**Chidham & Hambrook Parish Council**

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The Planning Inspectorate

FAO Leanne Palmer

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BRISTOL BS1 6PN 17 June 2021

Dear Sirs

**APP/L3815/W/21/3274502 – Land adjoining Scant Road West, Hambrook West Sussex PO18 8UA – Planning application Ref CH/20/01826/FUL**

**Appeal lodged by Neame Sutton on behalf of Sunley Homes, April 2021**

As the Parish Council of Chidham & Hambrook, we hereby request that Her Majesty’s Inspectorate give due importance and attention to the comments made by our Parish Council, initially on 15 September 2020 and subsequently on 11 January 2021.

We now note that there are some 500 plus documents held on the Chichester District Council (CDC) Planning Portal relating to this now appealed full planning application.

We have read in detail the Full Statement of Case (FSC) dated April 2021 by Neame Sutton, Chartered Town Planners on behalf of Sunley Homes, the appealing developer.

The opening gambit from the Appellant is to state that there is “common ground” to the extent that CDC cannot demonstrate a 5 year supply of housing land and thus the Appellant has lodged their appeal against the majority decision taken by CDC’s Planning Committee to reject the application to build 118 dwellings on this site, situated at the very northern extremity of our three village parish with the northernmost part of the site abutting the A27 major dual carriageway. **The Appellant’s assertion in para 3.2 of their FSC that Hambrook is a service village with substantial amenities is in our opinion completely incorrect.**

The Appellant is clearly very confident that their Appeal is justified because of a significant degree of compliance with the requirements of CDC’s Interim Policy Statement (produced as an interim position statement by CDC because their revised Local Plan will only be concluded in March 2023 at the earliest), as well as with CDC’s Development Plan and the latest requirements of the NPPF.

As the Parish Council we represent the interests of the occupants i.e. residents in just over 1,000 dwellings in a parish which is for nearly 50% of its surface area located within the AONB of Chichester Harbour, and which comprises three village communities, namely those of Chidham, Hambrook and Nutbourne East. It should not be overlooked that both Nutbourne East and Hambrook communities are currently clearly separated from the neighbouring parish to the west of Southbourne. Coalescence with Southbourne is something which must be avoided at all costs if the unique wildlife that both resides in our parish and transits between the AONB and the South Downs National Park and vice versa is not to be irreparably disturbed and indeed driven away from this uniquely beautiful and tranquil corner of West Sussex.

In paragraph 2.6 of the Appellant’s Full Statement of Case (AFSC) it is alleged that “*despite constant efforts to meet, the Parish Council were unwilling to engage”.* **We do not accept this statement as being true.** Chidham and Hambrook Parish Council has, along with everyone in the

UK since March 2020 had to adapt to not just a new way of living but also new methods of communicating, and we have engaged openly with Neame Sutton and Sunley Homes during the pandemic.

In paragraph 2.10 of their AFSC the Appellant comments that “*the Parish Council has carried out a site selection process, although the results are unknown at this stage.”*  The Inspectorate will surely appreciate the Hobson’s Choice situation faced by our Parish Council, which, having consulted all 1000+ residences via a Neighbourhood Plan Questionnaire in the summer of 2020 has revealed a very significant desire on the part of our residents to see significantly less new housing within our Parish than the 500 number cited in the Appellant’s FSC. Indeed only as recently as this week of 7 June, CDC’s Planning Department have reaffirmed that they are unable to provide not just our parish but many others within our District with more reliable housing allocation numbers. It would be suicidal for our Parish Council to go public to either our residents or indeed developers such as the Appellant as to which sites may indeed have been selected before any Referendum has been put to the vote with our residents.

It is equally completely understandable that residents within our parish – many of whom are retired and in their later years – really wish to see our idyllic, semi-rural environment preserved for them and their successors and not submerged under a sea of bricks, mortar and worse still effluent from housing developments built well in advance of the availability of the necessary wastewater treatment capacity which Southern Water clearly refuse to categorically acknowledge to the public.

In paragraph 2.11 of the AFSC, our Parish of Chidham and Hambrook is yet again referred to as a “*Service Village”.* This is absolute hyperbole. There is one small shop which is also a Post Office in Broad Road, admittedly close to the site in question, but this amenity does not open 24/7 – in fact very far from it - and offers minimal choice of basic foodstuff; there is a limited Southern train service from Nutbourne station and the 700 Coastliner bus service on the A259 at the southern end of Broad Road. The Primary School in Chidham Lane is too far away from the Scant Road site to be walkable. There is one small children’s playground in Broad Road. We as the Parish Council see zero justification for this “*Service Village”* branding or denomination of our three villages but one Parish. Our amenities can hardly be considered as being serviceable for our current residents and most certainly not for a significant number of additional dwellings. 118 dwellings on the Scant Road West site could be occupied by, conservatively, 300 plus residents and given the site location and the absence of proximate amenities, all these dwellings will use vehicles at some point in the day, each day. 118 cars will inevitably be the lowest number of additional motorised transport from this site and Broad Road is already heavily used by private and commercial vehicles, with an accident black spot at its southern junction with the A259 and a significant number of parked cars on both sides of this busy road after the level crossing and before the A259 junction.

**The Appellant goes on in paragraphs 3.1 and 3.2 to portray a completely unrealistic and very misleading picture of just what Hambrook is today.** The amenities in our parish are at best minimal and additional dwellings will do nothing other than reduce the quality of the semi-rural environment which has brought residents to our parish. Every dwelling built will add as a minimum one vehicle to our already busy and in key places, dangerous roads and lanes. Safety of our residents on foot and on two wheels is already challenged. The absence of amenities obliges our residents to get in their cars to go to school, work and seek amenities located in Havant, Emsworth and Chichester – all accessed along an increasingly busy A259.

In paragraph 4.4 of the Appellant’s description of The Appeal Scheme they have indeed addressed a request for a retail convenience store and community/business centre. Whilst this is an amenity which may appeal to our residents in our post Covid world we have had prior experience of inadequate take-up by residents of such facilities. Residents and the Parish Council will need to be completely reassured that even if this facility were realised, the developer will guarantee to maintain and run it even it proves loss-making in the early years of operation.

In paragraphs 4.13 and 4.14 the Appellant comments very briefly on the High Quality Design of the range and mix of housing which will be built.

As the Parish Council we share our resident’s concern that any future housebuilding within our Parish will actually be to the highest quality. Some of the most recent developments along Broad Road have not been built to the highest quality and indeed some dwellings failed to find buyers and became housing association properties.

At no time in our communications with the Appellant have we seen any artist’s impressions of the actual dwellings the developer intends to deliver – and given the somewhat unique configuration of homes along the southern side of Scant Road West, we question how the development will contribute positively to the village’s identity.

The Appellant in Section 5 of their FSC lays before the Inspectorate just how carefully they have framed their Appeal against CDC’s IPS all of which seems to focus on ticking boxes rather than focusing on the impact of a more than 10% increase in the number of dwellings in our Parish which as we have shown has minimal amenities.

In Section 6, the Appellant focuses on addressing the reasons given by CDC in refusing this application.

As the Parish Council we are deeply concerned that our Parish which is very rural in aspect – we have mostly country lanes both to the north and the south of the A259 known as Main Road. The landscape appreciated by wildlife and residents alike is one of open countryside bordered by trees and long-established hedgerows. Many verges are now subjected to limited cutting and indeed in the Spring of 2021 our “wilded” verges have been much admired.

The Appellant argues that the land on the appealed site is not of such good quality as may be found elsewhere in our Parish.

The issue surely is not one of quality. It is quite simply whether or not it is in the best interests of us all to build on good quality agricultural land which is used to provide food be this for animal or human consumption. Once this land is built upon, there will be no turning back. Our residents and our wildlife need green open spaces and those residents living immediately to the south of this plot will have their views up to the South Downs obliterated. At no point does the Appellant seem to focus on the importance of views and wildlife.

In paragraph 6.19, the Appellant attests that the Appeal Site has the locational benefit of being located adjacent to the settlement edge and thereby can and will utilise the existing infrastructure. The intention is for all vehicular traffic to access/exit these 118 dwellings via an entrance/exit point on to Broad Road just before the speed limit drops to 30mph.

This access will be on a stretch of road that descends a slope and where many drivers are required to adjust their speed. Our Parish Council has installed SID’s in Broad Road to discourage speeding along what is a long residential road – one of the very roads in our tiny Parish. It is interesting to note that West Sussex Speed Control camera vans have been focused on Broad Road in recent weeks. As the Parish Council we are frankly dismayed that WSCC and Highways England appear to give the nod to planning applications without site visits and without calling upon recent traffic and accident data reports. **We contend that any additional vehicular access on to Broad Road will be an additional danger to drivers, cyclists and pedestrians alike.**

In paragraph 6.22 we note that The Appellant has commissioned further expert evidence to convince the Inspectorate and thus CDC that the proposed housing will sit well with the existing settlement. Surely this aspect of integration should be available to all concerned parties prior to any appeal decision.

In Section 7, The Appellant seeks to demonstrate just how many boxes they can tick with their proposals read against the 2015 Adopted Chichester Local Plan Policies. There are an impressive number of green boxes ticked.

However in Table 4, Policy 2 – Development Strategy and Settlement Hierarchy, the Appellant seeks to justify imposing 118 dwellings on the hamlet of Hambrook when the indicative numbers for Hambrook/Nutbourne in Policy 5 is a mere 25. The only argument deployed to justify imposing an almost 500% uplift in the number of dwellings is to argue that CDC has failed to deliver a 5 year housing land supply target – imposed on CDC by Central Government as just that – a number produced by statisticians with absolutely no knowledge of the local environment at all.

In the same Table 4 under Policy 45 the Appellant refers once again to CDC’s failure on the 5 year housing land supply and argues that the site is contiguous with an identified Settlement Boundary as sufficient reason for this development in unadulterated countryside to be approved. We are quite certain that our residents would prefer the land in question to either continue to be farmed or better still ‘wilded’ or planted with environmentally friendly, carbon-capturing trees.

In the rest of Section 7 the Appellant is careful to present a rebuttal to CDC on their calculation of their housing land supply figures with some considerable and interesting detail but none of which has any bearing on our parish and our residents – other than to suggest that because CDC cannot prove they have met what may well be an erroneous Central Government requirement, it is just fine to go ahead and build 118 dwellings on this piece of agricultural land.

Table headed Summary of Statutory Consultee Responses featured in paragraph 7.35 reflects in our opinion much of what is fundamentally wrong with the current planning nightmare.

The only objection highlighted comes from the SDNP Authority and is roundly refuted by the Appellant.

It is ironic that Natural England and The Environment Agency appear to pay minimal attention to such a sizeable planning application which if it were looked at in the round and along with the plethora of other locations that have hit our tiny Parish in the past year might give both Consultees more concern.

The ease with which Southern Water can apparently sign off to a developer when it is in the public domain that local Wastewater Treatment plants in Thorney and Apuldram are short of capacity to treat wastewater and in times of heavy rain are obliged to make foul waste releases into the waters of Chichester Harbour AONB defies belief. Can the Inspectorate accept that 118 dwellings could be built because Southern Water have issued a letter saying they have no issues to this developer – in the full knowledge that if building were to start in 2022 and be completed by 2024 latest, Southern Water would not have capacity to treat the waste – and road tankers would be required to call to evacuate such material?

In the final section of the Appellant’s FSC, they have chosen to respond on a point by point basis to Third Party Representations from local residents.

We have already commented to the effect that our ‘*Service Village’* of Hambrook is no such thing and CDC are very well aware that **we as a Parish Council do not concur at all with the statement made by the Appellant in para 8.4 that *‘Hambrook…………is ranked 5th out of all Service villages based on level of services and facilities’.***

In para 8.13 and 8.14 the Appellant glosses over the isolated location of the site at the northern extremity of our Parish. Covid 19 has obliged many residents to shop on line and it is perhaps a given that our way of life be this in retirement or as working individuals will be changed for ever.

**This means that preserving our semi-rural, countryside environment with easy access up to the SDNP and down to the AONB must be priorities.**

There is no justification at all for the three villages of Hambrook, Nutbourne East and Chidham to have hundreds of houses imposed on them – 100 more houses would be a 10% increase in our total dwellings and any additional housing will merely increase our total number of dwellings proportionately in terms of percentage increase. The impact which any large number of houses

approved in our Parish will have on our semi-rural environment and our community will be destructive and harmful to our residents’ well-being and inevitably be beyond repair.

We respectfully request the Inspectorate to not view this appeal and application in isolation. It must be seen as just phase one of an unrelenting attack on a small and vulnerable Parish in West Sussex – a Parish with an 800 year old church; several Heritage assets and an ageing population demographic.

Yours faithfully



Philip MacDougall (Chair)

Chidham and Hambrook Parish Council

Sent by email to Leanne.palmer@planninginspectorate.gov.uk on Thursday 17 June 2021