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** | Alex King |
| **Address** | Mission Town Planning Ltd 42 Constitution Hill Road, Poole,Dorset |
| **Postcode** | BH14 0QD |

|  |  |
| --- | --- |
| **Telephone** |  |
| **Email** |  |
| **Organisation (if applicable)** | Mission Town Planning Ltd |
| **Position (if applicable)** | Planning Consultant |
| **Date** | 8th September 2021 |

# PART B

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

|  |  |  |  |
| --- | --- | --- | --- |
| Paragraph Number | Please refer to attachedrepresentations | Policy Reference: | Please refer to attachedrepresentations |

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

Support

Support with modifications  Oppose

Have Comments

|  |
| --- |
| **Please give details of your reasons for support/opposition, or make other comments here:** |
| Please refer to attached representations(Continue on separate sheet if necessary) |

|  |
| --- |
| **What improvements or modifications would you suggest?** |
| Please refer to attached representations(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.

Chichester District Council, Neighbourhood Planning, East Pallant House,

1 East Pallant, Chichester, PO19 1TY

[www.missiontownplanning.com](http://www.missiontownplanning.com/) Tel;

Our ref; Hunston NP Reps-NR-MTP-020921

9th September 2021

**BY EMAIL ONLY**

Dear Sir/ Madam,

## Hunston Neighbourhood Plan 2019-2037 Regulation 16 Consultation of the Neighbourhood Planning (General) Regulations 2012

These written representations have been prepared by Mission Town Planning on behalf of our client and the landowners of sites known as Farmfield and Ridgeway Nurseries, Hunston. These two sites form part of a wider allocation which included Hunston Dairy which does not form part of these representations. The representations are in respect of the Hunston Neighbourhood Development Plan Regulation 16 Consultation.

The purpose of these representations is to offer full support for the Hunston Neighbour Plan, its allocations and polices. Notwithstanding the support offered, we would seek to suggest a number of minor amendments to the wording of some policies and to allow for greater clarity and certainty of delivery. We would request that consideration is given to the proposed amendments.

It is not the intention of these representations to review the full plan, but to focus primarily on policy H1 of the emerging Hunston Neighbourhood Plan, which is subject to this consultation.

## The policy context

The introductory section of the Neighbourhood Plan sets out the planning policy context for the District and the Parish. The District has an adopted development plan “The Chichester Local Plan Key polices 2014 – 2029” adopted July 2015. Policy 4 of the plan sets out the provision within the plan to deliver 7,338 houses within the plan period across the District. Policy 5 sets the considerations and delivery of housing on “Parish Housing Sites” and allocated Hunston as having a requirement to deliver 25 units within the plan period. This is also set out within the Site Allocations Development Plan Document adopted January 2019.

Notwithstanding the above, this must also be considered in view of the Council’s emerging

policy position and also the land supply for the District as a whole.

The Council are currently working on a local plan review, which would culminate in the adoption of a new plan in Spring 2023. As part of this process and most recently the Council issued the Chichester Local Plan Review 2035 – Preferred Approach – December 2018 (Regulation 18). This was subject to consultation from December 2018 to February 2019.

The preferred approach document proposed policy AL11 – Hunston Parish, which instructs the allocation of a site/sites for the provision of 200 dwellings within the village. The policy goes onto to list a number of policy requirements for the sites that are proposed.

Most recently the Council have confirmed via a press release, that notwithstanding their efforts the Council are still unable to meet their housing land supply obligations as set out within National Planning Policy, and this is one of a number of aspects that is hindering the progress of a new local plan.

As is required by the National Planning Policy Framework (NPPF), neighbourhood plans;

“*must be in general conformity with the strategic policies contained in any development plan that covers their area”.1*

This is acknowledged throughout the Neighbourhood Plan. With this in mind, Paragraph 13 of the NPPF states that;

1 Paragraph 29 footnote 18 – NPPF (20th July 2021)

*“Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”*

Furthermore, Paragraph 29 confirms that;

*“Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.”*

Taking this into consideration, it is essential that the emerging Neighbourhood Plan does not seek to influence, constrain, or restrict any decisions as a result of the Local Plan Review.

## Neighbourhood Plan Consultation Representation

As stated above the purpose of this representation is to support the neighbourhood plan and its allocations. Working on behalf of the landowner and the potential developer of sites of Farmfield Nurseries (Site 1) and Ridgeway Nursery (Site 2).

The proposed policy H1 is clear and concise as to its aims. It sets out over 21 differing criteria that would need to be considered in order to bring any development forward. It is noted that the policy has added significantly to policy AL11 of the emerging Chichester Local Plan. AL11 is more strategic in scope, seeking to address the issues of the district as a whole, whereas Policy H1 benefits from being within a Neighbourhood Plan in that it is specific to that area and place and has allowed truly local issues to be considered in its preparation.

Below sets out the policy wording, and our considerations of this to enable the sites to come forward, and deliver on the aspirations of the Neighbourhood Plan;

***Policy H1 Housing sites allocation***

*Permission will be granted, within the Plan period, for housing on land identified on the Proposals Map.*

*The following specifics must be addressed as part of any planning proposal:*

* 1. *Provision of a minimum of 200 homes*;

Response – We fully support the allocation of the site, however, as noted within the plan the site is within 3 differing ownerships. It will be important to ensure that the sites can be delivered individually as well as collectively.

* 1. *A coherent and comprehensive Master Plan covering the whole site.*

Response – We fully support the need for a comprehensive plan for the site, however, this does need to address how the sites will come forward and be disposed of. While any masterplan will need to consider the sites as a whole, they cannot really be binding where they review sites which are outside of the applicant’s ownership. A masterplan should demonstrate how the sites could be comprehensively developed and should not be binding on the other sites coming forward.

The policy will need to consider how this fits within the wider Chichester Development plan and in turn, with National Planning Policy and Guidance.

Suggested amendment – “A comprehensive Master Plan which demonstrates how

the sites could be bought forward.”

* 1. *New development must attain a HQM minimum 3 to 4 star rating at final stage*

*certificate and Level 4 in the ‘My Footprint’ indicator.*

Response – The Housing Quality Mark (HQM), appears to be a new proposal offered by the Building Research Establishment (BRE) who are a private organisation with no legislative power. However, they have offered best practise with schemes such are BREEAM and CfSH. To date it is unclear how this accreditation is recognised by the development industry, and what the benefits would be over considered design, and building regulations. It is clear that the aims of the HQM are laudable and to be encouraged within any development coming forward.

Paragraph H1.5 clearly sets out a description of the HQM, how it works, and the reasons behind the use of the metric. Notwithstanding this, there are some fundamental issues in regard to the impact on viability of any development coming forward. In the sense of what the HQM requires to meet its standards. Moreover,

the balance between building regulations, which is a legal requirement and varying HQM levels, which are not a legal of binding requirement needs to be considered.

The use of such a mechanism could have ramifications for bringing forward local design codes, which are shortly to be a requirement. The use of a national body could reduce or even remove local criteria, for example a development could accord with point 4, below but fail to meet the HQM standards as a result of the required design. The government requirement for design codes makes it clear that materials should be local, and design should reflect local vernacular. Finally, the use of such a mechanism creates unnecessary conflict with emerging plans.

Suggested amendment; New development should seek attain a HQM minimum 3 to 4 star rating at final stage certificate and Level 4 in the ‘My Footprint’ indicator. Or to demonstrate how it reduces its impact on the environment.

* 1. *Innovative approaches to the construction of low carbon homes which demonstrate sustainable use of resources and high energy efficiency levels will be supported where they do not harm the historic rural character.*

*Examples would include but would not be limited to:*

* + 1. *siting and orientation to optimise passive solar gain; and*
		2. *the use of high quality, thermally efficient building materials; and*
		3. *installation of energy efficiency measures such as loft and wall insulation and double glazing;*
		4. *the use of low carbon heating systems.*

Response – This statement is fully supported.

* 1. High-quality imaginative design including permeable layouts for pedestrians, cyclists and vehicles with visually robust outdoor spaces-giving a sense of place and sense of orientation;

Response – We fully support this requirement.

* 1. *Landscape design and green infrastructure that contributes to a sustainable sense of place, such as wild areas for outdoor play, biodiversity buffers and wildlife corridors, and which softens the impact of the built form.*

Response – We fully support this requirement.

* 1. *Existing mature vegetation shall where possible be retained to complement and enhance the development proposals and contribute to the biodiversity of the sites*

Response – We fully support this requirement; however, this should be reviewed so opportunities are not lost to enhance biodiversity.

Suggested amendment; Existing vegetation, flora and fauna shall where possible be retained to complement and enhance the development proposals and contribute to the biodiversity of the sites, and wider area.

* 1. *Provision of affordable housing in line with the prevailing CDC policy, which should include a range of tenures and types including shared ownership, affordable housing to rent and entry level homes as based upon Parish needs;*

Response – We fully support this requirement.

* 1. *Proposals must respect and enhance the built character of the village and its high- quality countryside setting. Innovative and contemporary designs must be complementary to their context;*

Response – While the above is fully supported in principle, the above should be clearer in its what it is seeking to achieve, with this is respect of the existing vernacular, or whether newer “innovative designs” are acceptable.

* 1. *A hierarchy of linked routes and space that are permeable, relate to local facilities and which provide parking provision that makes a positive contribution to the setting of buildings.*

Response – We fully support this requirement. However, the issues are around parking provision and the reliance on private motor vehicles needs to be considered. Given issues around climate change; and the need to reduce emissions; to increase

people’s health and well-being, among many other reasons are well documented. A well-designed scheme should be for people and not specifically for parking provision. The need to consider the long-term impacts and how these spaces will operate should be considered.

* 1. *External lighting should be avoided but where necessary should be sited and designed to minimise light pollution*

Response – We fully support this requirement; however, this will need to be designed for the benefit of local people and also wildlife. This would accord with Policy EH7

* 1. *A footway will be created along the eastern edge of the sites to link to the village facilities*

Response – We fully support this requirement. As stated above if the sites are delivered in phases this needs to be considered in terms of how the scheme are implemented to deliver this important piece of infrastructure that will integrate the scheme with the village.

* 1. *Good connections to the cycle network*

Response – We fully support this requirement.

* 1. *Safer routes to the schools will be identified and the necessary improvements or additions will be provided.*

Response – We fully support this requirement. This will need to consider how these elements can be secured and also be in accordance with the relevant limitations of planning obligations as set out within regulation 122 of the Community Infrastructure Regulations 2010. While the development can deliver elements within land that is within its control, any elements beyond this would need to accord with the above regulations.

* 1. *A transport statement is submitted to demonstrate the capacity of the local highway network to accommodate the scale of development proposed*

Response – We fully support this requirement.

* 1. *A nitrate neutrality strategy is submitted in accordance with latest Natural England guidance and the phasing of the scheme takes into account the phasing of capacity improvements to the wastewater treatment works.*

Response – We fully support this requirement.

* 1. *No building shall be occupied until the sewerage network reinforcement scheme has been implemented in accordance with the approved details.*

Response – We fully support this requirement, there is a requirement from the relevant statutory undertaker.

Further to the above, the below policies, are also relevant of some consideration.

## Policy H3 Housing Mix

*Proposals for new housing must deliver a range of house types, sizes and tenures. Applicants should demonstrate how the proposal will meet local needs. Proposals where at least 25% of dwellings meet Lifetime Home Standards, or its equivalent, will be supported.*

Response – We fully support this requirement; however, this also needs to consider the viability of the impact of this delivery.

## Policy GA2 Parking in new development

*Development proposals will be supported only if they include the maximum level of off-street parking consistent with current standards. New development must provide its parking requirements on-site so as not to add to the existing congested roads,*

*unless evidence can be presented by the applicant that sufficient on-street parking is available.*

*The amount and disposition of vehicle provision in new residential development has a significant effect on the quality and flexibility of the development.*

* *Development should provide safe and convenient access to vehicles.*
* *Residents must be able to see their parked vehicles from their home.*
* *Placing vehicle parking and garages between houses behind the building line is desirable.*
* *Where parking is located in front of houses the design of the layout and landscaping shall aim to minimise their visual impact through the use of screen walling, fences, hedges, shrubs and appropriate trees.*
* *Vehicles should not be concealed in rear courtyards as this can lead to problems of crime and lack of personal security.*
* *The internal dimensions of garages shall be a minimum of 6.3m x 2.8m and their appearance shall relate to the appearance of the house they serve.*
* *Vehicle parking for flats shall be conveniently adjacent with the ground floor flat*
* *Layouts shall include provision for visitors and delivery vehicles*.

Response – The above should consider the implications of schemes which could become car dominated. Furthermore, the implication of changing travel habits, climate change, electric vehicles charging, needs for active travel and the infrastructure requirements needs very careful consideration.

The above policy could if strictly applied have significant implications on the delivery of sites coming forward that become car dominated and are difficult for pedestrians to safely navigate.

## Summary

The landowners and our clients fully support the Neighbourhood plan, but request that the above issues and implications are considered prior to the adoption of the Neighbourhood Plan.

We would welcome a meeting with the Parish Council to discuss the site, the emerging Neighbourhood plan and to work with the community in the delivery of sites 1 and 2.

Should you require and further information please do not hesitate to contact me, on the details set out below.

Yours sincerely,

Alex King – Managing Director Mission Town Planning

Tel;