

Liz Pulley

From: Anna Pockney <annafarquhar_thomson@hotmail.com>
Sent: 09 February 2015 18:13
To: Birdham Parish Council; Birdham NP
Cc: Valerie Dobson; Kate FARQUHAR-THOMSON; Doughnut; Paul White
Subject: Birdham Neighbourhood Plan - Comments of the Farquhar-Thomson Trustees
Attachments: 140607-01.pdf; PrelimSiteLayout.revB.col.pdf; response form.pdf; signedcommentsletter.pdf

Importance: High

FAO Mrs Lavinia Brooks and Mr David Siggs

Dear Mrs Brooks and Mr Siggs,

I attach a copy of our last representation to the Birdham Neighbourhood Plan.

I understand the revised Birdham Neighbourhood Plan is out for consultation until 12th February 2015 and that the emerging Local Plan is out for consultation until 19th February 2015. I understand that there will be a likely increase to housing across the Chichester district and that there may possibly be a further allocation of dwellings to be provided in Birdham. If this is the case we would like the land at Martins Cottage to be considered as one of the suitable sites, or possibly, as a reserve site in order to meet future housing requirements.

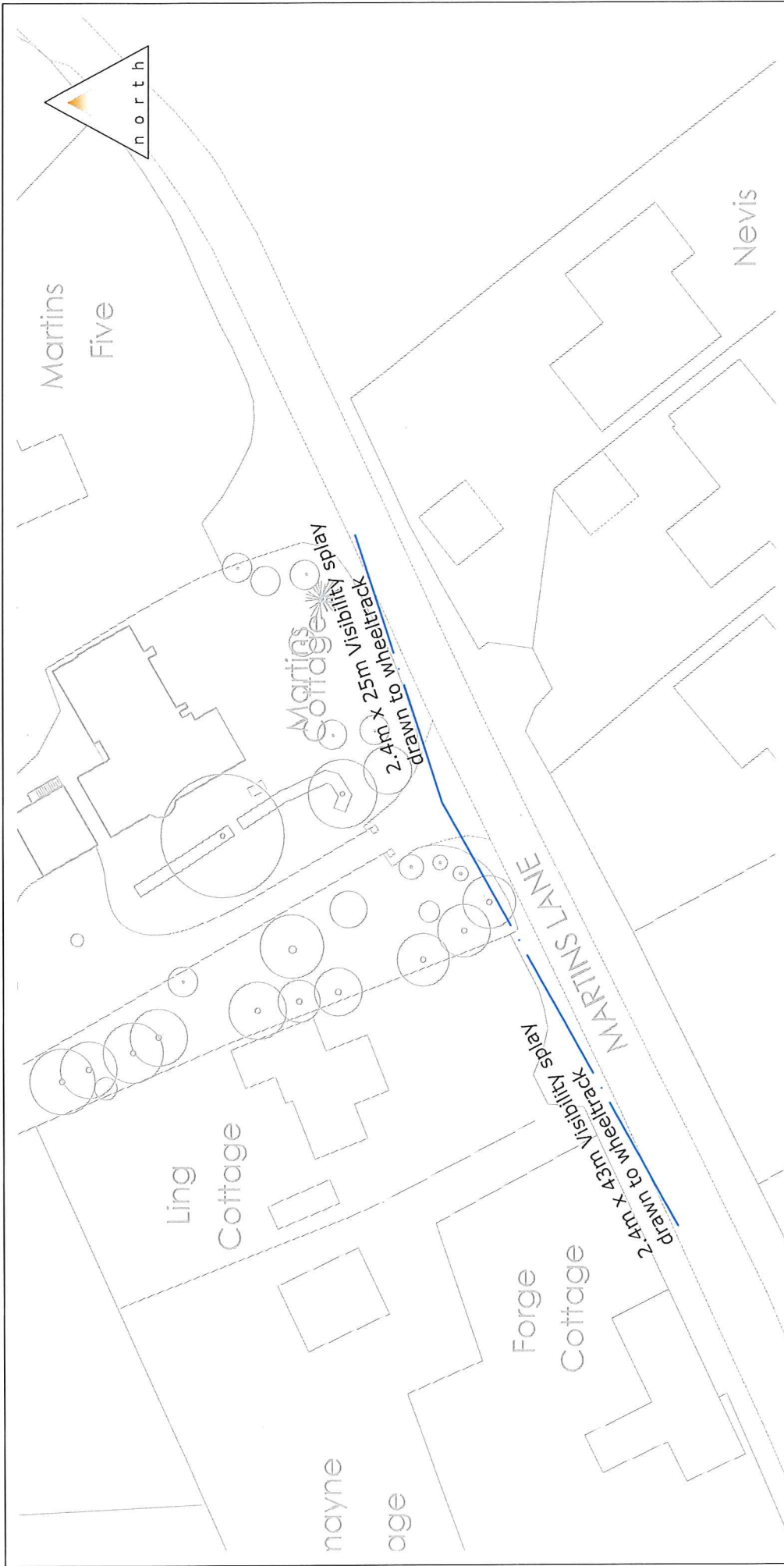
I will also send this correspondence by post.

I look forward to hearing from you.

Yours sincerely

Anna Pockney





motion

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www.motion-uk.co.uk

Project: Martins Lane, Birdham

Title: Proposed Access Arrangements and Visibility Splays

Scale: 1:500 (@ A4)

Drawing: 140607-01

Revision: -



REVISIONS
 A 16 July 2014 Layout altered
 B 17 July 2014 Layout altered

NUMBER 201406.FPApp.01
 REVISION 1-500 of A3
 SCALE 1:500
 DATE July 2014

PROJECT
 Proposed Development
 Land to the north of Martins Cottage Martins Lane Braham

CLIENT
 The Farquhar Thomson Family

Joanna Jefferson
 Architects

Site Layout

222 Oving Road, Chichester
 West Sussex
 PO19 1QJ
 Telephone 01243 532978
 Fax 01243 531150

Birdham Neighbourhood Plan

Public Pre-Submission Consultation Response form:



Birdham Neighbourhood Plan Steering Group has prepared a pre-submission Neighbourhood Plan for Birdham Parish and is inviting you to comment.

In order for your remarks to be taken into account when the Neighbourhood Plan goes to CDC and for final examination, and to keep you informed of the future progress of the Neighbourhood Plan, your contact details are needed.

All comments will be publicly available once they have been analysed on the www.np4birdham.co.uk website, and comments will be identifiable by name and organisation (where applicable). Please note that any other personal information provided will be processed in line with the Data Protection Act 1998.

Please fill in your contact details below:

Full Name:
The Trustees of the Farquhar-Thomson Trust comprising Mrs. Anna Pockney, Dr. Duncan Farquhar – Thomson and Ms. Kate Farquhar - Thomson
Organisation represented (where applicable):
Genesis Town Planning
Capacity in which commenting on plan
Landowners
Address and postcode:
c/o Paul White Genesis Town Planning 26 Chapel Street Chichester West Sussex PO19 1DL
Email address;
paul@genesistp.co.uk

Please make sure any additional pages are clearly labeled/ addressed or attached.

Please send your completed document to info@np4birdham.co.uk

Or in writing to Mrs Lavinia Brooks, 17 Walwyn Close, Birdham, PO20 7SR
Or Parish Clerk Mr David Siggs, 28 Langdale Ave, Chichester, West Sussex PO19 8JQ

Many Thanks your support is appreciated

BIRDHAM NEIGHBOURHOOD PLAN – PRE-SUBMISSION CONSULTATION

Your Name: Paul White

Please indicate whether you Support or Oppose each of the Policies and Proposals in the Neighbourhood Plan by inserting 'X' in the appropriate column below.
Please make any Comments or give Reasons on the following sheet.

Policy No.	Policy Title	Support without change	Support with modification (Give comments below)	Oppose (Give reasons below)
1	Heritage Assets & Their Setting			
2	Archaeological Sites			
3	Ecological Sites			
4	Landscape Character & Open Views			
5	Light Pollution			
6	Biodiversity			
7	Integration & Sense of Community	✓		
8	Retention of Assets of Community Value			
9	Traffic Impact	✓		
10	Footpaths & Cycle Paths			
11	Village Severance	✓		
12	Housing Allocation & Site Development			✓
13	Settlement Policy Area		✓	
14	Windfall Sites			✓
15	Rural Area Policy			
16	Housing Density & Design		✓	
17	Housing Need		✓	
18	Flood Risk Assessment			
19	SUDS Design & Management			
20	Surface Water Run-off			
21	Waste Water Disposal			
22	Development for Business Use			
23	Retention of Business			
24	Broadband & Telecommunications			

Proposal No.	Proposal Title	Support without change	Support with modification (Give comments below)	Oppose (Give reasons below)
1	Village Playing Field			
2	Bus Service			
3	Speed Restrictions			
4	Ditch Network Maintenance			
5	Business Growth & Support			

BIRDHAM NEIGHBOURHOOD PLAN – PRE-SUBMISSION CONSULTATION

Your Name: Paul White

Please give your comments for any modifications you would like to see to the Policies or Proposals or the reasons why you oppose them.

Page No.	Policy/ Proposal No.	Comments or Reasons
		See attached letter dated 18 July 2014 and accompanying site location plan.

(If necessary, copy this sheet for additional comments or reasons)

GENESIS

TOWN PLANNING

PLANNING | REGENERATION | ENVIRONMENT

The Birdham Parish Clerk
Mr. David Siggs
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PDW/14038

BY POST AND EMAIL

info@np4birdham.co.uk

July 18 2014

Dear Mr. Siggs

BIRDHAM DRAFT PRE SUBMISSION NEIGHBOURHOOD PLAN – COMMENTS ON BEHALF OF THE TRUSTEES OF THE FARQUHAR-THOMSON TRUST

Scope of Representations

We act on behalf of the above Trustees and would like to thank you for the opportunity to comment on the Birdham Pre Submission Neighbourhood Plan. Our comments are made within the deadline of 21 July and principally concern the proposed housing policies and potential for new housing allocations in the Plan and other policies as follows:

Policy 9 – Traffic Impact
Policy 11- Village Severance
Policy 12 – Housing Allocation and Site Development
Policy 13 – Settlement Policy Area
Policy 14 – Windfall Sites
Policy 16 – Housing Density and Design
Policy 17 – Housing Need

Our comments on Policy 12 should be read alongside the enclosed illustrative sketch plan prepared by Joanna Jefferson Architects and Access Arrangements Plan of Motion Consulting.

The sketch layout shows a modest **housing proposal of 5 detached dwellings on land adjacent to Martins Cottage**. There are no access constraints to this scale of development from Martins Lane and we therefore propose the site is included as a housing allocation in the Neighbourhood Plan. Our reasons are set out below.



Planning Policy Context

SHLAA

The land adjacent to Martins Cottage adjoins the existing settlement policy boundary of Birdham in the adopted Chichester District Local Plan. It has already been considered as a potential housing allocation by Chichester District Council and the most recent May 2014 Strategic Housing Land Availability Assessment (SHLAA) retains it as a potential future housing allocation. The site is referenced Site B108169 – Land at Martins Cottage. It comprises 1.47 ha and is shown in the SHLAA as having an indicative capacity of 40 dwellings.

Landscape Capacity Study 2009

As part of the evidence base for the emerging Chichester District Local Plan the Council commissioned a Landscape Capacity Study. The purpose of the Study was to assess where, in landscape terms, new development could best be directed to areas of least valuable landscape sensitivity and landscape value.

The Study considered all settlements of the District outside the National Park as a potential location for new housing and in the case of Birdham, considered the potential landscape impact of development both north and south of the A286 Main Road.

The Landscape Study concluded that given its location within the Chichester Harbour AONB, most of the land at Birdham on the north side of Main Road scored a 'negligible/low rating' for landscape capacity. In other words, it found the area to have less scope to accommodate new development without causing harm to the AONB landscape. This finding however, did not extend to land at Martins Cottage within the identified Landscape Character Area 95 – Birdham Northern Settlement Edge. This Character Area actually scored a 'medium' rating meaning that the study found it had capacity for **some limited development**.

In the event additional new housing sites are required at Birdham on the north side of Main Road we therefore believe this Character Area should be your priority search area for land.

Chichester District Local Plan Key Policies 2014-2029

On 30 May 2014, the Chichester Local Plan: Key Policies 2014-2029 with proposed modifications was submitted for independent examination to the Secretary of State. The Examination is now programmed to commence on 30 September 2014 and amongst other things the Local Plan Inspector will be considering whether the Plan is able to meet the development needs of its area.

As currently drafted the Local Plan sets out to meet housing need within a defined settlement hierarchy. Within this hierarchy Policy 2 defines Birdham as a 'Service Village'. Outside of Chichester city and the Settlement Hubs, it states that the Service Villages will be the focus for new development and facilities and provision will be made for 'small scale housing developments consistent with the indicative housing numbers set out in Policy 5'.

Policy 5 of the draft Local Plan provides for around 50 new dwellings at Birdham and we note this level of provision is referred to in the emerging Neighbourhood Plan. The figure cannot be relied on however until the Local Plan Examination Inspector has concluded that it actually meets housing need. If higher levels of growth District wide are recommended, individual settlements may have to provide for additional housing. In this regard we would suggest that the Birdham Neighbourhood Plan takes a more flexible approach to its housing policies perhaps with the inclusion of additional housing sites as future contingencies to allow for higher levels of growth if the Local Plan Examination Inspector requires it.

Local Plan Policy 34 deals with affordable housing and requires a 30% contribution on all residential development sites where there is a net increase of dwellings. Whilst the policy preference is for on-site provision it does allow the payment of a commuted sum for off-site provision where there is a net increase of 5 dwellings or less. In the event you agree that additional housing sites should be provided for in your own Neighbourhood Plan, the inclusion of this policy will therefore also need to be considered.

Policy Summary

The main points to note from the above Policy Review are:

- The site adjacent to Martins Cottage off Martins Lane has already been considered suitable for a housing development in principle in the May 2014 SHLAA.
- The SHLAA Site BI08169 – Land at Martins Cottage comprises 1.47 ha and has an indicative capacity of 40 dwellings.
- The site is located on the north side of the A286 Main Road adjacent to an existing settlement policy boundary.
- The site falls within a Landscape Character Area 95 – Birdham Northern Settlement Edge - which has been assessed in the recent past as having capacity for limited housing development.
- There is no other land on the north side of the A286 which is better suited for housing in landscape terms.

For all these reasons we believe the land adjacent to Martins Cottage should be included as a housing allocation in Policy 12 of the next Submission Version of the Birdham Neighbourhood Plan. As indicated above this could be a 'contingency' allocation to come forward in the event additional housing is required at Birdham as a result of the Local Plan Examination.

We do not however believe the site characteristics support a development of 40 dwellings which is the theoretical capacity in the District Council's SHLAA. Principally this is because the Landscape Capacity Study considered the area to be suitable for only 'limited housing development'. The site access will also be shared with Martins Cottage and other existing tourist accommodation in converted outbuildings nearby. The scale of the development will therefore need to be more limited than 40 units to ensure the associated traffic can be accommodated on the road network and accessed safely without causing harm to the residential amenity of adjacent occupiers.

If the development were limited to five dwellings this would be in keeping with the scale of neighbouring development and allow the provision of affordable housing with a financial commuted sum for off-site provision in accordance with the District Council's emerging Local Plan Policy 34.

The next section deals with the draft Neighbourhood Plan Policies themselves.

Neighbourhood Plan Policies

Policy 7 - Integration & Sense of Community

Policy 9 – Traffic Impact

Policy 11- Village Severance

Policy 12 – Housing Allocation and Site Development

Policy 13 – Settlement Policy Area

Policy 14 – Windfall Sites

Policy 16 – Housing Density and Design

Policy 17 – Housing Need

Policy 7 - Integration & Sense of Community

We support Policy 7 which requires development to integrate well into the existing community. In achieving this objective we would expect new development allocations to be focused to the north of the A286 Main road on land close to the existing facilities of Birdham adjacent to the existing settlement policy boundary.

Policy 9 - Traffic Impact

This policy states that any new development within the Parish with a significant traffic impact must mitigate that impact via developer contributions to measures agreed with residents and the highway authority. Traffic impact includes effects of adverse road safety, congestion and pollution on both the main roads and rural lanes.

We support this policy objective and suggest that traffic impact could best be managed locally at Birdham by the selection of several smaller allocations where impacts could be spread across the local road network.

Policy 11 – Village Severance

Following our comments on policy 7 and 9 we support Policy 11. As a general point we also believe that any new housing at Birdham should be focused on the north side of the A286 to avoid village severance and a breach of the road boundary which would occur if new housing were developed on the south side.

Policy 12 – Housing Allocation and Site Development

Policy 12 states that 79 dwellings consented over the last 6 months means the Parish has already met its housing target of 50 dwellings and there are no plans to allocate further sites at the present time.

We object to this policy. The consented sites are not new identified Parish Housing Sites. They are either windfall developments or developments for affordable housing known as rural exception schemes. Some of the sites have been allowed expressly to help contribute to a pressing 5 year land supply shortfall and this has still not been remedied. In any event as required the NPPF (paragraph 16) Neighbourhood Plans must be prepared that support the strategic development needs set out in Local Plans and must not promote less development than set out in a local plan (paragraph 184).

Until the housing requirements of the Local Plan have been tested at Examination and actual targets agreed we therefore believe it prudent for the Birdham Neighbourhood Plan to make full provision for 50 new dwellings required by Local Plan Policy 5 even if they are regarded as 'contingencies' in the short term before the replacement Local Plan has been adopted.

In our view the land adjacent to Martins Cottage off Martins Lane as shown on the enclosed layout plan should be included in policy 12 as a modest housing allocation of around 5 detached dwellings. This scale of development would be in keeping with the findings of the Landscape Capacity Study which considered the area to be suitable for 'limited housing development'. It would be in keeping with the scale of neighbouring development and allow the provision of affordable housing with a financial commuted sum for off-site provision in accordance with the District Council's emerging Local Plan Policy 34.

Anecdotal evidence of traffic speeds along Martins Lane indicates a required visibility splay for the altered access of 2.4 by 43m and 2.4 by 25m west and east respectively. These are achievable within highway land as shown on the Access Arrangements and Visibility Splay Plan 140607-01 accompanying this letter. The traffic associated with five dwellings could therefore be served by the shared access drive with Martins Cottage which would be widened to 4.8m and accommodated on the road network safely with no loss of residential amenity to Martins Cottage or the occupiers of the tourist accommodation.

Policy 13 – Settlement Policy Area

In the event the principle of an allocation is accepted for the site, it will also need to be included within a new Settlement Policy Area for Birdham.

Policy 14 – Windfall Sites/ Policy 16 – Housing Density and Design

We believe Policy 14 duplicates the objectives of Policy 13 and Policy 16. It duplicates Policy 13 which already allows the development of sites within the Settlement Policy Area. The allowable threshold of 6 dwellings in Policy 14 has been set to avoid over development. However this objective duplicates guidance in Policy 16 which requires the density of new development to be in keeping with existing character. Policy 14 could therefore be deleted and the tests for new development added to Policy 16.

Policy 17 – Housing Need

Policy 17 should be revised to reflect the policy wording of Local Plan Policy 34 particularly the principle that commuted sums for the provision of affordable housing will be accepted on sites where there is a net increase of 5 dwellings or less.

We trust these comments are helpful and we look forward to contributing to the next stages of the Neighbourhood Plan preparation process.

Yours sincerely
for Genesis Town Planning Ltd

A black rectangular redaction box covers the signature. A thin, curved line extends from the bottom right corner of the redaction box.

Paul D White BA (Hons) DipTP MRTPI
Director of Planning
paul@genesistp.co.uk

Enc

CC Mrs Lavinia Brooks, 17 Walwyn Close, Birdham, PO20 7SR