

## Policy H1 Meeting Housing Needs

### Introduction

1. These representations have been prepared on behalf of Gleeson Land in respect of its land interests at Land at Scant Road West, Hambrook ("the Site"). The Site is c. 3.0 ha. and is lies adjacent to the north eastern edge of Hambrook and the A27. The Site is ID reference HCH0024 within the Chichester Housing and Economic Land Availability Assessment, 2021 (HELAA).
2. The HELAA outlines that the Site has indicative capacity to deliver 80 dwellings. However, we envisage the capacity to be c. 56 dwellings. In accordance with the guidance and definitions within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guidance (PPG), the overall HELAA conclusions are that the Site is: suitable, available, achievable and deliverable for residential-led development within the period covered by the draft Chichester Local Plan ("the draft CLP").
3. The Site is in single ownership and controlled by Gleeson Land. Gleeson Land has a strong track record in providing deliverable planning consents to the housebuilding industry, which regularly results in new housing being built out in a timely manner. Our average time from receiving outline planning consent to commencement of development is 22 months. The average time from commencement to first occupation is 10 months. Subject to being allocated within either the Chichester Local Plan, or the emerging review of the Chidham and Hambrook Neighbourhood Plan, Gleeson Land expects completions on the Site to be achieved within five years from adoption of the plan.

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#### The Housing Requirement

1. Paragraph 5.2 of the draft Chichester Local Plan ("the draft CLP") outlines a constrained supply figure of 575 dwellings per annum (dpa) is proposed, below the identified housing needs for the District which is calculated at 638dpa (through the standard method). This equates to a shortfall of 1,134 dwellings against identified housing needs across the Plan period of 2021 – 2039, or circa. 63 dpa. The 575 dpa figure is split between what is termed the southern planning area (535 dpa), and northern planning area (40 dpa).
2. Of further concern, the draft CLP no longer seeks to provide an additional allowance for accommodating unmet need arising from the South Downs National Park. The Preferred Approaches consultation (December 2018) document identified a figure of circa. 40dpa to help meet the South Downs National Park housing needs.
3. The draft CLP outlines that the Council no longer considers it is possible to meet its minimum standard method figure in full, due to infrastructure constraints arising from transport capacity, in particular, the operational capacity of the A27 Chichester by-pass which forms part of the Strategic Road Network governed by National Highways. An infrastructure constraint that specifically relates to the southern planning area. Indeed the proposed 535 dpa is described by the Council as the development 'cap' – the effective A27 capacity tipping point.
4. However, as set out below, we are fundamentally of the view that the conclusion the Council has reached is demonstrably flawed, and renders the draft CLP unsound against the National Planning Policy Framework (NPPF) paragraph 35 "soundness" tests on the basis that the proposed housing figure fails to be 'positively prepared' or 'justified'.
5. This is because on a review of the Local Plan Transport Study (January 2023) (LPTS) there appear to be significant matters that have not been considered by the Council during the plan-making process (including the Sustainability Appraisal process – see our representations to the Sustainability Appraisal), which would demonstrably allow identified housing needs to be achieved in full. This includes:

- The LPTS and draft Local Plan makes no allowance for the RIS3 funding review, which is due to be concluded in 2023/24. The A27 has previously been identified as a location for Government investment (circa. £100m), with the funding only withdrawn as it was not possible to get consensus between local authorities. However, it is reasonable to assume that an award of funds is likely through RIS3. An award of fund through RIS3 would significantly increase network capacity on the A27, which in turn would enable greater levels of growth to be realised – it is noted that the LPTS sensitivity testing demonstrates an additional 165dpa can be achieved with the delivery of the full mitigation package.
  - The modelling underpinning the LPTS may overestimate the amount of traffic that is likely to be generated by the planned growth strategy. A blanket trip rate may not be reflective of the nature and location of identified developments, and no allowance has been made for the internalisation of trips within strategic sites, and the allowance made for sustainable travel (5%) does not correspond with West Sussex County Council's (WSCC) Travel Plan targets (10%).
  - The baseline traffic flows informing the modelling has a 2014 base, with further validation undertaken in 2018. Changes to traffic flows as a result of behavioural change since the Covid-19 pandemic will therefore not be reflected in the assessment.
  - In the period since the modelling informing the LPTS has been undertaken, future traffic growth has been reforecast by the Department for Transport and subsequently released in December 2022. The forecast growth is considerably lower than that used to inform the LPTS, and thus the assessment overestimates future year base line flows.
  - No additional modelling of a 700 dpa strategy, with the reduced mitigation package, has been undertaken. It has not been demonstrated that the proposed package of measures cannot accommodate an uplift in dpa.
  - The mitigation strategy appears to go beyond mitigation of the development impacts and result in an improvement of conditions beyond the baseline flows. This would suggest that there is headroom in the strategy to accommodate an uplift in dpa, even without improvements at Stockbridge.
  - There is a significant difference in the costing outputs of the mitigation strategy prepared by Stantec, as authors of the LPTS, and the Chichester District Council / WSCC revisions. It is not unreasonable to assume that the Stantec costings are accurate, given its experience of such infrastructure and that the exercise was informed by National Highways, who govern the A27 as part of the Strategic Road Network. Further consideration should be given as to whether the uplifted costs presented by CDC- WSCC are accurate.
6. We therefore consider that Chichester District Council should proactively look to meet at least its full identified need of 638dpa, plus an additional buffer to accommodate unmet needs from South Downs National Park, which was identified as circa. 40dpa in the Preferred Approaches consultation (December 2018). In addition, an appropriate buffer (i.e. 5%) should also be applied to ensure there is a realistic prospect of meeting housing needs.
  7. In doing so, it would result in an increased requirement of 712 dpa, or 12,816 dwellings over the course of the Plan period. Based on the currently identified supply of 10,359 dwellings, a further circa. 2,500 homes (rounded) would need to be identified and allocated through the Plan to address this uplift.
  8. In meeting this additional need, re-consideration of locations previously identified in the Preferred Approaches consultation as sustainable / suitable locations for growth, such as Chidham and Hambrook parish, would clearly be required. Indeed, as set out within our representations to Policies H2 and A12, the housing figure apportioned to the neighbourhood plan area should be increased to at least 500 dwellings over the plan period (as per the Regulation 18 draft Local Plan Policy AL10), if not more, to help address the 2,500 dwellings supply shortfall.

### Components of Supply

9. Policy H1 (Meeting Housing Needs) identifies that the total supply across the plan period (of 10,359 dwellings) is comprised of:
- Completions 2021/22 – 712 dwellings;
  - Known commitments:
    - Outstanding 2015 Local Plan and Site Allocations DPD 2014 – 2029 allocations without permission – 2,210 dwellings;
    - Outstanding 'made' Neighbourhood Plan allocations without planning permission – 100 dwellings; and
    - Planning permission as of 01 January 2023 – 3,364 dwellings.
  - New Strategic Locations / Broad Locations for Development and Allocations without planning permission – 3,056 dwellings;
  - Non-Strategic Parish Housing Requirements without planning permission – 260 dwellings; and
  - Windfall (small site allowance) – 657 dwellings.
10. A significant proportion of the above 'known commitments' (circa. 21%) comprise outstanding allocation from the 2015 Local Plan and 2014 Site Allocations DPD. These allocations, that do not benefit from planning permission, have simply been 'carried forward' from previous plan-making exercises. Given the time which has elapsed since these allocations were previously considered and adopted, and the lack of progress being made in delivering homes at these allocations, the Council should satisfy itself that these allocated sites remain suitable and deliverable locations for re-allocation in the draft CLP.
11. It is considered that the approach of carrying these allocations forward and re-allocating them within the draft CLP without evidence to confirm they remain deliverable or developable renders these allocations as unjustified. Clearly, if there is insufficient evidence to confirm these sites are deliverable or developable, then this brings into question whether re-allocating these sites in the draft Plan is an effective strategy for addressing growth requirements.

### **Recommended Change**

12. In view of the above, we proposed the following changes:
- (1) Increase the Policy H1 housing figure to at least 712 dpa (12,816 dwellings over the plan period) to meet the standard method figure in full; to help meet unmet needs arising within the South Downs National Park; and to provide a 5% delivery buffer:

<b>Housing Figure Element</b>	<b>Dwellings Per Annum</b>	<b>Dwellings between 2021 and 2039</b>
Standard Method	638	11,484
South Downs National Park Unmet needs Allowance	40	720
5% Delivery Buffer	34	612
<b>Total Housing Figure</b>	<b>712</b>	<b>12,816</b>

- (2) Increase the Policy H1 East-West Corridor sub-area housing provision figure from 8,717 dwellings to 11,174 dwellings between 2021 to 2039.
- (3) Update the Policy H1 components of housing supply figures, in particular the 'Category b Known commitments' following a critical review of the deliverability of the respective supply sites.