dwellings will be built within the 400m zone on the adjacent residential development site. This layout has recently been approved by CDC as it was able to provide sufficient mitigation to make these homes habitable. This has been done through the use of glazing and alternative means of ventilation. Further to this, it is clear that this 400m guide has been breached in a number of locations around Goodwood already (see below) without causing adverse impact on the occupiers.





2 Site Context and Analysis

Site Description

The site itself is flat and well contained by strong landscape boundaries, with virtually no vegetation within the site; making it ideal for development.

There is an existing access from Madgwick Lane at the north of the site, which connects to a track that runs into the centre of the site. At the end of the track there are a number of buildings for equestrian use - stables, stores and other ancillary buildings. These buildings are mostly wooden structures and are single storey. The buildings are surrounded by various paddocks, around 8, of varying sizes. Each is delineated with wooden fences and many contain small shelters for the horses.

At the south of the site it is possible to see a number of large residential buildings further south and glimpse views of other dwellings to the east.

Looking west, there are clear signs of ground works at the early stages of development for the Westhampnett/North East Chichester SDL. Once built out, views towards the western boundary will be filled with residential development, which runs right up to the site's boundary. However, currently this boundary is mostly made up of a low hedgerow with a few semi-mature trees.

Another paddock is located in the north eastern corner of the site and is the only field separated by vegetation. From this paddock it is possible to see a new car park recently built at Rolls Royce, however it is mostly well contained by a number of mature trees and hedgerows. Like the main part of the site, vegetation is only found on the boundaries.



In the centre of the site looking west towards Westhampnett/North East Chichester SDL



At the southern end of the site looking north

2 Site Context and Description



In the north eastern corner of the site, looking towards the Rolls Royce Facility



Pony paddocks in the centre of the site



Looking south towards the well established residential area



Pony paddocks in the north of the site

3 Planning Policy

National Planning Policy Guidance

The National Planning Policy Framework (NPPF) has recently been updated (July 2018)

The NPPF states that plans and decisions should apply a presumption in favour of sustainable development. They should do this by seeking opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.

The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities.

The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area. Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development.

The development plan should also be made up with non-strategic policies to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites.

The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.

Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.

Local Planning Policy

Local Plan Review

The adopted Local Plan identifies a housing requirement of 7,388 dwellings over the period 2012-2029 (Policy 4: Housing Provision) or approximately 435 dwellings per annum (dpa). This housing requirement excludes the SDNP area. This level of housing provision did not meet the objectively assessed need for housing across the plan area at the time of adoption. A housing need of 505dpa was considered a reasonable estimate for the plan area housing need, at the time of adoption (para. 7.4, adopted Local Plan). A further 70dpa were suggested to be required within the SDNP area.

The Council is currently undertaking a review of its housing requirement as part of the Local Plan Review. The proposed housing requirement is at least 12,350 dwellings over the plan period (2016-2035) or an average of 650dpa. This figure is stated to reflect the objectively assessed needs of the area and an allowance for unmet need from the SDNP. The derivation of the housing requirement figure utilises the standard method for assessing local housing need set out within the PPG.

The Council's evidence set out within the 2018 Chichester Housing and Economic Needs Assessment (2018 HEDNA) identifies a requirement of 609dpa using the standard method. The additional 41dpa is to assist in meeting the unmet needs from the National Park.

Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of specific, deliverable sites.

Of the sites allocated, the NPPF makes specific mention of small and medium sized sites as can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. This could be said of the proposed development site.

Chichester District Council Housing and Economic Land Availability Assessment 2018

The promoted site was covered by a detailed assessment within the Chichester District Council Housing and Economic Land Availability Assessment 2018. This concluded that the site is potentially suitable for development, subject to detailed consideration relating to noise from Goodwood.

It also correctly states that the site is available for development. As it is a relatively small site it will be possible to deliver the development within the current 5 year term.

The HELAA also found that the site is achievable during the Plan period, we agree with this assessment.

The site was also estimated to be suitable to yield 74 dwellings. As will be demonstrated later in this document, the site is suitable to deliver up to 100 homes and all of these could be built within the current 5 year period.

HELAA ID	Site Address	Settlement	Parish
HWH0009	Land west of The March CE School	Westhampnett	Westhampnett

Site size (hectares)	Existing Use	Proposed Use
3.09	Paddocks	Housing

Site Description
Large site to the south of Madgwick Lane and east of the The March CoE School. Site screened to north by treeline along Madgwick Road, open and exposed to the west. Site portioned into paddocks.

Suitability
The site is potentially suitable subject to detailed consideration relating to noise from Goodwood.

Availability
The site was submitted during the Call for Sites 2017 and is therefore considered available.

Achievability
There is a reasonable prospect that development would be achievable during the Plan period.

Yield	
Proposed (or estimated)	Source
74	CDC-derived

Estimated timescales for delivery		
1 – 5 years	6 – 10 years	11 – 16 years
46	28	0

4 Response to Preferred Approach - consultation December 2018

Separate forms have been submitted for each policy that is being commented on but this Promotional Statement contains all of our comments.

Object to the following policies:

- S3, and S4 in terms of the proposed development strategy, housing numbers and methodology.

Comments on policy:

- S16 for the presumption of general presumption against development proposals for noise-sensitive development within 400m of Goodwood Motor Circuit and Airfield.

Policy S3: Development Strategy

The development strategy set out in Policy S3 aims for most of the development to take place along the east-west corridor. Whilst we do not object in general to the approach, we do object to the form of its delivery and believe it does not reflect the 'Main Issues raised' in the Issues & Options consultation of June 2017. Question 3 requested feedback on the Vision and comments were received by the Council that there is 'Already too much development in East/West corridor; too much congestion; issues with A27; train links are slow'. The responses also state that it should include the need to protect the 'individual identities of villages' and development must be concentrated in areas 'closer to the city which has all the amenities'.

Question 4 discussed the sub-areas, which highlighted the East-West corridor as the best option but also notes that 'City will need to expand to accommodate the required housing and associated growth' and that there is a 'Risk of adjacent villages and towns coalescing into each other'.

Question 6 states that 'Chichester is the most appropriate location for new development; provides access to a full range of employment, education, transport, medical, retail and entertainment; support east/west corridor strategy. Parish boundaries should not limit proposals.'

It is clear from the responses above that development should be concentrated primarily in and around Chichester with a proportional quantum of development in the settlement hubs along the East-West Corridor. This would also be the most sustainable strategy for the future development of the district because Chichester is the sub-regional centre, but at the moment we believe the distribution of development is unbalanced. This will lead to increased road congestion and therefore pollution as people travel from the settlements to Chichester for work, leisure, and entertainment.

It is evident that most strategic allocations surrounding Chichester are existing allocations from the current Local Plan, with only 1050 new dwellings proposed around Chichester. Of the 4,400 new dwellings identified in the new local plan through the proposed strategic locations adjoining Chichester itself only counts for 24% of the total; with 76% in outlying areas. The new allocations in the East-West Corridor total 3300 new homes, of which 2250 (68%) are proposed to be delivered in the Settlement Hubs (Southbourne, Chidham and Hambrook, Bosham and Fishbourne) and only 1050 (32%) in and around Chichester itself. While it is agreed that other settlements should have some development, this appears to be disproportionate when there are other sites adjoining Chichester that are available.

The Local Plan spatial strategy should be changed to ensure any deliverable sites that are located close to Chichester itself are included and only then should other sites in the outlying settlements along the A259 corridor be considered. This will ensure a more sustainable pattern of development that focuses attention on Chichester but also delivers some development in the smaller settlements

that will support services but not overwhelm them. It is important to allow settlements to expand proportionately and for new communities to integrate with the existing population. It is considered that the scale of development along the A259 corridor is excessive, particularly at Southbourne, as it will result in an increase of over 40% of the number of houses (Southbourne Neighbourhood Plan, 2014 records 2,927 dwellings in the Parish). It is also questionable if it is appropriate or possible to deliver such a large number of new dwellings through a Neighbourhood Plan.

Given the existing local plan does not meet the housing requirements required, it is also considered to be a retrograde step for the new local plan to leave so many houses to the Neighbourhood Planning process as this will inevitably take additional time to progress. This site is available and can be delivered within the first 5 years of the new Local Plan but it is unlikely that sites the size of those being proposed along the A259 corridor could be allocated in a NP and then built within the first 5 years. This would exacerbate the under supply of houses needed by the local community.

As demonstrated above, suitable sites surrounding Chichester should be allocated before looking at smaller settlements to meet the housing need. My clients land is such a site and it meets the NPPF requirement of sustainable development to a much greater degree than other allocated sites. For example, the land is less than a 10 minute drive and under half an hour walk to the city centre; which can be achieved on safe footpaths. The site is also located near to the Westhampnett Crossroads bus stop on Stane Street, which has 3 buses an hour that travel directly to Chichester Bus Station in 17 minutes. There are no technical reasons why the site cannot be allocated as it is outside the National Park, not in a Statutory designation, not in flood zone 2 or 3 etc.

Policy S4: Meeting Housing Needs

The Chichester Local Plan Review identifies a total housing requirement of at least 12,350 dwellings over the period 2016 to 2035. This equates to an average supply of 650dpa and relates solely to the area outside of the SDNP.

The proposed housing requirement is based upon a requirement of 609 dwellings, derived using the standard method identified in the PPG (para. 2.35, 2018 HEDNA). A further 41 dwellings are added to accommodate unmet need arising from the Chichester District part of the SDNP (para. 2.22, Local Plan Review).

Whilst it is agreed that the standard method should be used to identify the housing needs of the area, it is considered it has been incorrectly applied. Furthermore, the inclusion of 41 dwellings for the SDNP is not sufficient to meet the unmet needs from this area.

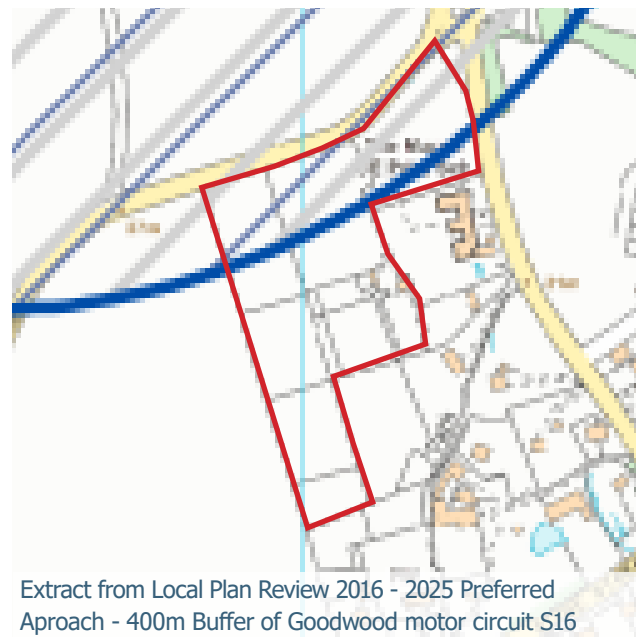
The PPG places a limit on the amount of increase in the minimum annual housing need figure an individual local authority can face. Where there is an up to date local plan, i.e. less than 5-years old, this is set at 40% above the average plan requirement. If there is no up to date local plan it is set at the higher of 40% above step 1 or the most recent plan requirement, whichever is the greater.

In terms of Chichester the extant local plan is less than 5-years old, being adopted in December 2016. This identified an average annual housing requirement of just 435 dwellings. The 2018 HEDNA utilises this requirement to identify a need for 609dpa over the period of the Local Plan Review, which has been capped at 40%.

However, the extant Local Plan did not provide for the full need of 505dpa due to several constraints including infrastructure capacity and the quantification of need within the SDNP (para. 7.9). The Plan states that 'For this reason the Council will review the Local Plan within five years to aim to ensure that OAN is met' (para. 7.9).

However, the PPG is clear that the cap is applied 'to help ensure that the minimum local housing need figure calculated using the standard method is as deliverable as possible. The cap reduces the minimum number generated by the standard method, but does not reduce housing need itself. Therefore strategic policies adopted with a cap applied may require an early review and updating to ensure that any housing need above the capped level is planned for as soon as is reasonably possible'. (PPG ID 2a-007).

Given that the Council is already not meeting its previously identified needs it appears contrary to the ethos of the NPPF and PPG to use the artificially low annual housing requirement of 435 dpa as the base figure and then final capped figure of 609 dpa to limit future need. There is also further unmet need in the neighbouring South Downs National Park. Therefore, it is proposed that the Council review their Housing Need figures.



Extract from Local Plan Review 2016 - 2025 Preferred Approach - 400m Buffer of Goodwood motor circuit S16

Policy S16: Development within vicinity of Goodwood Motor Circuit and Airfield

The HELAA 2018 assessed my clients site, HELAA ID HWH0009, stating it would be 'suitable for development subject to detailed consideration relating to noise from Goodwood'.



Policy S16 should not prohibit development on this proposed residential site because, like the adjacent residential allocation south of Madgwick Lane (Westhampnett/North East Chichester SDL), only a small portion of the site (1.3ha) is within the 400m noise buffer. The remaining 2.45ha of the site is outside of the buffer zone, which means a large part could be allocated and developed with no harm to the new residents.

However, a Planning Noise Review was submitted in support of a planning application on the promoted land (17/02260/FUL), which concluded that 'the site would be considered suitable for residential development' and 'the noise climate is such that the site should be considered suitable in terms of external amenity'.

Therefore, it is possible to provide additional housing within the buffer zone by using mitigation to avoid harm to the new residents. This has been successfully implemented on the adjacent SDL that locates 9 dwellings within the buffer zone.

This site should be allocated in its entirety and allow future technical work to prove that it is safe to deliver housing within the buffer zone.

Legend

-  Goodwood Circuit Buffer (400m)
-  Site Location

5 Proposed Conceptual Layout

The illustrative layout opposite provides an initial concept for the development of this site for 100 dwellings.

The site can accommodate a policy compliant 30% of affordable housing (Policy 34 Affordable Housing) across the site. This translates to 30 affordable dwellings that will be split into the appropriate affordable housing tenures.

The illustrative layout proposes access to be taken from Madgwick Lane that runs along the northern boundary of the site. If allocated, further detailed analysis will be carried out to determine the most appropriate location to access to the development. This can move as appropriate, however this location avoids the removal of any significant trees and uses the bend in the road to provide good visibility. Once in the site, the network would be split into a hierarchy of roads that adhere to Manual for Streets guidance.

Parking would be mostly provided on plot with some areas of allocated parking. If allocated, a more detailed design will be worked up and will accord with Guidance on Car Parking in Residential Developments (2010) and other adopted standards.

The layout would react to the SDL to the west, with gardens backing onto other gardens. This regard for the neighbouring development is a key factor in the shaping of this layout.

Pockets of open space are spread throughout the development, with a large area in the north eastern part of the site. Along the northern edge of the site, development has been set back to provide a soft front edge to the site.

As demonstrated by the noise assessment submitted in support of the application for the adjoining site (18/01024/REM), it is possible to mitigate the potential noise issues arising from the sites proximity to Goodwood Race Circuit. As well as the use of glazing and alternative means of ventilation, it is possible to design the layout in such a way as to minimise the spread of noise. For example, the houses on the northern edge of the site will act as a barrier to noise and will reduce the levels throughout the site. In addition to this, it would be possible to include a bund and/or an acoustic fence along the northern boundary. All these measures mean that the creation of habitable dwellings is possible in the portion of the site within the 400m zone.

This 400m buffer from Goodwood has been shown on the illustrative layout (red dashed line). There are 85 dwellings on the layout that are south, and therefore outside of, the buffer with only 15 dwellings within it.

Clearly the site is able to deliver at least 85 dwellings without the need to deal with the advisory 400m zone through technical analysis. However, as demonstrated by the adjacent site that has recently been granted reserve matters permission and dealt with the issue of noise, dwellings are achievable within the 400m zone. Therefore the site can deliver 100 dwellings.



6 Summary and Conclusion

The site occupies a very sustainable location, within walking distance to the a large commercial area with lots of shops and facilities. The site is also on the edge of Chichester which is the most sustainable settlement in the district. Sustainable sites located around Chichester should be allocated in the first instance, before other settlements are looked at. It is evident that the location is suitable for development as it adjoins one of CDC's existing Strategic Development Locations and is surrounded by other development; effectively constituting infill development.

This position is reinforced by Chichester District Council's own assessment of the site in the recently released Housing and Economic Land Availability Assessment which identified the site (HWH0009) as having potential for residential development. The assessment states that this site is **suitable, available and achievable**. This land can be combined with the rejected HWH0010 land, which can mostly provide open space rather than housing, meaning the two sites can deliver 100 dwellings.

The NPPF makes specific mention of small and medium sized sites as can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. This means that this land can make a valuable contribution to the current 5 year housing land supply.

Considering the above, it is clear that this well enclosed site makes a good prospect for residential development. Therefore, this site should be allocated for residential development in the current Local Plan Review.





**If you would like any more information
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