EXHIBIT (3E)

Housing and Economic Development Needs Assessment 2022

From: Stephen Brown (sbrown@chichester.gov.uk)

Date: Wednesday, 11 May 2022, 10:54 BST

DEVELOPMENT MANAGEMENT 2 1 MAR 2023

Hi William

Please find copied and pasted in full below: relevant sections of the recent Chichester housing needs study concerning Self and Custom Build.

https://www.chichester.gov.uk/localplanevidence

Document 003 Housing and Economic Development Needs Assessment - April 2022 Final Report (Iceni Projects and Justin Gardner Consulting)

Paragraph 65 to 68, pages 8 – 9 (Executive Summary)

Self and Custom Build

The Council is required to grant sufficient planning permissions to meet the demand identified on their custom and self-build Register.

Over the six base periods (typically 12 month recording periods), there has been a total of 150 registered expressions of interest in a serviced plot of land. And from 1 July 2018, the Council have had 3 applicants which have been placed on part 2 of the register. This averages 25 per annum.

In addition we can draw on NaCSBA data to better understand the level of demand for serviced plots in Chichester in relative terms. The data shows that Chichester has mid-levels demand of 125 persons per 100,000 of the population.

Iceni consider that in order to respond to demand in the sector, and in response to the PPG's Iceni requirements, the Council should support, through planning policy, the submission and delivery of self-build and custom housebuilding sites, where opportunities for land arise and where such schemes are consistent with other planning policies.

Paragraph 9.60 to 9.97, page to 149 to 153

Self and Custom Build

- As of 1st April 2016, and in line with the 2015 Act and the Right to Build, relevant authorities in England are required to have established and publicised a self-build and custom housebuilding register which records those seeking to acquire serviced plots of land in the authority's area in order to build their own self-build and custom houses.
- The Chichester Self-Build and Custom Housebuilding Register was introduced for 1st April 1.2 2016 and there have now been six full base periods^[1] up to 30th October 2021. Since 1st April 2018, the Council has chosen to set a local connection test and require that a fee be paid to join the register. In this instance, the PPG directs the relevant authority to have two parts to their register. All

individuals who apply for entry on the register and meet all of the eligibility criteria (including the local connection test) should be entered on Part 1.

- 1.3 Those who meet all of the eligibility criteria except for the local connection test must be entered on Part 2; however, as per the PPG, Section 2(1) of the 2015 Act places a duty on relevant bodies to have regard to each self-build and custom housebuilding register, including Part 2 of the register (where a register is in two parts).
- The Council is required to grant sufficient planning permissions to meet the demand identified on the Register as per the 2015 Act (as amended) and must have regard to the entries on Part 1 and Part 2 when carrying out their planning, housing, land disposal and regeneration functions. If assessed over the six base periods, there has been a total of 150 registered expressions of interest in a serviced plot of land.
- 1.5 The Table below provides a base period breakdown of those individuals who have expressed demand for serviced plots of land in Chichester. From 1 July 2018, the Council have had 3 applicants who have been placed on part 2 of the register.

Serviced Plot Demand by Base Period in Chichester

	Part 1	Part 2
Base Period 1 (16 August 2015 to 30 th October 2016)	31	
Base Period 2 (31st October 2016 to 30th October 2017)	79	
Base Period 3 (31 st October 2017 to 30 th October 2018)	39	
Base Period 4 (31 st October 2018 to 30 ^h October 2019)	0	
Base Period 5 (31st October 2019 to 30th October 2020)	0	
Base Period 6 (31st October 2020 to 30th October 2021)	0	
Total	149	3

Source: CDC Self and Custom Build Register

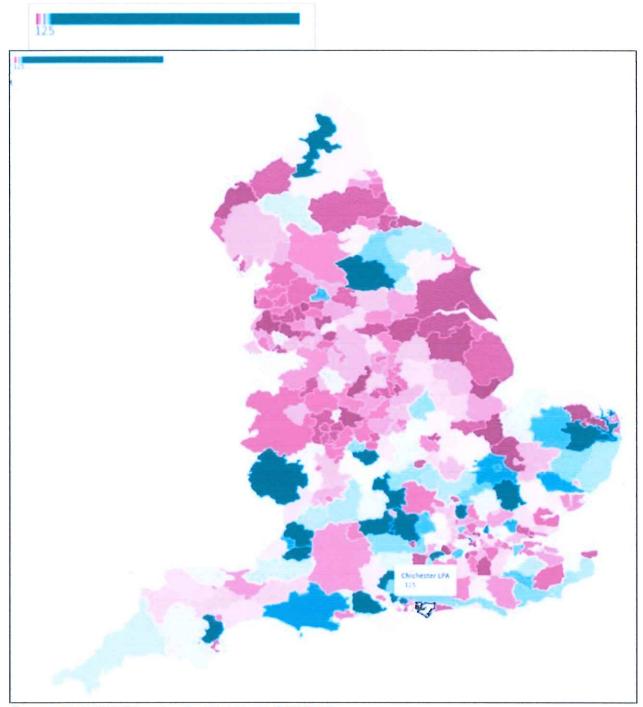
1.6 It is worth highlighting that a survey^[2] undertaken by YouGov on behalf of the National Custom and Self-Build Association ("NaCSBA") in October 2020 found that awareness of the Right to Build legislation is low with 83% of people unaware that the local authority self-build registers exist. As a result, the number of individuals on a local authority's self-build register may underestimate demand.

Broader Demand Evidence

- 1.7 In order to supplement the data from the Council's own register, we have looked to secondary sources as recommended by the PPG, which for this report is data from NaCSBA the national association for the custom and self-build housing sector.
- 1.8 First, it is worth highlighting that the recent October 2020 survey undertaken by YouGov on behalf of NaCSBA found that 1 in 3 people (32%) are interested in building their own home at some point in the future, including 12% who said they were very interested. Notably, almost half (48%) of those aged between 18 and 24 were interested in building their own home, compared to just 18% of those aged 55 and over. This is notable as, traditionally, self-build has been seen as the reserve of older members of society aged 55 and over, with equity in their property

1.9 Second, we can draw on NaCSBA data to better understand the level of demand for serviced plots in Chichester in relative terms. The association has recently published analysis with supporting maps and commentary titled "Mapping the Right to Build" in 2019. This includes an output on the demand for serviced plots as a proportion of total population relative to all other local authorities across England. One of the key maps within the report highlights the areas of strongest demand and this is shown in the Figure below.





Source: NaCSBA "Mapping the Right to Build," 2020

1.10 The map reflects register data from local authorities across the country with Chichester clearly highlighted. The map demonstrates that Chichester has mid-levels of demand per 100,000 of the population. The data which sits behind the map states that there is demand from 125 persons per 100,000 in Chichester which places the City in the top half of authorities in England.

Supporting the Self-Build and Custom Housebuilding

- 1.11 It is clear that there is demand for self-build and custom housebuilding serviced plots of land in Chichester as over the last five base periods, there has been at total of 150 entries. Set in context, data from NaCSBA research indicates that demand is mid-level with 125 individuals per 100,000 of the population on the register.
- 1.12 The Self-Build and Custom Housebuilding PPG sets out how authorities can increase the number of planning permissions which are suitable for self-build and custom housebuilding and support the sector. The PPG^[3] is clear that authorities should consider how local planning policies may address identified requirements for self and custom housebuilding to ensure enough serviced plots with suitable permission come forward and can focus on playing a key role in facilitating relationships to bring land forward.
- 1.13 There are a number of measures which can be used to do this, including but not limited to:
- supporting Neighbourhood Planning groups where they choose to include self-build and custom build housing policies in their plans;
- working with Homes England to unlock land and sites in wider public ownership to deliver self-build and custom build housing; and
- when engaging with developers and landowners who own sites that are suitable for housing, encouraging them to consider self-build and custom housebuilding, and facilitating access to those on the register where the landowner is interested;
- working with local partners, such as Housing Associations and third sector groups, to custom build affordable housing for veterans and other groups in acute housing need.
 - 1.14 The Chichester Local Plan adopted in July 2015 is silent on self-build and custom build housing. Iceni would note that an increasing number of local planning authorities have adopted specific self-build and custom housebuilding policies in respective Local Plans to encourage delivery, promote and boost housing supply. There are also a number of appeal decisions in the context of decision-taking which have found that paragraph 11(d) of the Framework is engaged in the absence of specific policy on self-build housing when this is the focus of a planning application.
 - 1.15 A specific policy would typically express support for self-build and custom housebuilding and require that a minimum proportion of plots within development schemes (often over a certain size) are offered to self-builders or as custom-build plots and/or allocation of sites solely for the use. This is often known as the "Teignbridge Rule" after the first District Council to adopt the first self-build policy. In this instance, 5% of all developable housing land is allocated for custom and self-build on larger sites.
 - 1.16 Iceni consider that in order to respond to demand in the sector, and in response to the PPG's requirements, the Council should support, through planning policy, the submission and delivery of self-build and custom housebuilding sites, where opportunities for land arise and where such schemes are consistent with other planning policies.

Paras 9.85 to 9.88, page 154

Self and Custom Build



- 1.1 The Council is required to grant sufficient planning permissions to meet the demand identified on their Custom and Self-Build Register
- 1.2 Over the six base periods, there has been a total of 150 registered expressions of interest in a serviced plot of land. And from 1 July 2018, the Council have had 3 applicants which have been placed on part 2 of the register. This averages around 25 per annum
- 1.3 In addition we can draw on NaCSBA data to better understand the level of demand for serviced plots in Chichester in relative terms. The data shows that Chichester has mid-levels demand of 125 persons per 100,000 of the population.
- 1.4 Iceni consider that in order to respond to demand in the sector, and in response to the PPG's requirements, the Council should support, through planning policy, the submission and delivery of self-build and custom housebuilding sites, where opportunities for land arise and where such schemes are consistent with other planning policies.

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A base period is a period of typically 12 months in which demand for custom and self-build is recorded. However, the first base period. The first base period began on the day on which the register (which meets the requirement of the 2015 Act) was established and ended on 30 October 2016. Each subsequent base period is the period of 12 months beginning immediately after the end of the previous base period. Subsequent base periods will therefore run from 31 October to 30 October each year.

A survey of 2,017 adults with fieldwork undertaken online between $9^{th} - 11^{th}$ October 2020. The figures are weighted and are representative of all GB adults aged 18+

[3] Paragraph: 025 Reference ID: 57-025-20210508

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