

Liz Pulley

From: Ellie White <ellie@m-c-c.biz>
Sent: 12 February 2015 16:59
To: Neighbourhood Planning
Cc: Nick Way (nick@southeastpublishing.com)
Subject: Birdham Neighbourhood Plan representations
Attachments: Birdham Neighbourhood Plan - representations.pdf; Birdham Neighbourhood Plan - reps.pdf

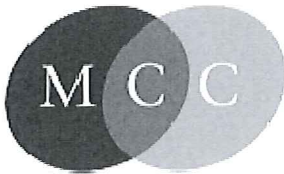
Dear Sirs,

Please find attached representations in respect to the Birdham Neighbourhood Plan.

Kind Regards,

Ellie White MPlan MRTPI
Land & Planning Manager





THE McLAREN CLARK GROUP

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Representation Form

Birdham Neighbourhood Plan

The Neighbourhood Planning (General) Regulations
2012 - Regulation 16

Birdham Parish Council has prepared a Neighbourhood Plan. The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally.

Copies of the Birdham Neighbourhood Plan and supporting documents are available to view on the District Council's website: <http://www.chichester.gov.uk/neighbourhoodplan>.

All comments must be received by 5:00pm on Thursday 12 February 2015.

There are a number of ways to make your comments:

- Complete this form on your computer and email it to: neighbourhoodplanning@chichester.gov.uk
- Print this form and post it to us at: **Neighbourhood Planning, East Pallant House, 1 East Pallant, Chichester PO19 1TY**

All comments will be publicly available, and identifiable by name and organisation (where applicable). Please note that any other personal information provided will be processed by Chichester District Council in line with the Data Protection Act 1998.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying which paragraph your comment relates to by completing the appropriate box.

PART A	Your Details
Full Name	MCC Planning on behalf of local resident/landowner
Address	Unit 4, Park Farm, Chichester Road, Arundel
Postcode	BN18 0AG
Telephone	
Email	
Organisation (if applicable)	MCC Planning
Position (if applicable)	Planner
Date	12/02/2015

PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	12
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

This submission specifically addresses the issue of housing and the plans justification for not identifying additional development sites.

Chichester District Council (CDC) have identified that 50 dwellings should be delivered within the Parish over the Local Plan period. The Local Plan has not yet been adopted and therefore cannot be relied upon until the Local Plan examiner has concluded that CDC meets its housing need. The Local Plan examination determined that this figure of 50 should be considered as a minimum. The examination also determined that CDC are unable to provide a sufficient amount of housing to meet the objectively assessed need (OAN). On this basis, the Neighbourhood Plan should seek to consider all possible development sites and consider each on its own merits to determine whether the Parish can deliver additional sites that do not have a detrimental impact on the surrounding area.

The Neighbourhood Plan identifies 79 homes that have recently obtained planning approval within the Parish. If these sites have recently obtained approval, this would imply that they are likely to be delivered within the next 5 year period to 2019. The Plan makes allowances for possible windfall sites, however, windfall development is not guaranteed. This means that the Neighbourhood Plan does not guarantee any development within the latter part of the plan period to sustainably accommodate any additional housing requirements.

The Local Plan classifies Birdham as a service village, a focus for new development and services. The SWOT analysis in section 3.8 identifies a number of weaknesses and threats, including a lack of medical facilities, primary school places and bus services. It is through the delivery of housing and infrastructure contributions that these facilities can be achieved. Providing windfall sites alone will result in an increase in population without the necessity for these developments to contribute directly to the Parish infrastructure and local amenities.

The neighbourhood plan group did not undertake a 'call for sites', meaning landowners were not given the opportunity to put forward sites to be considered by the local community. Often, schemes can be put forward to demonstrate how a proposal can overcome site constraints and deliver local benefits. Not including this process meant that the local community were not able to consider alternative options, assess individual sites and schemes on their own merits, and thus unable to identify sites that could be delivered for the benefit of the community throughout the entire plan period.

In respect to the consultation information that supported the housing policies, a questionnaire was submitted for the local community to identify sites that they thought would be appropriate for residential development. However, the maps that were issued had some field boundary lines removed. This meant that two smaller parcels of land may not have been perceived correctly and could have therefore been discounted on this basis of incorrect information. The Neighbourhood Group were contacted but rather than notifying residents or correcting the maps, they decided to take the view that *"it seems unlikely that residents took field boundaries into account when making*

their suggestions". Our client is of the opinion that the local community should have been notified to ensure that the process was carried out both positively, fairly and therefore within the community's best interest.

Our client recognises and appreciates the hard work that has gone into producing this plan. However, when considering the issues outlined above, our client is of the opinion that the Neighbourhood Plan has not been prepared positively. In addition, it should be considered that Birdham Neighbourhood Plan take a more flexible approach to its housing policies, considering the inclusion of additional housing sites to allow for higher levels of growth throughout the entire plan period.

What improvements or modifications would you suggest?

It should be considered that Birdham Neighbourhood Plan take a more flexible approach to its housing policies. We would request that they do this by carrying out a call for sites exercise allowing the community to consider the inclusion of additional housing sites and therefore seek to accommodate future local need and to allow for higher levels of growth, contributing towards the Districts OAN throughout the entire plan period.

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.



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Please complete Part B overleaf, identifying which paragraph your comment relates to by completing the appropriate box.

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Address	Unit 4, Park Farm, Chichester Road, Arundel
Postcode	BN18 0AG
Telephone	
Email	
Organisation (if applicable)	MCC Planning
Position (if applicable)	Planner
Date	12/02/2015

PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	4
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

There may be sites that may be suitable for delivering housing towards the OAN but this policy may unnecessary prevent these sites from being brought forward in the future. Therefore the policy should include the direction the viewer is facing i.e. if facing towards the settlement the viewer would expect to see views of dwellings within the settlement.

What improvements or modifications would you suggest?

The policy should include "When facing away from the existing settlement."

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.