Representations to Chichester District Local Plan Review 2035 Preferred Approach - December 2018 Consultation Policy S2 Settlement Hierarchy Policy AL7 Highgrove Farm, Bosham 7th February 2019

Prepared on behalf of:



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1. Introduction

- 1.1 The purpose of this statement is to provide representations, on behalf of Barratt David Wilson Homes (Southampton) Ltd and landowners, on the draft policies and supporting evidence base documents to the Local Plan Review 2035 Preferred Approach. The statement is submitted along with a completed Representation Form for each of the policies commented on. In addition to this statement the following documents are submitted in support of these representations:
 - Highgrove Farm Vision Statement, February 2019 (Luken Beck)
 - Land Promotion Transport Report, January 2019 (Paul Basham Associates)
 - Landscape and Visual Appraisal, February 2019 (SLR)
- 1.2 On the 24th July 2018 the National Planning Policy Framework (NPPF) was published by the Ministry of Housing, Communities and Local Government. For the purposes of the Examination of the Chichester District Local Plan Review, the NPPF 2018 will apply as the emerging Plan did not reach the Submission Stage by 24th January 2019.
- 1.3 These representations support the inclusion of the Land at Highgrove Farm, Bosham as a 'Strategic Development Location', as proposed in the Preferred Approach. Details of the site and proposals for a new neighbourhood are provided in the enclosed Vision Statement.
- 1.4 These representations also highlight the need for wording changes to the Preferred Options to reflect some conflicts with the criteria in national guidance, the supporting evidence base and the aspirations of the Parish Council. We consider the proposed changes would improve the 'soundness' of the Plan and therefore its chances of success at Examination. Paragraph 35 of the NPPF states that, for a Plan to be found 'sound' it must show that it is;
 - positively prepared (i.e. having regard to objectively assessed needs);
 - justified (i.e. through the exploration of alternatives);
 - effective (i.e. deliverable and accounting for cross-boundary strategic matters); and
 - consistent with national policy (i.e. interpreting the NPPF at the local level).
- 1.5 These representations comprise of the following:
 - **Objection** to the wording of draft Policy S2 Settlement Hierarchy
 - Objection to draft Policy AL7 Highgrove Farm, Bosham

2. Vision and Rationale for Development on Land at Highgrove Farm, Bosham

2.1 Barratt David Wilson Homes submitted to the Council an initial Vision Statement and Concept Masterplan for a new neighbourhood on the Land at Highgrove Farm, Bosham as part of the Chichester Local Plan Review Issues and Options Consultation in June 2017. Over the preceding months the proposed development framework and land-uses have evolved through a series of technical meetings, further submissions to Chichester District Council, Bosham Parish Council and stakeholder engagement including the following:



- Consultation meetings with Chichester District Planning Department in June, September and December 2018.
- Submission of an updated Vision Statement and related information in July 2018
- Submission of response to the Housing and Economic Land Availability Assessment (HELAA) consultation in September 2018.
- Consultation meetings with Bosham Parish Council's Local Plan Focus Group in December 2018 and January 2019.
- Going forward, monthly "Working Group" meetings have been scheduled with the Parish Council



Figure 1: Highgrove Farm Concept Masterplan (Source – Highgrove Farm, Bosham Vision Statement, Feb 2019)

2.2 The Land at Highgrove Farm is within the control of Barratt David Wilson Homes and partnering landowners, and there are no legal issues to constrain the site coming forwards for development within the next five years. Barratt David Wilson Homes are fully committed to raising the quality of housing and delivering the necessary components for successful new communities through a corporate commitment to Building for Life 12 (BfL12). Whilst operating nationally as a FTSE 100 company the south coast regional office has a long-established track record of delivering new neighbourhoods and associated major infrastructure projects, working closely with local communities, housing associations, utility companies, interest groups and Local Authorities.



- 2.3 Barratt David Wilson Homes are proud to bring forward the Land at Highgrove Farm to create a logical and highly sustainable extension to Bosham. In addition to delivering both market and affordable homes of mixed sizes, types and tenure the development would deliver a new church / community hall, informal public open space, children's play areas and c. 2ha of land for use as 2FE Primary School (or, should there be insufficient need for a primary school in this location, additional residential and leisure / recreational provision). The proposed development would also support and bring forward investment in highways and surface water drainage.
- The entire site is located between the railway line to the north and Main Road (A259) to the south. There is residential development along the western boundary, accessed from Brooks Lane, as shown in Figure 1. To the east there is a row of houses fronting Main Road, beyond which is a grouping of commercial buildings at Ham Farm and surrounding fields. Full planning permission was granted¹ on 19th December 2019 to Barratt David Wilson Homes for 50 dwellings in the south-western corner of the site. The approved residential layout, landscaping and vehicular access are integrated within the Concept Masterplan.
- 2.5 The railway line and mature field boundaries provide some enclosure from long distance views, although additional landscaping is proposed to soften and partially screen views from Main Road, as described in the submitted Landscape and Visual Appraisal. The delivery of a larger comprehensive development would also provide an opportunity to design a new surface water drainage system that could also connect to the approved 50 dwelling development therefore allowing a more comprehensive planting scheme to be delivered within the linear open space in the south west corner of the site rather than the more limited landscaping due to the approved drainage scheme.
- 2.6 Whilst there are a range of services and facilities within Bosham the scale of development proposed would significantly enhance the sustainability of Bosham through the following:
 - At least 75 affordable homes, in addition to the 15 affordable homes in the approved development (i.e. 30% policy requirement), suitable for first time buyers and low-income households in the local community.
 - At least an additional 175 new market homes of mixed sizes and types.
 - Provision of land to accommodate a new 2FE Primary School (or relocate Bosham Primary School) and deliver a new community / church hall.
 - A substantial area of informal public green space to serve as an amenity resource for existing and new neighbourhoods whilst providing a defined and defendable eastern green edge to Bosham, safeguarding the gap between Bosham and Fishbourne and softening views of the new development.
 - An easily accessible new neighbourhood including a new bus loop and direct walking routes to Bosham Railway Station and local shops and services.
 - Delivery of a new pedestrian crossing on Main Road.
 - Improvements to the existing field drain network to reduce the risk of surface water flooding on Main Road and Brooks Lane.

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¹ CDC ref. BO/17/03148/FUL



3. Object to Policy S2 'Settlement Hierarchy'

- 3.1 The Preferred Approach carries forward the classification for Bosham as a Service Village set out in the Adopted Chichester Local Plan: Key Policies 2014-2029 and the Local Plan Review Issues and Options (July 2017). Whilst we welcome the focus in the supporting text², to draft Policies S2 and S3 on the Services Villages, alongside Chichester City and the Settlement Hubs, as locations for new strategic development we consider Bosham would be more appropriately classified as a Settlement Hub.
- 3.2 Bosham and Broadbridge are in close proximity and considered by the Council to function together as a single settlement³. Residents of both settlements will easily travel to the other settlement for access to services and facilities. Bosham and Broadbridge are ranked joint fourth highest in terms of key services provision, alongside the Settlement Hubs of Southbourne and East Wittering & Bracklesham⁴. Bosham / Broadbridge provides 21 key services and facilities, including Bosham Railway Station, Post Office, GP surgery, local shops and primary school. This level of community infrastructure, public transport access and population size is considerably greater than the other Service Villages.
- 3.3 Bosham / Broadbridge should be reclassified as a Settlement Hub on account of its range of key services and facilities. It is a more sustainable location for strategic development than the other Service Villages, all of which have smaller populations and fewer key services and facilities. The Bosham Vision Statement (Feb 2019) demonstrates how the proposed strategic site allocation for 250 dwellings, with associated education and community infrastructure would further reinforce the role and function of Bosham / Broadbridge as a sustainable location for planned growth.
- 4. Object to Policy AL17: 'Highgrove Farm, Bosham'

³ Footnote 3 to paragraph 4.5, Local Plan Review Background Paper Settlement Hierarchy (December 2018)

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² ref. para 4.18

⁴ Appendix 1, Local Plan Review Background Paper Settlement Hierarchy (December 2018)



- 4.1 We welcome the identification of Bosham as a 'Strategic Development Location' in the Preferred Approach. This recognises the range of key services and facilities located within the settlement, as referred to above, and the potential role Bosham will play in delivering the full local housing need for the District.
- 4.2 Notwithstanding the above we would like to draw to the Council's attention that Barratt David Wilson Homes do not propose to deliver a new 2FE Primary School as part of the 250 dwelling strategic allocation. The proposal is to provide a suitable area of land (c. 2ha) to accommodate a new or relocated 2FE Primary School. Barratt David Wilson Homes remain committed to delivering a minimum of 250 dwellings (in addition to the approved 50 dwellings), community / church hall and public green spaces (i.e. play areas, informal amenity space, allotments). It would not be viable for a residential development on this scale, with 30% affordable housing provision, community infrastructure and other \$106 and CIL contributions to deliver a new school.
- 4.3 The requirement to include sports pitch provision within the strategic allocation is also not supported. Through our technical assessments and discussions with Bosham Parish Council the eastern part of the site is partly visible from the South Downs National Park to the north and the Area of Outstanding Natural Beauty (AONB) to the south. There is a clear desire within the draft policy text and at local level, expressed through feedback from Parish Council meetings and community events, to ensure the visual separation between Bosham / Broadbridge and Fishbourne is maintained. In response, a substantial area of public open space is proposed to the east of the developed part of the site, as shown in Figure 1. This area is described in the submitted Bosham Vision Document (Feb 2019) as a multifunctional naturalistic green space, functioning as both a local amenity space, natural habitat, green buffer to views into the site and a defined and defendable edge to Bosham. For these reasons the location of sports pitches within the site is not justified or deliverable in the context of wider community infrastructure forming part of the strategic allocation.
- 4.4 With the above in mind we request that the Council amend the wording of the policy and supporting text, as follows [additional text in bold]:

'Policy AL7: Highgrove Farm, Bosham

Approximately 13 hectares of land at Highgrove Farm, Bosham, as defined on the policies map, is allocated for a residential-led development of a minimum of 250 dwellings and the **provision of land to enable the future provision of** a two-form entry primary school, **should the need arise**. Development in this location will be expected to address the following site-specific requirements......'

'6.56

There are a number of specific issues that need to be taken into consideration when planning the development and site layout at Highgrove Farm. These include:

- Potential landscape sensitivities, particularly in terms of the open nature of the site and external views from surrounding areas especially the Chichester Harbour AONB and the South Downs National Park;
- Integration with the existing allocation and development to the west;



- Consideration of the potential impact of development in terms of recreational disturbance on the Chichester Harbour SPA/SAC/Ramsar;
- The provision of land to enable the relocation of the existing primary school in Bosham onto the site to facilitate expansion of pupil capacity. If there is insufficient need for a school to be located within the site, other community uses (such as leisure or recreational uses) or additional residential development would be provided on the surplus land to meet local need;'
- Protecting existing properties along Brooks Lane, in terms of visual amenity and overlooking;
- Provision of community facilities and open space and playing pitch;

5. Conclusions

5.1 These representations support the development strategy in the Preferred Approach to disperse development throughout the District with a clear role for the Settlement Hubs and Service Villages to ensure the local housing needs are met in the most sustainable locations. Our representations also highlight the risks to the emerging Local Plan of the current wording in Draft Policies S2 and AL7 and the relevant supporting text, which could undermine the 'soundness' of the Plan at Examination. Our proposed wording changes and reclassification of Bosham / Broadbridge as a Settlement Hub are justified through the Local Plan evidence base and are necessary to ensure the wider aspirations for the strategic allocation are deliverable, alongside a minimum of 250 dwellings, within the early rears of the Plan.

