

Policy H2 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.

Policy H2: Strategic Locations / Allocations 2021 – 2039

1. For brevity, we have not repeated our representations to Policy H1 for the purpose of providing detailed context over why we consider Policy H2 is unsound against the NPPF paragraph 35 "soundness" tests, namely being 'positively prepared' or 'justified'.
2. By way of a summary, we consider Chichester District Council (CDC) should be looking to meet at least its full identified need of 638 dwellings per annum (dpa), plus an additional buffer to accommodate unmet need 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.
3. Doing so, would result in an increased Policy H1 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.
4. In meeting this additional need, re-consideration of locations previously identified in the Preferred Approaches consultation as sustainable / suitable locations for growth, such as Hambrook, would clearly be required. Indeed, as set out within our representations to Policy A12: Chidham and Hambrook the housing figure apportioned to the neighbourhood plan area should increase 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.
5. Our Policy H1 representations also recommended that the Council should undertake a critical review of the Policy H1 components of housing supply figures, in particular the deliverability of the 'Category b Known commitments' sites. The result of this critical review is expected to necessitate the removal of one or more of the strategic site allocations, or at least a downward amendment to the expected number of deliverable dwellings within the plan period.

6. As result, either additional strategic housing allocations will need to be identified, and / or the strategic location figures increased in order to meet either the Policy H1 figure as drafted (10,350 dwellings between 2021 to 2039), or the higher figure we are strongly recommending the Council to use in order to address identified soundness failings (12,816 dwellings between 2021 to 2039).

Recommended Change

7. In view of the above, and our representations to Policy H1, we proposed the following amendment to Policy H2. However, as set out within our representations to Policy A12, it should be noted that we consider the amendment below represents the minimum figure that should be apportioned to the Policy H2 Nutbourne and Hambrook (Chidham and Hambrook Parish) strategic location.

Reference	Location	Dwellings
A12	Nutbourne and Hambrook (Chidham and Hambrook Parish)	300 -500