



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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Is this the official view of the organisation named above? Yes X 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:	Page 136 paras 7.1 to 7.13	Policy Reference:	Policy DM1
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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:

Draft Policy DM1 appears to be closely aligned with Policy DM6 insofar as the former caters for various forms of specialist housing whilst the latter sets out the policy for the accommodation of agricultural and other rural workers. At present neither policy extends to the provision of specialist housing for agricultural, horticultural or rural workers for which reason on behalf of Landlink, representations are made to both draft policies and the lower text. This submission deals primarily with Policy DM1 but a separate submission is made for DM6 prepared along similar lines.

What follows is a review of the draft Local Plan Review together with the Council's various Background evidence-based reports. Towards the end of the representations some positive comments are made to improve the plan addressing the environmental, social and economic benefits as the three overarching principles of sustainable development (NPPF 2018, paragraph 8)

Paragraph 7.39 of the Review accepts that the District is largely rural in character and often there is a need for rural workers to live in the countryside. It states also that residential development is not normally permitted in the countryside. Earlier in paragraph 7.1 (Page 134) it states clearly that local authorities should inter alia;

- plan to meet the housing needs of the whole community as a minimum, taking account of any unmet needs in neighbouring areas unless there are specific circumstances to justify a different approach,
- provide wider housing opportunity and choice and a better mix in the size, type and location of housing,
- place housing in locations which are accessible by public transport to jobs, shopping, leisure, education and health facilities,
- give priority to using previously-developed land within urban areas,
- make more efficient use of land, and
- promote good design in new housing development, placing the needs of people before the ease of traffic movement.

The following paragraphs in the Review allude to various forms of specialist housing to include hostels and residential institutions but the full complement of specialist housing does not extend towards housing rural workers in the countryside which, according to the Council's evidence base, puts a strain on the housing stock.

The Council's evidence base contained within the GL Hearn HEDNA Report (January 2018) makes a number of presumptions and conclusions which need to be reviewed and reconsidered and on the back of those comments, Policy DM1 could be improved by modification or perhaps Policy DM6 could be updated and amended to provide for specialist rural worker accommodation.

According to the Council's evidence base, the Chichester Housing and Economic Development Needs Assessment (HEDNA) [January 2018] recognises the huge contribution that the horticultural / food industry makes to the local, regional and national economy. Figure 22 (page 44) and paragraphs 4.25 and 4.26 further illustrate the projected annual growth rates for the period 2016-2035 stating that accommodation and food services sector is likely to generate **2,200 additional jobs**. (para 4.26). Paragraph 11.52 (page 189) points out that the industry in Arun and Chichester is the strongest in the country of which "75% is located in Chichester." "The industry generates around £1bn in turnover" supporting circa 7,500 jobs in the District.(page 189 HEDNA) Members of the Council are fully aware of the international importance of the industry for which reason alone, the industry needs the continued nurturing and support in planning policy terms to ensure the future success of food production and preparation for the next 20 years.

Paragraph 3.19 of the HEDNA reiterates the point that within the horticultural / food production sector, levels of employment "are subject to seasonal variations" and it is that factor which requires constant attention and management. It is recognised that the sector supports some **7,500 jobs** and all of these employees need to be housed. Paragraph 8.60, page 131 (HEDNA) makes an obvious remark that local agriculture and horticultural businesses state that workers choose the private rented sector out of choice as they do not reside in the District all year. Clearly this statement is correct in part, but the types and levels of accommodation are often inappropriate, too costly or several miles away inevitably adding to traffic issues on the already congested highway infrastructure. It is surprising to learn at paragraph 8.66 (HEDNA) that whilst there was recognition of some interest in more sustainable locations for agricultural workers to live that "this was not currently required nor proffered as a solution." Regrettably Landlink was not consulted during the preparation of the HEDNA Report neither was one of the largest employers on the Chichester Food Park (see paragraph 11.51) hence the opportunity to contribute at this stage is welcomed. Landlink have a particularly good understanding of this market sector currently providing 500 bed spaces in West Sussex a large proportion of which is in Chichester.

The HEDNA Report notes that "There are substantial expansion plans for the local horticultural industry.....on the South Coast" (paragraph 11.60) and as far as we know, further improvements and innovation within the industry will continue attracting further challenges including improving the living conditions of workers, transient or otherwise. Paragraph 11.73 continues recognising that "***the imported staff have a significant impact on local residential stock***" with many priced out of local homes" (our emphasis) which explains why cheaper, less convenient accommodation is sought elsewhere further afield.

The basis of the Hearn projected forecasts for future employment numbers is difficult to understand as Figure 74 (page 192) is unclear without any y axis explanation although the x axis is self-evident. Notwithstanding, it is appreciated that paragraph 11.80 admits, "***As such it is difficult to draw any labour force-based conclusions on future need***" for which reason it would be more robust and realistic to look at the evidence of current employment levels and base projections on the best available information on the ground which suggests

that levels of employment will increase. Meanwhile housing opportunities are declining and pressures for additional worker housing can only increase.

From evidence available from Natures Way Foods operating from the Chichester Food Park the following information is of assistance;

- Current workers are employed from Bulgaria, Hungary, Latvia, Lithuania, Poland, Portugal, Romania, Slovakia and UK, the most common nationalities being Polish, Bulgarian and Romanian.
- The majority of staff have a current address in Bognor Regis, Portsmouth and Chichester.
- The average length of employment for temporary workers with NWF is up to 12 weeks but it important to note that over 70 temporary staff work an average 27+ weeks.

The empirical evidence available demonstrates the majority of workers live in Bognor Regis a large proportion of which have short term contracts thus requiring short term housing.

The conclusions of the HEDNA report stipulates a requirement of 609 dwellings per annum capping the OAN at 40% above the adopted figure of 7,388 homes over the period 2012-2029. The remainder of the report concentrates on the provision of the private and affordable requirement but whilst recognising the Government's ambitions and initiatives to boost home ownership and self/custom build development (paragraph 12.10) there is little discussion regarding custom build development of the nature raised last year to accommodate agricultural and horticultural workers in a more sustainable location.

As is often the case, reports are short lived and the January 2018 HEDNA Report is no different insofar as paragraph 11.76 reports that the former South Downs Holiday Village in Bracklesham Bay is used to house seasonal workers but as of the 19th December 2018, the opportunity to be housed at the holiday village is now very limited as planning permission has been granted for 85 new dwellings (Ref: EWB/18/00753/OUT) The result of the permission continues to add to existing pressures for housing workers in suitable accommodation.

The Local Plan Review does take account of the evidence base but paragraph 7.39, whilst recognising the need for 'specialist' housing for agriculture and horticultural workers "*may require a countryside location where new residential development would not otherwise be permitted*" there is no policy enabling the provision of any larger scale purpose build housing in an otherwise suitable location. In a somewhat dismissive way paragraph 7.43 states, "***The needs of the temporary and permanent workforce in the horticultural industry should be met in the general housing stock as there is no specific need for residential accommodation in the countryside.***" This opinion is challenged because there *is* a need and even the HEDNA Report says clearly that there is a "**significant impact on local residential stock**". (paragraph 11.3). This is not a new concept and the Council has promoted this in 2006, paragraph 328 of the Chichester Core Strategy Submission making mention of the need to accommodate workers in self-contained accommodation. (Please see letter submitted 7th August 2018 which includes paragraph 328 in an appendix.) Twelve years later and there remains no planning policy to offer the opportunity to provide an important specialist type of housing stock that would contribute to the Local Plan objective of continued support for the largest employer in the District and the Region in order that the industry can retain its role as market leader.

Proposed draft Policy DM1 makes provision for the accommodation of specialist housing but omits the opportunity to promote housing in the countryside of a suitable scale and type to

accommodate rural workers such as those working in agriculture and horticulture. If the policy could extend the inclusion of specialist housing for rural workers on a scale commensurate with appropriate levels of support to the HDA, this would be very supportive of both the social and economic limbs of the NPPF. More specifically the site at Walnut Tree Farm which is a highly sustainable location from many different aspects.

Whilst preparing representations to the Chichester Local Plan Review, research has been undertaken within East Cambridgeshire District Council where specialist agriculture, horticultural and rural housing needs have been addressed in a specific way. For example, at Barway in Ely, Cambridge, since 1989 to the present day, specialist housing has been approved for agricultural and horticultural workers in the countryside evidenced by the following planning permissions;

Planning Permissions granted at GS Shropshire & Sons Hainey Farm, Barway, Ely Cambridgeshire for Barway Services Ltd.

East Cambridge DC

- 89/01385/FUL – siting of temporary dormitory portakabins for use between April to November 1990-1994 – Approved
- 93/00958/FUL – Expansion of vegetable Production Area Associated crop Cold Storage (5,124sqm) & Farm Hostel (1,200sqm) – Approved
- 99/00371/FUL – Extension of temporary permission for 34 portakabins and 3 caravans until 1st May 2002 for temporary accommodation for seasonal agricultural workers – Approved
- 99/00372/FUL – Erection of hostel building (1,680sqm) and social building (774sqm) for seasonal agricultural workers) – Approved

The provision of such housing in Ely has clearly reduced the general pressures for housing elsewhere whilst supporting the rural economy by creating a self-sufficient sustainable form of affordable housing in close proximity to the employment areas thus reducing the need to travel.

It has been suggested already that Walnut Tree Farm 3.1ha (see attached plan) located on the edge of the western edge of the Runcton HDA and the Runcton settlement, there is scope to provide such accommodation in a highly sustainable location which would satisfy an important demand and, if allocated, would alleviate other housing pressures elsewhere.

Within the Council's Settlement Hierarchy evidence base (Background Paper December 2018) page 7, North Mundham and Runcton is identified as a Service Village settlement with limited community facilities but it is recognised that Chichester City is close by. Draft Policy S2 sets out the principle that any site allocations will be identified in accordance with policies in the Local Plan Review hence it is important to understand and identify the need for specialist worker housing so that the allocation can be identified. Paragraph 4.14 continues saying, "***The starting point for housing development at Service Villages is that in principle, they are suitable places to accommodate new housing.***" But in the scenario of trying to provide 'specialist worker accommodation' on a site such as Walnut Tree Farm, which is located adjacent to the HDA and on the edge of Runcton Service Village, there must be scope to identify the site for such housing, easing other housing pressures elsewhere in the District.

In order to enable such housing, there are several policy options available by amending the draft Local Plan Review.

- a) Amend Policy S2; (see below)

- b) Amend Policy DM6 to allow for special rural workers; or,
- c) Amend Policy DM1 to expand on the definition of specialist housing (see below); and / or
- d) Amend Plan DM15 to include Walnut Tree Farm within the settlement boundary of Runcton; or
- e) Create a specific new policy to allow specialist housing within the countryside particularly to enable the provision of housing for agricultural, horticultural and rural workers.
- f) Given the almost unique location of Walnut Tree Farm sandwiched between the Runcton HDA and the settlement boundary of Runcton, allocate the site for rural housing in the Plan.

The Council's evidence base "**Landscape Capacity Study**" [2018] **Sub-Area CH33 Walnut Tree Farm** concludes "**This sub-area has been ascribed a medium/high capacity, in part because of its lack of formal designations and indivisibility. It is considered that some development may be accommodated around the existing clusters of built form and provided it is informed by further landscape and visual impact assessment and sensitivity integrated into the landscape.**"

As the proposal is to consider the western end of the land only at Walnut Tree Farm (see attached plan) which has no existing landscape and adjoins the settlement boundary, it is believed that subject to other technical matters being satisfied such as transport and drainage, that the allocation could be ratified. To this end further discussion followed by additional technical work could be undertaken as part of the LP Review process during 2019.

The **Sustainability Assessment** prepared by the Council (at paragraph 5.2.21 (page 41)) allows for additional specialist housing (DM1) but the SA may require a review in this context.

It is noted that the Peter Brett **Transport Study of Strategic Options and Sustainable Transport Measures** states that "for Scenario 1, and with the proposed mitigation in place, the network conditions are generally projected to be comparable to those in the baseline suggesting that the proposed junction mitigation has the potential to mitigate and accommodate the growth provided for in this scenario;" [Paragraph 12.1.2, Page 134]

Attachments:

- Plan of the current HDA showing the Walnut Tree Farm (part in the HDA)
- Plan of the Walnut Tree Farm site at 2.0ha considered suitable, available and developable for specialist housing.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

There is evidence available within the various Council's evidence base documents to promote and enable a small self-build rural housing scheme for agricultural / horticultural countryside workers at Walnut Tree Farm within or adjacent to the HDA on the edge of Runcton.

Revised Policy 2 could include wording to the effect that:-

“Service Villages: North Mundham/Runcton

Given the special needs of the agricultural / horticultural food cluster sector for much needed housing to accommodate workers, 3ha of land at Runcton is identified for the provision of a rural workers housing scheme.”

The settlement boundary of Runcton could be altered to accommodate the site allocation or, due the specialist nature of the allocation, it could remain within the HDA or a countryside designation. The DM15 Plan may need amending further?

Draft Policy DM1 could acknowledge the specialist housing required for workers in the preamble of the policy wording and added accordingly? What follows is an extract from draft Policy DM1 with additional words using a blue font.

“Policy DM1: Specialist Housing

Proposals for specialist needs housing such as homes for older people, people with disabilities, **agricultural, horticultural and countryside workers**, student accommodation or homes for other specific groups who may require properties that are specifically designed and / or allocated will be supported where:

1. There is a clear identified need;
2. The development is located in an area that is sustainable to meet the social as well as the housing needs of the intended residents;
3. It will not lead to a concentration of similar uses in an area that would be detrimental to the character or function of an area and / or residential amenity;
4. It is in close proximity to everyday services, preferably connecting by safe and suitable walking / cycling routes or public transport for the intended occupier;
5. It can be demonstrated that the development is designed and managed to provide the most appropriate types of support for the target resident;
6. It can be demonstrated that revenue funding can be secured to maintain the long term viability of the scheme; and **where appropriate**,
7. The scheme is supported by the relevant statutory agencies.

Proposals which may result in the loss of specialist needs accommodation will not be permitted unless it can be demonstrated that there is no longer a need for such accommodation in the Plan area, or alternative provision is being made available locally through replacement or new facilities.”

Chichester Local Plan Review 2035 Preferred Approach – December 2018 Schedule of proposed changes to the policies map – possibly needs to be amended as above.

The Council's SA along with other strategic evidence-based documents will require amendments and updating as a result of any policy changes.

(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>):	Graham Beck
Date:	7 th February 2019