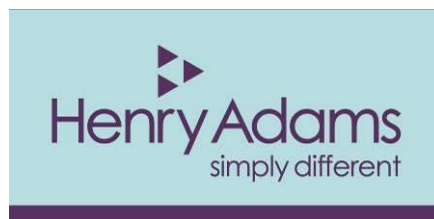


Representations on behalf of:

TAYLOR WIMPEY STRATEGIC LAND

Chichester Local Plan Review 2035 - Preferred Approach Consultation

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Appendices

Appendix HA-1 – Site Location Plan

1. Introduction

- 1.1. Henry Adams LLP have been instructed by Taylor Wimpey Strategic Land to prepare representations in response to the Regulation 18 'Preferred Approach Consultation on the Chichester Local Plan Review 2034'. Taylor Wimpey have control of land at Chantry Hall Farm, located to the east of Foxbury Lane, Westbourne. This is a proposed housing allocation in the Westbourne Neighbourhood Plan. A site location plan is shown at **HA-Appendix 1**.
- 1.2. As set out by our clients in response to the Issues and Options Consultation, they support the preparation of the Local Plan, but they maintain that the Local Plan should seek to allocate as much of its housing need as possible, including non-strategic sites to provide a clear spatial strategy for future development and developer certainty, as well as ensuring a rolling five-year housing land supply. The NPPF at paragraph 68 makes clear that small and medium sized sites can make an important contribution to meeting the housing requirements of an area and are often built-out relatively quickly. Local planning authorities should therefore identify through the development plan, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, use tools to help bring such sites forward and support the development of windfall sites.
- 1.3. Our clients have worked alongside the preparation of the Westbourne Neighbourhood Plan, which awaits the publication of the Inspector's Report, following Examination hearings in October 2017. Our client supports the allocation of the site for housing but reaffirms that the site can accommodate a larger number of dwellings than the 'at least 6 dwellings' figure proposed for the site. At the time of writing, there does not appear to any certainty regarding the timing of delivery for the Neighbourhood Plan.

2. Consultation Response

- 2.1. These representations are made in response to the Preferred Approach Consultation. The comments below relate specifically to Policies relevant to housing provision within the identified Service Villages in the district and the need for these to provide an appropriate quantum of housing to achieve the overall strategy within the Plan.
- 2.2. A response to each of the Strategic policies relevant to Westbourne and our client's land is set out below.

Policy S2: Settlement Hierarchy

- 2.3. Policy S2, The Settlement Hierarchy, sets out a framework for the Council to achieve its vision for the plan area, meet the scale of development required and enhance the quality of the built, natural, historic, social and cultural environments, while sustaining the vitality of communities.
- 2.4. The development requirements for the sub regional centre, settlement hubs and service villages will be delivered through site allocations and through windfall development in accordance with other policies in this Local Plan Review.
- 2.5. Westbourne comprises a Service Village, within which the land for new strategic development will be allocated through the Local Plan Review or a neighbourhood plan at a number of service villages where there is an opportunity to provide development based on the strategy of dispersing development across the plan area. The Policy goes on to say that within some service villages, where no strategic housing sites are proposed, a housing figure has been identified for a number of parishes.
- 2.6. The Policy approach to support delivery of housing in the service villages is supported in principle, however, to achieve an appropriate level of housing growth and associated infrastructure provision, it is considered that all service villages should accommodate a proportionate level of housing growth to meet the key objectives in the Local Plan. Specifically with regard to Westbourne it is considered that further housing numbers should be identified for this village to support its vitality and sustainability. The land at Foxbury Lane, Westbourne can accommodate a higher number of dwellings than the at least figure in the Neighbourhood Plan. The site adjoins the existing settlement and is within easy walking and cycling distance of the village centre and as such presents a logical and suitable location for housing.

Policy S3: Development Strategy

- 2.7. The development strategy identifies the broad approach to providing sustainable development in the plan area. It seeks to disperse development across the plan area, focusing the majority of planned sustainable growth at Chichester and within the east-west corridor. New residential development is to be distributed in line with the settlement hierarchy, with a greater proportion of development in the larger and more sustainable settlements.
- 2.8. As with the approach under Policy 2, the principle of this approach is agreed. However, to accord with the objectives of the Plan to accommodate a majority of

development along the east-west corridor and Chichester City, Service Villages such as Westbourne must be allocated a proportion of housing to achieve this. It must also be acknowledged that service villages and smaller settlements require a level of housing to sustain their role and ensure they remain vibrant and sustainable locations to live and work. Allocating a proportionate amount of housing to each of these will achieve this objective whilst retaining their character and meeting local housing needs. At present the methodology for selection of service village allocations does not appear to be evidenced or consistent across the Plan area.

Policy S4: Meeting Housing Needs

2.9. The housing target for the Plan Area is to provide for at least 12,350 dwellings to be delivered in the period 2016-2035. It is accepted that the Council has allowed for the delivery of the headline figure above, however, this should be considered as a minimum figure and the Council should plan for a greater proportion to ensure flexibility in accordance with Policy S3, discussed above. This is the approach taken by some of the neighbouring authorities.

2.10. The National Planning Policy Framework (NPPF) (2018) confirms at paragraph 20, the following:

Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for, inter-alia:

a) *housing (including affordable housing), employment, retail, leisure and other commercial development;*

2.11. Paragraph 22 of the NPPF 2018 then goes on to confirm:

Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure

2.12. The housing requirement is directed by the recently published Housing and Economic Development Needs Assessment (HEDNA) (2018) for Chichester. The Council's calculation of housing requirement has been based on Objectively Assessed Housing Need (OAN), rather than the standard method.

2.13. We raise objection to this approach to calculation given the method put forward in the Review document. In accordance with the transitional arrangements set out in the NPPF, the standard method of calculation should be applied, unless

exceptional circumstances apply. The NPPF at Paragraph 214 describes the following requirements:

The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019. Where such plans are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan produced for the area concerned.

At this stage it has not been clearly demonstrated that exceptional circumstances exist for using the OAN contained within the HEDNA (2018) for calculating housing need. It is therefore considered that either further justification is required in this regard to justify the approach or the standard methodology is used to calculate the housing need.

- 2.14. In terms of the overall quantum of housing identified to be delivered, the level of housing development in the Plan is based on 'Option 1: 650 dwellings per annum (dpa)', as detailed in the Sustainability Appraisal for the draft Plan.
- 2.15. The Sustainability Appraisal sets out that the primary benefits of this option are economic and meeting the minimum objectively assessed need, which includes the requirement for parts of the District in the South Downs National Park, which the parish of Westbourne adjoins (un-met need from the Draft South Downs Local Plan). As noted above, this does not provide any flexibility in the plan making process and does not account for the benefits that could result from additional infrastructure, and the associated economic and social benefits that will result.
- 2.16. Additionally, there does not appear to be any allowance for un-met need for the wider Housing Market Area (HMA). Consideration must be given to this to ensure the soundness of the Plan.
- 2.17. Taking account of the above, it is likely that this would lead to a greater requirement for housing per annum. Paragraph 68 of the NPPF makes clear that small and medium sized sites can make an important contribution to meeting the housing requirements of an area and are often built-out relatively quickly and therefore local planning authorities should identify through the development plan, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, use tools to help bring such sites forward and support the development of windfall sites. The Council should therefore look to identify smaller sites in the services villages and sustainable small and medium size allocations to satisfy this requirement. The land identified in the Westbourne

Neighbourhood Plan at Foxbury Lane, being promoted by Taylor Wimpey Strategic Land, would be well placed to accommodate a greater number of homes in accordance with paragraph 68 of the NPPF, as well as being able to be delivered early in the Plan period and as such helping to maintain a rolling five year housing land supply.

- 2.18. Additionally, a higher proportion of homes will assist in terms of the likely infrastructure requirements for the Plan period, which will be essential to ensure the objectives of the Plan are met.

Policy S5: Parish Housing Requirements 2016 – 2035

- 2.19. Policy S5 sets out that small scale housing sites will be identified to help provide for the needs of local communities in accordance with the parish housing requirements. Suitable sites will be identified either through neighbourhood plans or a subsequent development plan document.
- 2.20. Westbourne is not identified for either a strategic housing allocation, nor does the Plan highlight the requirement for the delivery of small scale housing sites within Westbourne. On behalf of our clients, we raise objection to the Plan on this basis.
- 2.21. The parish of Westbourne includes the separate and outlying hamlets of Woodmancote and Aldsworth. It accommodates education facilities within the village for pre-school and primary aged children. Secondary school provision is available in Southbourne. The village centre hosts a number of shops, services and facilities. The village is also well placed to link with the A27 trunk road. Westbourne is therefore well placed to serve and deliver a greater number of homes, to assist in meeting the overall requirements of the Plan period.
- 2.22. It is accepted that there is a Neighbourhood Plan progressing, however, following examination in October 2017, progress has stalled with this and there is currently no certainty on delivery of this Plan and its associated housing numbers. In addition Taylor Wimpey Strategic Land made representations throughout the production of the Neighbourhood Plan and at Examination that the site at Foxbury Lane, which it is promoting, can accommodate a greater number of dwellings than the at least figure identified by the Neighbourhood Plan.
- 2.23. The Draft Neighbourhood Plan highlights a significant need for affordable housing, which the draft Neighbourhood Plan fails to meet, due to the size and form of proposed housing allocations.

- 2.24. In order to ensure the appropriate delivery of housing for the parish and to meet future needs, the Local Plan should underpin the requirements for housing delivery in the Neighbourhood Plan, given the uncertainty in its progress through examination, with the Review, highlighting a specific figure for housing delivery in Westbourne.
- 2.25. In addition, the site specific allocation in the draft Neighbourhood Plan, for our clients land at Chantry Farm fails to make efficient use of land, which is contrary to the objectives of the NPPF 2018, which states at paragraph 122:

Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b) local market conditions and viability;*
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e) the importance of securing well-designed, attractive and healthy places.*

Paragraph 123 then goes on to states that:

Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.

- 2.26. In Westbourne, the landscape constraints highlighted elsewhere within and around the village as part of the Neighbourhood Plan highlight the importance of achieving appropriate densities from development sites, including the land at Foxbury Lane.
- 2.27. Again, as highlighted already in these representations, the local planning authority should have regard to paragraph 68 of the NPPF and the need to identify small and medium sized sites for housing.
- 2.28. A greater number of homes should also be highlighted for delivery in Westbourne. The current Neighbourhood Plan highlights an affordable housing need figure for the parish of 26 dwellings. The current number of households on the housing needs register for Westbourne is 23. In line with the currently drafted Neighbourhood Plan, given the nature and scale of allocations, only 5

affordable homes would be provided within the village. This falls significantly short of the identified need and therefore the overall quantum of housing for Westbourne should comprise an **at least** figure of 90 dwellings to address the affordable housing needs for the Parish. This would be based on 30% provision, in line with the current and proposed affordable housing percentage requirements. Should that not be provided, the Plan would fail to address the immediate and on-going affordable housing needs of the District.

- 2.29. The parish is considered to be of appropriate scale, with good transport links and local services and facilities to accommodate this requirement.
- 2.30. Given the timescale that has passed since the preparation of the Neighbourhood Plan, this has not taken account of the requirements of the NPPF 2018, and may soon be considered out of date, if adopted at all.
- 2.31. The Local Plan Review should guide and support allocations at a local level, particularly in the case of Westbourne amid such uncertainties in the Neighbourhood Plan making process.

Policy S12: Infrastructure Provision

- 2.32. Policy S12 confirms that the Council will work with neighbouring councils, infrastructure providers and stakeholders to ensure that new physical, economic, social, environmental and green infrastructure is provided to support the development provided for in this Plan.
- 2.33. This policy is supported, however, an appropriate quantum of housing is required to deliver the substantial infrastructure requirements highlighted for the Plan period. To ensure the deliverability of infrastructure, further consideration should be given to a greater number of dwellings and appropriate densities on development sites, to deliver the requirements set out in the Infrastructure Delivery Plan (2016-2035).

3. Conclusion

- 3.1. We are supportive of the production of a new Local Plan to plan for future housing growth. However, concerns are raised with regard to its approach to allocations within the Service Villages, in particular Westbourne and the overall housing numbers identified within the Plan.

- 3.2. Westbourne is subject to a draft Neighbourhood Plan, but as noted above, following Examination in 2017, the Inspector's Report has not been published. As such, there does not appear to be any certainty regarding its delivery. We are therefore of the view that the consultation version of the Local Plan should underpin the requirements for housing delivery in the Neighbourhood Plan. This will provide certainty over the delivery of housing and inform any further work that may be required on the Neighbourhood Plan, given the significant passage of time passed since its Examination.
- 3.3. Westbourne is considered to be an appropriate scale, with suitable supporting services and facilities to accommodate further housing over the Plan period. This will ensure that the vitality and sustainability of the village is supported and opportunities are provided to deliver affordable housing as part of housing developments.
- 3.4. As detailed above, we consider that further work is required to justify the housing provision in the Plan and to identify further housing numbers for Westbourne, specifically on the land at Foxbury Lane, which can accommodate a greater number of dwellings than the at least figure in the draft Neighbourhood Plan. We would therefore support discussions going forward on this matter and would like to work closely with the District Council to achieve an allocation for the appropriate level of growth for Westbourne.
- 3.5. In order for the Local Plan Review to be considered sound, we recommend the following amendments to the consultation document:
 - Identify a housing figure for Westbourne for the Plan period and/or allocate land at Foxbury Lane, Westbourne for a greater number of dwellings than in the draft Neighbourhood Plan to ensure efficient use of land, in accordance with paragraphs 20, 22, 122 and 123 of NPPF 2018;
 - Identify an objectively assessed housing need for the District using the standard methodology and taking account of unmet needs of adjoining authorities, then allocate this number across the district, including to the service villages to meet localised housing needs;
 - Identify small and medium sized sites to deliver housing early in the Plan period in accordance with paragraph 68 of the NPPF 2018.
- 3.6. Should the above amendments to the Plan be achieved, Taylor Wimpey Strategic Land would be supportive of the Plan.