



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		Ian Johnson
Address		30 Carlton Crescent, Southampton
Postcode		SO15 2EW
Telephone		02380 633440
Email		ianjohnson@lukenbeck.com
Organisation (if applicable)	Seaward Properties	Luken Beck
Position (if applicable)		Managing Director

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

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To which part of the document does your representation relate?

Page/ Paragraph Number:	Page 30, 32, 33	Policy Reference:	S2 Settlement Hierarchy
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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 Preferred Approach carries forward the Adopted Chichester Local Plan: Key Policies 2014-2029 classification for **Hermitage** as one of the District's Service Villages. We welcome the focus in the supporting text (ref. para 4.18) on the services villages as locations for new strategic development, as part of the Council's strategy to disperse development across the Plan area in suitable locations.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

N/A

(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>):	Ian Johnson
Date:	04.02.19



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To which part of the document does your representation relate?

Page/ Paragraph Number:	Page 33 - 35	Policy Reference:	S3 Development Strategy
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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:

We welcome the policy objective to disperse development across the Plan area. We also support the location of non-strategic sites, community infrastructure and appropriate forms of commercial development within the Service Villages. However, we **object** to the exclusion of Hermitage as a Strategic Development Location within the table in the policy and therefore its exclusion from the list of Service Villages identified for growth. Our objection is also relevant to the Settlement Hierarchy Local Plan Background Paper (December 2018) which is not considered to provide a robust evidence base to support the draft policy.

We also object to the following wording of the policy:

'To ensure that the Council delivers its housing target, the distribution of development may need to be flexibly applied, within the overall context of seeking to ensure that the majority of new housing is developed at Chichester City and settlement hubs where appropriate and consistent with other policies in this plan. Any changes to the distribution will be clearly evidenced and monitored through the Authority's Monitoring Report.'

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Hermitage is identified in the Settlement Hierarchy Local Plan Background Paper (December 2018) as a Service Village, which is carried forward into draft Policy S2: Settlement Hierarchy. The exclusion of Hermitage from draft Policy S3 as a Strategic Development Location is understood to result from a limited assessment undertaken by the Council of population size and the broad range of key services and facilities that are accessible to Hermitage. Paragraph 4.5 of the above background paper states,

'The Council do not monitor data specific to Hermitage as it forms part of Southbourne parish and lies adjacent to the village of Emsworth (Havant District). The Council considers that its proximity to the services in Emsworth and Southbourne is sufficient to designate Hermitage as a Service Village. '

As a result of the above approach Hermitage is excluded from the ranking of District Settlements for their access to key services and facilities in Appendix 1 of the background paper. This is a significant oversight. There are a range of key services within the local centres of Emsworth and Southbourne accessible to Hermitage via a range of sustainable travel modes, including employment, education, healthcare and leisure facilities.

Whilst the policy wording recognises the need for a sequential approach to the distribution of housing (i.e. ensuring the majority of new housing is developed at Chichester City, the Settlement Hubs and then in the Service Villages) the reference in the policy to *'the distribution of development may need to be flexibly applied'* could lead to growth in less sustainable locations over the Plan period and a weakening of the Plan-led approach. The policy wording is inconsistent with the Government's commitment to *'significantly boosting the supply of homes'*, as set out in Paragraph 59 of the NPPF and encouraging Local Authorities to provide a greater degree of certainty in seeking to meet their full housing needs.

To suggest flexibility, rather than a positive move to deliver the full local housing need as part of the plan-making process is unnecessary. There is sufficient provision within Paragraph 11 of the NPPF under the 'presumption in favour of sustainable development' to allow for an alternative distribution of development to come forward, should there be under supply of housing during the Plan period.

In summary, the above policy wording is **not positively prepared, nor will it be effective** in delivering the District's full local housing need in sustainable locations, such as the Settlement Hubs and Service Villages. We therefore request;

- the inclusion of Hermitage within the list of Strategic Development Locations; and
- the following wording is deleted from the policy text,

~~*To ensure that the Council delivers its housing target, the distribution of development may need to be flexibly applied, within the overall context of seeking to ensure that the majority of new housing is developed at Chichester City and settlement hubs where appropriate and consistent with other policies in this plan. Any changes to the distribution will be clearly evidenced and monitored through the Authority's Monitoring Report*~~

(Continue on separate sheet if necessary)

Declaration

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Name (print):	Ian Johnson
Date:	07.02.19



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To which part of the document does your representation relate?

Page/ Paragraph Number:	Page 127 - 129	Policy Reference:	AL13 Southbourne Parish
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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:

We welcome the identification of Southbourne as a 'Strategic Development Location'. This recognises the range of key services and facilities located within Southbourne (ref. Appendix 1 of the Settlement Hierarchy Background Paper (December 2018) and the potential role Southbourne Parish will play in delivering the full local housing need for the District.

Notwithstanding the above we wish to draw the Council's attention to the potential conflict in the following policy wording with the development strategy (ref. draft Policy S3) and the ability of the emerging Plan to meet the local housing needs of the District and apply the '*presumption in favour of sustainable development*' (ref. Paragraph 11, NPPF):

'Land will be allocated for development in the revised Southbourne Neighbourhood Plan for a mixed use form of development to include a minimum of 1,250 dwellings, along with land to be allocated for employment and community uses subject to further examination of potential sites and including any amendments to the settlement boundary. Development will be expected to address the following requirements:'

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Whilst we support the draft policy objective to deliver housing, employment, retail, social and community facilities at Southbourne through the Neighbourhood Plan process, the above policy wording predetermines how the emerging Neighbourhood Plan should distribute the identified local housing need and associated development. The requirement in the above wording for development to address all 16 criteria assumes a single site will come forward, as opposed to a number of sites which collectively could meet the 16 requirements, if planned for in advance.

Proposals for sustainable urban extensions where land is 'available' and 'achievable' in Settlement Hubs such as Southbourne, are a sustainable way to meet the local housing need in the early years of the Plan period and support the long-term vitality of existing communities. A number of smaller sites can collectively bring the benefits of a single major large-scale development, with the added benefit of early delivery, provided a strategic approach to infrastructure delivery is taken and coordinated through an emerging Plan, SPD or other supporting document (i.e. Infrastructure Delivery Plan). This is recognised in Paragraph 68 of the NPPF where by the important contributions of small and medium sized sites can make in meeting the housing requirements of an area and are often built-out relatively quickly.

The 'Land at Woodfield Park Road' is located outside of the AONB and is not constrained by other environmental or infrastructure issues. The site is accessible to a range of key services within the local centres of Emsworth and Southbourne, including employment, education, healthcare and leisure facilities.

In order to encourage the objective assessment of all options for the distribution of housing within Southbourne and avoid the exclusion of sustainable sites, such as the 'Land at Woodfield Park Road' the following change should be made to the policy wording:

*'Land will be allocated for development in the revised Southbourne Neighbourhood Plan to **enable the delivery of** ~~for a mixed-use form of development to include~~ a minimum of 1,250 dwellings, along with land to be allocated for employment and community uses subject to further examination of potential sites and including any amendments to the settlement boundary. Development **should be dispersed around the settlement to allow the phasing of well-integrated** high quality **sustainable urban extensions providing good access to facilities and sustainable forms of transport.***

Development proposals will be expected to make proportionate contributions towards the delivery of the following requirements:

1. ~~Provision of a form of development to be masterplanned as a high quality sustainable extension(s) of Southbourne and be well integrated with the existing settlement providing good access to facilities and sustainable forms of transport;~~
2. A range of types, sizes and tenures of residential accommodation to include specific provision to meet specialised housing needs including accommodation for older people;
3. Provision of suitable means of access to the ~~site(s)~~ **sites** and securing necessary off-site improvements (including highways) to promote sustainable transport options;
4. Opportunities as they arise to improve the situation relating to the various existing or planned railway crossings;
5. Provision of an up to two form entry primary school;
6. Potential expansion of secondary school subject to further consideration;
7. Expansion and provision of community infrastructure potentially to include early years' childcare provision, community hall/centre and expansion of doctors' surgery plus flexible space for employment/small-scale leisure use;
8. Provision of on-site public open space and play areas in accordance with Policy DM34;
9. Detailed consideration of the impact of development on the surrounding landscape, including views towards the South Downs National Park and Chichester Harbour AONB and their settings, and any potential for coalescence between adjoining or nearby settlements along with a detailed landscape management plan;
10. Opportunities for the expansion and provision of green infrastructure into the wider countryside including between settlements and facilities;
11. Demonstration that development would not have an adverse impact on the nature conservation interest of identified sites and habitats;

12. Provide mitigation to ensure the protection of the SPA, SAC and Ramsar site at Chichester Harbour including contributing to any strategic access management issues, loss of functionally linked supporting habitat and water quality issues relating to runoff into a European designated site;
13. The protection of any other key views;
14. Provision of infrastructure and community facilities in accordance with the most up to date Infrastructure Delivery Plan;
15. Provisions of the West Sussex Minerals Plan, and associated guidance, in relation to ~~the~~ **sites** being within a defined Minerals Safeguarding Area.
16. Ensure sufficient capacity within the relevant Wastewater Treatment Works before the delivery of development as required.

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:	Page 36	Policy Reference:	S4: Meeting Housing Needs
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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:

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.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

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. 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.

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).

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.

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 and Service Villages. 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.

(Continue on separate sheet if necessary)

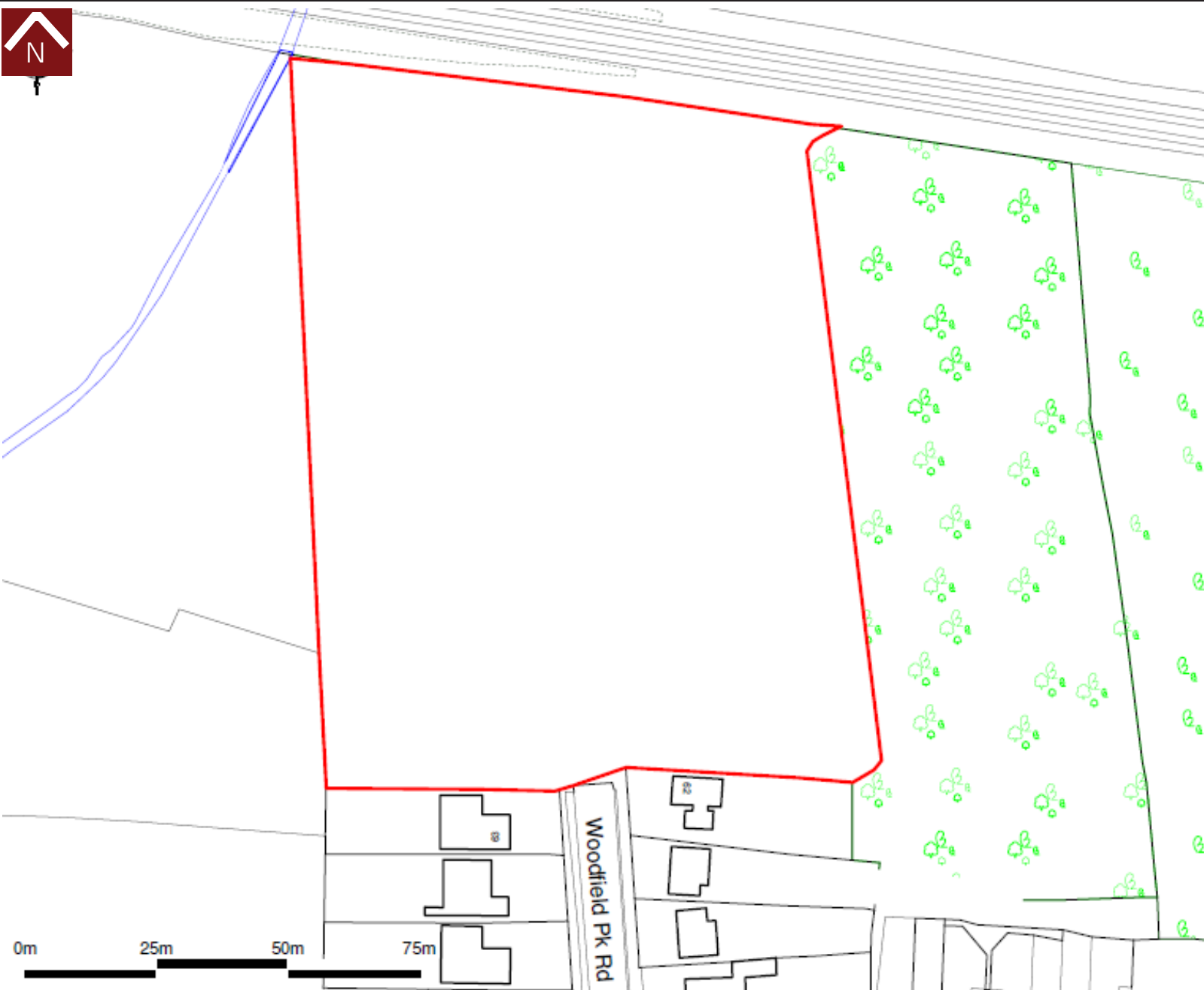
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Name (<i>print</i>):	Ian Johnson
Date:	07.02.19



N



Title: LOCATION PLAN

Site and Address: Woodfield Park Road, Hermitage

Drawing Number: 13020/02

Drawn: NF

Checked: IJ

Scale: Not to scale

Date: 07.02.2019

Notes:

This map is produced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationary Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings.

LUKEN BECK MDP LTD OS LICENCE NO. 100016272

This drawing is for illustrative purposes only and is subject to detailed topographical survey and site investigation, including ground conditions/contaminants, drainage, design and planning/density negotiation. The feasibility of the design shown, therefore, must not be relied upon. It has not been considered in respect of the CDM Regulations.

Luken Beck

30 Carlton Crescent
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