



Representation Form

Local Plan Review: Preferred Approach Consultation

The consultation on the Local Plan Review: Preferred Approach will run from 13 December 2018 to 7 February 2019. The document and more information on the consultation can be viewed on our website www.chichester.gov.uk/localplanreview

All comments must be received by 11.59 pm on Thursday 7 February 2019.

There are a number of ways to make your comments:

- Comment on the document on the internet using our online consultation website www.chichester.gov.uk/localplanreview (**Recommended**)
- Complete this form on your computer and email it to us at planningpolicy@chichester.gov.uk
- Print this form and post it to us at: Planning Policy Team, Chichester District Council, East Pallant House, 1 East Pallant, Chichester, West Sussex, PO19 1TY

How to use this form

Please complete Part A in full. Please note anonymous comments cannot be accepted, a full address including postcode must be provided.

Please complete Part B overleaf, using a new form for each separate policy or paragraph that you wish to comment on. Please identify which paragraph your comment relates to by completing the appropriate box.

For more information, or if you need assistance completing this form, please contact the Planning Policy Team by email at planningpolicy@chichester.gov.uk or telephone 01243 785166.

PART A	Your Details	Agent's Details (if applicable ¹)
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Organisation (if applicable)	Landacre Developments Ltd	
Position (if applicable)		

Is this the official view of the organisation named above? Yes No

¹ Where provided, we will use Agent's details as the primary contact.

PART B

Please use a new form for each representation that you wish to make. Please note anonymous comments cannot be accepted. Any personal information provided will be processed by Chichester District Council in line with the General Data Protection Regulations 2018. More information is available at:

<http://www.chichester.gov.uk/dataprotectionandfreedomofinformation>.

To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	S2, S4, S5, S12, AL9,S24
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Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support

Object

Have Comments

Enter your full representation here giving details of your reasons for support/objection:

The 'tests of soundness' for Local Plan preparation are set out in paragraph 35 of the NPPF2. They require the 2016-35 Local Plan to have been:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

We will deal with the tests more thoroughly in the next Submission Plan but at this stage our headline comments cover the following policies of relevance to Fishbourne:

Settlement Hierarchy (S2), Housing Need (S4), Parish Housing Sites (S5) and Countryside (S24).

Policy S2 – Settlement Hierarchy

The Settlement Hierarchy background paper provides justification for the hierarchy in Policy 2 of the Local Plan. It forms the basis for the proposed distribution of growth by distinguishing between those settlements considered to be the most sustainable having the best range of facilities and accessibility from those with the least. Most development is focused on the former and development to meet local needs or no development whatsoever on the latter. We agree that Fishbourne is properly classified as a service village in the hierarchy ranking 9th in terms of

population with 10 total facilities.

Policy S4 – Meeting Housing Needs

The identified housing need has been informed by GL Hearn's Chichester Housing and Economic Development Needs Assessment (January 2018)

The Assessment confirms the objectively assessed need (OAN) is capped at 40% above the adopted housing requirement. The Local Plan was adopted on the basis of approximately 435 dpa. Capping the OAN to 40% above the adopted figure gives Chichester a housing need of 609 dpa. The Plan actually provides for 12,350 dwellings over a 19 year period equivalent to 650dpa to meet the 609dpa plus 41dpa which are unable to be met within the District part of the National Park.

Whilst we understand the need assessment has been carried out in accordance with the standard method set out in PPG we suggest it has potential flaws as the 435dpa in the adopted plan already fails to meet need. It should also consider the un-met needs of other adjoining authorities not just the National Park.

Out of the total 12,350 dwellings, 4,400 or 35% are proposed as new strategic allocations. Given this significant reliance on large sites and the potential longer lead in times for housing delivery we therefore suggest the plan includes a trajectory for them especially as this would better comply with Paragraph 73 of the NPPF2.

Policy S5 – Parish Housing Sites

Parish housing allocations comprise 500 dwellings and paragraph 4.26 of the Plan says they have been distributed amongst the settlements in accordance with their ranking in the settlement hierarchy.

However, we are concerned that Fishbourne has been given a nil allocation in S5 and instead the total 250 dwelling allocation has been included in policy AL9 as a parish strategic allocation. We believe that as Fishbourne parish is preparing its own Neighbourhood Plan, it should be given the flexibility to choose how it allocates sites for development. In our view, a nil allocation in S5 could be interpreted to mean all 250 houses have to be found on 1 single site rather than on several smaller sites as part of a dispersed strategy.

Policy AL9 – Fishbourne Parish

We support the allocation of land for a minimum of 250 dwellings at Fishbourne Parish as this reflects its ranking in the settlement hierarchy as a larger service village. However, we prefer the principle of having more than one site meet the strategic allocation as part of a dispersed strategy across the District. Spreading development over more than 1 site would assist short term housing delivery and minimise the long lead in times that the very large strategic sites are suffering in the current Key Policies Local Plan. The associated community infrastructure could still be delivered over more than 1 site in accordance with the Infrastructure Delivery Plan's requirements in policy S12 and

the CIL levy.

Policy S12

We support policy S12 which refers to the Council's Infrastructure Delivery Plan (IDP). However the Local Plan Policy or the IDP itself should make clear, **for at least the first five years**, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development. This is not set out in either S12 or the IDP (paragraph 15.9) which specifically deals with the Fishbourne AL9 allocation. Paragraph 15.9 of the IDP should in addition state that 'the parish is allocated for residential development of 250 dwellings' rather than 'the site is...' in recognition that more than 1 location should be selected for the allocation.

S24 Countryside

Policy S24 deals with countryside and settlement policy boundaries. Not all settlements however are proposed for a settlement policy boundary review in the Local Plan and this includes Fishbourne. Boundaries not included will be reviewed through a subsequent Site Allocation DPD or a Neighbourhood Plan Review.

According to the Local Development Scheme the Site Allocation DPD will not be adopted until July 2022 and the timetable for the Fishbourne Neighbourhood Plan review is unknown.

We object to the way the settlement policy boundary reviews are proposed to take place in the Plan. We prefer an earlier boundary review for all settlements in the Plan. A boundary amendment for Fishbourne now could increase the supply of windfall sites in the urban area and reduce the requirement for new greenfield allocations in the later Neighbourhood Plan. A boundary amendment now could also secure benefits from redevelopment opportunities of previously developed sites and other suitable land which abuts an existing boundary and relates more to the built up area than the surrounding countryside.

Land to the south of Clay Lane/west of Blackboy Lane on the north west edge of Fishbourne falls into the latter category as it abuts the existing built up area of Fishbourne at Godwin Way. It has a closer association with the built up area than the wider countryside. But it is prevented from redevelopment at this time precisely because the settlement boundary for Fishbourne has not been updated by the District since the 1999 Local Plan. To wait until the next Site Allocation DPD in 2022 or the Neighbourhood Plan Review would simply frustrate the site coming forward to help meet the new housing requirement. It could make a modest but valuable contribution of around 19 dwellings.

Therefore we propose a settlement boundary amendment for Fishbourne to include land south of Clay Lane/west of Blackboy Lane. However if boundary reviews of all settlements are not to be made in the Plan we would request policy wording to the last sentence of S24 be amended as follows:

'Defined settlement boundaries may be altered by a future development plan document and/or a neighbourhood plan. In the interim, where a boundary amendment is justified against the key requirements of the settlement boundaries background paper that should be regarded as a material consideration in connection with the submission of any planning application'.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Policy S4 - The Plan needs to include a housing trajectory of the strategic allocations to assist future monitoring of housing delivery as suggested by paragraph 73 of the NPPF2.

Policy AL9 – the allocation of 250 dwellings minimum to Fishbourne Parish is supported but the allocation should be spread across more than one site. Spreading development over more than 1 site will assist short term housing delivery and minimise the long lead in times that the very large strategic sites are suffering in the current Key Policies Local Plan. This would not impact on infrastructure delivery because it would still be identified and phased in the IDP as set out in S12. Policy AL9 could therefore state ‘A site or a combination of sites will be allocated for development in the revised Southbourne Neighbourhood Plan...’

Alternatively, AL9 could be deleted and the 250 dwelling allocation reassigned to Policy S5 to allow the development to come forward as a dispersed strategy.

Policy 24 should have additional wording as suggested above unless a settlement boundary amendment is made in the Submission Plan to include land at Clay Lane/Blackboy Lane as shown on the attached plan.

(Continue on separate sheet if necessary)

Declaration

I understand that any comments submitted will be considered by Chichester District Council in line with this consultation and will be made publicly available on their website www.chichester.gov.uk and may be identifiable by my name or organisation, if provided.

Name (<i>print</i>):	Paul White
Date:	7 February 2019