

CDC Draft Local Plan

Chichester Society's Comments on Selected Policies

Policy No.2 Development Strategy and Settlement Hierarchy

Oppose

Whilst the Chichester Society acknowledges the need to provide additional housing over the period covered by the Plan, the basis for this policy is questionable, founded as it is on an annual house building figure of 395 per annum.

The Society objects to any building on the greenfield sites identified in the policy, namely West of Chichester (Whitehouse Farm) and Westhampnett (Oldplace Farm). The Society identifies the preferred sites for development as Shopwyke Lakes, Tangmere and Southbourne.

No development should be considered on greenfield sites until all brownfield sites have been developed. Building on multiple sites at the same time may end in irreversible over provision of housing development and loss of greenfield should the demographic calculations prove to be over-estimated.

Consideration should be given to more development at Tangmere to provide the settlement with a critical mass to make it a proper village with appropriate community facilities. Consideration should be given to some development at Drayton.

Policy No.4 Housing Provision

Oppose

Having studied the rationale for 6,715 houses in the plan period, we have been unable to find how many houses are required for different groups of households. We suggest that the numbers allocated to different sites should include the following priorities: -

- new household formation from existing households and from existing households that need bigger homes;
- new households required to meet employment growth;
- houses required to replace those beyond their useful life (probably a small number).

We do not see as a priority the need to accommodate new households: -

- wishing to live here but to work outside the district;
- wishing to live here but not working

We have trawled the housing market studies to find what number of houses would be needed to meet these priorities - without success - but guess that it would be less than 6,715.

The Society therefore challenges the empirical evidence that has led the District Council to believe an annual housing figure of 395 is the correct one. The Society reluctantly accepts that the figure may have to be as high as 350 houses per annum.

Policy No.7 Master Planning Strategic Development

Support with modifications

The Chichester Society supports the Local Plan intention to initiate and manage the development of 'strategic locations' by using a 'comprehensive master planning process'. Recent large-scale housing schemes within Chichester at Graylingwell and Rousillon Barracks demonstrate the positive potential of such an approach.

However we believe that Policy 7 should be strengthened. As currently phrased the stated intentions are desirable and laudable but have little meaning. For example:

- Item 3 Incorporate high standards of urban design and architecture etc
- Item 5 Creating a strong sense of place etc:
- Item 16 Understanding the historic environment etc

While Graylingwell has demonstrated an effective response to these issues, evidence from some other residential developments over the last 10 years demonstrates the Council has at times found it difficult to implement its good intentions: as for example the housing development located between Barnfield Drive to the north and Westhampnett Road to the south.

The Council's Local Plan must demonstrate this cannot occur again. Policy 7 needs to give greater meaning to the 16 aspirations by either providing illustrative examples within the text or by referring the reader to linked policies where they exist. The 16 aspirations can be supplemented to good effect by adding one to insist that developer-led consultation (Planning-for-Real) is a foundation for larger and/or significant schemes (e.g. over 20 dwellings, a school, health centre etc). This approach was successful in the early stages of the Graylingwell development and more recently at Shopwyke Lakes.

An effective public consultation will improve the quality of a Master Plan – and thus the quality of life for residents in future generations. Policy 7 ends with a statement about managing the master planning process and advises that a 'management plan *should* be produced'. In the Society's view a management plan is essential and therefore 'should' must be substituted by 'will'.

Policy No.9 Development and Infrastructure Provision

Oppose

We think that this policy does not provide for sufficient priority to be given the provision of 'social' infrastructure. The requirement for health facilities is buried in a paragraph which at first sight is more concerned with power and other utilities. With a high proportion of elderly people, and that proportion expected to grow, health facilities are of major concern to our members.

We also note that schools are overcrowded, with, for instance, parents sending their children to Midhurst and Southbourne for secondary education. Our recommendation is that the requirement for social infrastructure should be made explicit and separated from physical infrastructure so that its importance is not overlooked. In this respect we would expect to see specific mention of health, education, shopping and leisure.

Policy No.12 Chichester City Employment Sites

Oppose

As the Society objects to the development of the Whitehouse Farm and Westhampnett sites, it naturally follows that it objects to the development of employment land at these sites. The Society does however welcome the Council's support for refurbishment, redevelopment and other improvements at the Terminus Road and Quarry Lane industrial estates.

The Society suggests that the Council explores the potential for development for employment uses of the former oil storage depot site at Bognor Road.

Policy No.14 Chichester City Transport Strategy

Comment

The Chichester Society considers this policy to be weak and showing little evidence of firm commitment. Phrases such as 'initiatives to promote behavioural change' and 'exploring potential options' (used twice) are local government speak for paper exercises rather than action. The Society expects any new developments to have transport services and options commensurate with the size of the development. Cycle routes must be integral to any new major development. Cycle lanes must be installed at the outset of any development not as an afterthought.

The Society proposes a 50mph speed limit on the A27 Chichester By-pass to improve traffic flow and discourage 'bunching' and would encourage the District Council to champion this cause.

Policy No.15 Development at Chichester City North

Support

The Society has participated in the Chichester City North Working Party which produced the Development Brief and supports new development and infrastructure improvements on the surplus NHS land. We support permeable pedestrian/cycle links through the proposed development to Graylingwell Park, to the City Centre, to Oaklands Park/Broyle Road and to the retail sites at Barnfield and Portfield. We also propose eastward links to the countryside of the Lower Lavant Valley and to Westhampnett and East Lavant and up Chalkpit Lane to the South Downs National Park at Seven Points and The Trundle.

Policy No.16 West of Chichester Strategic Development Location

Oppose

Planning policy since the 1950s has been to create a firm and clearly defined demarcation between the city and the countryside to the west of the former Chichester-Midhurst railway line (Now Centurion Way cycle path.) South of Newlands Lane the countryside is identified in the Chichester District Local Plan First review 1999 as a Strategic Gap separating Chichester and Fishbourne.

Any development west of Centurion Way would create an urban encroachment into greenfield land of high visual quality which helps to define Chichester as a historic city set within unspoiled countryside.

Whitehouse Farm comprises medium/high quality arable land which should be retained for food production, with hedgerows and shaws of importance for nature conservation. Two public rights of way leading west from the Parklands estate and from Centurion Way (Newlands Lane being the more northerly) give access to Fishbourne at Clay Lane and at Salthill Lane respectively. In addition the landowner allows permissible access along hedgerows and around the boundaries of arable fields south of Newlands Lane, which provides for informal recreational pursuits within a countryside setting, with views back to the Cathedral spire.

Similarly the landowner encourages permissible access from the B2178 Old Broyle Road along the hedgerows and boundaries of a large arable field to the north-east giving access to Brandy Hole Copse LNR and to Centurion Way/Brandy Hole Lane. Again this provides a very important recreational facility with extensive views to the Cathedral spire, to the hills of the Isle of Wight and is greatly valued by residents of the city and beyond, in conjunction with visits to Brandy Hole Copse.

The only feasible means of vehicular access to major development west of Centurion Way would necessitate new links from the B2178 Old Broyle Road (as proposed in Phase 1) and from Westgate. Traffic generated by Phase 1 would either pass down B2178 St Paul's Road to Northgate and thereon via the ring road (westwards or eastwards) towards the A27, or alternatively in a northerly direction along the B2178 towards Petersfield or through Lavant towards Midhurst.

Traffic heading for the M25 or London would be likely to do this rather than to use the congested ring road to reach the A27 and so via the A3 and A246 to the M25. A later southerly link from Westgate to Phase 2 would pass across Bishop Luffa school grounds creating noise and pollution in an area at present free of external influences, and cause increased traffic congestion at the A27 Fishbourne roundabout.

A phase 1 development would not meet NPPF policy 7 which requires all development to be sustainable. It would not be economically sustainable as it would require costly infrastructure, not socially sustainable as it would not be integrated with the existing community, and not environmentally sustainable as it would destroy an as yet unspoiled gateway to the city. The entire development would totally overwhelm the city.

It would be a peripheral development, costly in terms of infrastructure and thus unlikely to achieve the required level of 40% affordable housing. The road networks outside the development site would be overloaded as there is no evidence that funding to achieve free flow traffic movements on the A27 Chichester bypass will be funded within the Plan period.

Significant modal shift to encourage walking, cycling and use of public transport would be unlikely to be achieved. The existing road network in the west of the city takes the form of concentric rather than radial roads, and with no direct radial footpath or cycle links through Parklands to the city centre. The provision of a high frequency bus service would not be economically viable particularly in the evenings and at weekends.

To summarise, the Chichester Society considers it would be impossible for a Strategic Development west of the city at Whitehouse Farm to become a sustainable urban extension to the city. What benefits it could provide in terms of housing and employment provision would be totally outweighed by the numerous disbenefits to the existing city and to its inhabitants.

Policy No.17 Shopwyke Strategic Development Location

Support

The Chichester Society has supported the current planning application for 500 homes. It has also opposed the proposal for 'Glenmore Business Park' in place of the permitted (but not started) B8 warehouses, so that this land and the industrial land south west of Shopwyke Lakes could be used to increase the capacity of the strategic development site to about 600 homes. They are all brownfield sites forming part of Portfield Quarry.

Extra homes and a small number of business units could be located here with up to 100 or more houses screened by these units in this strategic site which could reduce the number required elsewhere in the plan period. The Society is keen that this development ensures that cycle routes are optimised and includes the use of green bridges. It also wants to ensure that the development has adequate screening from the A27.

Policy No.18 Westhampnett Strategic Development Location

Oppose

The Chichester Society objects to the identification of Westhampnett as a Strategic Development Location. It would be impossible to provide a development of up to 500 homes together with 3 hectares of employment uses without destroying both the character of Westhampnett village or its rural setting.

The site boundary indicated on map 12.6 fails to identify the area proposed for built development. Even if this was to be concentrated close to the eastern edge of the boundary it would seriously impact on the greenfield surrounds of the village and the strategic gap between the village and Chichester.

The view across the Lavant valley to the edge of the city and to the cathedral spire and the Graylingwell water tower would be likely to be lost. Furthermore the greenfield gap between Madgwick Lane and the Goodwood motor race circuit and airfield would be lost as well and also the views of the Trundle.

Both the housing and the employment developments would be clearly visible from the Trundle and thus adversely affect the setting of the South Downs National Park. The loss of these greenfield areas and views would thus have widespread implications. It would adversely affect the ambience of the various facilities provided by the Goodwood estate both nearby and on the Downs themselves. It would affect the setting of Rolls Royce motor car plant which has been developed in sympathy with its high quality rural surroundings. It would affect the approach to the city of Chichester from the National Park and vice versa the approach to the National Park from the city.

The housing development could not be easily integrated with Westhampnett and any community facilities would not be central to the village. However the Society considers that Westhampnett and the hamlet of Maudlin could benefit from further housing development providing community facilities which they currently lack, e.g. a village hall, village green, local shop and public house, none of which have regrettably been provided in conjunction with the recent housing developments.

The village and hamlet have a dispersed and disjointed character through mid 20th century ribbon development along the former A27 trunk road, and several vacant sites emphasise this restless character. We understand that Westhampnett parish council is embarking on a Neighbourhood Plan for the village including Maudlin. This is the opportunity to identify those sites, mainly brownfield but maybe some greenfield, which could be considered for housing development, for perhaps up to 250 homes, to include community facilities as appropriate.

Consideration might also be given to extending the Settlement Policy Area as defined in the 1999 Local Plan. Environmental improvements might also be investigated, including landscaping, streetscape improvements and traffic calming on the lines carried out at Petersfield and Liphook by the Dept: of Transport some 20 years ago following the opening of the A3 bypass.

Finally the Society considers that the Lower Lavant Valley (Old Place Farm) should remain in agricultural use rather than laid out as a landscaped country park. It complements Whitehouse Farm on the west of the city as a tract of countryside and which though narrow still retains its rural character with the views of South Downs beyond. There is however no permissive access and there is a need for informal recreation in the lower Lavant Valley for those living on the eastern side of the city who at present have very little access to open countryside. Footpaths and cycleways could connect to Westhampnett (avoiding the dangerous Madgwick Lane) and up the west side of the valley to Fordwater, East Lavant and the Trundle, providing sustainable access to the National Park complementing Centurion Way on the west side of the city..

Policy No.19 Tangmere Strategic Development Location

Support

The Chichester Society supports the development of Tangmere as a Strategic Development Location provided it is developed through a master plan drawn up by potential developers, the parish council and local stakeholders.

We support brownfield rather than greenfield development wherever possible. and we actively participated in the master plans for the three major Strategic Developments at Chichester, i.e. Graylingwell, Roussillon Barracks and Shopwyke Lakes.

South and south-west of the village of Tangmere there is a considerable expanse of brownfield land comprising much of the former Tangmere aerodrome, part which we suggest might be developed as a phase 1 housing development before greenfield land to the west of the village is developed if required later in the Plan period. This would depend on acceptable measures to provide access from the existing A27 roundabout either through the village or via Chichester Business Park.

Brownfield land should be safeguarded to allow for the future expansion of the Tangmere Horticultural development Area, and a landscape buffer provided to shield the housing areas from light pollution from the glasshouses.

The policy suggests the possible relocation of Tangmere Aviation Museum, and this might be sited adjacent to the former Control Tower which is in a very poor structural condition and requires urgent attention. The site of the present museum could be an appropriate location for a community hub serving the whole village and providing local shops, a café and perhaps a public house.

If it is decided that greenfield development is required later in the plan period, with a new link road from the A27/285 slip roundabout, a landscaped buffer to the west of the development site could be planted in advance of the development to allow time for vegetation to become established as a screen reducing its visual impact on the strategic gap between Tangmere and Shopwyke Lakes.

Early in the plan period a footpath and cycleway network should be established to provide sustainable access from Tangmere to Chichester via Shopwyke Lakes,

to the South Downs National Park via Westhampnett, and to Barnham and Bognor.

Tangmere currently has a poor quality bus service, particularly in the evenings and on Sundays and only linked to Chichester. A higher quality service would be viable if serving an increased population at Tangmere as well as at Shopwyke Lakes and Westhampnett. Later in the plan period it might be feasible to provide a bus/ footpath/ cycleway connection to the B2233 to enable a through bus service to Barnham station and perhaps also to Littlehampton and Bognor.

In view of the extent of brownfield land available, Tangmere could perhaps accommodate some 1500-2000 homes within the plan period, but carefully phased to ensure that community facilities are provided in step with development. Tangmere is World-famous and could become a vibrant settlement in its own right rather than seen as a satellite for Chichester, but it is essential for the community as a whole to be involved in every stage of its development.

Policy No.29 Edge and Out of Centre Sites

Comment

The Society believes that any further edge of town development is undesirable, but it cannot be objected to per se because of present government policy. The caveats imposed in the Plan are entirely commendable (e.g. should not generate undue traffic, or detract from vitality of city centre). However, in practice there will be many a slip twixt cup and lip, since no-one can say for sure what damage will be inflicted on the city centre by an out of town development until after permission has been granted. We would suggest a change that any out of centre development (not just those over 2,500 m) should be accompanied by a "full assessment of the potential impact on town centres and nearby centres".

The draft plan proposes three categories of site. (1) Retail centre, (2) Edge (of retail centre), and (3) Out of centre. The title strongly suggests that provisions 1-9 apply both to "Edge" and to "Out of centre" sites. The preamble is more ambiguous, in that the phrase "outside the central area" could be understood as either including edge of centre sites, or excluding such sites. Moreover the provisions themselves sometimes clearly can only refer to completely "out of centre" sites, which in turn seems to imply that perhaps all the provisions exclude Edge of Centre sites. The reader is taken from a position of assuming that Edge of Centre sites are included, to assuming that they are excluded. Greater clarity is needed.

After some genuine confusion, it has been concluded that all of provisions 1 to 9 are intended to exclude edge of centre sites and to apply only to Out of Centre ones. If so, this means that the Draft Plan is lacking guidance on Edge of Centre sites, and, in particular, that Policy 29 is silent regarding such important factors as the adverse effects which an Edge of Centre site might have in terms of increased traffic generation and the overall vibrancy of the city centre (an ill-considered edge of centre application can have similar adverse effects to those of an Out of Centre proposal).

Paragraph 16.14 states that the category of "out of centre" will be "within the built-up area boundary" only "where possible". The plan needs to clearly distinguish between the two quite distinct categories of "out of centre site within the built up area" and "out of centre site outside the built-up area" (the difference between which is no less clear cut than the difference between "retail centre" and "out of centre").

There is also some loose language, referring to Chichester as a "town" whereas "city" would not only be more technically correct but would also make things clearer for the reader. Hence the suggested four separate categories would be as follows: (1) Retail Centre, (2) Edge of Retail Centre, (3) Edge of City and (4) Outside City. (As discussed above, at present the draft Plan conflates categories (3) and (4)).

Further the plan should make it clear that development of sites which are Outside City (category (4)) can generally be presumed to be outweighed by other Plan policies (e.g. protection of the character of the area, access to and enjoyment of unspoilt countryside) and will therefore not generally be acceptable except in wholly exceptional circumstances (which the Society has so far failed to envisage).

In conclusion, the Society feels that the plan needs to be given greater teeth if the commendable caveats of the Plan are to have meaningful force and if retail provision is not to almost literally bulldozer through the other policies which have competing claims. It is quite clear from past history that rigorous testing of claims is needed if city centre vitality is not to be lost: as superstores have arrived over the past couple of decades, Chichester has lost all its fishmongers and greengrocers; and the arrival of John Lewis At Home was followed in short shrift by the loss of one electronics shop (Panasonic, East street), one drapers (Sussex Linen, North Street) and one furniture and carpet shop (Chantry House Oak, North Street).

Policy No.35 Affordable Housing

Comment

The Chichester Society notes the Local Plan requirement that 30 percent of dwellings on a new residential development are to be 'affordable', as defined by the NPPF. We appreciate that the percentage was formerly 40 percent and that this was reduced owing to current development economics.

We would expect the Council to maintain a watching brief on the situation when reviewing and updating its Strategic Housing Market Assessments and, when market conditions improve, increase the proportion of homes delivered that meet affordability criteria.

We think that Policy 35 can be strengthened by including a paragraph in the Policy statement to reinforce the meaning and implication of 'affordable' housing. In future years anyone consulting Policy 35 of the adopted Local Plan should immediately understand that '30 percent affordable' means two in three such homes (approximately) are designed and delivered to meet the need for social rented housing; with between a quarter and a third meeting the demand for

'intermediate' tenures of which shared ownership is just one example. Making this explicit in the Policy summary will be to the long-term benefit of the District's residents.

Policy No.47 Heritage

Comment

The unique character of the city centre has suffered from changes that arise from the wish of retailers to modify their premises without regard to their location. The Chichester Society has asked the council to make the requirements of its 'Guidance Note on Shopfront and Advertisement Design' mandatory and the Society suggests this should be incorporated in the Local Plan. The Society queries the Council's sincerity in aspiring to maintain the integrity of predominantly open and undeveloped character of the area in the context of its identification of development of the Whitehouse Farm and Westhampnett sites.

Policy No.48 Natural Environment

Comment

How does the Council square the aspirations articulated in this policy with its intentions to pursue a policy of development of the Whitehouse Farm and Westhampnett sites?

Policy No.51 Green Infrastructure

Comment

How does the Council square the aspirations articulated in this policy with its intentions to pursue a policy of development of the Whitehouse Farm and Westhampnett sites? In particular the issue of not dissecting the linear network of cycleways in the context of Centurion Way and Whitehouse Farm development?

Policy No.53 Open Space, Sport and Recreation

Support

The Society agrees with this policy and would encourage the CDC to preserve open spaces as open spaces and not use them all up for sport and recreation facilities. Adequate parking will be required in addition to public transport, cycling and walking provision.