

## 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.

**Representation Form**

**Hunston Neighbourhood Development Plan 2019-2037**

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

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>.

**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](mailto: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.

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| --- | --- |
| **PART A** | **Your Details** |
| **Full Name** | Miss E White |
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| **Organisation (if applicable)** | Henry Adams LLP |

|  |  |
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| **Position (if applicable)** | Senior Planner |
| **Date** | 08 09 2021 |

**PART B**

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

|  |  |  |  |
| --- | --- | --- | --- |
| Paragraph Number |  | Policy Reference: | H1 |

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

## Support

Support with modifications

Oppose X Have Comments

|  |
| --- |
| **Please give details of your reasons for support/opposition, or make other comments here:** |
| **Opposition to the Approach to new residential development, Policy H1 Housing sites allocation, Hunston Site Assessment Report.**  **Key considerations and concerns highlighted in the accompanying document.**  (Continue on separate sheet if necessary) |

|  |
| --- |
| **What improvements or modifications would you suggest?** |
| **Please see accompanying document.**  (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.

**Hunston Neighbourhood Development Plan Regulation 16 Consultation**

Representations on behalf of Spiby Partners

August 2021



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Town Planning  Development Consultancy

* 1. **Introduction**
     1. Henry Adams LLP act on behalf of Spiby Partners (Client) in respect of Land east of Foxbridge Drive and south of the B2145, Hunston (the Site).
     2. These representations respond to the Regulation 15 Consultation version of the Hunston Neighbourhood Development Plan (2021). Within the following sections we intend to set out our observations that primarily relate to the proposed number of dwellings to be allocated, alongside our concerns over the proposed allocation and the consideration of other policies within the draft plan.
  2. **Approach to new residential development – oppose**
     1. The Council adopted the Local Plan 2015, which sets out the strategic approach for managing development in the District. It highlights the key strategic development sites across the District. However, in line with both legislative requirements and also the compressed housing number in the 2015 document, there is a requirement for the document to be reviewed and updated.
     2. The draft Local Plan Review was issued for consultation in December 2018. Hunston was categorised as a ‘service village’ and thus draft Policy AL11: Hunston Parish requires the Neighbourhood Plan to allocate a ***minimum*** of 200 dwellings, including any amendments to the settlement boundary.
     3. However, the total housing requirement and thus settlement distribution of housing within the draft plan was based on the Chichester Housing and Economic Development Needs Assessment (HEDNA) with the expectation that the Local Plan Review would be submitted within 5 years post adoption of the Local Plan (by 15th July 2020). This was not possible and thus Chichester’s housing requirements will be based on the standard methodology for calculation. Based on this methodology, housing delivery will be assessed against the minimum figure of 628 dwellings per annum.
     4. Unfortunately, we are unable to locate any supporting note aside from the draft Local Plan Review reference that has been used to inform this figure within the evidence base to the Neighbourhood Plan, nor the date at which this information was issued and agreed following public consultation.
     5. As there is not currently an up-to-date Local Plan, coupled with the increase in requirement from that within the Local Plan (2015), it is clear that the Council cannot demonstrate a suitable housing land supply. As a result, it is our view and that we believe of the Council’s Planning Officers, that the tilted balance under Paragraph 11 of the NPPF

is engaged, i.e. that permission should be granted unless adverse impacts of doing so

would ‘significantly and demonstrably’ outweigh the benefits.

* + 1. Given the engagement of the tilted balance, it is even more important to ensure that the correct housing figure is allocated in order to prevent any further decrease in land supply and in turn the risk of speculative applications throughout the district.

### *Planning Practice Guidance*

* + 1. The National Planning Practice Guidance provides very clear advice on matters of housing numbers, where it states:

*The scope of neighbourhood plans is up to the neighbourhood planning body. Where strategic policies set out a housing requirement figure for a designated neighbourhood area, the neighbourhood planning body does not have to make specific provision for housing, or seek to allocate sites to accommodate the requirement (which may have already been done through the strategic policies or through non-strategic policies produced by the local planning authority). The strategic policies will, however, have established the scale of housing expected to take place in the neighbourhood area.*

*Housing requirement figures for neighbourhood plan areas are not binding as neighbourhood planning groups are not required to plan for housing. However, there is an expectation that* [*housing requirement figures will be set in strategic policies, or an indicative figure*](https://www.gov.uk/guidance/neighbourhood-planning--2#para101)[*provided on request.*](https://www.gov.uk/guidance/neighbourhood-planning--2#para101) ***Where the figure is set in strategic policies, this figure will not need retesting at examination of the neighbourhood plan. Where it is set as an indicative***

***figure, it will need to be tested at examination*** (bold italic text is our emphasis).

(NPPG: Paragraph: 104 Reference ID: 41-104-20190509)

*Where strategic policies do not already set out a requirement figure, the National Planning Policy Framework expects an indicative figure to be provided to neighbourhood planning bodies on request. However, if a local planning authority is unable to do this, then the neighbourhood planning body may exceptionally need to determine a housing requirement figure themselves, taking account of relevant policies, the existing and emerging spatial strategy, and characteristics of the neighbourhood area. The neighbourhood planning toolkit on housing needs assessment may be used for this purpose. Neighbourhood planning bodies will need to work proactively with the local planning authority through this process, and the figure will need to be tested at examination of the neighbourhood plan, as neighbourhood plans must be in general conformity with strategic policies of the development plan to meet the ‘basic conditions’.*

(NPPG Paragraph: 105 Reference ID: 41-105-20190509)

* + 1. It is clear that both the figures within the adopted Local Plan (2015) and draft Local Plan Review (2018) do not set a clearly defined figure or even an indicative figure for the parish based on the standard methodology. The housing figure is therefore a matter that must be tested through further consultation and at examination having been informed by appropriate evidence.
    2. Considering the above factors, a formal, updated response should be obtained from Chichester District Council setting out the number of dwellings that need to be provided within the Parish. This should form part of the evidence base. If not forthcoming from Chichester District Council, this should be prepared on behalf of the Parish Council to inform the headline figure, which is not evidenced at present.
  1. **Policy H1 – Housing sites allocation - oppose**
     1. Notwithstanding the above observations, we feel that it is important to consider the merits of the proposed allocation.
     2. The proposed allocation is located to the south-east of the village, completely detached from the village and the settlement boundary. Due to this, it does not relate well to the existing settlement pattern and would be creating a standalone development of 200 dwellings. The allocation therefore lacks connectively and cohesiveness which are key elements when considering a sites suitability and sustainability. The proposed allocation was also discounted from the District Councils HELAA assessment due to the fact that it is not within close proximity to the existing built up area.
     3. Para H1.2 references the Site Assessment document within the evidence base that sets out the rationale for the allocation;

***The allocation makes use of partly brown field sites and is capable of accommodating all 200 homes.***

* + 1. The draft allocation comprises a number of glass houses which are not classed as brownfield land. There is the old dairy and a residential property within the allocation, but these are minimal in size when considering the size of the site. The Hunston Site Assessment Report (2019) within the evidence base demonstrates that the allocation comprises three sites, determining that the majority of the land within each is arable/grazing land with only a small area being considered as brownfield.
    2. We would suggest that the brownfield element therefore is not significant enough to justify development of a site that is so detached from the existing village envelope.
    3. The fact that the proposed allocation can deliver the total number of required dwellings in one place should not be considered as a benefit that overrides development on a site that is clearly detached from the main settlement and would have a detrimental impact on the character of the settlement.

### *Allocation of the site is likely to result in journeys on foot around the village, helping to* sustain social contact and healthy lifestyles but also provides good connectivity to the cycle network with the possible reduction in vehicle movements.

* + 1. The proposed allocation is located to the south of the village meaning that there will be an increase traffic movements through the village in order to access facilities and employment opportunities within the main settlements (likely Chichester) this is contrary to the observation made at Para GA4.1 which specifically states that traffic issues continue to cause major concerns within the parish.
    2. The proposed allocation is not in close proximity to the existing footpath network. The creation of footpaths through the site would only be of benefit to the new residents. The site is separated from the settlement by a row of terraced properties from the B2145 and thus the only way of accessing the existing footpath network via footpath 181 would be to walk along the edge of the B2145. This will likely be the case if allocated as there is a privately owned field located between the site and the surrounding footpaths.
    3. We would therefore question how the allocation has good connections to the footpath and cycle way network and which footways would be improved to deliver benefits to the wider community.
    4. An additional point to note is that relying on just one site to deliver the housing needs of the Parish carries some risk. Given the unsuitable nature of the proposed allocation, there is potential that its delivery could be delayed, or not come forward at all. This may result in further speculative development proposals, beyond that expected within the Neighbourhood Plan. It is considered that smaller scale, high quality development would better serve the village and respect its rural setting.
  1. **The Site and its suitability**
     1. The Site comprises approximately 4.25 hectares of agricultural land located to the south of the B2145 and east of Foxbridge Drive. Agricultural access is taken from the B2145 which abuts the entirety of the northern boundary. The western boundary adjoins residential property Oakdene and properties at Foxbridge Drive and Farm Close. The Site is not located within or in close proximity to any land at risk of flooding, nor is it in proximity to any heritage assets.
     2. In policy terms, the Site is located outside but adjoining the settlement boundary to the west and is otherwise unconstrained. The latest Housing Economic Land Availability Assessment (HELAA) (2021) assessed the Site positively, with potential to deliver approximately 80 dwellings in the medium term.
     3. In terms of accessibility, the Site is sustainably located and well connected with the local footpath and cycle network. There is a surfaced path that runs along the northern boundary of the site, largely separated from the road behind a hedge. This is not a designated footpath as it forms part of the National Cycle Network Route 2 however, it is used as such as it connects into the tow path that runs along the Chichester Canal which travels north into Chichester or south towards the sea. A footpath is also located along the B2145, providing access to services within the village.
     4. The Tow Path travelling into Chichester is also part of National Cycle Network Route 2 which connects directly into the heart of the city. This then connects into other cycle networks north into Kent and west towards Portsmouth and beyond.
     5. Initial feasibility studies determine that approximately 3 hectares of the site could be suitable for residential development. The area for development would be focused around the western boundary whilst the remaining area would comprise formal and informal open space alongside additional planting and a robust landscaping strategy that will respect the Ancient Woodland at Hunston Copse whilst ensuring net biodiversity gain and green infrastructure connectivity with the biodiversity corridors that have been identified to the north and east. Creating a landscape buffer to the east will also create a clear, defensible boundary to the village.
     6. The allocation and development of this land would provide a number of benefits to the local community;
        + The Site is well-connected to local services and facilities, within walking distance of the village facilities such as the Hunston Store and Post Office, pub, village hall, playing fields and canoe club;
        + Para GA4.1 specifically states that traffic issues continue to cause major concerns within the parish. Being located north of the village with direct access onto the B2145 means the site would minimise additional traffic through the village;
        + Proposals would include additional footpaths north-south to ensure connectivity away from the main road whilst linking with existing footpath 188 which runs east-west around the site;
        + The Site is not subject to any environmental designations or constraints and is not liable to flooding;
        + A suitable landscaping strategy would ensure net biodiversity gain and green infrastructure connectivity with existing biodiversity corridors to the north and east;
        + A landscape buffer to the east would create a clear, defensible boundary to the north-eastern edge of the village;
        + Provision of formal and informal open space would be of benefit to residents throughout the community and to the north of the village especially;
        + The Site is not constrained and does not rely upon significant infrastructure improvements in respect of delivery;
        + Development proposals would include a mix of high-quality homes, with the potential to include starter homes, bungalows suitable for the elderly and affordable housing to meet the varying needs of the community; and
        + Any future development would make contributions to local facilities and infrastructure.
  2. **Other Draft Policies and supporting evidence**
     1. The following section seeks to respond to other policies that would be in the interest of our Client and their landholdings.

### *Hunston Site Assessment Report - oppose*

* + 1. The Site Assessment Report now appears to be updated since the 2019 version considered at Reg 14 stage. The Report now provides an assessment of each site based on potential impact, high medium, low or unknown.

Having considered the assessment for the Site, we feel that there are a number of categories that should be reconsidered, namely:

* + - * Site Features - The site does not comprise 3 HELAA sites, it comprises 2; the farm buildings and the wider land.
      * (2) - The landscape sensitivity should be considered medium as per the landscape study. Whilst the site is in close proximity to the SNCI, this is not located within the site. This feature and the National Route 2 link could be considered susceptible to development but could be accommodated through careful design and appropriate mitigation.
      * (5) – if the site were to be sensitively designed then an agricultural field which comprises a large tract of land would still remain between development at Hunston and the North Mundham Settlement boundary to the east, maintaining the individual identity of settlements. This should therefore be categorised as medium (yellow) not high (red).
      * (7) any application would need to be accompanied by an Ecology Assessment and any recommended phase 2 surveys to demonstrate that there would not be any harm to existing species and that due to absence or mitigation. This should therefore be considered low not medium impact.
      * (9) this specifically references harm to watervole and barn owl habitats but there is no evidence to support this and our initial Ecology Survey does not identify such habitats. Any proposal will look to provide connections with existing habitats and corridors and thus this should not be considered as high impact.
      * (20) The site is located within Flood Zone 1 and applications and supporting drainage statements should demonstrate that there will not be increased flood risk elsewhere. Given that areas of Hunston are located within Flood Zone 2, this site should be categorised as low impact not medium.
      * (23) the proposal does not prejudice any viable agricultural operations, the farm is based in Sidlesham and will still be viable should development occur. This should therefore be considered as low not medium impact.
      * (24) there is not an Historic Ancient Monument that is identified on Historic England Mapping or on Magic Maps and thus we would question this conclusion.
      * (34) There is no clear evidence of the Portsmouth and Arundel Canal features on site, this field has been laid to pasture and grazed for a number of years
    1. The current assessment determines that the Site comprises the fourth least number of high impact gradings. If the above points were to be considered in further detail then it is clear that the number of criteria that fall within the High Impact category could be reduced significantly and thus we would question whether this, alongside the sites location, would provide for a more favourable conclusion.
    2. We feel that it is also important to note that the allocations include three sites, (1, 2 and

3) that have all been rejected through the HELAA assessment due to being detached from the settlement boundary. The purpose of the settlement boundary is to be the focus for new development and thus those sites which are in close proximity/immediately abut the settlement and can be considered sustainable, should be the focus for new development.

### *Village Survey*

* + 1. A summary of the village survey responses has been included within the Evidence Base documents on the Parish Council website. We feel it is important to draw attention to the Housing Choice Questions. When given a choice, 79 residents which equates to 58.96% of respondents, chose Site 6 Reedbridge Farm (The Site) as their preferred housing choice.
  1. **Further considerations – interim policy statement for housing**
     1. The Interim Policy Statement for Housing Development has been introduced in order to focus future development towards the most appropriate and sustainable locations.
     2. This statement recognises the need to boost the supply of housing and thus the statement seeks to demonstrate a proactive approach to the delivery of housing until the Local Plan Review is adopted. This statement has been written in line with National Planning Policy and the presumption in favour of sustainable development. It sets out a list of criteria that if adhered to, the Council would consider good quality development.
     3. The first of these criteria is that the site boundary in whole or in part is contiguous with an identified settlement boundary. The three allocated sites therefore would not meet one of the main criteria considered a priority at district policy level. We would therefore question whether the allocations are aligned with the key principles of the Development Plan.
  2. **Summary**
     1. In summary, whilst our client supports the Parish in their approach to devising a Neighbourhood Plan for the area, we do not feel that the plan as a whole reflects the needs and opportunities of the area.
     2. We are of the opinion that further evidence should be provided to justify the provision of 200 new dwellings at a time when the District do not have an up-to-date Local Plan and are falling behind on housing delivery.
     3. In addition, we are of the opinion that the housing allocation should be reconsidered and those sites adjoining settlement boundaries, better related to the village, better connected, provide benefits to the community as a whole and assessed positively by the District Council should be given further consideration.