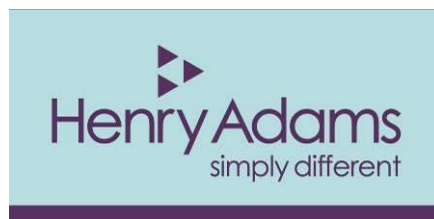


Representations on behalf of:

WEST SUSSEX COUNTY COUNCIL

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 West Sussex County Council (WSSC) to prepare representations in response to the Regulation 18 'Preferred Approach Consultation on the Chichester Local Plan Review 2035'. The majority of land in question to which this consultation response relates to the majority of the land holding associated with the proposed strategic housing and employment allocation **Policy SA6: Land South-West of Chichester** (Apuldram and Donnington Parishes). This land holding falls within the ownership of WSSC is shown in **HA-Appendix 1**.
- 1.2. This is the first of any formal representations to the Council with regard to the Local Plan Review process, but the purpose of this representation is to support the principle of the proposed allocation, which would comprise a key part of both future housing and employment delivery for the District. There are a number of matters that we believe should be addressed in terms of the quantum of employment floorspace and housing numbers to ensure a sound and deliverable scheme for the site.

2. Consultation Response

- 2.1. These representations are made in response to the Preferred Approach Consultation, and relate specifically to draft Policy SA6 as well as considering the overall strategy within the Plan, given the nature and scale of the proposed allocation under Policy SA6.
- 2.2. A response to each of the Strategic policies relevant to the above site 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. Chichester City remains as a sub-regional centre, which we continue to support. As a result, a strategic mixed use allocation of both employment and housing should be located so as to compliment the City. The allocation will allow the City to continue to develop as a sub-regional centre and the potential quantum of employment floorspace provides a broader range of employment opportunities. This should also include an appropriate mix of leisure, retail and civic uses.

Policy S3: Development Strategy

- 2.6. 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 distributed in line with the settlement hierarchy, with a greater proportion of development in the larger and more sustainable settlements.
- 2.7. As with the approach under Policy 2, the above supports the provision of sustainable growth in and around Chichester. We support this proposal, however, only two additional housing sites are identified in this policy for Chichester as part of the Review, therefore, these sites should have the ability to provide a greater proportion of housing, to ensure flexibility in delivery, as well as supporting the required infrastructure associated with a mixed used scheme at Policy site SA6.
- 2.8. The policy wording does go on to confirm that to ensure that the Council delivers its housing target, the distribution of development may need to be flexibly applied, to ensure that the majority of new housing is developed at Chichester City and settlement hubs. This approach is supported as it provides the appropriate flexibility in preparing a mixed use site.

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. In accordance with the NPPF 2018, and the transitional arrangements set out at paragraph 214 of the Framework, which states:

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.

As the plan is not being submitted ahead of the above date, it should therefore be based on the standard method of calculation, unless exceptional circumstances justify an alternative approach. 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 further justification is required in this regard to justify the approach.

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 (unmet 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 to this must be given to this to ensure the soundness of the Plan.
- 2.17. It is likely that this would lead to a greater requirement for housing per annum, and the land identified under Policy SA6 would be well placed to accommodate a greater number of homes and create a suitable buffer to safeguard the longevity of the Plan, throughout the Plan period.
- 2.18. Additionally, a higher proportion of homes will assist in terms of the likely infrastructure requirements for Policy SA6, which will be essential to mitigate the sites impact, but also to provide a community that compliment and connects with the City centre. This is discussed further below.

Policy S8: Meeting Employment Land Needs

- 2.19. Policy S8 sets out that to contribute towards sustainable economic growth, provision will be made for a net additional 145,835 sq.m of new floorspace for uses in the B Use Classes (B1, B2 and B8), in addition to other employment-generating uses,
- 2.20. In our opinion and experience of dealing with new speculative business space across the Chichester District that remains a significant amount of space and feels very optimistic given the lead in time for securing an implementable planning permission, building / implementing / delivering space in the open market, local demand generally and of course the economics around commercial development (rents / capital values / build costs / risk / profit). To consider this further, we have identified Glenmore Business Park, as a smaller, but comparable site to consider.

Glenmore Business Park – example

- 2.21. Since 2012, Henry Adams have been involved with Glenmore Business Park (GBP) on the A27 just outside Chichester. It is a very good example and useful backdrop to local issues. GBP is an important commercial scheme for Chichester given its size, the fact that it is being built speculatively and that units can be bought or sold. Key highlights are:

- The site is 10.34 acres with planning permission for 17,576 sqm's of B1c, B2 and B8 space. Planning was granted on 30 January 2014 for 7,469 sqms of flexible B1c, B2 and B8 plus outline planning permission for an additional 10,107 sqm's (which secured full planning permission on the 11th October 2016).
 - The implied plot ratio is around 42%, this is slightly above a norm of circa 40%.
 - Applying this ratio to the long term need identified above (145,835 sqm's) it implies a land requirement over the duration of the Local Plan of 350,000 sqm's i.e. around 35 hectares. It could even be more and would be driven by the scale / massing / height of future B1, B2 and B8 development. Policy site SA6 could certainly accommodate the majority in terms of available land.
 - The Glenmore scheme will have taken virtually 5 years from planning to completion and it could be argued that Chichester may only be able to deliver say another 3 or 4 Glenmore style schemes over the life time of the Local Plan.
- 2.22. The key point is that based on the experience of dealing with GBP, and the time involved to make it successful, we are of the opinion that the need for 35 hectares of land as identified above is quite optimistic and must assume an influx of new businesses re-locating to Chichester. Whilst this is an objective of the plan, relying on restricted tenures/use classes may constrain this delivery of employment floorspace within the plan period. Flexibility as to the use classes proposed would assist in this regard, i.e. it should not just rely on this level of floorspace being driven by B Use Classes.
- 2.23. We are therefore of the view that Policy site SA6 can deliver an appropriate quantum of employment floorspace requirements, however, this should not comprise solely B Use Classes. It should comprise a mix of employment type uses, therefore Policy SA8 should reflect flexibility on differing opportunities for employment floorspace, beyond B Use Classes.

Policy S12: Infrastructure Provision

- 2.24. 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.

- 2.25. We support this policy, however, in applying this to Policy SA6, the current proportion of housing numbers and employment land would restrict the delivery of the infrastructure identified for the site, and would place reliance on other funding streams, such as other development sites or infrastructure bids. With the appropriate quantum of housing provision and employment land, Policy site SA6 has the ability to provide significant infrastructure improvements, including a Stockbridge relief road and green pedestrian/cycle routes over the A27 and beyond in to the Manhood Peninsula.
- 2.26. To ensure the deliverability of infrastructure, further consideration should be given to the viability of delivering the infrastructure required to support the relevant site allocations for employment and housing provision through the Infrastructure Delivery Plan (IDP) (2016-2035).

Policy S13: Chichester City Development Principles

- 2.27. Policy S13 confirms that new development, infrastructure and facilities will be planned for Chichester City that enhance the city's role as a sub-regional centre and visitor destination, contribute to meeting local needs, and conserve and enhance the city's historic character and heritage.
- 2.28. The above approach is supported and Policy site SA6 has the ability to deliver a high proportion of the requirements of this Policy, namely (but not exclusively):
- Support and strengthen the vitality and viability of the city centre and its role as a shopping/visitor destination, employment centre and a place to live; through the off-set of City centre sites to Policy site SA6.
 - Enhance the city's existing entertainment and leisure offer, including the 'evening economy';
 - Reinforce and strengthen the city's office market;
 - Protect views of the cathedral;
 - Enhance the character and distinctiveness of the city's local neighbourhoods;
 - Provide or contribute towards an enhanced network of green infrastructure, including additional parks and amenity open space, outdoor sport pitches, recreational routes and access to natural green space;

- Support and promote improved access to the city and sustainable modes of travel;
 - Enhance the key routes in and out of the city.
- 2.29. We would therefore support this policy wording and can confirm that Policy site SA6 can help deliver the key objectives of this policy to support the City, subject to any viability constraints.

Policy SA6: Land South-West of Chichester (Apuldram and Donnington Parishes)

- 2.30. Policy SA6 sets out that approximately 85 hectares of land is allocated at land south-west of Chichester, for an employment-led development to include approximately 33 hectares of employment land (suitable for B1b/B1c/B2 and B8 uses) and a minimum of 100 dwellings along with a new link road connecting the A27/A259 Fishbourne roundabout and A286 Birdham Road. This relates to our clients land, who comprise the major landholding of the proposed allocation. Our clients land ownership is detailed at HA-Appendix 1.
- 2.31. The Policy also confirms that provision will need to be made for sustainable transport facilities (if required) and a neighbourhood centre / community hub (incorporating local shops and flexible space for employment/small-scale leisure use).
- 2.32. We are supportive of the principle of this policy, however, there is opportunity for the infrastructure requirements to be delivered without reliance on other sites or infrastructure funds, should the appropriate quantum of housing and commercial floorspace be allocated as part of the plan.
- 2.33. As such, we consider that a greater proportion of homes should be identified as a minimum requirement for the site to support the delivery of required infrastructure. As discussed above, the IDP, does not address the viability and deliverability of infrastructure for the Plan period. Therefore, we consider that further work is required to justify the quantum of housing and employment floorspace so as to ensure that the site can be delivered as a standalone scheme.
- 2.34. In addition, we consider that there are wider considerations as to the benefits that this site can offer. Whilst the Policy should not be reliant on other sites, a wider policy objective to release City centre sites from uses that could be accommodated on this edge of the City presents a real opportunity to deliver a wider Place Making objective across the Plan period. This would require further discussion with other key sites within the City centre, including the Southern

Gateway, as to how each site could complement one another. It could also underpin the importance of this site allocation and delivery of the Plan Objectives.

- 2.35. In terms of the wording of the site specific requirements, we are supportive of these requirements and a masterplan led approach, with an appropriate balance of uses within the allocation can ensure the delivery.
- 2.36. It is also important to note that WSCC as landowners have an understanding with the Chichester Harbour Trust regarding any potential development of land identified under Policy SA6. This would require a buffer, or appropriate blocks of land between Apuldram Lane and any proposed new development.
- 2.37. The purpose of this agreement is to ensure the joint objectives of the parties to protect and conserve the Chichester Harbour Area of Outstanding Natural Beauty from any environmentally damaging intrusion resulting from highway or other new development proposals, and to create an appropriate undeveloped protection zone combined with environmental benefits between the new development and Chichester Harbour.
- 2.38. In addition to the above, Kingsham Quarry, land east of the Stockbridge Road, will deliver a new area of open space, following its excavation for 'Chichester Grit'. This has the opportunity to provide for further open space and mitigation for Chichester Harbour, in the event that policy site SA6 is delivered.

Deliverability of Employment

- 2.39. In terms of allocating the site for employment uses, consideration is given to the overall quantum and subsequent deliverability. Typical build options for a developer would be as follows:
- *Option 1 - Pre-let development* – Secure a significant pre-let and build out on that basis. This will de-risks the development and underpin future development but in our experience pre-lets are very rare. Also, the option is aimed at the larger more bespoke facilities.
 - *Option 2 - Speculative development* – This is in line with the approach taken on the Glenmore Business Park. There is an element of risk with this approach, and requires an experienced / professional developer who understands the development process. It also implies WSCC either build out speculatively (unlikely) or more likely sells some or all of the landholding allocated to

commercial to a developer at a process that makes future development viable.

- *Option 3 - Hybrid development* – A pre-let is secured from an anchor tenant and the balance of a scheme is built out speculatively over the duration of the Local Plan.
- *Option 4 - Land sales* – We are aware there is demand from owner occupiers looking to buy land and build out their own bespoke facility.

2.40. In our opinion, the developer would need to implement all of the options identified above and on the back of a detailed masterplan and with a key anchor tenant driving the delivery of the site. This should also include a mix of residential/leisure, show room (sui-generis), civic and mixed use buildings.

2.41. Notwithstanding, the site remains a suitable site to accommodate a strategic employment site for the city, given the location and proximity to a major trunk road and Chichester generally.

Other Relevant Strategic Policies

2.42. In addition to the specific commentary to policies above, it is confirmed that we would support the objectives of the below draft policies:

- Policy S20: Design
- Policy S21: Health and Wellbeing
- Policy S22: Historic Environment
- Policy S23: Transport and Accessibility
- Policy S26: Natural Environment
- Policy S27: Flood Risk Management
- Policy S28: Pollution
- Policy S29: Green Infrastructure
- Policy S31: Wastewater in the Chichester Harbour and Pagham Harbour Wastewater Treatment Catchment areas
- Policy S32: Design Strategies for Strategic and Major Development Sites
- Policy DM7: Local and Community Facilities

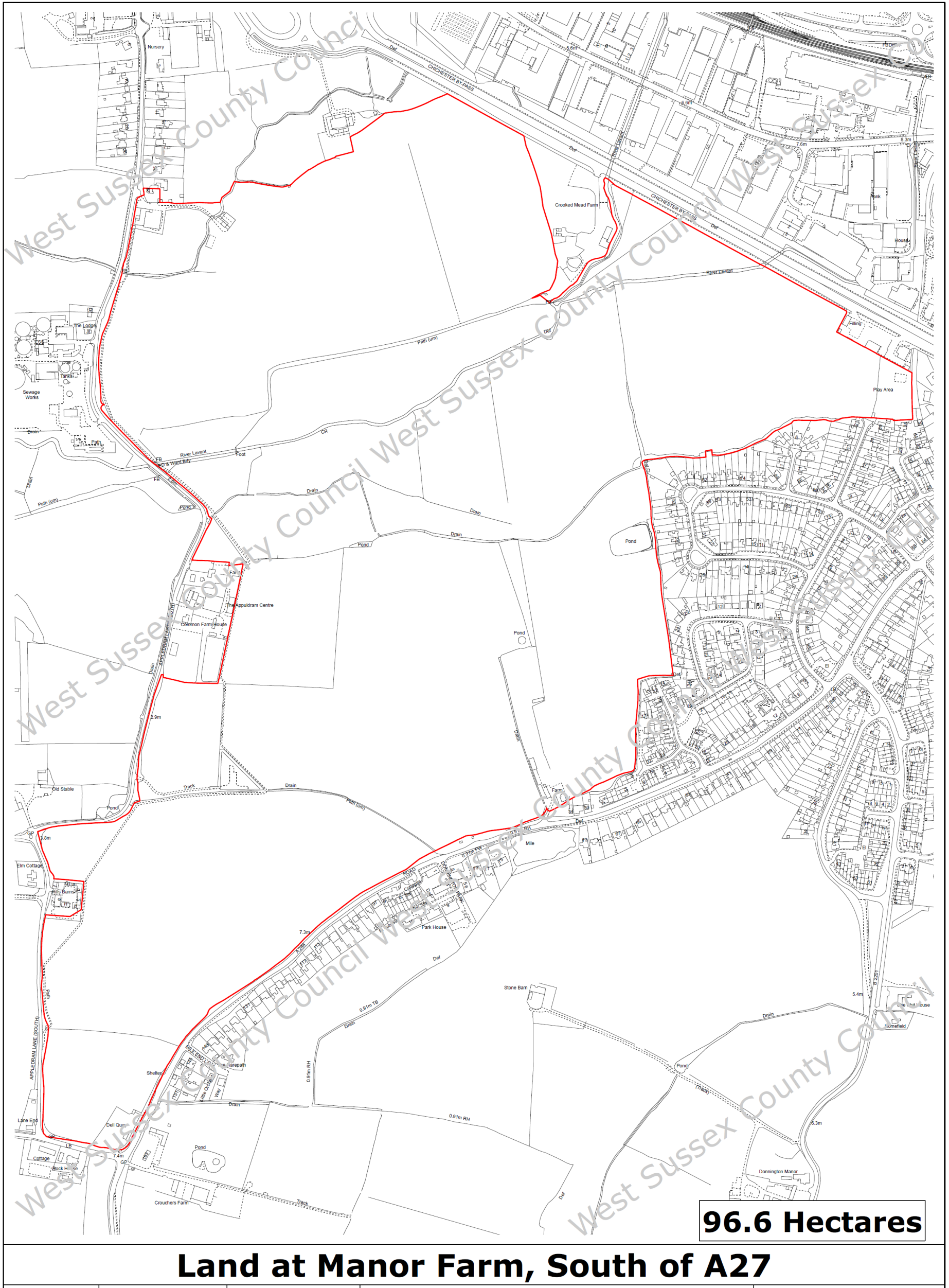
3. Conclusion

3.1. We are supportive of the draft Plan in principle and in particular the proposed allocation on land south-west of Chichester, under Policy SA6. This seeks to

deliver an employment led allocation, with moderate provision of housing. It is considered that the site has great potential to deliver a mixed use strategic development for the District, meeting both a significant housing and employment land need. The site should be delivered in accordance with a detailed masterplan, to take account of adjacent land and potential support sites within the City Centre.

- 3.2. Whilst we do support the principle, there are a number of matters that we have raised which should be considered in further iterations of the Plan. It is considered that the indicated housing provision provides only the minimum required, and should be a starting point in terms of the number of dwellings. This approach does not allow for any flexibility in the Plan making process, or safeguard the Plan through the Plan period. When considering this point, alongside the infrastructure requirements for Policy site SA6, it is considered that this site could accommodate a greater number of dwellings.
- 3.3. Policy site SA6 is considered to be a suitable site to accommodate a strategic employment site for the city, given the location and proximity to a major trunk road and Chichester generally. The quantum of floorspace provision is a matter to be considered in greater detail, to ensure deliverability.
- 3.4. Housing provision is considered to be appropriate for the site and should be delivered alongside the proposed employment floorspace. In order to deliver the infrastructure required to provide a suitable means of access, it is considered that the quantum of housing proposed is required as a minimum, to ensure the viable delivery of the overall site.
- 3.5. It is considered that the Development of a mixed use site will enable there to be a coordinated and timely delivered package of infrastructure.
- 3.6. As detailed above, we consider that some further work is required to justify the housing provision in the Plan and also the quantum of employment and residential floorspace to be delivered as part of Policy SA6. We would therefore support discussions going forward on this matter and would like to work closely with the District Council to achieve a suitable and deliverable strategic development site.

HA-Appendix 1: Site Location Plan



Land at Manor Farm, South of A27

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