



**CHICHESTER LOCAL PLAN REVIEW – PREFERRED  
APPROACH CONSULTATION, DECEMBER 2018**

**Chichester District Council**

**Response on behalf of Berkeley Strategic Land Limited**

February 2019



## Document Control

Project: Land at Raughmere Farm, Chichester

Client: Berkeley Strategic Land Limited

Job Number: HP19003

<b>Issue</b>	<b>Date</b>	<b>Status</b>
1	17.1.19	Draft
2	18.1.19	Draft
3	5.2.19	Draft
4	7.2.19	Final



1. WYG has been instructed by Berkeley Strategic Land Limited to make representations to the preferred approach version of the Chichester Local Plan Review which has been published under Regulation 18 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012). The consultation runs from 13 December 2018 to 7 February 2019.
2. Separate forms have been submitted for each policy that is being commented on but this document and the WYG Lavant Housing Need Study contain all of our comments.
3. We are objecting to the following policies:
  - S2, S3, and S4 in terms of the proposed development strategy
  - S4 and S5 in terms of the housing numbers and methodology
4. We believe that our client's land, at Raughmere Farm, immediately to the north of Chichester and adjoining the existing built-up area is a much more sustainable site and if a strategy had been followed that focused on robustly assessing the more sustainable sites adjoining the city, then this site would have been allocated. The site is identified in **Appendix A**.
5. The site adjoins the built-up area and is a natural progression of the city and offers a permanent solution to ensuring there is separation between the settlement of Lavant (and the National Park) from the city, by proposing a green edge to the north of the site in perpetuity. See opportunity plan in **Appendix B**.
6. The site should be allocated for 150 units and we can confirm it is in single ownership, available, can be delivered, and the option is with a single housebuilder so development can commence on site quickly after allocation and granting of planning permission. There are no constraints that would delay development and we believe the site offers a good location in a highly sustainable location close to the facilities of the city and with easy access to the countryside for a healthy lifestyle.



## **Policies S2, S3 & S4 pages 32-37: Objection to development strategy**

7. Policy S3 sets out the development strategy but we believe it is misguided and does not reflect the issues raised in the Issues & Options consultation of June 2017. That document (under question 3 at the time) asked for comments on the Vision and comments were received by the Council that:
  - Already too much development in the East/West corridor; too much congestion; issues with A27; train links are slow
  - Should include the need to protect the individual identities of villages
  - Development must be concentrated in areas with direct train links and closer to the city which has all the amenities.
8. Question 9 of the Issues & Options consultation specifically asked about the spatial principles and which were the most important for a strategy to reflect. The first priority list was:
  - Maximise re-use of previously developed (brownfield) land – 38
  - Focus development in locations where there is greatest accessibility to employment, local services and facilities – 12
  - Respect the character of the existing settlement pattern including maintaining gaps between settlements – 6
  - Focus development in locations where there is greatest potential to maximise sustainable travel (public transport, walking and cycling) – 6
  - Locate development to minimise its impact on protected or locally important landscapes, heritage and biodiversity – 5
  - Focus on locations and development that will deliver or contribute most to infrastructure and local facilities – 5
  - Focus on sites that can be delivered quickly to ensure a flexible development supply – 1
9. The strategy set out in Policies S2-S4 is therefore not appropriate as it seeks to spread the development widely and does not concentrate enough development on Chichester itself, which would be more sustainable. Chichester is the sub-regional centre and so should have the main proportion of development with the settlement hubs and service villages having *some* development, but we believe the distribution amount is unbalanced. This will lead to increased road congestion and therefore pollution as people travel from the settlements to Chichester for work, leisure, and entertainment.
10. It is understood that of the 4,400 new dwellings identified in the new local plan through the proposed strategic locations only 24% are adjoining Chichester itself with 76% in outlying areas. While it is agreed that other settlements should have some development, this appears to be disproportionate when there are other sites adjoining Chichester that are available.



11. The Local Plan spatial strategy should be changed to ensure any sites that are located close to Chichester itself and can be delivered are included and only then should other sites in the outlying settlements along the A259 corridor be considered. This will ensure a more sustainable pattern of development that focuses attention on Chichester but also delivers some development in the smaller settlements that will support services but not overwhelm them. It is important to allow settlements to expand proportionately and for new communities to integrate with the existing population. It is considered that the scale of development along the A259 corridor is excessive, particularly at Southbourne, as it will result in an increase of over 40% of the number of houses (Southbourne Neighbourhood Plan, 2014 records 2,927 dwellings in the Parish).
12. The NPPF promotes sustainable development and the site at Raughmere Farm is more sustainable than other sites that have been promoted and is on a main bus route into Chichester city centre that only takes 7 minutes right into the city centre (Cathedral) and is a regular service. There are no technical reasons why the site cannot be allocated as it is outside the National Park, not in a Statutory designation, not in flood zone 2 or 3 etc.
13. The Inspector that dismissed the previous appeal on the site in 2014 accepted the site was reasonably sustainable but decided that the proposal was damaging to the function of the 'strategic gap'. However, this is no different to the now proposed development around settlements along the A259, such as Southbourne, where the new developments will be within the existing 'gaps' between settlements. For example, the existing Southbourne Neighbourhood Plan, 2014 seeks to allocate sites for 300 houses and is careful to ensure this protects the settlement gaps between Southbourne, Nutbourne, and Hermitage/Lumley/Thornham villages (para. 4.5 of NP). The proposal to now add 1,250 houses to Southbourne will undermine the 'gap' in the same way that the appeal Inspector previously commented on the Raughmere Farm site impacted on the 'gap' and therefore given the more sustainable location, given its proximity to Chichester, than Southbourne it should be chosen instead to better reflect the spatial distribution.
14. The HELAA sets out in Appendix 2 that the site was rejected simply because:

*"Located in the Local Gap allocated in the Lavant Neighbourhood Plan"*

15. It is considered that the reason for rejecting the site simply because it was in the Local Gap as shown on the Lavant Neighbourhood Plan was incorrect when other sites were chosen that impact on settlement coalescence. Choosing sites for allocation requires difficult decisions to be made and



therefore the site should have been properly assessed against a range of criteria rather than simply being excluded on one ground. It is not understood why the 'gap' in this location is awarded additional status over other 'gaps' where development is being explored.

16. It has also been previously set out (Berkeley letter dated 26 September 2018 – see **Appendix C**) how the Lavant Neighbourhood Plan policy LN3 does not *actually* reject any development in the 'gap' and instead is a positive policy that sets out requirements to be met for new development. This includes a LVIA to be submitted and landscape features retained, and the site promotion document sets out how these points have been addressed. Therefore, we believe the straight rejection of the site simply because it is in the gap is premature and it should have been properly assessed against other sites.
17. Berkeley are prepared to offer a landscape led scheme and to offer the remainder of the site as open space to protect the sensitive part of the 'gap' in perpetuity. This would be a good addition to the local community but has been discounted before it could be properly considered.
18. Berkeley consider that it is possible to offer a scheme that differs from the appeal scheme that was refused and seeks to address the concerns of the appeal Inspector. In the appeal, the Inspector commented that the proposed landscaping was intended to be 'visually porous' to allow views of the dwellings and garages, which he stated would be damaging to the 'strong demarcation evident here between Chichester and the surrounding countryside' (para. 30). He also criticised the impact on the residents in Keepers Wood and Rew Lane due to the proximity of the proposed new houses.
19. Berkeley believe a scheme could be offered that delivers a much thicker landscape setting so that views from the road would not be porous and instead someone travelling north from Chichester would not be as aware of the development through the trees. The Opportunity Plan included in Appendix B demonstrates that this is possible with a green corridor around the site to ensure separation from the existing houses and a strong landscape buffer. The thick landscape buffer would provide a woodland belt to provide a strong arboreal link to the adjacent tree belts and habitat corridors to give a strong sylvan edge to the development. This would ensure that the dwellings were not visible as you travelled up the road from Chichester with views left open across the top part of the site and replicate the existing strong sylvan northern edge to the city as mentioned by the Inspector.
20. The opens space is relatively flat and would be left open so there is a clear demarcation between the settlements of Lavant and Chichester when travelling in both directions. The landscape buffer and



wooded edge would ensure an attractive transition into Chichester and still ensure a suitable gap is maintained between settlements and views across the site are still possible.

21. The scheme has taken on-board the previous appeal decision and a landscape-led design is achievable and can address the main concerns about the visual intrusion into the gap and also offers the benefit of a large open space on the north of the site. We would welcome the opportunity to discuss this further with the Council, Parish Council, and local community to find a scheme that is acceptable.
22. We are not aware of any other technical concerns that cannot be resolved. The Inspector on the previous planning appeal commented on the potential for noise from aircraft to exceed 55dB but it is noted that the City Council have since then published a report relating to planning application 16/03791/OUT. This report appears to accept that noise solutions can be found and we believe this issue can be satisfactorily resolved.
23. Given the existing local plan does not meet the housing requirements required, it is also considered to be a retrograde step for the new local plan to leave so many houses to the Neighbourhood Planning process as this will inevitably take additional time to progress. This site is available and can be delivered within the first 5 years of the new local plan but it is unlikely that sites the size of those being proposed along the A259 corridor could be allocated in a NP and then built within the first 5 years. This would exacerbate the undersupply of houses needed by the local community.



#### **Policies S4 & S5 pages 36-41: Objection to meeting housing needs**

24. We do not believe the housing numbers have been calculated correctly. This is set out in detail in the separate WYG document “Lavant Housing Need Study: Raughmere Farm.”
25. In summary, the main concerns are that the housing needs for Chichester District have been wrongly assessed (for example, the baseline and affordability factors are out-of-date, the cap has then been incorrectly applied, market signals have not been fully considered) and the unmet needs from neighbouring authorities have not been sufficiently catered for.
26. The Lavant Neighbourhood Plan also underrepresents the actual housing need and has not planned suitably for the required growth and around 206 dwellings should be delivered in Lavant over the Plan period.
27. The document concludes that the changes set out below are required to make the plan sound:

#### **Policy S4: Meeting Housing Needs**

The requirement of, at least 12,350 dwellings should be increased to ‘at least 13,015 dwellings’. This is in accordance with our analysis of the relevant local housing need identified in section 3 of this report. The subsequent sources of supply will need to be reviewed to include an additional 665 dwellings plus appropriate buffer to provide flexibility. Given that 1,178 dwellings of this figure is required to meet the unmet needs of the SDNP it is recommended that a significant proportion be provided near to the SDNP boundary, in areas such as Lavant.

#### **Policy S5: Parish Housing Requirements 2016-2035**

Based upon the information contained within our analysis (section 4 above) it is recommended that the housing figure for Lavant be amended from zero to circa 206 dwellings.

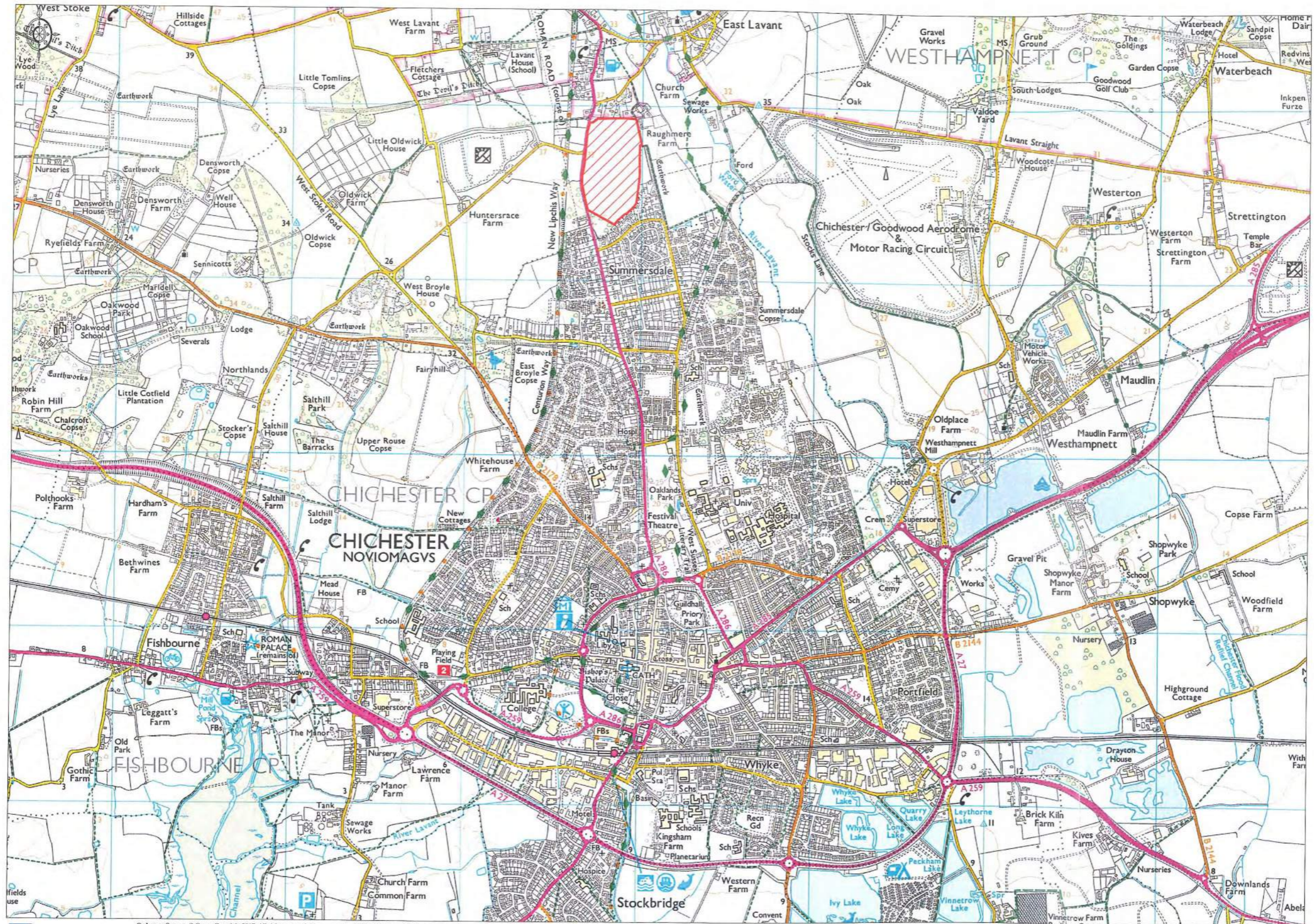




## APPENDIX A

### SITE LOCATION PLAN – RAUGHMERE FARM, CHICHESTER

Raughmere Farm, Chichester





## APPENDIX B

### OPPORTUNITY PLAN – RAUGHMERE FARM, CHICHESTER





## APPENDIX C

### BERKELEY LETTER REGARDING HELAA

Mike Allgrove  
Planning Policy Manager  
Planning Policy  
Chichester District Council  
1 East Pallant  
Chichester  
West Sussex  
PO19 1TY

26<sup>th</sup> September 2018

Dear Mike

## Housing and Economic Land Availability Assessment 2018

Thank you for inviting comments on the 2018 Housing and Economic Land Availability (HELAA).

Berkeley has entered into an option agreement with the owners of the land at Raughmere Farm, Chichester which is referred to as site HLV0007. A plan of HLV0007 is attached as Appendix 1.

HLV0007 is one of 142 sites that are rejected at Stage 2 of the HELAA. We believe that HLV0007 should be reassessed at Stage 2 and should be considered as a 'suitable' housing site.

Appendix 2 of the HELAA, Sites Rejected with Reasons, sets out the following reason for the rejection of HLV0007:

*Located in the Local Gap allocated in the Lavant Neighbourhood Plan.*

The Local Gap referred to in the reason for rejection for HLV0007 is contained within Policy LNNDP3 of the Lavant Neighbourhood Development Plan. The policy is as follows:

*Development proposed within a Local Gap, as designated on the LNNDP Map, must comply with the following criteria to be acceptable:*

- 1. Diminution of the gap must not visually, perceptually or physically lead to coalescence of settlements (A Landscape and Visual Impact Assessment must demonstrate no diminution in openness of and views from the local gaps.)*
- 2. Important trees and hedgerows and key landscape features must be retained as part of any development proposal.*

*Proposals for the use of a Local Gap for outdoor sport and recreation and other community uses will be supported unless the use will have a significant detrimental impact on the openness of the Local Gap and wider landscape. Any structures associated with the outdoor sport and recreation and other community uses must satisfy the criteria above.*

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Policy LNDP3 does not prohibit development in a Local Gap. Policy LNDP3 sets out a criteria for development proposed within a Local Gap. Policy LNDP3 should not therefore be a reason for rejecting HLV0007 at Stage 2 of the HELAA.

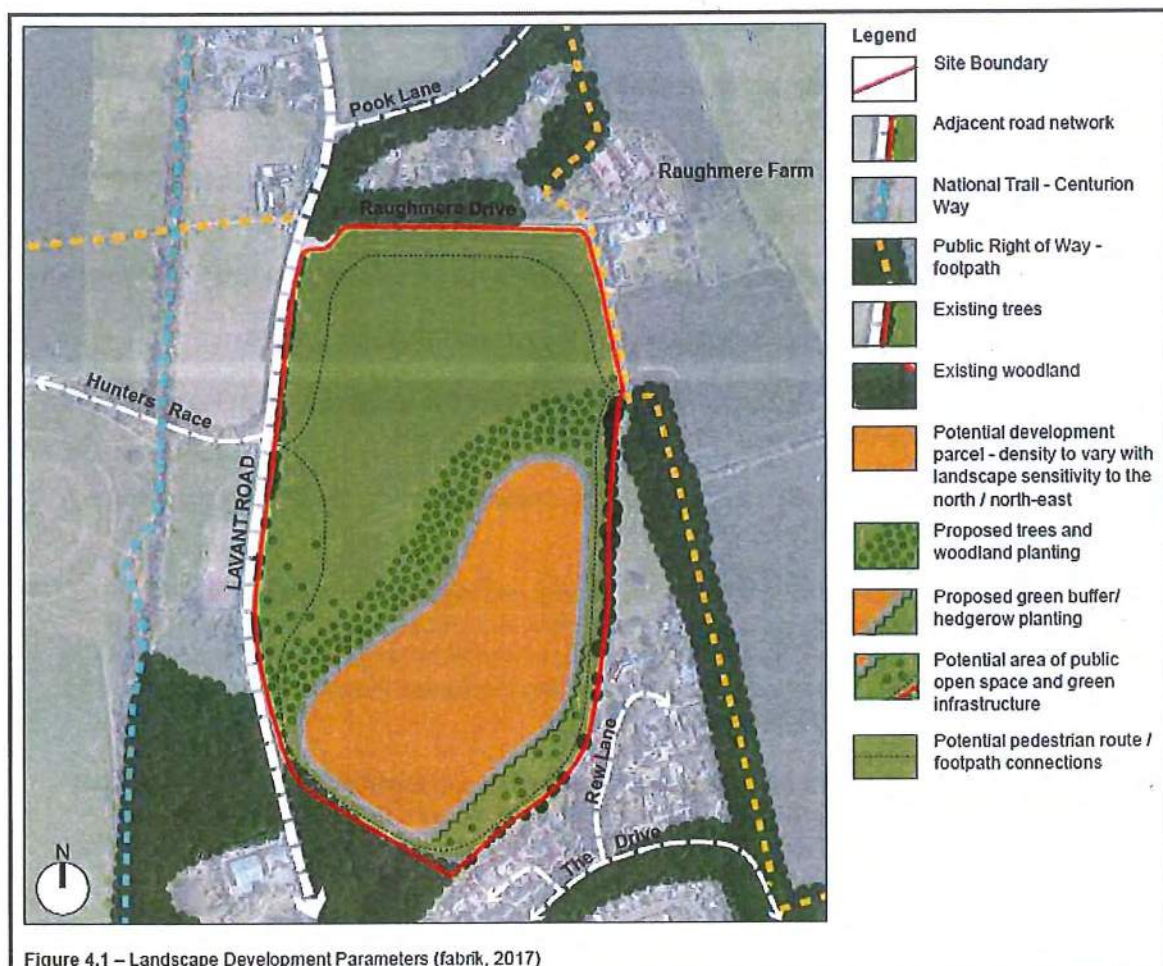
The accompanying text at 5.14 of the Lavant Neighbourhood Development Plan identifies three local gaps and HLV0007 is located in the Chichester – Mid Lavant local gap:

**(iii) Chichester – Mid Lavant**

*Appeal decision (APP/L3815/A/13/2200123) acknowledged that the 'Strategic Gap' prevented the coalescence of Chichester and Lavant. In addition this is not just a separating wedge of undeveloped land but the transition from suburb to secluded Village.*

Berkeley has commissioned a Landscape and Visual Feasibility Report which is attached as Appendix 2. This report considers local planning policies, the site (HLV0007) and its surroundings and Appeal Decision APP/L3815/A/13/2200123.

An extract of this report, Figure 4.1 - Landscape Development Parameters Plan, has been included below:



The parameters seek to meet the criteria for development proposed in the local gap set out in LNDP3 and the description of the Chichester – Mid Lavant local gap at 5.14 by:

LNDP3 – Criteria 1: Diminution of the gap must not physically lead to coalescence of settlements

The development of the site can provide a new parcel of development to the north of Chichester which is responsive in its form to the adjacent woodland to the east and west, and additionally sensitive to the open countryside character of the existing field parcel and its setting. A mature area of open land located to the north of the development parcel will be a physical gap separating the development parcel from Mid Lavant.

The location and the extent of this parcel will ensure that the diminution of the gap will not physically lead to the coalescence of Chichester and Mid Lavant.

LNDP3 – Criteria 2: Diminution of the gap must not visually lead to coalescence of settlements

The development of the site can provide a woodland belt which forms a strong arboreal link to the adjacent tree belts and habitat corridors and forms a strong sylvan edge to the development.

This woodland belt will help to protect against increased inter-visibility between Chichester and Mid Lavant and as the woodland belt matures, it could help to decrease the existing level of inter-visibility between the settlements.

This woodland belt will help to ensure that the diminution of the gap will not visually lead to coalescence of Chichester and Mid Lavant from viewpoints along the Lavant Road.

LNDP3 – Criteria 3: Diminution of the gap must not perceptually lead to coalescence of settlements

The development of the site can provide a substantial area of open space to the north of the woodland belt with informal footpath routes connecting to the existing public rights of way beyond the Site to the east and west.

This new area of open space, which will be publically accessible, will help to ensure that the diminution of the gap will not perceptually lead to coalescence of Chichester and Mid Lavant.

LNDP3 – Criteria 4: Important trees and hedgerows must be retained as part of any development proposal

The development of the site can ensure that road junction works will be kept to a minimum, rural road character is maintained and that existing vegetation is retained where possible.

The parameter plan seeks to retain all important trees and hedgerows and includes significant new tree planting.

LNDP3 – Criteria 5: Important key landscape features must be retained as part of any development proposal

The development of the site can provide a development parcel which is set back from the existing residential dwellings along The Drive and Rew Lane. This set back will enable existing trees to be retained and provide an area of open space between existing rear



gardens and proposed dwellings in order to reduce the visual effects for residential receptors and minimise the loss of visual amenity.

Setting the development parcel back from the existing residential dwellings, retaining existing trees and including new areas of open space will help to ensure that key landscape features are retained as part of the development proposal.

We consider that HLV0007 should be reassessed at Stage 2 on the basis that Policy LDNP3 does not preclude development and our development proposal for HLV0007 would satisfy the criteria set out in Policy LDNP3.

I can confirm that the site is available for development and the new homes could be delivered by Berkeley within the first five years of the new Local Plan.

We believe that the Council should seek to reconsider the suitability of sites that are located adjacent to Chichester City. Chichester City as a sub-regional Centre is on the first tier of the settlement hierarchy and therefore should be a focus for major development. However in the 2018 HELAA, only 10% of the 7,917 the new homes that could be provided by sites identified as potentially suitable, are located adjacent to the built-up edge of Chichester City. HLV0007 is an example of a site located adjacent to the built-up area of Chichester City that is suitable for development and could deliver much needed new homes for the City within the first five years of the plan period.

We would be delighted to meet with you at your convenience to discuss how HLV0007, having regard to its edge of settlement location, could be designed sympathetically to provide high quality new homes for local people and beautiful new public open spaces.

Kind regards,



Katherine Tittley  
Development Director