



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)
Full Name		Kris Mitra
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Organisation (if applicable)		
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, S24, SB3 (North Mundham)
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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 but our comments herein cover the following:

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 North Mundham/Runcton is properly classified as a service village where development will be provided based on land being available in suitable locations.

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.

North Mundham has been allocated a figure of 50 dwellings, by the provision of a settlement boundary extension to the north of the settlement off School Lane, north of the B2166. We would contend that this proposed settlement boundary extension is discordant and remote from the settlement, and would not be an appropriate extension of the settlement. It is also inconsistent in its relationship with the settlement as a whole and extends excessively north.

We consider that the site appended to this submission at Lagness Road, Runcton would make a more logical and consistent extension of the settlement boundary, adjacent to the settlement of Runcton and capable of accommodating up to 25 dwellings. On that basis, the settlement boundary around the site north of the B2166 could be reduced to accommodate 25 dwellings instead of 50, and the amount of development shared equally between the two settlements. Such an approach would still deliver necessary affordable housing and contributions towards local infrastructure, but the impact of development would be more evenly spread across the settlement area. In addition, the site at Lagness Road has housing on three sides and is well contained and better related to existing development. The site is also sustainably located.

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 but North Mundham/Runcton (SB3) is.

We propose that the site at Lagness Road should be removed from the designated countryside and encompassed within the settlement boundary of Runcton to accommodate up to 25 dwellings. Furthermore, the proposed settlement boundary extension at North Mundham adjacent to School

Lane should be reduced to deliver 25 dwellings.

SB3 – North Mundham/Runton Settlement Boundary

The map at SB3 identifies the settlement boundary changes for North Mundham/Runton. At present the plan shows three boundary changes, two to incorporate sites already identified in the adopted Site Allocations DPD and a proposed settlement boundary extension to the north of the B2166. We consider that the areas identified as part of the adopted Site Allocations DPD are misleading and should simply be accorded settlement boundary status as they are already developed. The plan should be changed to include the site at Lagness Road which forms a logical settlement boundary extension and is contiguous with existing development.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Policy S2 – Identify the provision of 25 dwellings at Runton off Lagness Road. In the event that the plan maintains the provision of 50 dwellings at North Mundham, this allocation should be increased to 75 to take specific account of the site at Lagness Road being capable of accommodating a further 25 dwellings.

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 S24 – Remove the site at Lagness Road from the designated countryside area and incorporate within the settlement boundary of Runton.

Settlement Boundary Map SB3 – Amend the settlement boundary as defined in accordance with the attached plan and include the site at Lagness Road within the settlement of Runton.

(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>):	Kris Mitra
Date:	7 February 2019