

Liz Pulley

From: Amanda Sutton <Amanda.Sutton@neamesutton.co.uk>
Sent: 08 June 2018 13:19
To: Neighbourhood Planning
Subject: Boxgrove Reg 16 Neighbourhood Plan
Attachments: Reg16 Boxgrove Response Form.pdf; Boxgrove NP Representation Letter 8th June 2018.pdf

Dear Sir/Madam

Please find attached representations made on behalf of my Clients Mr & Mrs Parry in respect of the Regulation 16 Boxgrove Neighbourhood Plan.

Kind regards

Amanda

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Representation Form

Boxgrove Neighbourhood Development Plan

The Neighbourhood Planning (General) Regulations
2012 - Regulation 16

Boxgrove Parish Council has prepared a Neighbourhood Development 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 Boxgrove Neighbourhood Development 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 8 June 2018.

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**

Important Note: 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	Amanda Sutton of Neame Sutton Ltd o/b Mr & Mrs Parry
Address	Neame Sutton Ltd Coles Yard Barn North Lane Clanfield Hampshire

Postcode	PO8 0RN
Telephone	02392 597139
Email	Amanda.sutton@neamesutton.co.uk
Organisation (if applicable)	Neame Sutton Ltd on behalf of Mr & Mrs Parry
Position (if applicable)	Director
Date	8 th June 2018

PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	H5 Small Development Sites
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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

<p>Please give details of your reasons for support/opposition, or make other comments here:</p> <p>Please see separate letter.</p> <p style="text-align: right;">(Continue on separate sheet if necessary)</p>

<p>What improvements or modifications would you suggest?</p>

Please see separate letter.

(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.

8th June 2018



BY EMAIL ONLY to:
neighbourhoodplanning@chichester.gov.uk

Dear Sir/Madam

BOXGROVE NEIGHBOURHOOD PLAN
REGULATION 16 SUBMISSION PLAN DECEMBER 2017
REPRESENTATIONS ON BEHALF OF MR AND MRS PARRY, PRIORY COTTAGE, THE STREET, BOXGROVE, PO10 0EE

I write with reference to Boxgrove Parish Council's emerging Neighbourhood Plan, which is currently the subject of public consultation.

1.0 Introduction:

Neame Sutton Limited, Chartered Town Planners, is instructed by Mr and Mrs Parry to submit representations in respect of the Boxgrove Neighbourhood Plan 2015-2031, Regulation 16 Submission version (dated December 2017).

2.0 Background:

The Localism Act 2011, introduced neighbourhood planning to give local communities the opportunity to take a more active role in shaping their future by setting out a vision for their community.

In order that they may become part of the Statutory Development Plan, and thus relied upon for the purposes of decision making of planning applications, Neighbourhood Plans must meet a number of basic conditions in order to comply with legislation (paragraph 8 (1)(a) of Schedule 4B to the Town and Country Planning Act specifically refers), tested by an Independent Examiner.

In order to meet the basic conditions, a Neighbourhood Plan must:

- Have regard to national policies;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies contained in the development plan; and
- Be compatible with EU obligations and human rights requirements.

It is considered that as currently drafted, the Neighbourhood Plan is not capable of support, as it has failed to meet some of these basic conditions.

3.0 Areas of Concern for the soundness of the Neighbourhood Plan:

(i) Amount of housing proposed:

As a family with growing children my Clients fully acknowledge, and endorse, the need to ensure that communities adequately plan to meet the future needs of its residents, and as such supports the principle of a Boxgrove Neighbourhood Plan.

However, it is equally important to make sure that this is balanced with the need to preserve and enhance the special environmental qualities of the village.

As currently drafted the Boxgrove Neighbourhood Plan goes beyond meeting the future needs of Boxgrove for the period up to 2029 without any reasoned justification.

Policy 5 of the Adopted Chichester Local Plan: Key Policies 2014-2029, states that small scale housing sites will be identified to address the specific needs of local communities, as defined by the District's Strategic Housing Market Assessment (SHMA), and in relation to Boxgrove identifies the need to allocate sufficient site/s to deliver a total of 25 dwellings in the period 2017 to 2029.

This level of development is derived from a detailed assessment of the housing potential and capacity of individual parishes and settlements undertaken by Chichester District Council. This analysis has considered the size and character of individual settlements, levels of local housing need, the availability of everyday services and facilities, and levels of accessibility and public transport. It has also taken account of known development constraints and potential sites in each parish (paragraph 7.25 of the Adopted Local Plan specifically refers).

Furthermore, it reflects the fact that new housing should be directed primarily towards larger, more sustainable settlements. In this respect, Boxgrove is identified as a service village, which is a third tier settlement in the Council's settlement hierarchy after the sub-regional centre of Chichester City and settlement hubs of East Wittering/Bracklesham, Selsey, Southbourne and Tangmere, and is therefore consistent with the aims of achieving sustainable development, as set out in the National Planning Policy Framework (the Framework).

The Neighbourhood Plan acknowledges at Section 5.7 that the 25 homes allocated by the District Council in their Local Plan have been met by the appeal which was allowed at Land off Priors Acre for 22 dwellings on 26th May 2016 (APP/L3815/W/15/3138439), and subsequent infill developments.

The needs of Boxgrove until 2029 have therefore been adequately met in full.

My Client's share the view of Chichester District Council in their consultation response to the Regulation 14 Pre-Submission Plan (as set out in the Consultation Statement), that "There is ~~currently~~ no overriding requirement for the parish to identify any further housing allocations".

Whilst it is accepted that the Parish Council may wish to allocate additional sites given that the Local Plan figure of 25 homes is not expressed as a maximum, there is no overriding need for housing to justify the allocation of Site 7 – Land at the Old Granary, which both Chichester District Council and Historic England consider to be a sensitive site, as set out in Appendix A to the Consultation Statement.

(ii) Location of proposed housing sites:

Our Client's remain concerned that the Neighbourhood Plan does not reflect the majority view of the community in terms of the location of proposed housing sites, and do not agree with the Parish Council's assertion (page 7, Consultation Statement) that site 7 – Land at the Old Granary should remain allocated to reflect the wishes of the residents.

It is evident from the Site Assessment and Neighbourhood Plan surveys that the overwhelming majority of residents voted in favour of land at Halnaker Crossing to accommodate the future needs of Boxgrove. However, this site has been omitted on the basis that the Parish Council could not afford to undertake a Strategic Environmental Assessment (SEA) to support the Neighbourhood Plan. Whilst this is unfortunate, this is not a valid planning reason to omit a site from further consideration.

When all of the options available were considered by the community in January 2016, 16% showed support for Site 7 compared to 72% for Site 2 at Halnaker Crossing.

Consequently, this approach fails to take account of the majority view of the community and as such fails to have regard to the objectives of Neighbourhood Planning, as set out in the framework of paragraph 184, which states that "Neighbourhood Planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community".

(iii) Evidence base to support identification of Site 7 – Land at the Old Granary:

It is noted that since the first iteration of the Regulation 14 Pre-Submission Neighbourhood Plan was published in May 2017, a Heritage Impact Assessment has been retrospectively carried out by Whaleback (August 2017) to now support the proposed allocation of 3-6 dwellings on land west of The Old Granary.

The Heritage Report examines the setting of the site within its context and this is graphically illustrated on the Site Setting Map on page 6.

However, this map has omitted those trees along the site frontage onto The Street and also those trees along the access road to the Old Granary, which it is argued contribute to the sites character and appearance and this part of Boxgrove as you enter the village. Accordingly, they too should be identified as important tree groups on the map.

Furthermore, the Report at page 21 seeks to assess the impact of the proposed development, as far as it can, acknowledging that the development "has not yet been designed so the effects cannot be assessed".

However, the diagram on page 21 shows a proposed layout with 2 single storey buildings arranged as an agricultural yard situated to the rear of the site and a 2 storey dwelling sited on The Street's frontage.

The inclusion of a 2 storey dwelling sited on The Street's frontage is contrary to Policy H3 which seeks to allocate the site for a "courtyard of 3-6 single storey residences with gardens and screened parking."

The 2 storey dwelling does not therefore form part of the proposals for the site and should therefore be deleted. Indeed, my Clients have been consistently advised by the Parish Council's advisor that any development that takes place on this site will be restricted to single storey.

(iv) *Policy H5 proposed wording:*

Notwithstanding our Client's assertion that site 7 is not necessary to meet future housing needs up to 2029 and should therefore be deleted, in the event that the site remains within the Plan then our Client's support the views of Chichester District Council that the Policy would benefit by the inclusion of *"additional criteria to protect the characteristics of the site and mitigate any potential impact development proposals may have. Any such policy, for example, could use the findings of the heritage impact assessment to inform a more detailed and robust policy that would seek to enhance and not detract from the significance of the identified heritages assets in this sensitive location."*

Whilst it is noted that the Parish Council has amended the policy wording to include a requirement for the design and layout of any development to reflect the historic sensitivities of the area, which is supported by our Clients, it is suggested that the Policy should also include the requirement to:

- retain those trees along the site frontage onto The Street and also those trees along the access road to the Old Granary, which it is argued contribute to the sites character and appearance and this part of Boxgrove as you enter the village; and
- ensure any development is set back within the rear of the site to protect the key view across the site as identified in the Conservation Area Appraisal.

I trust the above representations are in order. Should you have any additional information then please do not hesitate to contact me.

With kind regards

Yours sincerely

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