



RODWAY PLANNING
CONSULTANCY LIMITED

Planning Policy
Chichester District Council
East Pallant House
Chichester
WEST SUSSEX
PO19 1TY

7th February 2019

Dear Sir / Madam,

Chichester Local Plan Review 2035
Preferred Approach Consultation: December 2018
Land at Fourways, Clay Lane, Fishbourne

In March 2016 our clients, who own the above detailed site, made submissions to the District Council in respect of the ‘call for sites’ process. This has resulted in the site being assessed by the Council in the Housing & Economic Land Availability Assessment (HELAA), 2018.

At Appendix 4 to the HELAA document is the detailed assessment of the considered sites. In respect of our client’s site, the following extract of the HELAA refers:

HELAA ID	Site Address	Settlement	Parish
HFB0023	Land at Four Ways, Clay Lane	Fishbourne	Fishbourne

Site size (hectares)	Existing Use	Proposed Use
0.37	Dwelling and curtilage	Housing

Site Description
The site comprises a dwelling and its domestic curtilage. The site lies to the north of Fishbourne. There is a thick tree screen to the A27 to the north, and residential properties to the west.

Suitability
The site is suitable as it is adjacent to the settlement.

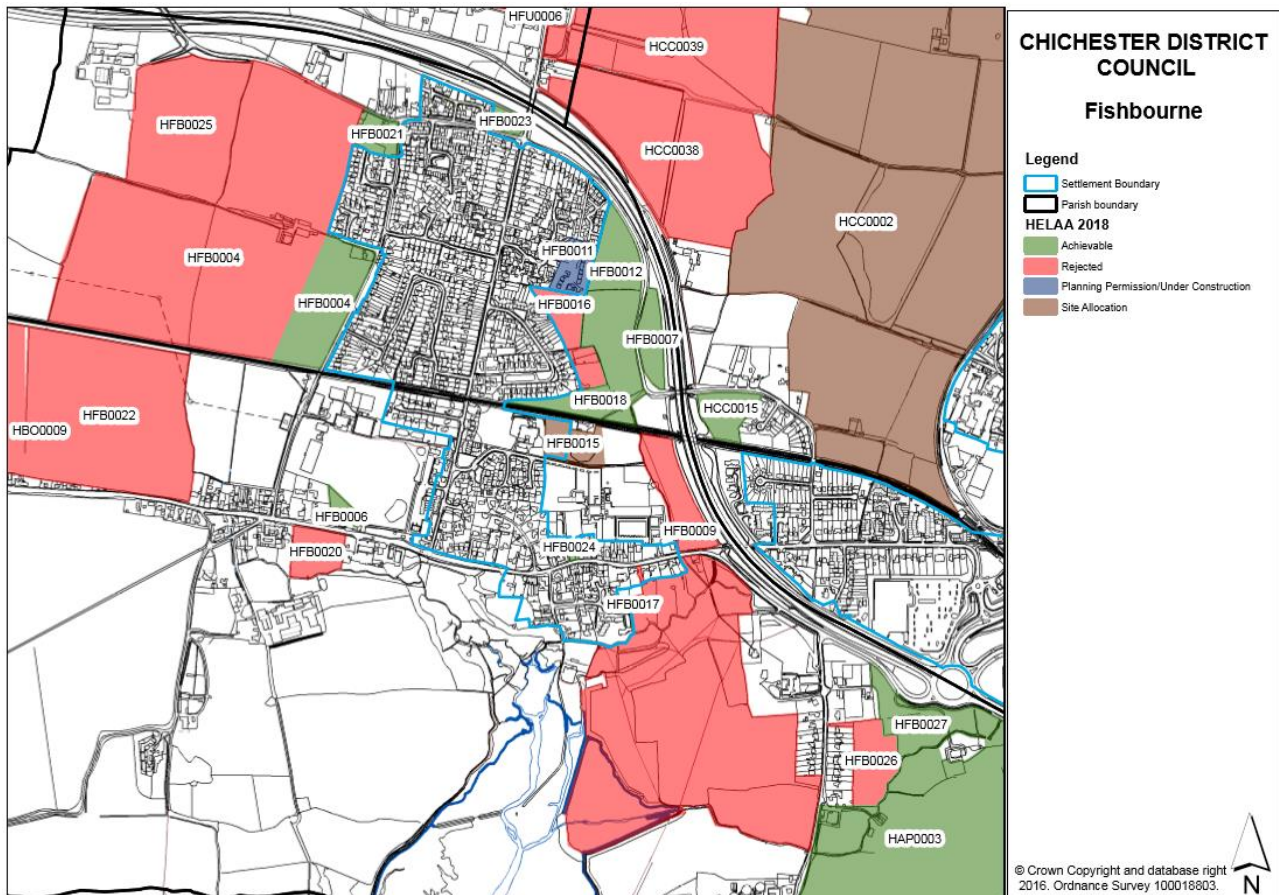
Availability
The site was submitted during the Call for Sites 2016 and is therefore considered available.

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

Yield	
Proposed (or estimated)	Source
14	Promoter

Estimated timescales for delivery		
1 – 5 years	6 – 10 years	11 – 16 years
14	0	0

The HELAA Parish Map for Fishbourne identifies the site as one of a small number of ‘green’ sites, i.e. those that are considered suitable, available and achievable for residential development in the Plan period.



It is understood that the HELAA forms a key component of the evidence base that will inform the Chichester Local Plan Review, and its purpose is to identify a future supply of land which is **suitable, available and achievable** for housing and economic development over the plan period. Although it is also acknowledged that the HELAA is a technical study, and does not represent policy, it does provide a clear indication of those sites that the Council consider suitable to meeting the future needs of the District.

On behalf of our clients, Mr Butterfield & Miss Waldron, we are instructed to continue to promote their land as being suitable and achievable for residential development. We can confirm it is available immediately, with a very high likelihood that housing could be



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delivered on the site within the 1-5 year period. We therefore seek for the District Council to amend the Local Plan 'Preferred Approach' document, with the intention of allocating the site for residential development. The site is free from planning constraints or designations, and is therefore eminently suitable for development.

We have now had the opportunity to review the current consultation version of the Local Plan 2035. We can comment on this as follows:

Draft Policy S4 entitled 'Meeting Housing Needs' determines that the District's housing requirement for the full plan period (1 April 2016 – 31 March 2035) is a minimum of 12,350 dwellings. We do not wish to contest this now, but we do expect this figure to be scrutinised given the need to boost the supply of housing generally.

Further, it is also evident that there are significant affordability issues in the District, and this is a situation that is worsening. National Planning Policy Guidance advises that the more significant the affordability constraint, the larger the improvement to affordability is required. Given the above, we consider that a 25% uplift to the demographic OAN is justified in this case.

The Local Plan Review also provides a mechanism for not only increasing housing supply generally, but also focussing on the need to address the significant affordable housing shortfall within the District. **Draft Policy S6** sets out the Council's strategy for providing affordable housing. However, it must also be acknowledged that a greater number of total homes being provided during the Plan period would also give rise to a greater number of affordable housing units being provided (subject to compliance with Policy S6 criteria).

It is noted that **draft Policy S2**, sets out that land for development will be identified and allocated through the Local Plan Review or a neighbourhood plan. The policy includes a settlement hierarchy, and determines that Fishbourne is a 'service village', which the supporting text confirms that these settlements provide *"an opportunity to provide*



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development based on the strategy of dispersing development across the plan area in conjunction with land being available in suitable locations... at some service villages where no strategic housing site is proposed, a housing figure has been identified for a number of parishes. These numbers will be required to be delivered by way of either a neighbourhood plan for the parish, or through a subsequent DPD."

Draft Policy AL9 relates to the provision of housing in Fishbourne. It states that *"Land will be allocated for development in the revised Fishbourne Neighbourhood Plan for a minimum of 250 dwellings"*. A number of criteria and requirements are then listed, which new developments will have to accord with.

Although we appreciate the District Council's position in respect of Fishbourne parish (given the anticipation of the Neighbourhood Plan Review being progressed and ultimately 'made'), the purpose of our submissions are to confirm to the Council three key matters:

1. The availability of our clients site at Fourways, Clay Lane; which has been positively assessed within the Council's own HELAA, and which we consider represents a suitable and deliverable development opportunity. The site is sustainably located, is suitably well related to the existing built form, and would not result in isolated new homes. The site is free from technical, landscape or any other constraint that would limit development being delivered in a timely manner;
2. The Council identifies the need for at least 250 homes to be delivered in Fishbourne, therefore supporting the principle of additional housing in the village; and,
3. It is understood that the revised Neighbourhood Plan (NP):
 - could come forward with no site allocations; or
 - could not be subject to a review (if the community decide against it, either at the outset or via a referendum); or
 - if the NP is reviewed, then this maybe delayed, therefore delaying the provision of housing in the Parish.

Ultimately leaving the provision of a minimum of 250 dwellings to a Neighbourhood Plan Review is risky, as the District Council are not in control of this process.

Indeed, progress with the preparation of Neighbourhood Plans can be very slow, expensive, and beset with technical issues that Parish Council's and communities' do not have the resources or knowledge to deal with competently. Therefore, there are no guarantees that a sound plan will be produced, or indeed be capable of being 'made'. In any case the next steps in the preparation of the NP review are not guaranteed, and the timescales for the revised NP coming forward are not fixed.

If the District Council also do not allocate within the Parish of Fishbourne then the situation would likely arise that there would be no allocations within this area. Given that the Local Plan housing strategy sets out that a certain quantum of residential development is to be provided within this Parish, we would then question how the District Council envisage this housing being delivered if there is no clear policy mechanism in a made/adopted Plan for doing so? This would undermine the development strategy as a whole, and weaken the District's housing supply.

In our opinion, the Local Plan should be modified now, so as to allocate our client's land opportunity at Fourways for residential development, which would make a notable contribution to the minimum amount of housing that Fishbourne is required to accommodate during the plan period.

Parallel with an allocation, the settlement boundary should also be amended so as to encompass the entirety of our client's land.

We would be grateful if we could be kept informed of the progress made with the Local plan Review, and we would be pleased to have the opportunity to make further representations to the Council and/or Planning Inspector responsible for examining the submitted version of the Local Plan, when appropriate to do so.



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In addition, if any further information is required, then please do not hesitate to contact the undersigned.

Yours sincerely,

Tim Rodway
Director

*c.c. Mr Butterfield & Miss Waldron,
Fourways, Clay Lane, Fishbourne*

