# Proposed Affordable Housing Development Mill Road Park Rear 3—56 Mill Road Westbourne

I am writing with regards to the Westbourne Community Land Trust's (CLT) recent planning application to develop housing on the park at rear of Mill Road adjacent to the allotments.

You can view more details on the application and make comments by searching for **Application Number 20/01061** at <a href="https://www.chichester.gov.uk/viewplanningapplications">https://www.chichester.gov.uk/viewplanningapplications</a>. I appreciate and understand that there will be some in the community who the feel the benefit of developing affordable housing on the park outweigh the negatives from reducing one of only two limited 'Public Open' spaces we are lucky to have within the village. However, there are key questions arising from the application which have not been answered in the submitted information or the public consultation.

### Have the Community been listened to?

Whilst I believe the Westbourne CLT are acting in good faith in seeking to develop affordable housing in the village I am afraid there are major flaws with how they have presented the information for public consultation and in particular the case for seeking planning consent on the Mill Road site.

The Public Open Space that the park occupies is owned by Chichester Council and leased to Westbourne Parish Council until approximately 2030. Chichester Council have agreed to sell the site to the Westbourne CLT, an unelected group which is supported by the Parish Council, on the basis it will be only sold if/when planning consent has been granted.

The CLT have misrepresented the level of support they have for developing the Mill Road site. Throughout the process Westbourne CLT have issued letters and statements which overstate the levels of support, ignored the comments put to it and taken it as a fact that the 106 members who have signed up to the CLT support an application on this site. It is only by voicing a strong response to this planning application that the CLT and PC will hopefully review their intentions and take account of public opinion. If you have strong views now is the time to make your voice heard as no response is being interpreted by the CLT as approval to their plans.

# What are the Prospects of any other development at Mill Road?

One of the reasons being suggested for developing the Mill Road site is that this affordable development will stop a future large scale housing scheme on the park. This is simply not the case as the site is both outside the Settlement Boundary and not allocated within the Adopted Chichester Local Plan which runs until 2029. Until 3<sup>rd</sup> June 2020 the Chichester area officially had an adequate number of residential sites to meet its 5 year housing supply requirements. Westbourne has already allocated a sufficient number of houses within its Neighbourhood plan to meets it requirements. Some would argue that we already have too much housing being proposed locally but the key point is that the Mill Road will be protected until at least 2029 after which we would rightly expect the Parish Council to further defend our open spaces for the Village.

As a result of the above, the only party currently with any hope of securing consent on the Mill Road land is an Affordable Housing provider using a little used 'Exception Site' rule and not a private developer.

## Why have the CLT not shared its Sequential Test & Economic Viability?

The Westbourne Neighbourhood Plan 2017 to 2019 clearly states that there 'there are sequentially preferable sites' which now seems to have been forgotten in the submitted application information. This point has been raised with the CLT numerous times, and not answered. The evidence the CLT have provided with the planning application shows that other than sending letters there is no genuine effort has been made to acquire one of the already allocated housing sites within the local plan and convert it to affordable housing. If this approach were viable it would have the benefit of providing affordable housing on a site already allocated and reduce the housing burden on Westbourne.

The 'Exception Site' rule, which the CLT are seeking to exploit, requires the CLT to demonstrate that there is a lack of sites available within the Settlement Boundary and that the local housing need can not be met on a site within 5 miles. This information was not provided for consultation and only provided as part of the planning application which does not allow time for proper scrutiny.

The CLT has not provided a financial appraisal or economic viability of either the Mill Road site or any other alternative sites which are allocated in the local plan as part of the application. This is also a requirement of the 'Exception Site' rules. The local community should have the opportunity to consider fully the genuine choice for where they would like their housing to be developed, whilst the CLT should be showing full financial transparency on the costs of the proposed development and its viability.

## Why should Westbourne accept reduced Public Open Space?

The proposed development reduces the open space available and the replacement park facility is completely inadequate. A MUGA (Multi Use Games Area) is no substitute for the existing hard surfaced court and large grass football pitch. The application states that the existing park is in need of investment. If the Parish Council have not maintained the park correctly since its installation this should not be used as part of an excuse to develop it. The creation of facilities for the allotments, a minority membership group, is a not a way to justify a reduction of the Public Open Space which is currently available for all to use.

Chichester's Open Space Study of September 2018 confirms that Westbourne already has a shortfall of Amenity Green space. The application is offering a small strip of land at Covington Road to offset the loss of space which is very odd bearing in mind it is sandwiched between houses and is of no use due to its size and shape. Furthermore, the application suggests that the open space at Hampshire Farm Meadows also offsets the loss. This land is not in West Sussex, let alone Westbourne; Why should the community accept open space ½ a mile up the road whilst losing what we already have?

### Who will Manage the Housing?

The CLT needs to publish in full its detailed plan for who controls, manages, completes maintenance, and allocates any affordable housing built by the CLT, wherever that might be. To gain consent for Mill Road as an 'Exception Site', it is a planning requirement that the built housing needs to be owned and managed by an approved affordable housing provider. This is at complete odds with the CLT statements that they will own/manage as they are not an affordable housing provider and therefore would not comply with any planning consent granted. The CLT neither have the resources and skill set to be a successful affordable housing provider. If the houses are to be managed by a 3<sup>rd</sup> party, the local community needs to know in order to take a reasoned decision on the quality, or otherwise of the proposed management company who will look after them.

The above comments are not intended an exhaustive list of reasons against this proposed development as there undoubtably concerns many will wish to raise on the layout, parking spaces, flooding, environment and its proximity to the national park but I trust this letter has been informative.

Should you wish to discuss anything in this letter please do contact me.

Yours sincerely