Hunston Neighbourhood Development Plan Regulation 14 Consultation

Representations on behalf of Spiby Partners

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Town Planning ▶ Development Consultancy

1 Introduction

1.1 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).

1.2 These representations respond to the Regulation 14 Consultation version of the Hunston Neighbourhood Development Plan (2020). 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

2.1 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.

2.2 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.

2.3 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.

2.4 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.

2.5 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 unlikely that the Council will be able to 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 will be engaged, i.e. that permission should be granted unless adverse impacts of doing so would 'significantly and demonstrably' outweigh the benefits.

2.6 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

2.7 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 provided on request. ***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)

2.8 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.

2.9 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.

3 Policy H1 – Housing sites allocation - oppose

3.1 Notwithstanding the above observations, we feel that it is important to consider the merits of the proposed allocation.

3.2 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.

3.3 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.

3.4 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.

3.5 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.

3.6 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.

3.7 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.

3.8 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.

3.9 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.

3.10 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.

4 The Site and its suitability

4.1 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.

4.2 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) (2018) assessed the Site positively, with potential to deliver approximately 80 dwellings in the medium term.

4.3 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.

4.4 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.

4.5 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.

4.6 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.

5 Other Draft Policies and supporting evidence

5.1 The following section seeks to respond to other policies that would be in the interest of our Client and their landholdings.

Map D Built Up Area Boundary - oppose

5.2 The built up area boundary has been drawn incorrectly. Application ref 18/01320/FUL; Land east of Lowlands, was approved for 7 new dwellings in September 2018 and is currently in the process of being built. The site was allocated for development under Policy HN1 of the Site Allocations Development Plan Document (2019). Inset Map 12 of the DPD redraws the settlement boundary around this site and thus this should be followed through within the Neighbourhood Plan.

5.3 In addition, whichever site the Parish choose to allocate, the built up area boundary should be amended to include the allocated site. This is not currently the case.

Hunston Site Assessment Report (2019) - oppose

5.4 The Site Assessment Report simply outlines assessments of each site, it does not provide any methodology to truly determine the benefits and disbenefits of each site on a comparison basis. It is therefore not clear how, other than residents voting on each site, the allocation has been chosen in accordance with Planning Policy and the Presumption in Favour of Sustainable Development that is set out within the National Planning Policy Framework and as referenced within para. 2.2.1 and section 5.2 of the Draft Neighbourhood Plan.

5.5 The assessment of Land east of Foxbridge Drive determines that the site is *'separated from the settlement edge by a large area of open land.'* This simply is not the case. As noted earlier within this statement, Farm Close has now been built as has land adjoining Lowlands. The site therefore adjoins the settlement boundary at the end of Foxbridge Drive and Farm Close. The only undeveloped area of land is the residential garden of Oakdene, north of Farm Close.

6 Further considerations – interim policy statement for housing

6.1 The District Council have recently released a draft copy of the Interim Policy Statement for Housing Development for consultation. Such a statement was previously adopted in order to bridge the gap prior to the adoption of the Local Plan (2015).

6.2 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.

6.3 The first of these criteria is that the site boundary in whole or in part is contiguous with an identified settlement boundary.

7 Summary

7.1 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.

7.2 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.

7.3 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.