

**Liz Pulley**

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**From:** Andrew Collis <  
**Sent:** 04 June 2018 13:41  
**To:** Neighbourhood Planning  
**Subject:** Boxgrove Regulation 16 representation  
**Attachments:** Boxgrove Neighbourhood Plan - Regulation 16 Consultation final.pdf

Dear Sir/Madam

Please see attached Gladman Developments representation in regards to the Boxgrove Neighbourhood Plan regulation 16 consultation.

Kind regards,  
Andrew Collis

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# GLADMAN

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Dear Sir/Madam,

This letter provides Gladman Developments Ltd (Gladman) representations in response to the submission version of the Boxgrove Neighbourhood Plan (BNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. Gladman requests to be added to the Council's consultation database and to be kept informed on the progress of the emerging neighbourhood plan. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy.

## Legal Requirements

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the BNP must meet are as follows:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.*
- (d) The making of the order contributes to the achievement of sustainable development.*
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*

## National Planning Policy Framework and Planning Practice Guidance

The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.

Directors: D J Gladman BA, R J Gladman MCSP, SHP, J M S Shepherd BSc, CEng, MICE, G R Edwards DipTP, MRTPI

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At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the latest and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.

The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

### **Planning Practice Guidance**

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the BNP's ability to meet basic condition (a) and (d) and this will be discussed in greater detail throughout this response.

### **Relationship to Local Plan**

To meet the requirements of the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.

The current adopted plan that covers the Boxgrove Neighbourhood Plan area and the development plan which the BNP will be tested against is the Chichester Local Plan: Key Policies, which was adopted on 14<sup>th</sup> July 2015. It provides the overarching planning policy framework for Chichester covering the period up to 2029. The adopted plan sets out a minimum housing target across the 17-year plan period of 7,388 homes equivalent to 435dpa.

The Council are currently in the process of preparing a Local Plan Review to supplement the adopted Local Plan Part 1. The emerging plan will set out to provide a new policy framework for planning and development in the district up to 2034, and once adopted will constitute the statutory development plan relevant to the BNP. The Local Plan Review is at a very early stage of preparation and as such, Gladman suggest sufficient flexibility is therefore drafted in to the policies of the BNP to ensure that there is no conflict with the emerging Local Plan Review that could lead to these policies being superseded under Section 38(5) of the Planning Compulsory Purchase Act 2004.

### **Boxgrove Neighbourhood Plan**

This section highlights the key issues that Gladman would like to raise with regards to the content of the BNP as currently presented. It is considered that some policies do not reflect the requirements of national policy and guidance and as such Gladman have sought to recommend a series of alternative options that should be explored.

Gladman would like to take this opportunity to remind the Council that it is not within the remit of a Neighbourhood Plan to determine planning applications, and as such where reference is made in the plan to 'permitting' or 'refusing' development, Gladman suggest that the wording is amended to read 'supported' or 'not supported'.

### **Policy EH6 – Landscape character and important views**

Policy EH6 states that development should preserve the attributes of views and vistas, and it must maintain the local character of the landscape. In line with this policy, Gladman suggest changing the wording to 'Development should conserve and enhance the attributes of views and vistas'. This would bring the policy in line with the NPPF, and the NP own core objectives as set out on p24.

We submit that new development can often be located in areas without eroding the views considered to be important to the local community and can be appropriately designed to take into consideration the wider landscape features of a surrounding area to provide new vistas and views.

Gladman have seen no evidence to demonstrate why these views are of such value to the local community. Opinions on landscape are highly subjective, therefore, without further evidence to demonstrate why these views are considered special will likely lead to inconsistencies in the decision-making process.

Furthermore, Gladman note the key views cover extensive areas of the undeveloped eastern section of the neighbourhood plan area. This could be viewed as an attempt to impose an almost blanket restriction towards development in a significant part of the neighbourhood area, if proposals are not deemed to be in full compliance with this policy. Gladman consider that to be valued, a view would need to have some form of physical attribute, and as such the policy or supporting text must identify which views contain such a physical feature. This policy must allow a decision maker to come to a view as to whether particular locations contains physical attributes that would 'take it out of the ordinary' rather than selecting views which may not have any landscape significance and are based solely on community support.

The Guidance states that *"Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan"*. Accordingly, Gladman consider that this matter should be investigated and based on appropriate evidence prior to the Plan being submitted for Examination.

#### **Policy EH8 – Conserve and Enhance the Landscape and Heritage Environment**

Policy EH8 states that development must 'respect and enhance' the distinctive character of the area and the significance of local heritage assets.

The Framework requires a distinction to be made between designated and non-designated assets and different policy tests should then be applied to each. Paragraph 132 of the Framework makes it clear that great weight should be given to a heritage asset's conservation and that 'the more important the asset, the greater the weight should be'.

With reference to designated heritage assets, the Policy should refer specifically to paragraphs 133 and 134 of the Framework which sets out that Councils should assess the significance of the designated heritage asset and where there is less than substantial harm, this should be weighed in the planning balance against the public benefits of the proposal. Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits to outweigh that harm.

For non-designated heritage assets, the policy must reflect the guidance set out within paragraph 135 of the Framework. This states that the policy test that should be applied in these cases is that a balanced judgement should be reached having regard to the scale of any harm and the significance of the heritage asset.

Gladman believe that this policy needs to be redrafted in order to ensure that it conforms with the guidance and requirements set through national policy.

#### **Policy EE1 – Supporting existing employment and retail**

Gladman raises concern with criterion (3) of this policy which seeks to ensure that new residential development should be located to ensure there is no significant adverse impacts from existing commercial uses. Gladman consider this policy too broad, and suggest the policy is refined to consider each application on a site by site basis.

## **Policy H1 – Quality of Design**

Policy H1 sets out a list of 10 design criteria that all proposals for residential development will be measured against.

Whilst Gladman recognise the importance of high quality design, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics and the character of the local area. There will not be a 'one size fits all' solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles.

Gladman therefore suggest that more flexibility is provided in the policy wording to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone. We consider that to do so could act to impact on the viability of proposed residential developments. We suggest that regard should be had to paragraph 60 of the NPPF which states that: "*Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles*".

## **Policy H5 – Small development sites**

Policy H5 proposes that between 5-7 new dwellings will be delivered over the plan period. This is to go above the 25 homes designated by CDC in the site allocations plan. Boxgrove is classified as a Service Village in the adopted Local Plan and will be the focus of new development consistent with the identified local need.

Gladman acknowledge that seeking to support sites for development is a positive approach however there is insufficient evidence to support the allocations. Having considered the Housing Sites Analysis assessment, as available on the Neighbourhood Plan website, little assessment has been made regarding the sustainability of the proposed small development sites. Due to the lack of evidence and the small scale of these allocations, Gladman suggest that to meet the basic conditions these allocations would be better placed under the windfall policy.

## **Policy GA2 – Parking in new development**

Gladman note the Parish Councils concern regarding on street parking and the associated congestion issues. Gladman suggests that the policy is redrafted to conform with policy 39 of the CLP. Policy 39 states that "*The level of car parking provision should be in accordance with the current West Sussex County Council guidance. This, together with residential parking and the level of cycle parking, will be assessed on a flexible site by site basis*". As currently worded, it would suggest that all future housing development would be expected to meet the maximum levels of off street parking and any applications would not be considered on a site by site basis. This could lead to viability issues of such schemes and does not accord with Framework.

## **Conclusions**

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response,

Gladman has sought to clarify the relation of the BNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.

Gladman is concerned that the plan in its current form does not comply with basic conditions (a) and (d). The plan does not conform with national policy and guidance and in its current form does not contribute to the achievement of sustainable development.

Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

Yours Faithfully,



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