



RH/HP17021

06 February 2019

Mr M Allgrove
Planning Policy Manager
Chichester District Council
East Pallant House
1 East Pallant
Chichester
PO19 1TY

Dear Mr Allgrove

Chichester Local Plan Review – Preferred Approach (Regulation 18 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012) – Consultation Response

I write on behalf of Seaward Properties in response to the Council's invitation to comment on its Local Plan Review – Preferred Approach (hereafter 'the Plan'). My client has the opportunity to bring forwards land south of Clappers Lane, Earnley for development within the Plan period (see **Appendix A – Site Location Plan**) to provide around 100 new homes, 30% of which will be affordable. The land is in single ownership and the developer and land owner have reached an advanced stage in agreeing terms to take the site forwards to application stage. As such the site is available, achievable and deliverable. Seaward Properties are very familiar with the area having recently completed a number of other high-quality developments within Chichester District and are keen to work with Officers to deliver a development in Earnley that will make a significant contribution to housing delivery which has been designed to take account of the sites unique features and respects the existing landscape quality of the surrounding area. The site has previously been promoted through earlier consultation on the emerging Plan including the 2017 Issues and Options consultation and the 2018 Housing and Economic Land Availability Assessment which identifies the site as being achievable within the Plan period.



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The Approach to Housing within the Plan

Within **Policy S2 (Settlement Hierarchy)** Bracklesham is identified in the Council's Settlement Hierarchy Paper (December 2018) as a Settlement Hub where there is a range of service and facilities with a reasonable size population base to support them. Bracklesham is one of only four identified Settlement Hubs identified as being secondary service centres after only Chichester itself. The Council therefore, acknowledges that Bracklesham is a sustainable location. Whilst my clients site lies in Earnley Parish, it lies on the eastern edge of the Bracklesham / East Wittering built up area and is therefore, closely related to this settlement in terms of the general pattern of development. The western boundary of the site abuts the eastern edge of the Bracklesham / East Wittering settlement as proposed to be extended through the Plan. The site is therefore, a logical addition to development in this area which will support the continued viability of existing services and facilities in Bracklesham and East Wittering whilst also being close enough to Earnley to equally support its services. The allocation of the site for development would represent a sustainable pattern of growth regardless of administrative boundaries and the current hierarchy reflects this principle.

Policy S3 (Development Strategy) sets out the Council's proposed approach to general development across the District through the Plan period. The first objective is to focus development around Chichester and the east-west corridor. Whilst it is accepted that this is the most sustainable location in the District, this strategy will result in a.) an excessive burden on an already challenged infrastructure network (the A27 and poor quality rail services) and b.) mean that other more remote areas across the District will not keep pace with the development of services and facilities in proportion with the amount focused in Chichester itself. Furthermore, it is commonly the case that the complexities around strategic allocations can result in delays to development which can have a consequential impact for housing delivery across the District and consequently the objectives of **Policy S4 (Meeting Housing Needs)**. To address these issues the Council should give consideration to better dispersing development across the District on a higher number of smaller sites. These types of sites should be located towards the periphery of the District whereby settlements can sustain the prospective occupants of new developments. There are a number of benefits to this approach. In the first instance, smaller sites are more likely to come forwards early in the Plan period and ensure that Chichester can deliver the amount of housing required. Delays in land negotiations are less likely to affect the deliverability of sites of this type. Secondly, by locating those sites on the periphery of the District, a proportion of the residents would use local facilities on a daily basis thereby supporting the sustainability of these settlements. Furthermore, the use of local facilities would lessen any immediate burden on infrastructure in the vicinity of Chichester and allow time for it to be developed and improved over the longer term which would avoid compounding an existing problematic situation. Thirdly, the development of smaller sites at the edge of the District would better encourage more widespread infrastructure improvements across



the District rather than focusing solely on Chichester. Finally, this approach is fundamentally more sustainable. The focus of a District's housing requirement in a central area will not lead to sustainable patterns of growth over the longer term.

With regard to **Policy S4 (Meeting Housing Needs)** the Plan is heavily reliant on Neighbourhood Plans delivering large-scale housing allocations which are considered to be disproportionate to the Neighbourhood Plan (NP) process. For example, the plan anticipates Southbourne NP accommodating 1,250 dwellings, Chidham and Hambrook NP accommodating 500, East Wittering NP 350 and Fishbourne 250. To ensure the Plan delivers in terms of its housing requirement, this will require Neighbourhood Planning Groups to have made significant progress on their respective Plan and Plan reviews by May 2019. This is a complex and time-consuming task and the timescales involved may result in a rushed NP process with the alternative of Chichester District Council taking back control and allocating sites contrary to an emerging NP. This is reflected in the minutes of the Chidham and Hambrook NP Group meeting minutes of November 2018 where it is minuted that one of five volunteer residents '*expressed surprise*' at the '*tight timescale indicated for the (review) project*'. In respect of Fishbourne NP, the Parish Council met on 15th January 2019 where the Groups response to the current consultation was discussed. The minutes are awaited and are likely to provide a steer on the NP groups views on the extent of development proposed within the NP area. Each of the NP groups involved are at various stages in the preparation and review process of their respective Plans making it difficult to predict how quickly each will progress. This will require Council Officers to allocate a significant proportion of their time to support NP groups which may delay work on other Policy work with a consequential impact on progress and delivery of sites across the District. Furthermore, whilst Southbourne NP group have identified land to accommodate their portion of housing development, it is a single site, north of the railway line and therefore, require a bridge. This level of infrastructure improvement is likely to render this scale of development undeliverable in the context of the NPPF. The improvements will be required to facilitate this scale of development and, as such, are likely to be unviable which again, conflicts with the NPPF.

With reference to **Policy S5 – Parish Housing Requirements 2016-2035)** National Guidance is clear that Plans should plan for a minimum number of homes over the Plan period. In its current form the draft Plan fails to acknowledge that there may be other sites within the Parishes that could come forwards and make a valuable contribution to housing supply both within the District and to assist in addressing the national shortfall. My client's site at Clappers Lane is available, achievable and deliverable. Significant consideration has been given to the proposals for the site. In promoting the site for development, its opportunities and constraints have been carefully considered and an initial concept masterplan for the site has been prepared which is set out in more detail within the **Vision Document** included as **Appendix B**. The Vision Document



provides detail on a range of considerations relating to the site including the Development Rationale, site connectivity, ecology, landscape character, local character and context, flood risk and drainage.

The site positioned to the south side of Clappers Lane which connects to Bracklesham Lane to the west of Earnley. Public rights of way run alongside the eastern and southern boundaries separate from the site by tree belts and dense scrub with an area of woodland in the south east corner of the site. The site slopes gently away to the east and south with the Earnley Rife beyond and the majority of the site lies in Flood Zone 1. The surrounding land uses comprise residential development and Medmerry Caravan Park to the south, residential development and Holdens Caravan Park beyond Clappers Lane to the north, two sites which have recently been granted planning permission for a total of 150 dwellings to the west and open countryside to the east. Earnley Conservation Area is located close to the north east corner of the site. Within 1km of the site, prospective residents would have access to a range of services including retail, food and drink outlets, leisure facilities, a school/nursery, health facilities, a church, a post office and other leisure facilities. There are also 6 bus stops within 1km of the site providing residents with access to higher order services further afield in Chichester and Selsey. The site is only c.3km from the A27 which is a major route providing vehicular access to a wider range of large settlements and rail services. Preliminary ecology, flood risk and drainage assessments have been carried out on the site which have informed the design solution. The Council's Landscape Character Assessment and the distinctiveness of existing local development has also influenced the design solution for the site.

The conceptual included in the Vision Document focuses on providing a pedestrian, mobility impaired, cycle and public transport over car travel whilst also securing a safe access strategy from the existing highway network and off site improvements to the existing footway network. The overall concept is landscape led with built form being concentrated in the north west corner of the site where it will have the closest synergy with existing development. Existing boundary vegetation will be retained to provide a soft appearance to the west boundary of the site. Of significance in terms of the layout 6ha of parkland is proposed to wrap around the north eastern corner, along the eastern side of the site and to extend over almost of the southern part of the site (see **Appendix C – Parkland Plan**). Within this area it is proposed to retain existing native trees and hedgerows, enhance the existing woodland around the southern boundary, wildlife buffer zones, a range of habitats including a pond and community orchard. Through this space a network of accessible routes would be provided linking with existing publicly accessible routes beyond the east, west and southern boundaries of the site thereby enhancing local connectivity and enhancing the open space offer for existing and prospective residents. This space would make a significant contribution to the Council's Green Infrastructure, would have the benefit of providing an enhanced ecological habitat and ensure the land is *retained in perpetuity* to the benefit of both the open space and green infrastructure objectives and ensuring



a gap in built form is retained between the eastern edge of Bracklesham and East Wittering to the west, and Earnley to the east. Furthermore, the gap along the eastern edge of development would ensure the setting of the Earnley Conservation Area is preserved.

In addition, and to underpin the landscape led approach taken, it is proposed to integrate a community garden and a LEAP at the heart of the residential development. It is proposed that the garden would be managed by the Local Community, provide an 'edible landscape' and provide a space that residents would take ownership providing the development with a sense of place. The LEAP would be located adjacent with direct access to the communal garden and incorporate natural play facilities and sensory planting to encourage imaginative play and natural education.

With regarding **Policy DM16 (Sustainable Design and Construction)** the orientation of the majority of the homes will maximise solar gain, the buildings will be constructed using highly efficient thermal installation, a number of low carbon initiatives will be incorporated with the aim of achieving a reduction in CO2 emissions by 10%. SUDS will be utilised on the site incorporating a management train which improves water quality before it leaves the site and be beneficial to wildlife in terms of surface storage in the wetland habitat.

To reflect the overall objectives of the NPPF and **Policy S1 (Presumption in favour of Sustainable Development)** economically, the site will provide around 100 homes, 30% of which will be affordable. The development would have a local construction value of £10.5 million, create 35 construction jobs with an addition 55 supply chain jobs. The occupation of the development will create £3 million of local expenditure within shops and facilities, and create 12 permanent jobs through the need for expanded facilities. The Local Authority will see the benefit of £715,000 in New Homes Bonus, £179,000 in Council Tax Revenue and receive approximately £1.1 million in Planning Contributions. The site is available and deliverable meaning these benefits would be created very early in the Plan period (by comparison to other large, strategic developments which will have a far longer lead in period until benefits are realised).

This site represents an opportunity to deliver high quality and attractive residential development that responds to the future housing needs of East Wittering/ Bracklesham in a manner that is sensitive to the site and its wider setting.

Other Policies

Turning now to the Policies set out in the Plan, one of the key challenges identified within the Plan is the requirement to *protect the area's biodiversity and habitats* and to *plan for new open space to meet the needs*



of the growing population. The provision of over 6ha of parkland, incorporating a range of ecological retention and enhancement features on the site, linking with existing public networks beyond the site and including community features (orchard and garden) will support the objectives of **Policies S21 (Health and Wellbeing), S26 (Natural Environment), S29 (Green Infrastructure), DM28 (Natural Environment), DM29 (Biodiversity) and DM32 (Green Infrastructure)** and the development will ensure these features are retained in perpetuity. The amount of parkland proposed on the site represents 64% of the site area which reflects the importance of this aspect of the proposals in the design rationale.

Conclusions

In summary, there are a number of key objectives within the Plan that are welcomed and supported. The general provision for the requirement for housing is supported and in this context, the acknowledgement that Bracklesham is a sustainable location is welcomed. Furthermore, the aims to protect the area's biodiversity and habitats and plan for new open space to meet the needs of the growing population area supported. However, the overall strategy to focus development primarily around Chichester and the East-West peninsula cannot be supported in the context of my clients site at Clappers Lane. This will result in an unsustainable pattern of growth across the District over the longer term, increase the immediate burden on infrastructure that is already straining under pressure and limit the investment in infrastructure elsewhere in the District. The Plan as drafted also places an over burden on the Neighbourhood Plan process and, as is evidenced above, the local groups with the responsibility for progressing these matters are already beginning to express concern at the pace at which these matters are expected to progress which is not promising in terms of longer term delivery. To address this, the Council should consider allocating more sites around the periphery of the District which would create a more sustainable pattern of growth and assist in terms of the timing improvements to the existing infrastructure both within the centre of the District and towards its edges.

My clients land is available, achievable and deliverable in the immediate future and would make a valuable contribution to not only market and affordable housing but also a significant contribution to green infrastructure and parkland in the immediate context of the site and its surroundings.

I trust these comments will be considered when the next stage of the Plan is considered including consideration being given to the inclusion of the land south of Clappers Lane, Earnley as an allocation in the Plan. My client and I would welcome the opportunity to discuss this with the Planning Policy team.



Finally, should you have any queries regarding the contents of this letter please do not hesitate to contact me on 023 8202 2800 or at rebecca.humble@wyg.com.

Yours sincerely

A handwritten signature in dark ink that reads 'RHumble'.

Rebecca Humble
Associate

cc. Steve Culpitt, Seaward Properties

Encs: Appendix A – Site Location Plan
Appendix B – Vision Document
Appendix C – Parkland Plan