

Neighbourhood Planning Chichester District Council East Pallant House

1 East Pallant CHICHESTER PO19 1TY

JJF/21040

8th September 2021 **By e-mail only**

Dear Sir/Madam

**Hunston Neighbourhood Development Plan 2019-2037**

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

We write on behalf Mr & Mrs Lomas (the owners of Hunston Village Dairy), Rebecca Newman-Smith (the owner of Freshfields Nursery) and Mr Leon Zijl (the owner of Ridgeway Nurseries) whose combined landownership comprises the proposed Policy H1- Housing Sites Allocation in the draft Neighbourhood Plan.

Our comments on the draft Neighbourhood Plan and Background Documents are as follows:

1. **Comments on Hunston Neighbourhood Development Plan – Regulation 15 Submission Paragraph 2.2.1** (Page 8)

This paragraph refers to the National Planning Policy Framework (NPPF) published in March 2012, and the revised version of July 2018, and how these have been taken into consideration in preparing the draft Neighbourhood Plan. Whilst it is acknowledged the Regulation 15 version of the draft Neighbourhood Plan was published for consultation on 15th July 2021 the NPPF was revised again on 20th July 2021. For completeness paragraph 2.2.1 should also refer to the revised NPPF of July 2021.

**Paragraph 5.7 (Page 48)**

This paragraph states that *“Hunston has a housing allocation of 200 homes designated by CDC”.* This wording is not consistent with Policy AL11: Hunston Parish of the Chichester Local Plan Review 2016-2035: Preferred Approach (December 2018) which confirms that *“Land will be allocated for development in the Hunston Neighbourhood Plan for a minimum of 200 dwellings, including any amendments to the settlement boundary”.* Since the Local Plan Preferred Options was published the District Council has been testing an even higher dwelling provision for Hunston Parish. The first page of the Habitats Regulation Assessment (HRA) that forms part of the background evidence of the Reg 15 Neighbourhood Plan refers to a revised distribution strategy for testing and a possible provision of 300 dwellings as part of the Local Plan Review December 2020.

Although the District Council has yet to confirm the final dwelling provision for Hunston Parish in the emerging Local Plan Review it is likely to be a minimum of 200 dwellings or more and as such this should be reflected in the wording of paragraph 5.1 which should include a reference to the housing allocation for the parish being a *‘minimum’* of 200 homes. This would also be consistent with the wording of Policy H1 – Housing sites allocation.

**Policy H1 - Housing Sites Allocation (Pages 48 - 49)**

My client welcomes and supports the proposed Policy H1 housing sites allocation for a minimum of 200 homes on the combined sites of Farmfield Nurseries, Ridgeway Nursery, and the former Hunston Village Dairy. The allocation site is well located in terms of its relationship to local facilities. In landscape terms (particularly in respect of important views and vistas) it is less sensitive and better able to accommodate new development than other potential locations in the parish. This aspect also applies to the potential effects on heritage assets such as the setting of listed buildings and the Conservation Area, none of which would be harmed by the development of the allocation site. In addition, all the sites forming part of the Policy H1 housing sites allocation fall outside the 12km zone for the Singleton and Cocking Tunnels SAC

This allocation has the potential to provide all of the dwelling requirement for the settlement in one place, which would minimise the amount of change experienced in the parish to just one area, providing significant amounts of new public greenspace as well as the necessary infrastructure improvements to serve the proposed and existing developments in the village. It would provide a range of housing types including affordable housing (shared ownership, social rent and starter homes) and market homes plus new independent living accommodation for the elderly/aging population of the parish. A wide mix of housing sizes and types could be provided to meet the needs of the parish including 1-bedroom and 2-bedroom homes for first time buyers/renters plus a range of 3-bedroom and 4-bedroom houses for families. There is also sufficient space to provide new green infrastructure including amenity green space to meet the needs of the development as well as additional green space to help reduce the existing shortfall in the Parish. It could also contribute towards the cost of providing a new pedestrian crossing between the village hall and the recreation ground in the southern part of the village. This is referred to in paragraph 3.1.3 of the Plan as being urgently required.

**Proposals Map (Page 58)**

There appears to be a drafting error on the Proposals Map shown on page 58 of the draft Plan in respect of the Hunston Dairy site (Site 3). The former agricultural buildings including a static caravan plus the field in the north eastern corner of the site have not been coloured dark purple. This suggests that this part of the site does not form part of the allocation although it would be included within the proposed revision to the Settlement Boundary. This is inconsistent with the Proposals Map that formed part of the Regulation 14 draft plan of May 2020 which included all of the dairy site as part of the Policy H1 housing allocation.

The current Proposals Map approach is also inconsistent with the three sites (Sites 1, 2 and 3) as identified on *Figure 4.1 - Sites Assessed for the Hunston Neighbourhood Plan* on page 17 of the Strategic Environmental Assessment (SEA) by AECOM for the Hunston Neighbourhood Plan. It is also inconsistent with the site boundary edge red on the aerial image forming part of Table 4.3: Site 3 of the SEA (page 22); and the approach used for the housing allocations on Site 1 – Farmfield, and Site 2 – Ridgeway Nurseries which include existing buildings and open field areas.

This drafting error should be remedied by including the former agricultural buildings, the static caravan plus the field in the north eastern corner of Site 3 within the area shaded dark purple.

Page 2

1. **Comments on Strategic Environmental Assessment (SEA) for the Hunston Neighbourhood Plan**

**Table 4.3: Site 3 – Commentary, Site 3: Hunston Village Dairy (page 22)**

The commentary headed *‘Biodiversity and Geodiversity’* on page 22 refers to this site as falling within the 12km buffer zone for the Singleton and Cocking Tunnels SAC. This, however, is inconsistent with Natural England’s HRA comments dated 12th August 2021. The second page of the *Stage 1 – Details of the plan or project* assessment confirm that whilst the northern most part of the Parish is within the 12km zone for the Singleton and Cocking Tunnels SAC the impact on the SAC has been screened out as no likely significant effects are anticipated because all of the proposed housing allocation sites in the NP are in the part of the parish that is outside the 12km zone.

As result the reference to Site 3 being within the within the 12km zone for the Singleton and Cocking Tunnels SAC on page 22 of the SEA and similarly those made in respect of Site 1: Land at Farmfield Nursery (page

18) and those for Site 2: Land at Ridgeway Nursery (page 20) should be deleted.

1. **Summary**

Subject to the above observations and suggestions my client fully supports the draft Neighbourhood Plan particularly the proposed housing sites forming Policy H1. The owner of Site 3: Hunston Dairy and the owners of Site 1: Farmfield and Site 2: Ridgeway Nurseries are fully committed to the preparation of a coherent and comprehensive Masterplan for the Policy H1 allocation and to working with the Neighbourhood Plan Steering Group and local residents to deliver a high-quality sustainable development on the land. As set out in the draft Plan and the accompanying background documents the allocation is relatively unconstrained and can be developed quickly. This will assist in meeting the housing needs of the parish and also make a valuable contribution towards the high district wide housing requirement.

We trust the comments raised above are of assistance in progressing to the next stage of Neighbourhood Plan.

Please do not hesitate to contact me or my colleague, Kris Mitra, should you require additional information or clarification on any matter in progressing to the Regulation 16 stage of the draft Plan.

Yours faithfully

**for Genesis Town Planning Ltd**

**Jeremy Farrelly BA (Hons) UPS DUPI MRTPI Director of Planning**

Page 3

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
* 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** | Jeremy Farrelly |
| **Address** | Genesis Town Planning Ltd, 26 Chapel Street, Chichester, West Sussex |
| **Postcode** | PO19 1DL |
| **Telephone** | 01243 534050 |

|  |  |
| --- | --- |
| **Email** |  |
| **Organisation (if applicable)** | Genesis Town Planning Ltd |
| **Position (if applicable)** | Director of Planning |
| **Date** | 8th September 2021 |

# PART B

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

|  |  |  |  |
| --- | --- | --- | --- |
| Paragraph Number | Paragraph 2.2.1 | Policy Reference: |  |

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

Support Support with modifications 

Oppose Have Comments

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| **Please give details of your reasons for support/opposition, or make other comments here:** |
| Please see 3rd paragraph on page 1 of Covering Letter(Continue on separate sheet if necessary) |

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| **What improvements or modifications would you suggest?** |
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If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/addressed or attached.

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

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| Paragraph Number | Paragraph 5.7 | Policy Reference: |  |

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

Support Support with modifications 

Oppose Have Comments

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| **Please give details of your reasons for support/opposition, or make other comments here:** |
| Please see 4th paragraph on page 1 of Covering Letter(Continue on separate sheet if necessary) |

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| **What improvements or modifications would you suggest?** |
| Please see 4th paragraph on page 2 of Covering Letter(Continue on separate sheet if necessary) |

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**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 B

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

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

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

Support

* Support with modifications Oppose Have Comments

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| **Please give details of your reasons for support/opposition, or make other comments here:** |
| Please see paragraphs 5 and 6 on page 2 of Covering Letter(Continue on separate sheet if necessary) |

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

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| --- | --- | --- | --- |
| Paragraph Number | Proposals Map | Policy Reference: |  |

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

Support Support with modifications 

Oppose Have Comments

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| **Please give details of your reasons for support/opposition, or make other comments here:** |
| Please see 7th and 8th paragraphs on page 2 of Covering Letter(Continue on separate sheet if necessary) |

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| **What improvements or modifications would you suggest?** |
| Please see 9th paragraph on page 2 of Covering Letter(Continue on separate sheet if necessary) |

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|  |  |
| --- | --- |
| **PART A** | **Your Details** |
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| **Postcode** | PO19 1DL |
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|  |  |  |  |
| --- | --- | --- | --- |
| Paragraph Number | Table 4.3 on Page 22 of SEA | Policy Reference: |  |

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

Support Support with modifications Oppose Have Comments 

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| --- |
| **Please give details of your reasons for support/opposition, or make other comments here:** |
| Please see 10th paragraph on page 3 of Covering Letter(Continue on separate sheet if necessary) |

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| **What improvements or modifications would you suggest?** |
| Please see 11th paragraph on page 3 of Covering 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.