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# Chichester Local Plan: Representations

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On Behalf of The Trustees of D R Picks  
Grandchildren's Settlement

February 2019

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**Appendix C** – Urban Design Analysis

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## 1.0 Introduction

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- 1.1 These representations have been prepared on behalf of The Trustees of D R Pick Grandchildren's Settlement ("the Landowner") in response to Chichester District Council's (CDC) Regulation 18 Draft Local Plan consultation. The representations relate to land adjacent to the main road in Birdham, Chichester, PO20 7HU. A site plan showing the extent of the land is included at **Appendix A**.
- 1.2 The site is part of Whitestone Farm, an approximately 63 Ha agricultural unit, south and east of Birdham. A plan showing the coverage of Whitestone Farm is included in **Appendix B**. Whitestone Farm is predominantly arable fields, but also comprises a series of former farm buildings and pony paddocks. There are three cottages, Whitestone Farm Cottages, towards the north of the site that are no longer in the possession of the Landowner.

### Technical Work

- 1.3 The submission is supported by a number of technical reports produced by specialist consultants. This technical work demonstrates the site is suitable, available and deliverable in line with Planning Practice Guidance on Housing and Economic Land Availability Assessments<sup>1</sup>.
- 1.4 The technical reports have been used to identify the opportunities and constraints for the development. This has informed the Urban Design Analysis (**Appendix C**).

### Further Consultation

- 1.5 Savills contacted Birdham Parish Council (BPC) prior to the submission of this report. BPC is not in a position to discuss sites in the Parish until the Local Plan has been advanced. The Landowner will seek to work closely with BPC to develop the proposals for the site.

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<sup>1</sup> <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment#factors-sitesbroad-locations-developed>

## 2.0 The Existing Site and the Proposed Development

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### Overview of the Existing Site

- 2.1 The site lies to the south of the Main Road (A286) in Birdham, West Sussex, and comprises 13.3Ha of arable, greenfield land, which is used within the wider farming operations of Whitestone Farm. It is currently accessed through a private road off of the A286, and has road frontage along the length of the main road. The site is private land and provides little public benefit to the local community
- 2.2 A line of overhead power cables traverses the site in an east to west direction, between Bell Lane and Sidlesham Lane. There is also a footpath that runs from Farne Lane through the development site towards Batchmere and Sidlesham. This will be maintained as part of the development proposal.
- 2.3 Within Birdham there are a number of services and facilities, including: a Local store; a Petrol Station; Birdham Primary School; Birdham Village Hall; St James' Church; and, other commercial enterprises.
- 2.4 South of the A286, there are numerous dwellings. To the west of the site, three cottages are located in the middle of the site, and large commercial operations and dwellings located to the east of the site. These set a precedent of buildings either side of the Land at Whitestone Farm which means the site is an infill opportunity.
- 2.5 The A286 connects Birdham to Chichester. To the south west of the site, the A286 feeds in to: the B2179, towards the Witterings; and, Bell Lane, towards the village of Somerley. There are cycle paths and regular bus services close to the site, enabling sustainable transport from Birdham to Chichester, the Witterings, Bracklesham and Selsey.
- 2.6 Further detail on the site and the surrounding area is contained in the Urban Design Analysis (Appendix C) and the Landscape and Visual Impact Assessment (Appendix D).

### Planning Policy Designations

- 2.7 The site abuts the settlement boundary of Birdham, with the A286 acting as barrier between the countryside and the settlement boundary. The A286 also acts as the boundary to Chichester Harbour Area of Outstanding Natural Beauty (AONB).

### Ownership

- 2.8 The site is wholly owned by the Landowner (**Appendix B**).

### The Proposed Development

- 1.6 An urban design analysis for the site is included at **Appendix C**. In summary, the proposed development is likely to include the following:
  - Up to 125 homes including affordable housing;
  - New and upgraded pedestrian and cycle routes with the potential to improve connections to

## Land at Whitestone Farm

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Sidlesham and the surrounding villages;

- Open amenity space, allotments and ecological enhancements.

1.7 The proposed development is still at an early stage, and will evolve to reflect local needs in the Parish following discussions with BPC.

## 3.0 Policy and Evidence Base

### Planning Policy Context

#### National Planning Policy Framework (2018)

- 3.1 Following the release of the revised National Planning Policy Framework (NPPF) in July 2018, Local Planning Authorities were instructed to revise or refresh their Local Plans to ensure consistency with the new NPPF. Annex 1 of the NPPF states that for the purpose of examination, new Local Plans submitted to the Secretary of State after the 29<sup>th</sup> January 2019 are subject to the policies in the NPPF 2018, requiring them to adopt the new Standardised Methodology for Calculating Housing Need. Typically, in the South of England, the new calculations have seen an increase in Housing Need.
- 3.2 The Chichester Local Plan Review is expected to be submitted to the Secretary of State in April 2019, therefore it will need to be consistent with policies within the NPPF 2018 and make provision for 609 dwellings per annum<sup>2</sup> (dpa), including an allowance to accommodate any shortfalls in housing provision from neighbouring authorities under the duty to cooperate.
- 3.3 The NPPF at paragraph 78 is relevant where it states that:

*‘To promote sustainable development in rural areas, **housing should be located where it will enhance or maintain the vitality of rural communities.** Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.’*

#### Adopted Chichester Local Plan: Key Policies 2014 – 2029 (2015)

- 3.4 The Chichester Local Plan Review seeks to refresh the Chichester Local Plan: Key Policies 2014-2029, which was adopted in 2015.
- 3.5 Policy 2 of the adopted Local Plan sets out the development strategy and settlement hierarchy for the District, stating that outside of Chichester City and the Settlement Hubs, Service Villages (including Birdham) will be the focus for new development and facilities. Policy 2 also outlines the Districts Policy on Settlement Boundaries, noting that there is a presumption in favour of sustainable developments within Settlement Boundaries, reflecting the general approach:
1. *‘Respecting the setting, form and character of the settlement;*
  2. *Avoiding actual or perceived coalescence of settlements; and,*
  3. *Ensuring good accessibilities to local services and facilities.’*
- 3.6 Policy 5 of the adopted Local Plan sets out the indicative housing numbers 2012-2029 for each Parish in the District, in which Birdham is given a housing target of 50 dpa. It should be noted that these figures derived from the Objectively Assessed Need in the District during that period at 505 dpa. This has been superseded by the Government’s Standardised Methodology which has revised the target to 609 dpa.

<sup>2</sup> Planning for the right homes in the right places – Housing Need Consultation Table

<https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

### Chichester Local Plan Review 2016 - 2035 (Preferred Approach – December 2018)

- 3.7 The site is located outside of a settlement boundary, within the open countryside. Due to its coastal location, the site is subject to Chichester Harbour and Pagham Harbour Bird Protection development policies. The boundary of the Chichester Harbour AONB runs along the boundary of the site (along the A286), which means the site is located wholly outside of the AONB.
- 3.8 The emerging Local Plan seeks to deliver 12,350 dwellings over the plan period, reflecting their objectively assessed housing need, plus an allowance for accommodating unmet need from the Chichester District part of the South Downs National Park. Their housing strategy has set out a broad spatial distribution of housing, with a housing provision of 1,933 dwellings in the Manhood Peninsula over the plan period.
- 3.9 To meet the District's housing need, the Council needs to accommodate a minimum of 12,350 net additional dwellings in the Plan period. The current housing strategy makes provisions for a total supply of 12,478 new dwellings. However, 1,195 dwellings are projected from Windfall sites and Parish Housing Requirements, including a minimum of 125 dwellings within Birdham.
- 3.10 It is caveated within Policy S5 of the draft Local Plan that:
- 'If draft neighbourhood plans making provision for at least the minimum housing numbers of the relevant area have not been submitted for examination within 6 months of the adoption of this Local Plan, the Council will allocate sites for development within a Development Plan Document in order to meet the requirements of this Local Plan.'*
- 3.11 Whilst this demonstrates the Council's intent to allocate housing if neighbourhood plans fail to deliver sites, the policy places significant pressure on local parishes to re-examine their neighbourhood plan. The lead in time to preparing a Development Plan Document will be substantial and the Council should consider a more pro-active approach to deliver smaller allocations within its parishes.
- 3.12 The new development strategy outlined in Policy S3 states that to achieve sustainable growth, the Council will:
- 'Ensure that new residential development is distributed in line with the settlement hierarchy, with a greater proportion of development in the large more sustainable settlements.'*
- Policy S3 goes on to state the Strategic Development Locations for the following service villages:
1. Bosham [Policy AL7]
  2. Fishbourne [Policy AL9]
  3. Hambrook/Nutbourne [Policy AL10]
  4. Hunston [Policy AL11]
- 3.13 It is acknowledged that these Service Villages have been identified for new strategic development: *'according to the strategy of dispersing development across the plan area' and 'site availability'*. There is no further justification for how the housing figures have been distributed across the Service Villages.
- 3.14 Policy AL11 is pertinent where it makes provision for 200 dwellings to come forward through Hunston's neighbourhood planning process. The Settlement Hierarchy Report identifies that Hunston is smaller than Birdham, with less facilities, similarly lacking in rail infrastructure and is equidistant to Chichester City. As such, Hunston is neither larger or more sustainable than Birdham. The allocation of 200 dwellings in Hunston appears inconsistent with Policy S3 and should be addressed within the Local Plan.

### Birdham Parish Neighbourhood Plan (March 2016)

- 3.15 Emerging Policy S5 of the draft Local Plan will require Birdham Parish to revise their Neighbourhood Plan to make provision for 125 units over the Plan period 2015-2035.
- 3.16 Birdham's Neighbourhood Plan was formally adopted in 2015 and made site allocations for 79 units over the plan period 2014-2029. This was supplemented by Policy 14 of the neighbourhood plan which provides support for 'windfall' development for development schemes of up to five units.
- 3.17 Notably, one of the sites allocated in Birdham's Neighbourhood Plan was identified as experiencing delays until 2023 in a recent Planning Appeal (ref: APP/L3815/W/17/3182355). The Land at Crooked Lane secured planning permission in 2016 (ref: 16/01809/FUL). However, disputes over access and lawful development have resulted in considerable delays to the construction process.

### **Local Evidence Base**

#### Housing and Economic Development Needs Survey (HEDNA) (January 2018)

- 3.18 This report considered the indicative assessment of housing need based on the standard methodology proposed by the Government in September 2017, which calculated Chichester District's housing need at 609 dwellings per annum.
- 3.19 The HEDNA identified affordability pressures throughout the District, with a workplace affordability ratio of 12.22. This has fed back into net need for a net addition of 285 affordable homes per annum across the plan period and an evidenced need for increased diversity of tenures offered throughout new developments in the District.

#### Landscape Capacity Study (November 2018)

- 3.20 The Landscape Capacity Study (LCS) examined the plan area outside of the South Downs National Park and established settlement boundaries to identify the sensitivity of each sub-section to change. The aim of this study is to maintain the key landscape characteristics in the district and safeguard long distance views within the district. The LCS highlights a substantial number of landscape constraints within this region, with only 9 sub-parcels in the district noted as having a high, or medium-high capacity for change. Whitestone Farm is assessed within the sub-parcel n. 98, within which, the land is identified as having a medium capacity for change.

#### CDC Settlement Hierarchy (December 2018)

- 3.21 The settlement hierarchy identifies priority areas for growth, highlighting the sustainability of each settlement and distinguishing which areas have the best range of facilities and accessibilities to facilitate growth. This report identifies a total of ten services and facilities within Birdham, subsequently classifying the area as a Service Village: *'a settlement which offers the opportunity to allow development to meet local needs and support existing services'*.



### Housing and Economic Land Availability Assessment (HELAA) (August 2018)

3.22 The site was submitted to the Housing and Economic Land Availability Assessment in 2016 (ref: HBI00022). The site was assessed as being achievable and available. However, the site was identified as '*potentially suitable, subject to detailed considerations*'. To demonstrate the suitability of the site, this representation is supported by:

1. Preliminary Ecology Appraisal;
2. Flood Risk and Surface Water Runoff Assessment;
3. Landscape and Visual Impact Assessment; and,
4. Transport Appraisal.

## 4.0 Justification for Site Allocation

4.1 This section provides the justification for the proposed site allocation.

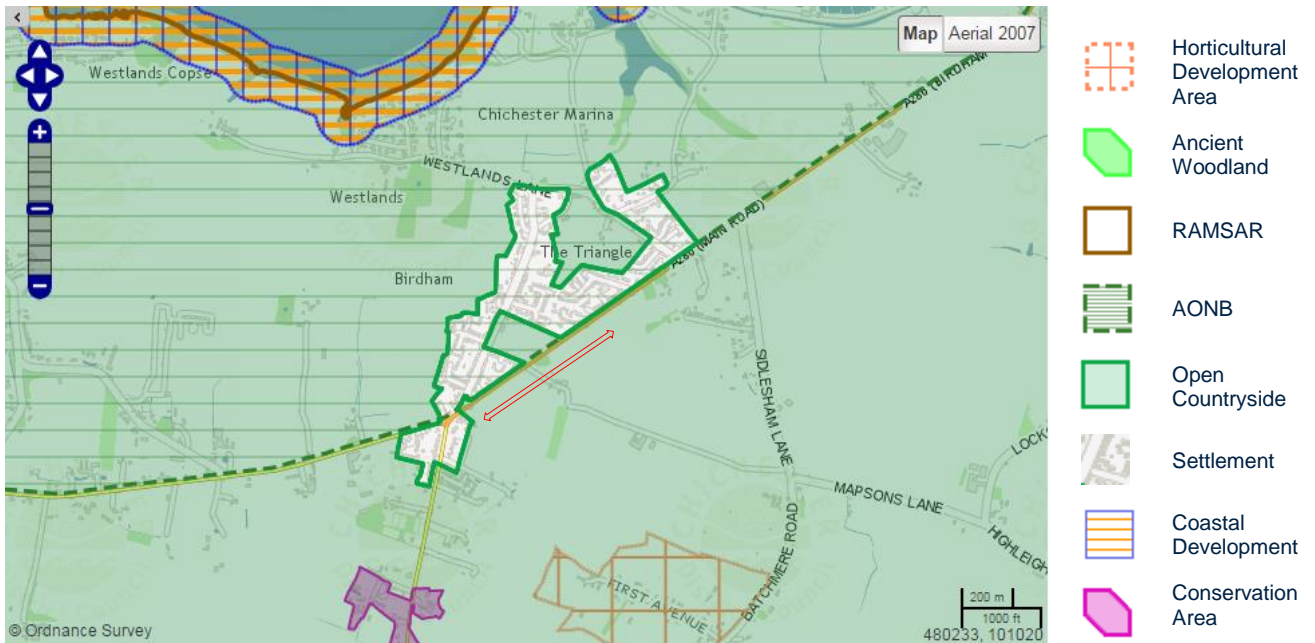


Figure 1: Planning Constraints surrounding the Village of Birdham [red arrow denotes the site]

### Land Supply in Birdham

- 4.2 Figure 1 demonstrates the extensive planning constraints surrounding Birdham and that there is a limited capacity for infill development within the settlement boundary to meet housing need. Therefore, the Parish will be obliged to look outside of the current settlement boundary to allocate enough housing to contribute to CDC’s housing targets.
- 4.3 The Land at Whitestone Farm provides one of the only opportunities for residential development next to the settlement boundary without encroaching on the Chichester Harbour AONB. In accordance with Paragraph 172 of the NPPF, the protection of landscape and scenic beauty in the AONB should be given the highest status of protection. Development on land within AONBs should be resisted unless there is a case for exceptional circumstances. As there are viable sites in Birdham, outside of this designated area, development north of the A286 should be resisted.
- 4.4 Development north of the A286 would also be closer to a Special Area of Conservation (Solent Man Time) and two Sites of Special Scientific Interest (Chichester and Langstone Harbours and Chichester Harbour).
- 4.5 Birdham Parish Neighbourhood Plan acknowledges this and Policy 12 sets a precedent of development outside of the AONB, with allocations for 55 dwellings along Bell Lane (Rowans Nursery and Tawny Nursery).
- 4.6 An Appeal (ref: APP/L3815/W/17/3182355) was refused in November 2018 for “the erection of 77 houses, B1 floorspace, retail and open space, with the retention of one dwelling” at Land at Koolbergen, Kelly’s and Bellfield Nurseries, Bell Lane. One of the reasons cited for refusal was that the location of the development,

beyond the end of the settlement boundary, would 'extend the village even further into the countryside, and into the narrow gap between Birdham and Somerley'.

- 4.7 The Appeal demonstrates that development along Bell Lane has reached capacity. Further site allocations along Bell Lane could negatively affect the setting of a conservation area and result in the coalescence of Birdham and Somerley. This would result in conflict with emerging Policy DM19, which protects against the coalescence of villages in Chichester Harbour AONB and its setting. Development along Bell Lane would also conflict with emerging Policy DM27, which seeks to maintain the individual identity and setting of settlements, particularly within conservation areas and the AONB.
- 4.8 There are no viable alternative locations to meet housing supply in Birdham without encroaching onto the AONB, protected sites, or coalescence with other settlements. This demonstrates that the Land at Whitestone Farm is relatively unconstrained within this area.
- 4.9 It should be noted that the HELAA (Figure 2), only assessed two sites in Birdham as being achievable, the Land at Whitestone Farm (ref: HBI0022) and the Land at Common Piece (ref: HBI0009) The Land at Common Piece is only 0.41 Ha, with a potential yield of 12 dwellings. Whilst development on this site could contribute to housing supply in Birdham, the Land at Whitestone Farm is the most appropriate location to provide housing at a sufficient scale to satisfy CDC's Parish housing requirements.

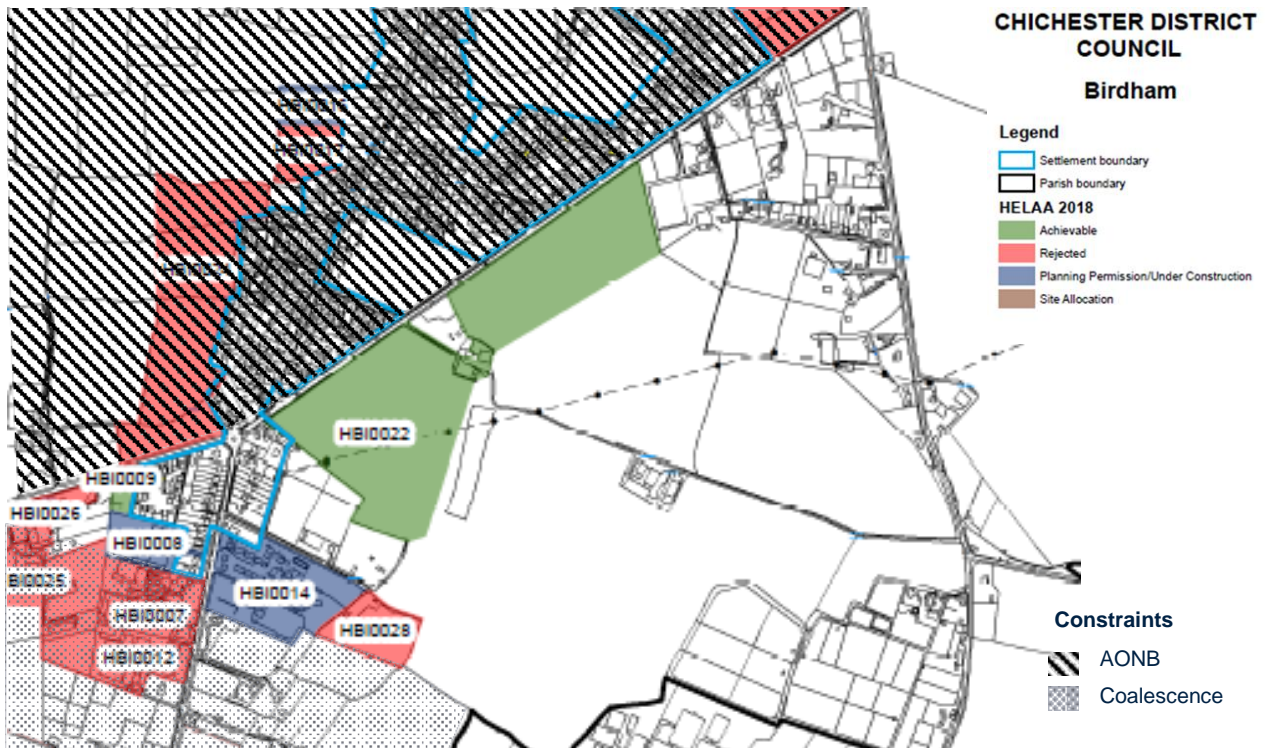


Figure 2: A plan of sites submitted to the HELAA, the Land at Whitestone Farm (ref: HBI0022) was assessed as being achievable.

### Effects on Birdham's Character and Appearance

- 4.10 The Rowans Nursery (ref: 17/00316/FUL) and Tawny Nursery (ref: 12/04147/OUT) developments along Bell Lane have introduced a ribbon village pattern along the main roads in Birdham. This has complemented the new centre developing towards the south of Birdham, along the junction of the A286, B2189 and the B2179, which was noted in the CDC Settlement Capacity Study (2013). Expanding the settlement boundary south of the A286, to include the Land at Whitestone Farm, will help to restrict sprawl and promote residential development that is concentrated towards the Village core.
- 4.11 The site is currently surrounded on three sides by development, with residential and commercial buildings located to the northern, eastern and western aspects of the site. Whitestone Farm provides the opportunity for infill development, consolidating the built up area towards the centre of Birdham.
- 4.12 A carefully considered residential scheme on this site, which is designed to complement the vernacular of Birdham, would ensure that future development does not detract or undermine the character and appearance of Birdham. It will also provide the opportunity to support the developing centre towards the junction of A286, B2189 and B2179, reinforcing the new focal point within the Village.
- 4.13 The Landscape and Visual Impact Assessment (**Appendix D**) demonstrates that modest residential development can be accommodated on the site to create an attractive village focal point. This site provides the opportunity for a co-ordinated and sensitively designed residential scheme in Birdham. This will provide the housing needed to retain local services and community facilities, whilst resisting uncoordinated, piecemeal development to meet Birdham Parish's housing targets.

### Sustainable Location

- 4.14 The Settlement Hierarchy report references the Planning Practice Guidance for Rural Housing<sup>3</sup>, which highlights the need for rural housing to ensure the viable use of local facilities, including: schools; local shops; cultural venues; public houses; and, places of worship. This report identifies 10 facilities within Birdham, including:
- St James' Church;
  - Birdham Village Hall;
  - Birdham CofE Primary School;
  - A Local Shop;
  - Three Bus Stops; and,
  - Three Outdoor Community Facilities.
- 4.15 This analysis fails to account for the Petrol Station, which provides basic supplies. Notably, all of these amenities are within a short walk from site.
- 4.16 The bus stop opposite the site provides access to several regular bus services, including:
1. 52 – Chichester – Birdham – Bracklesham and the Witterings;
  2. 53 – Chichester – Birdham – Bracklesham and the Witterings;
  3. 614 – The Witterings – Birdham – Selsey;

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<sup>3</sup> Planning Policy Guidance – Rural Housing <https://www.gov.uk/guidance/rural-housing>

4. 652 - Chichester – Birdham – Bracklesham and the Witterings; and,

5. 653 - Bracklesham and the Witterings– Birdham – Chichester.

- 4.17 Whilst bus times vary throughout the day, a typical bus journey from the site to Chichester takes approximately 22 minutes and a bus journey from the site to West Wittering or East Wittering takes roughly 8 minutes to 15 minutes respectively.
- 4.18 From the site, it takes 21 minutes to cycle into Chichester, 14 minutes to West Wittering and 11 minutes to Bracklesham<sup>4</sup>.
- 4.19 The varied transport options demonstrates the sustainability of the site, and the capacity for the site to reduce the amount of journeys made by car. The site's proximity to local facilities encourages alternative modes of transport, demonstrating the unique positioning of the site and its ability to deliver housing close to the existing facilities and services within the Village.
- 4.20 Paragraph 84d of the NPPF recognises the need for planning policies to support *'the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.'*
- 4.21 This is reinforced by Paragraph 78 of the NPPF which clearly demonstrates the capacity for housing to enhance or maintain the vitality of rural communities.
- 4.22 Development on the Land at Whitestone Farm will contribute to an increased patronage of facilities and promote the sustainability of the services within the Village. For example, many rural bus services are in decline because they suffer from low patronage<sup>5</sup>. Therefore, a modest increase in population can help to sustain such vital services.

### Technical Work and Constraints

- 4.23 The following technical information has been undertaken to support this representation:
- Preliminary Ecology Appraisal;
  - Flood Risk and Surface Water Runoff Assessment;
  - Landscape and Visual Impact Assessment; and,
  - Transport Appraisal.

### Ecology

- 4.24 An ecology report has been prepared by Arbeco (**Appendix F**) which identifies that there are some ecological constraints affecting the site. However, it goes on to explain that these can be addressed through further survey work and the implementation of appropriate mitigation and enhancement measures.
- 4.25 In summary, the ecology report reaches the conclusion that adequate mitigation and enhancement measures can be provided to address the ecological constraints.

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<sup>4</sup> <https://cyclejourneyplanner.westsussex.gov.uk>

<sup>5</sup> <https://bettertransport.org.uk/sites/default/files/research-files/The-Future-of-Rural-Bus-Services.pdf>

## Flood Risk and Surface Runoff Assessment (FRSRA)

- 4.26 An FRSRA has been prepared by Herrington Consultants (**Appendix G**). This notes that the site is located within flood risk zone 1 and falls outside of any flood risk area. However there is a risk that an extreme pluvial event could result in localised surface water flooding or the existing pumping station could fail. The FRSRA recommends the implementation of SuDS and the replacement of the existing culvert with an open watercourse, where possible, to mitigate against the risk of flooding. Development will also be located to the higher parts of the site where there is no risk of flooding.

## Landscape

- 4.27 A Landscape and Visual Appraisal (LVA) has been undertaken by Huskisson Brown Associates (**Appendix D**). The report highlights the scope for a modest residential development to be sensitively accommodated on the site, respecting the relationship with the AONB and the character and visual amenity of the locality. The report explains that whilst the development will result in the direct loss of the landscape resource, the site lies outside of the AONB and is largely free of landscape constraints.
- 4.28 Notably, the sites immediate surroundings pose significant landscape and visual detractors in the area, particularly, the petrol station and roadside car park area neighbouring the local shop. Therefore, future development is unlikely to result in substantial additional harm to the setting of the AONB. Development can mitigate against this through the incorporation of an '*in character*' landscape framework that seeks to create a positive urban-rural interface and retain the wider open setting of farmland at the edge of Birdham.
- 4.29 There is the opportunity to provide mitigation and enhancement measures to soften the site and its surrounds. Additional boundary planting to reinforce the existing hedgerow framework and the introduction of greenspace within the development proposal will create an attractive village fringe and create strong eastern boundary to distinguish between the urban and rural landscape.

## Transport

- 4.30 A Transport Appraisal (TA) has been prepared by PellFrischmann (**Appendix E**) which demonstrates that suitable and safe access north-west of the site can be achieved on to the site to accommodate the proposed development of 125 dwellings. PellFrischmann have also developed the access proposals to futureproof the land for up to 300 units.
- 4.31 Additional access has also been modelled towards the north-east of the site and emergency access towards the south of the site towards Siddlesham Lane.
- 4.32 The TA highlights the sustainability of the site, recognising its '*very good access to bus stops, which provide connections to Chichester railway station and other key facilities in the local area.*'

## **Heritage**

- 4.33 The closest designated heritage assets to the site are 'Cherry Tree Cottage' (Grade II listed) and Birdham Public House (Grade II listed). Any development will be designed sympathetically to ensure that there is no significant impact on these heritage assets

### 5.0 Deliverability and Viability

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#### **Deliverability**

- 5.1 The land is wholly owned by the Landowner, and is free from any legal constraints. The site is therefore available for development. The site does not require any significant infrastructure improvements to bring it forward and can be delivered in a short period of time.

#### **Viability**

- 5.2 Whilst the land is in the early stages of planning promotion, we have assessed the viability of the proposed scheme and are comfortable that on the basis of the assumptions within these representations, it represents a viable scheme. Birdham is within a strong market area both in terms of house price values and house builder appetite and we do not consider there to be any financial impediment to delivering the scheme.

### 6.0 Conclusion

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- 6.1 This report sets out that the Landowner's site is suitable, available and deliverable in line with Planning Practice Guidance. This is confirmed by the accompanying technical reports.
- 6.2 The Land at Whitestone Farm provides the opportunity to contribute to the Council's housing supply on a site that is relatively free of constraints. This is a rare characteristic within a highly constrained District and demonstrates the site's capacity to support housing delivery in the District without undermining the natural and built environment.
- 6.3 The Landowner would like to thank CDC for the opportunity to comment on and influence this important process and would like to meet with officers in due course to discuss the contents of this report.