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The Clerk (Carol Smith)
Hunston Parish Council
Hunston Village Hall
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Chichester
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Emailed to: clerk@hunstonparishcouncil.org

Date: 26 June 2020
Our ref: 14733/11/SSL/TJ/
Your ref:

Dear Carol,

Response to the Hunston Neighbourhood Plan Regulation 14 Consultation: Submission made on behalf of the Church Commissioners for England

We write in response to the Hunston Neighbourhood Plan Regulation 14 consultation on behalf of our client, the Church Commissioners for England (CCE). Our submission relates to CCE's landholdings in Hunston, located to the east of the B2145 Selsey Road. For ease of reference, please find enclosed with this letter a Vision Document for the site (dated February 2019) and a Site Location Plan.

We are aware that the CCE site has not been allocated in the current draft Neighbourhood Plan. This is disappointing from CCE's perspective. We would like to reaffirm our position that the CCE site represents the best option for meeting the future development needs for Hunston and, having reviewed the draft Neighbourhood Plan, also meets the Parish Council's rationale for the proposed site allocation. It is therefore, requested that the CCE site be kept under consideration, in the event that the preferred sites are undeliverable/unavailable or additional land is required.

Background

As part of the call for sites in March 2019, land owned by CCE was promoted. This 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.

Following this submission, the Parish Council confirmed that the CCE site was not their 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.[1]

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The Parish Council should be aware that the plan at page 55 of the Neighbourhood Plan shows an area allocated in red and is referred to as 'Proposals Map' within the key, without specifying it is the proposed housing site. It is assumed (based on the table at para. H1.3) that this is the land allocated for housing, combining land at Farmfield Nursery, land at Ridgeway Nursery and the Village Dairy site.

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The Site Allocation

The draft Neighbourhood Plan refers to the 'Site Assessment' document within the evidence base as providing the rationale for the proposed allocation. However, having reviewed this document and the information provided within the HELAA forms there are a number of concerns about the evidence and justification for the allocation which is not in accordance with Chichester's adopted or emerging local plan and, therefore, calls in to question the soundness of the Plan. To further explain, comments are provided below against each of the suggested rationale within the Neighbourhood Plan which supports the proposed allocation.

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

A very limited amount of the land proposed within the proposed allocation is brownfield land. All three of the site proformas within the Site Assessment refer to the majority of the sites being within 'arable use' or 'grazing land' as is the case with the CCE site. There are also inconsistencies in the site capacity figures used in relation to the three sites comprising the allocation. For example, page 4 of the Site Assessment refers to Land at Farmfield, Land at Ridgway Nursery both with a yield of 50 units and the Village Dairy providing a further 80 units (180 in total). Therefore, it appears the three sites may not be capable of accommodating the 200 units required as a minimum.

"The allocation protects the open landscape and important views to the east of the Parish

The proposed allocation is poorly located in relation to the existing village as concluded by the Council's HELLA's assessment which rejects two of the three sites (the Village Diary and Farmfield Nursery) due to their detachment from the settlement boundary. The third site (Ridgeway Nursery) is further detached from the boundary and was not assessed as part of the HELAA process. In our view, the CCE site is much better located in terms of providing a discrete and well contained extension to Hunston, rounding off the existing settlement. It would help deliver a more sustainable pattern of development, with homes in closer proximity to existing community facilities in accordance with CDC draft policy S20 (Design) which amongst other things requires development to "*respond positively to the site and surroundings…" and be" well connected to provide safe and convenient ease of movement by all users*". The proposed allocation cannot meet these requirements.

Furthermore, the extracted comments from the landscape capacity study referred to within the Site Assessment suggests there is no difference in the sensitivity of the landscape value of the proposed allocation in comparison to the CCE site. All four sites are rated the same in terms of visual sensitivity, landscape sensitivity and wider landscape sensitivity with either a medium or medium/high rating. Therefore, it is unclear why the landscape value of land to the east of the Parish has been considered differently in comparison to the landscape value of the proposed allocation to the south. The proposed masterplan outlined in the Vision Document would provide a new Village Green within the centre of the settlement and a significant new area of open space, therefore retaining some views to the east and creating a new amenity area for residents to enjoy. The proposed open space and development parcels would work with the site's features and provide a new positive outlook on to the countryside beyond.

"The allocation protects the view into and out of the Conservation Area."

The Vision Document proposes a masterplan for the CCE site which incorporates generous areas of open space around the Spire Cottage Listed Building and Conservation Area. This open space will retain a green setting for these heritage assets and preserve the setting of the Conservation Area. Therefore, this rationale is also applicable to the CCE site.

The allocation protects Bremere Rife an important habitat for water voles protected by the Wildlife and Countryside Act.

The Bremere Rife runs along the eastern boundary of the southern parcel of the CCE site and is recognised as an important habitat. 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 could provide additional new habitats for water voles as well. Overall, a net biodiversity gain would be achieved across the site. Therefore, this rationale is also applicable to the CCE site.

Allocation of the sites should be capable of delivering benefits in the form of improvements to the footways.

The proposed CCE masterplan would deliver significant improvements to footways in the vicinity of the site, including potentially upgrading the existing footway in Hunston to link with the existing public right of way and cycle route along the Chichester Ship Canal. The CCE site would therefore also be capable of delivering improvements to footways in and around the settlement.

Allocation of the sites 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.

The CCE 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 path network. Its location in the heart of the village is close to existing facilities would discourage car use encourage sustainable transport behaviour.

Retaining the robust landscape boundary hedges and trees on the boundaries of each site will provide visual containment to the settlement edges, enhance the habitats and biodiversity and protect the important drainage function of the ditch to the south of The Old Dairy.

These advantages and similar boundary treatments can all be achieved through the development of the CCE site. The masterplan would create defensible landscape edges and a defined boundary to the village, by enhancing existing hedgerows and vegetation with new planting. These features, alongside the green corridor, open spaces, ditches and natural SUDS features will enhance habitats and biodiversity across the site.

Conclusions on site selection rationale

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 proposed methodology used to assess the sites is unclear. The Site Assessment suggests that the "*HELAA site allocations were reviewed and assessed against a standard set of criteria. Scores were allocated to each piece of land and conclusions drawn from that assessment*". No further detail is provided as to how the sites scored and what the key criteria is. However, in our view the Parish Council's rationale is also applicable to the CCE site and significantly improves on what can be delivered by the draft allocated site, resulting in benefits for the local community.

Within the draft Neighbourhood Plan there is no assessment made of whether the sites considered are deliverable and developable. On this basis an Inspector cannot be assured that these sites are likely to come forward within the plan period to deliver the required new homes. This is an important element of the exercise of allocating land for development and should be incorporated into the Neighbourhood Plan process prior to the submission of the document. 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.

The Chichester Local Plan

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).*

The Chichester Local Plan has been delayed due to a number of complex issues that the Council are working to address. These include, the capacity of essential infrastructure including the A27 and wastewater treatment works and environmental constraints. The Council have also declared a climate emergency and are considering how to ensure this is addressed within the Local Plan. The current situation with Covid-19 also has the potential to further delays on the Local Plan progress. Overall, there appears to be some uncertainty with the timescale for its adoption.

The current additional work being undertaken by Chichester does not currently include any update to housing requirements and distribution across the District. However, should the work on the local plan become protracted and/or the Inspector finds that the housing requirements should be increased further it may be necessary to allocate additional housing within Hunston. The draft Neighbourhood Plan could go further than CDC's requirements for a minimum of 200 units. This would help address potential further increases from Chichester District Council through the Local Plan Review and also provide a more robust defence against speculative developments from coming forward on non-allocated sites around Hunston.

CCE Land at Hunston

To summarise, we continue to consider that the that CCE site is the most appropriate and sustainable location for a natural extension to Hunston. 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.

The site is wholly within CCE's ownership, is available now and as demonstrated by the Vision Document is a suitable site for development. The site could accommodate approximately 240 homes which could be delivered on a phased basis early in the plan period. There are no overriding physical or technical constraints that would act as an impediment to development.

Should you have any questions regarding our submission or wish to meet to discuss the opportunity presented by CCE's land, please do not hesitate to contact me or my colleague Tara Johnston.

Yours Sincerely,



Clare Catherall

Associate Director
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