**Hunston Neighbourhood Development**

**Plan 2019-2037**

**The Neighbourhood Planning (General) Regulations 2012 - Regulation 16**

**Representation Form**

## Hunston Parish Council has prepared a Neighbourhood Plan Review. 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 Hunston Neighbourhood Development Plan 2019-2037 and supporting documents are available to view on Chichester District Council’s website:

[http://www.chichester.gov.uk/neighbourhoodplan.](http://www.chichester.gov.uk/neighbourhoodplan)

**All comments must be received by 5:00 pm on 9 September 2021.**

# 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**

# Use of your personal data

## All comments in Part B below will be publicly available and identifiable by name and (where applicable) organisation. Please note that any other personal information included in Part A below will be processed by Chichester District Council in line with the principles and rights set out in the General Data Protection Regulation 2016 (GDPR) and the Data Protection Act 2018, which cover such things as why and for how long we use, keep and look after your personal data.

**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 to which paragraph your comment relates by completing the appropriate box.

|  |  |
| --- | --- |
| **PART A** | **Your Details** |
| **Full Name** | Tara Johnston |

|  |  |
| --- | --- |
| **Address** | LichfieldsThe Minster Building 21 Mincing Lane London |

|  |  |
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| **Postcode** | EC3R 7AG |
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| **Email** |  |
| **Organisation (if applicable)** | Lichfields |
| **Position (if applicable)** | Planner |
| **Date** | 08.09.2021 |

**PART B**

# To which part of the document does your representation relate?

|  |  |  |  |
| --- | --- | --- | --- |
| Paragraph Number | H1.2 | Policy Reference: |  |
|  | H1.3 |  |  |

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

## Support

Support with modifications

Oppose

Have Comments X

|  |
| --- |
| **Please give details of your reasons for support/opposition, or make other comments****here:** |
| Please see cover letter for further details.(Continue on separate sheet if necessary) |

**What improvements or modifications would you suggest?**

Please see cover letter for further details.

(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.

Neighbourhood Planning Chichester District Council East Pallant House Chichester

West Sussex PO19 1TY

**Date:** 8 September 2021

**Our ref:** 14733/11/SSL/SBi/20125621v5

#### Your ref:

Dear Sir/Madam

# Response to Hunston Neighbourhood Plan (Submission Plan - Regulation 16): Submission made on behalf of the Church Commissioners for England

We write on behalf of our client, the Church Commissioners for England (CCE), in relation to the above Hunston Neighbourhood Plan (2021) consultation.

CCE owns land to the east of the B2145 Selsey Road. The site was promoted for residential development as part of Chichester District Council’s Housing and Economic Land Availability Assessment ‘Call for Sites’ process in March 2019. It was also promoted in May 2020 as part of the Parish Council’s Regulation 14 consultation and we are disappointed that it has not been allocated as a preferred development area within the submission version of the Neighbourhood Plan.

Within these representations we would like to reiterate the opportunity presented by CCE’s land to meet the future development needs for Hunston, as it fully meets the Parish Council’s objectives for the proposed site allocation and importantly, will deliver significant local benefits. We also take the opportunity to respond to comments made by the Parish Council in its Statement of Consultation. We also take the opportunity to respond to updated flood data for the site and comments made by the Parish Council in its Statement of Consultation. Against this backdrop we respectfully request that the CCE site be reconsidered.

# Background

CCE’s site comprises 15.3ha and is located to the east of the B2145 Selsey Road, on land north and south of Church Lane. The site is highly accessible, located within a maximum of 5-6 minutes walking distance to Selsey Road, where a number of bus routes connect the village to Chichester. A Vision Document has previously been prepared and was presented to Hunston Parish Council; this included a detailed analysis of the site and its surroundings and provided justification as to why the site is suitable for development. This technical review of the site concludes there are no technical impediments to development.

The Chichester Local Plan Review 2035 is currently underway. The Preferred Approach (2016-2035) consultation was published in early 2019 and identified a requirement within draft Policy AL11 Hunston Parish for land to be *“allocated for development in the Hunston Neighbourhood Plan for a minimum of 200 dwellings, including any amendments to the settlement boundary.” (our emphasis).*

Following Chichester District Council’s ‘Call for Sites’ in 2019, the Parish Council confirmed that the CCE site was not its preferred option for meeting the housing requirement for Hunston. This position is maintained in the draft Neighbourhood Plan with an alternative allocation identified for the 200 units (draft Policy H1.3).

As part of the current Hunston Neighbourhood Plan Regulation 16 consultation, Hunston Parish Council has published a Consultation Statement which review and comments upon previous representations received, including Lichfields’ with respect to CCE’s land at Hunston. We wish to comment further on the Parish

Council’s position as documented in the Consultation Statement below.

### Response to the Parish Council’s Consultation Statement

Below we provide a response to the Parish Council’s Consultation Statement under a number of relevant

headings.

#### Agricultural land

The Consultation Statement states that *“The allocation makes use of partly brown field sites and is capable of accommodating all 200 homes”* (row 5, page 14).

We disagree with this position. As stated in our previous representations, Farmfield Nursery and the Village Dairy are in agricultural use. In the Consultation Statement the Parish Council disagree claiming that the sites to be allocated are in arable use, specifically stating that the farmfield at the Village Dairy has been unused for a number of years with only a small percentage of the Ridgeway site being used for grazing.

However, this is incorrect. The Chichester HEELA (2021) confirms both sites as being in agricultural use and land that is or was last occupied by agricultural or forestry buildings is excluded from the definition of brownfield land in the NPPF (2021).

CCE’s site is also in agricultural use and should not be discounted on this basis.

#### Site capacity

It was noted in our Regulation 14 representations that there were inconsistencies in the site capacity figures used for the three sites comprising the allocation, and that the sites may not be capable of accommodating the minimum 200 units required. Within the Consultation Statement, the Parish Council agreed that there was a lack of clarity regarding the site capacity numbers, stating an intention for this to be corrected. The previous Site Assessment, which formed part of the evidence base for the Regulation 14 plan, stated a capacity of 180 homes across the three sites, and this has now been amended to state that the Land at Farmfield has a capacity for 50 units, Land at Ridgeway has a capacity for 80 units and Village Diary having capacity for 80 units, totalling 210 homes across the three sites.

The Chichester HEELA (2021) also assesses the various sites submitted in Hunston. For the land at the Village Dairy, the indicative capacity is noted to be between 30-60 dwellings, therefore a lower capacity than noted in the Parish Council’s own Site Assessment. This calls into question the site allocation’s actual housing capacity. Further detail will need to be provided and justified by the Parish Council to confirm that the minimum housing requirement at Hunston can be met across the three sites.

In relation to CCE’s land at Hunston, the HELAA (2021) confirms that the site is still considered deliverable. However, it’s dwelling yield had reduced to take into account corrected climate change data and was now considered to yield 104 dwellings over a net development area of 3.73ha. In short, the revision was due to discrepancies between the flood risk scenarios used to determine the risk of flooding from the outputs of the 2018 Strategic Flood Risk Assessment (SFRA). However, all information within the SFRA remains based on

the coastal modelling study completed in 2016 referenced throughout the SFRA. The updated flood maps suggest that the site frontage to Selsey Road may be at risk of flooding and extending to the south of the site.

However, it is important to note that the developable areas identified within our previously submitted 2019 Vision Document remain outside the flood extent of even the extreme undefended scenarios, with areas at risk of flooding identified as recreation ground and open space. Furthermore, the access from Church Lane is only affected in the 200 year climate change (2115) undefended scenario, so again ‘dry access’ as defined in flood risk terms would only be unavailable for this unlikely event. In light of this, the concept masterplan and the anticipated development yield as set out in our 2019 Vision Document remains at approximately 240 homes on this single site.

### Sustainability

We would like to reemphasise that the allocated sites are poorly located in relation to the existing village. Development of these sites would fail to create a natural extension of the settlement and would appear isolated.

The NPPF encourages sustainable patterns of development. The essence of sustainable development is locating housing in close proximity to existing local services and facilities to minimise the need for additional travel. Development of the CCE site would achieve a sustainable pattern of development through extending the existing settlement boundary, opposed to developing housing in an isolated location away from existing provisions. CDC draft policy S20 (Design) requires development to be *“well connected to provide safe and convenient ease of movement by all users”.* Due to its proximity to the existing settlement, the CCE site would meet these requirements.

As noted in our previous representations, the CCE site is much better located in terms of providing a discrete and well contained extension to Hunston, rounding off the existing settlement of Hunston. Within the Consultation Statement the Parish Council acknowledged that the context of views, the Conservation Area and the preservation of arable land was considered important in response.

The CCE site is located within a very sustainable location, with extensive footpath networks, opportunities for cycling and good public transport links via bus, thus meeting the requirements of draft Policy H1.2Within their Consultation Statement the Parish Council agreed that the allocation of the CCE site would likely result in journeys on foot around the village, however, raise the issue of crossing the B2145. On balance, the benefits set to be delivered in terms of sustainable forms of transport within and around Hunston should outweigh the safety considerations of crossing a relatively minor road.

#### Impact on the Conservation Area

##### *“The allocation protects the view into and out of the Conservation Area”. (H.12)*

The Parish Council is not in agreement that the open spaces proposed within CCE’s site would preserve the green setting of related heritage assets and preserve the setting of the Hunston Conservation Area, of which the site partly lies within.

The proposed landscape buffers will help to mitigate any impact on the setting, character and appearance of the Hunston Conservation Area. This approach has been informed by masterplanning and heritage expertise and CCE would like to reaffirm that it would allow for the setting of the Hunston Conservation Area to be protected.

#### Biodiversity Net Gain

##### *“The allocation protects Bremere Rife an important habitat for water voles protected by the* Wildlife and Countryside Act” (H1.2).

The proposed masterplan retains the Rife within a green buffer along the edge of the development ensuring it is protected and enhanced. In addition, Sustainable Urban Drainage Systems (SuDS) would also be incorporated into the green corridors which would provide additional new habitats for water voles as well.

Within their Consultation Statement the Parish Council comment that the delivery of 200+ homes and new access road over the Rife would not result in a biodiversity net gain on the site. As set out in the Vision Document, biodiversity enhancement would be achieved through a network of open spaces which would protect and enhance neighbouring Ancient Woodland and the SNCI.

##### *Footway improvements*

***“Allocation of the sites should be capable of delivering benefits in the form of improvements***

***to the footways” (H1.2)***

The Parish Council highlight an alternative footway which would not require the crossing of the B2145 and in their opinion would be a much safer route than the route proposed in the CCE masterplan. Whilst the path identified by the Parish Council would not require crossing of the B2145 on balance, the provision of a secondary new footpath should constitute delivery of improvements to the existing footways provision in Hunston.

The new proposed footpath will create access into the southern parcel of the site, which is currently not easily accessible via footways. The new proposed footpath will deliver benefits by increasing pedestrian permeability and accessibility of the site. This is a benefit. As stated in the Vision Document the site’s extensive network of public footpaths are expanded through the development, linking the various open spaces within the masterplan via green corridors. The site is considered sustainable due to its extensive footpath networks. The CCE’s site masterplan will deliver improvements to the footways by introducing a new footway into the southern parcel of the site. **CCE maintain the position that the proposed masterplan would deliver significant improvements to footways in the vicinity of the site.**

#### Defensible boundaries

The Parish Council assert that the CCE site’s proximity to Meadow Close, Southover Way and Foxbridge, where trees and hedges are less established, does not result in a robust landscape boundary to allow for visual containment. However, the main focus of the criteria is not on the surrounding area but rather how the site will retain its own boundaries and the visual containment of that site. We re-assert that the masterplan would create a defensible boundary to the village, by enhancing existing hedgerows and vegetation with new planting.

#### The Chichester Local Plan Review

As part of the current review, it is understood that CDC is considering evidence as to whether there is a requirement to increase the housing requirement to address any unmet need from neighbouring authorities.

As a consequence, it is possible that the minimum 200 unit housing requirement for Hunston could increase further prior to the Local Plan being adopted. Should this be confirmed, it may be necessary for the Neighbourhood Plan to allocate additional land for housing and, in such circumstances, the use of the CCE land should be reconsidered. The standard method figure for Chichester is 759 dpa using the April 2021 update. Even if the housing requirement does not increase in the current Local Plan Review, it is likely that the Council will need additional land for housing in the future, which may include housing in Hunston.

#### CCE Land as an Alternative Allocation

Overall, it is considered that the CCE site meets the rationale applied to the proposed allocation, with the added advantage of being in a more sustainable location, closer to the heart of the village and is therefore a more appropriate extension to the settlement.

The enclosed Vision Document provides a detailed analysis of the site and surroundings and the background technical work on heritage, landscape, ecology, transport, character which has been carried out on behalf of CCE. This technical review of the site concludes there are no technical impediments to development.

The Vision Document demonstrates the following:

1. *New housing* - how the site could deliver a variety of housing types and sizes and providing affordable housing would of benefit to the village.
2. *Heritage* – the development would respect historic assets, their setting and maintain key views through the site, such as the view towards Chichester Cathedral.
3. *Sustainable Development* - the site is located within a very sustainable location, with extensive footpath networks, opportunities for cycling and good public transport links via bus. The development offers the opportunity to add to the existing foot and cycle network. It is also located within a short distance of Chichester railway station, accessed via bus.
4. *Open Space* - the provision of a Village Green and significant new area of public open space to retain a green setting to Spire Cottage could be incorporated.
5. *Green Corridor* - natural features such as Hunston Copse will be protected and enhanced through their incorporation into a green network.
6. *Hydrology* - existing water and drainage features will be retained where practical. In addition, SUDs features will be integrated within green corridors, edge treatments, ditches, play and ecology to contribute to the overall character of the village.
7. *Delivery* – The site is wholly in CCE’s ownership and can be brought forward in a phased approach early in the plan period, without the need for costly infrastructure and utilising the existing road network.

# Conclusion

To summarise, CCE consider that their site is the most appropriate and sustainable location for development in Hunston. The site provides an opportunity to sensitively and sustainably extend the existing village boundary to provide additional homes to meet an identified housing need.

We would request that the Parish Council re-consider the position of the CCE land east of Selsey Road as it is considered to offer potential through careful planning. We would be more than happy to discuss the site with you and your fellow Councillors in more detail. Please do not hesitate to contact me.

In the event that any of the proposed allocation sites cannot come forward within the plan period, we would reiterate that the CCE site should be considered as an alternative or additional option. It is entirely within CCE’s ownership and we can confirm that it is available to come forward now.

Yours faithfully

pp.

#### Tara Johnston

Planner