



Representations to Chichester District Local Plan Review 2035
Preferred Approach – December 2018 Consultation

Policy S2: Settlement Hierarchy
Policy S4: Meeting Housing Needs
Policy AL8: East Wittering Parish

7th February 2019

Prepared on behalf of:



BARRATT
— HOMES —

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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:

- Stubcroft 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 classification of East Wittering in the Preferred Approach as a Settlement Hub, although object to the housing target of 12,350 dwellings for 2016-2035 and the resultant under provision of housing in East Wittering. Details are provided within this statement and enclosed Vision Statement of how the Plan requirement for 350 dwellings (minimum) could be accommodated and larger growth options and new community infrastructure could be provided in East Wittering through a Neighbourhood Plan or Site Allocations DPD.

1.4 These representations highlight conflicts with the criteria in national guidance which could be judged to render the emerging Plan 'unsound' and therefore incapable of being successful at Examination. Paragraph 35 of the NPPF states that, for a Plan to be found 'sound' it must show that it has been;

- 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:

- **Support** to draft Policy S2 – Settlement Hierarchy
- **Objection** to draft Policy S4 – Meeting Housing Needs
- **Objection** to draft Policy AL8 – East Wittering Parish

2. Vision and Rationale for Development on Land at Stubcroft Farm, East Wittering

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 Stubcroft Farm, East Wittering 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, East Wittering Parish Council and stakeholder engagement.

On 26 November 2018 BDW and members of the professional project team met with East Wittering and Bracklesham (EW&B) Parish Council to introduce the vision for the development of the land shown in Figure 1 to 3 for new housing and community facilities and infrastructure. The meeting included discussion of local requirements and an emerging site plan was provided to EW&B Parish Council in January 2019 to show how local aspirations could be delivered on the site.

BDW is committed to continuing to liaise with the EW&B Parish Council in order to provide information regarding the new neighbourhood proposals through the Parish Council’s Neighbourhood Plan process without prejudice.



Figure 1: 300 Dwelling Growth Option



Figure 2: 600 Dwelling Growth Option



Figure 3: 875 Dwelling Growth Option (including Emery land)

- 2.2 The Land at Stubcroft Farm, which comprises of Options 1 and 2, 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. The additional land that combines to form Option 3 includes land in the ownership of Emaray Holdings. Options 1 and 2 both provide the appropriate highway access to the Emaray Holdings land.
- 2.3 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.
- 2.4 Barratt David Wilson Homes are proud to bring forward three growth options on the Land at Stubcroft Farm, each of which create logical and highly sustainable extensions to East Wittering. In addition to delivering both market and affordable homes of mixed sizes, types and tenure a development Option 1 for 300 dwellings would also deliver a new local centre. If a greater housing need was identified and a strategic allocation identified in East Wittering beyond the Plan requirement for 350 dwellings (minimum) it could deliver greater benefits through on-site community infrastructure and facilities, for the benefit of the Parish and residents across the Peninsula. A more encompassing development on a larger site could deliver between 600 and 875 dwellings, a new east / west link road between Church Road and Bracklesham Lane to alleviate traffic congestion in Stocks Lane (B2179). The larger of the three growth options could deliver 875 or even up to 1,000 dwellings with improved footpath / cycle links, land for a new secondary school, employment, care facility and substantial areas of informal public open space and children's play areas, as shown in Figure 3. The proposed development would also support and bring forward investment towards off-site primary healthcare, sports facilities and highway improvements, such as upgrades to key local junctions which would have benefits for the wider Parish.
- 2.5 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:
- Between 100 and 263 affordable homes (i.e. 30% policy requirement for growth options of 300, 600 and 875 dwellings), suitable for first time buyers and low-income households in the local community.
 - At least an additional 200 - 612 new market homes of mixed sizes and types, dependant on growth options of 300, 600 and 875 dwellings (total).
 - Provision of a new east / west link road access between Church Road and Bracklesham Lane for all growth options.
 - Land to accommodate a new secondary school as part of the largest growth option for 875 dwellings. Alternatively, further residential development, commercial or leisure uses could be delivered should there not be a need for a new school.
 - A new Local Centre accessed from Church Road, Bracklesham Lane and Stubcroft Lane for the 600 and 875 dwelling growth options.

- Land to accommodate employment generating uses as an extension to the existing Church Road Business Estate and with direct access to Bracklesham Lane, delivered through the 875 dwelling growth option.
- A substantial linear park along the existing water course to create a River Walk for informal amenity, habitat enhancement and surface water drainage that would benefit existing and new neighbourhoods.
- An easily accessible new neighbourhood including a new bus spine and direct walking routes ('Greenways') to East Wittering town centre and connections with the rights of way network across the wider area.

3. Support to Policy S2 'Settlement Hierarchy'

- 3.1 The Preferred Approach carries forward the Adopted Chichester Local Plan: Key Policies 2014-2029 classification for East Wittering / Bracklesham as one of the District's four Settlement Hubs. We welcome the focus in the policy wording and supporting text on the Sub Regional Centres, Settlement Hubs and Service Villages as the main locations for strategic site allocations, employment, retail, social and community facilities.
- 3.2 We support the Settlement Hub classification for East Wittering / Bracklesham as the District's fourth largest settlement (in population size) after Chichester, Selsey and Southbourne and joint fourth highest ranking settlement in terms of number of key services and facilities (ref. Appendix 1 of the Settlement Hierarchy Background Paper (December 2018)). The range and type of key services and facilities within the town centre and limited environmental constraints on the northern boundary of Est Wittering and good access to the regional road network and public transport links justifies the key role East Wittering / Bracklesham will play in meeting the District's full local housing need.

4. Object to Policy S4: Meeting Housing Needs

- 4.1 We are pleased to see that the Local Plan is progressing although we consider the approach to meeting the District's local housing need and the development strategy is 'unsound'. The policy requirement to deliver 12,350 dwellings over the Plan period (2016-2035) is based upon the Standard Method of assessment. The application of the Standard Method without sufficient adjustment to meet some of the needs of the adjoining authorities or the specific social and economic circumstances of the District increases the risk of failing to meet the full local housing need. The policy is therefore not considered to be positively prepared or consistent with national policy.

Capped Housing Supply

- 4.2 Paragraph 60 of the NPPF requires strategic policies to identify a minimum number of homes, through undertaking a standard method of assessment. The Planning Practice Guidance (ref. Housing Need Assessment, PPG) describes the standard method of assessment and states a 40% cap above the average annual housing requirement should be applied where existing planning policies are less than five years from their date of adoption. However, the Council's approach to applying the 40% cap to the 'policy on'

figure of 435 dwellings per annum (dpa) has resulted in an artificially low housing need of 609 dpa¹. However, if the cap were to be applied to the 'policy off' figure of 505 dpa, as recognised by the Inspector at the Chichester Local Plan Examination in May 2015, this would increase the housing need to 707 dpa and be more consistent with the Government's objective to significantly boost the supply of homes². Over the Plan period this would result in a requirement to increase the housing supply by 98 dpa or 1,862 dwellings over the Plan period.

- 4.3 Whilst the purpose of the cap is to help ensure the minimum local housing need figure is deliverable, the PPG also states (ref. 007 Reference ID: 2a-007-20180913) that the cap does not reduce the housing need itself. The housing need is therefore greater within the District than is currently being planned for through the standard method of assessment.
- 4.4 Notwithstanding the above, the implications of suppressing delivery through a total reliance on the capped supply, not only fails to meet the full market and affordable housing need but also increases the risk of the Plan becoming quickly out of date, should completions not progress at the rate suggested in the housing trajectory. In this event it is highly likely the District would face increased pressure from speculative applications in less sustainable locations than through a Plan-led approach, and the prospect of an early review of the emerging Local Plan.

Unrealistic Programme of Delivery

- 4.5 The 'stepped' approach towards meeting the housing need, as set out in Appendix 2 and 3 of the Annual Monitoring Report 2018 is considered to be entirely unrealistic. Over the last 6 years (applying the AMR base date of 2012) an average net housing target of 435 dwellings was planned, which is a suppressed figure agreed by the Inspector at the previous Local Plan Examination, as referred to above. Even when applying this lower figure there has resulted in a shortfall of 247 dwellings, or 41 dwellings each year. In the first five-year period of the Plan and applying the Council's projected housing supply³ against the target of 609 dpa there would result a shortfall of 421 dwellings. If the higher target of 707 dpa is applied to the same projected housing supply a shortfall of 894 dwellings would result over the first five-year period.
- 4.6 In order to clawback the growing shortfall the Housing Trajectory⁴ applies the stepped approach. For years 2023/24 and 2024/25 the annual housing supply is projected to be 795 dpa and 609 dpa respectively. There has not been a sufficient justification provided for a stepped trajectory. The plan should allocate a range of sites, in terms of size and location, that will ensure provision comes forward evenly across the whole plan period. To rely on such a high delivery rate later in the Plan period is wildly optimistic and unlikely to be achieved, based on past completion rates and the experience of most other Local Authorities with stepped housing trajectories.

Failure to Significantly Boost the Supply of Homes

¹ ref. Paragraph 12.8 Chichester HEDNA (January 2018)

² ref. Paragraph 56, NPPF

³ Appendix 2, Chichester AMR 2018

⁴ ref. Appendix 3, Chichester AMR 2018

- 4.7 The requirement for a more ambitious approach to housing supply is further supported by the disparity between the sum of local housing need assessment, calculated using the standard method amounting to c. 264,000 a year (ref. 2014 household projection figures) against the Government's commitment to delivering 300,000 homes a year by the mid-2020's (i.e. an annual shortfall of 36,000 homes).
- 4.8 In order to be consistent with the NPPF requirement to significantly boost the supply of homes and address the constraints of the 40% cap and limitations of the standard method it is clearly not the Government's intention for the identification of a minimum number of homes to be the automatic end point for Local Authorities when identifying a sufficient amount and variety of land in their emerging Local Plans.
- 4.9 The proposed policy wording is not positively prepared, consistent with national policy nor will it be effective in delivering the District's full local housing need in sustainable locations, such as the Settlement Hubs. We therefore request the Council review the approach towards meeting the full local housing needs of the District and plan for an increased supply of housing over the Plan period, in particular within the early years of the Plan.

5. Object to Policy AL8: East Wittering Parish

- 5.1 We welcome the identification of East Wittering as a 'Settlement Hub' 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 East Wittering will play in delivering the full local housing need for the District.
- 5.2 Barratt David Wilson Homes have undertaken a series of technical exercises to assess the soundness of larger growth scenarios for East Wittering, in addition to the work undertaken by Chichester District Council on the Sustainability Appraisal and other evidence base studies. The submitted Stubcroft Farm Vision Statement (February 2019) is consistent with the conclusions of the Settlement Hierarchy Background Paper (December 2018) in its consideration of East Wittering as a sustainable settlement for future growth, based on its range of key services and facilities and limited environmental constraints in the immediate area.
- 5.3 Whilst Barratt David Wilson Homes are committed to delivering a minimum of 300 dwellings as a first phase of growth and in accordance with draft Policy AL8, the Preferred Approach has not fully justified why growth is restricted to this level, given the sustainability of the location. Considerably higher levels of growth area proposed for Southbourne (i.e. 1,250 dwellings) and Tangmere (i.e. 1,300 dwellings) through the relevant draft policies both of which are comparable settlements in terms of services provision.
- 5.4 The Sustainability Appraisal for the Chichester Local Plan Review – Preferred Approach (October 2018) assesses the Strategic Development Locations. The assessment of Policy AL8 identifies negative ratings for potential for growth in East Wittering Parish, in relation to highways and landscape character impacts.

Landscape Character

- 5.5 All three growth options in the Vision Statement comprise land that is located outside of designations for landscape and ecological sensitivity. The submitted Landscape and Visual Appraisal (February 2019) (LVIA) has found that all growth options are on land of a moderate sensitivity and slight value in landscape character terms, with a resultant medium/high capacity to accommodate development. In summarising the Landscape character and potential landscape effects of development the LVIA states,

'It is likely that development on this site would result in localised significant landscape effects. However, effects on landscape receptors around the site would be limited, as the site is largely enclosed by structural vegetation and buildings. Landscape effects could also be mitigated by conserving and enhancing the existing hedgerow network, enhancing biodiversity, retaining and improving ditches, and by introducing broad greenways in order to conserve open views across the site.'

- 5.6 All three growth options in the Vision Statement include a hierarchy of green spaces that limit development in more prominent parts of the site and also create green corridors for improved recreation, east-west and north-south pedestrian and cycle permeability and biodiversity enhancements. A new River Walk linear park would form part of the green space network and would include a link with the wider countryside for existing East Wittering residents to the south of the site. More detailed recommendations for the masterplan and mitigation measures are provided in Section 5 of the submitted LVIA.

Strategic Highway Network

- 5.7 The Paul Basham Associates Local Plan Promotion Report (February 2019) provides an assessment of the highway impacts identified in the Sustainability Appraisal, proposed contributions sought through the Infrastructure Delivery Plan and the Peter Brett Associates Transport Reports. The report also assesses levels of access to sustainable modes of transport and the implications of the proposed land-uses (residential, commercial, care facility, local centres and secondary school) included in each of the three growth options for trip generation, traffic distribution and effects on future junction capacities.
- 5.8 All three growth options are to be accessed from Church Road to the west and Bracklesham Road to the east. For the largest of the growth options (i.e. Option 3 – 875 dwellings) both roads would continue to operate significantly under their assumed capacity (up to 70% and 68% of capacity respectively).
- 5.9 With regard to the impact on the A27 Chichester Bypass and associated junctions the report considers a larger quantum of development could be accommodated with some mitigation at both Stockbridge and Fishbourne Roundabouts. In view of the distance from the A27 there is an opportunity for traffic to be dispersed along the approach roads to the A27 junctions, whereas the focus on the East-West Corridor for growth will result in traffic having little opportunity to disperse before arriving at the junctions of the A27. The report concludes,

'that development could be provided in this location without having a significant impact on the operation or safety of the local road network, including the potential to provide community infrastructure with the potential to reduce vehicle trips such as a local centre and a school.'

- 5.10 It is also likely a higher level of growth would be more likely to influence modal shift and reduce reliance on Chichester for key services and facilities. The loss of some local services and shop closures in the Parish has been raised in recent public consultations by the Parish Council. This is a trend more likely to be arrested through largest scale growth and investment.
- 5.11 In view of the above assessments of the largest growth option for 875 dwellings we are of the option that draft Policy AL8 should increase the housing supply, for allocation in the East Wittering Neighbourhood Plan, to 875 dwellings. The Land at Stubcroft Farm has capacity to meet this level of housing need and provide tangible benefits to existing residents in East Wittering and Bracklesham through new community infrastructure that would limit the need to travel outside of the settlement to access key services and facilities such as secondary schooling and jobs.
- 5.12 The level of housing need for East Wittering is constrained in the Preferred Approach on the grounds of landscape and highways impact. This statement and the submitted Local Plan Promotion Report (February 2019) identify a workable highway solution, as such offering a viable potential to accommodate more of the District's housing need in East Wittering. Through the Land at Stubcroft Farm there is a realistic prospect of a significant quantity of this housing and new community infrastructure being delivered within the first five years of the Plan period.
- 5.13 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 AL8: East Wittering Parish

Land will be allocated for development in the East Wittering Neighbourhood Plan for a minimum ~~350~~ 875 dwellings including any amendments to the settlement boundary. Development will be expected to address the following requirements:'

6. Conclusion

- 6.1 These representations support the development strategy in the Preferred Approach to disperse development throughout the District with a clear role for the Settlement Hubs to help meet the local housing need in the most sustainable locations.
- 6.2 Our representations highlight the risks to the emerging Local Plan of Draft Policy S4. Policy S4 should allow for the proper operation of Paragraphs 59 and 60 of the NPPF. It cannot at present and is therefore not considered to be 'positively prepared' or 'consistent with national policy'. Using a suppressed housing needs assessment and entirely unrealistic assumptions of higher delivery in the second half of the plan period Barratt David Wilson Homes has no choice but to object to the Preferred Approach Local Plan on the grounds of 'soundness'.
- 6.3 The acknowledgement of East Wittering / Bracklesham as a Settlement Hub in the Preferred Approach is welcomed. However, the artificial cap applied to East Wittering, limiting

housing growth to 350 dwellings over the Plan period, is not justified. In view of the comparable range of key services to other Settlement Hubs, which are individually allocated over 1,000 dwellings, and the evidence presented in the Council's evidence base studies and reports commissioned by Barratt David Wilson Homes there is no compelling justification for not increasing the housing supply to at least 875, or even 1,000 dwellings. Through the higher level of growth proposed in Options 2 and 3, the resulting investment in community infrastructure and support for the viability of the town centre is likely to result in a reinforcement of the role of East Wittering, in line with the objectives of Policy S2. Smaller piecemeal development would not bring the same infrastructure benefits.

- 6.4 The submitted LVIA suggests the Land at Stubcroft Farm is capable of large-scale growth with limited landscape impact. The submitted Local Plan Promotion Report considers a higher level of growth is more likely to influence modal shift and reduce out commuting to Chichester for services and employment. Whilst East Wittering / Bracklesham are located outside of the East/West Corridor Sub-Area the distance from the A27 creates the opportunity for traffic dispersal along the route. The focus on the A27 corridor for a large proportion of the housing provision is likely to result in traffic having little opportunity for dispersal before arriving at the junctions of the A27.
- 6.5 The growth options described in this Statement and in the Stubcroft Farm Vision Statement are suitable and immediately deliverable and would help meet the first five years of a more realistic objectively assessed housing need and reduce the risk of the draft Plan being found to be 'unsound' at Examination.

