

Liz Pulley

From: Chris Rees <CRees@savills.com>
Sent: 11 June 2015 11:54
To: Neighbourhood Planning
Subject: Representation - Tangmere
Attachments: L110615 TNP CDC.pdf; Tangmere NP Response Form.pdf; ATT00001.txt

Dear Sir or Madam,

Please find attached a response form and accompanying letter in respect of the Tangmere NP, submitted on behalf of Bloor Homes.

Best regards

Chris

Chris Rees
Director
Planning

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SNPL301695

11 June 2015



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Dear Sir or Madam

TANGMERE NEIGHBOURHOOD PLAN – SUBMISSION PLAN

Please accept this representation made on behalf of Bloor Homes to the Tangmere Neighbourhood Plan (Submission Plan). The comments made in this representation remain consistent with that provided at the Pre-Submission stage of the Plan production.

You will note that the majority of these comments mirror that presented by the other two parties of the Consortium, having been formed through review of the draft policies jointly by the three parties. Where separate comments are made, these concern specifically the land controlled by Bloor Homes in the vicinity of Malcolm Road.

3. Planning Policy Context

Para 3.13 – This paragraph is worded as if an Appropriate Assessment (AA) will be necessary. It is not certain that an Appropriate Assessment will be necessary, and therefore the final sentence should be re-worded as follows:

“In addition, due to the overwintering of birds in the Chichester and Pagham Harbours, development may need to contribute towards mitigation/avoidance measures should an Appropriate Assessment be required, and deem this necessary.”

4. Vision, Objectives and Land Use Planning Policies

Para 4.6 – The second sentence of this paragraph refers to policies within the Neighbourhood Plan replacing policies in the Local Plan. This is incorrect. Policies in the Neighbourhood Plan cannot ‘replace’ those in the Local Plan but may supplement them once adopted. The paragraph needs to be amended to reflect this.

Policy 1: A Spatial Plan for the Parish

This is a re-statement of strategic policy from the Local Plan regarding the principle of development within settlement boundaries and the approach to be taken to development restraint outside those boundaries. It is not appropriate or necessary to include within the Neighbourhood Plan. Instead it is suggested that a cross reference is inserted to policy 2 in the Pre-Submission Draft Chichester Local Plan.

Policy 2: Strategic Housing Development

In general, we support the policy directions within policy 2, although as drafted the Policy seeks to provide detailed direction to the laying out and form of development at the Tangmere SDL in the absence of necessary and appropriate studies and assessments being completed. Studies such as Landscape and Visual Impact Assessment, Highway Assessment, Ecology, Archaeology etc, will guide and shape the formation of the most appropriate masterplan and laying out of the SDL, which should be recognised within the NP and the introductory wording of Policy 2.

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Policy 2(i)

It is agreed that the SDL should contain a series of connections, however, what status those connections will have can not be concluded until the necessary Highway Assessment and modelling has been completed. In particular, I refer to the East/ West Corridor where it connects to Malcolm Road, and whether such a connection will be limited to cycle, pedestrian and buses, or whether the connection will allow unrestricted vehicular access.

It is noted within **Paragraph 4.18** that the NP considers this area to be suited to all forms of Transport. Such a statement is made without the Parish Council understanding the implications of allowing through traffic along Malcolm Road, nor whether this is actually achievable in respect of the additional traffic that would move east to west through the existing village.

It will be important that the correct road hierarchy system is put in place, that provides a pleasant environment for residents, pedestrians and cyclists, while also facilitating connections through the SDL and back to the existing village itself. The NP should recognise that the scale, form and design of these connections, and whether they are bus only or open to all traffic (Malcolm Road), will be a matter for the detailed masterplanning stage.

Policy 2 (ii / iii / viii / x)

As drafted, the NP envisages the area to the west of Malcolm Road to contain a number of elements, including a new 'Village Main Street', specific house types and the provision of a new Primary School.

We are pleased to see that the text in respect of the commercial uses proposed at the Village Main Street now has the caveat of 'subject to marketing evidence' added to the wording (**x**). We would reiterate that prescribing commercial requirements for the SDL to deliver in the absence of any such evidence would be unsound.

Further commentary on this new 'Street' is provided within **Paragraphs 4.18 and 4.19**, and we would reiterate that any commercial use classes to be provided within the SDL would need to be subject to a full viability and marketing exercise to show that it is deliverable. Such wording should also be added to these paragraphs.

In respect of **Policy 2 iii a**, we maintain our objection to prescribing that this area of the SDL should include specifically smaller house types suited to starter homes and for those wishing to downsize. Firstly, such homes will be suited to many parts of the SDL, not just specifically this location, and thus there is no justification for the NP to set out such a principle. Secondly, it is nonsensical to have a 'principle' that directs homes for first time buyers and those who are later in life and wishing to downsize specifically to the area of the site where the Primary School is to be located. Such housing will on average have less primary aged children, and yet, the NP would seek to locate them as a matter of principle next to the school.

Moreover, there is no scale applied to this 'principle' nor what 'emphasis' would mean against which the Planning Application can be considered against.

The reality is there will be a range of house types across the SDL to meet both the affordable and market demand for housing. The NP should not be seeking to define where those house types should be located, potentially hindering the ability to create a balanced community across the SDL.

In respect of the school site (**viii**), Bloor Homes considers that this could be an appropriate location for the school. Early discussions have already taken place with the District Council, County Council and Parish in respect of the SDL providing for a 2FE facility, which would represent an over provision of education land when measured against the needs of the SDL.

The delivery of the 2FE in line with the CIL Regulations will need to be discussed further as part of formation of the Planning Application.

Policy 2 (v)

We are pleased to see that a requirement to provide self build homes has been removed from the Submission Draft, however, in light of this, there would be no need for criterion v.

Policy 2 (vii)

Overall, the Policy wording is considered too prescriptive, and goes beyond setting broad principles for the masterplan to take into account. The masterplan will need to consider a range of opportunities and constraints to the laying out of infrastructure, services, facilities and housing, and will be informed by a wide range of assessments and studies. By way of example, it may not be the most appropriate solution to retain all of the hedgerows in the current location, but instead, replace or even move those hedgerows in line with an overarching strategy for habitat creation and green infrastructure on site. The NP is pre-empting analysis that will need to be completed as part of the masterplanning process, which in turn could hinder that process.

It is noted within **Paragraph 4.14** of the Submission Draft that the 'precise area and nature of development in Policy 2 will be subject to the outcome of any necessary Environmental Impact Assessment of the proposals'. Such a statement should be added to the wording of Policy 2, which coupled with the changes sought, would provide a more flexible policy and one which can evolve as the design process evolves.

Paragraph 4.23 cites that 'around 25m' would be required to act as a buffer to the A27, which is a distance that has been formed by the Parish without the benefit of understanding the noise constraints and appropriate mitigation. A buffer will be required, the precise width of which will be tested through the design process. Consequently, the wording of the NP should be amended to remove reference to 25m, and instead simply refer to the width of the buffer to be a matter for the detailed design process to conclude.

As a general observation, there is little recognition within the NP wording that the potential items to be funded or contributed towards via the legal agreement, are subject to the overall assessment of viability, inclusive of any CIL Contribution to be payable. Such a statement should be included within the opening sections of the NP, to ensure that all parties are aware that such an assessment will be required as part of the Planning Application process.

I trust these comments are helpful as we move towards examination of the Tangmere Neighbourhood Plan, and I look forward to discussing further in due course.

Yours faithfully



Chris Rees
Savills Planning

Copy: R Hatchett - Bloor Homes





Representation Form

Tangmere Neighbourhood Plan

The Neighbourhood Planning (General) Regulations
2012 - Regulation 16

Tangmere 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 Tangmere 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 11th June 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	Christopher Rees
Address	2 Charlotte Place, Southampton
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Email	crees@savills.com
Organisation (if applicable)	Savills
Position (if applicable)	Director
Date	11.6.2015

PART B

To which part of the document does your representation relate?

Paragraph Number	See attached statement	Policy Reference:	See attached statement

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:

See attached statement

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

See attached statement

(Continue on separate sheet if necessary)

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