

Tony Whitty  
Planning Policy  
Chichester District Council

**Sent electronically only**

17 March 2023

Dear Tony,

**SUBJECT: CHICHESTER LOCAL PLAN 2021 – 2039 REG. 19 CONSULTATION**

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1. We are writing on behalf of Reside Developments Ltd who, as you will know, have a current planning application submitted at Willowbrook Riding Stables, Hambrook (reference 21/01910/OUT) for 63 dwellings. This was recently listed at Planning Committee with a recommendation from officers to approve but was withdrawn from Committee due to the announced proposed changes to the NPPF and now due to queries on the A27 contributions.
2. We are broadly supportive of the Local Plan and appreciate that a lot of hard work has gone into it and that it is seeking to address a lot of technical and political issues. However, we are concerned that it does not deal with the housing need in sufficient detail at this stage so the solution to the most pressing need of demand for housing lacks detail on how this will be resolved. Conversely, many of the policies are overly prescriptive (which removes local solutions) and too detailed and will end up creating barriers to delivery of housing.

Housing need

3. **Policies H1 – H3** on housing are not clear how they will deliver the necessary amount of housing. The Duty to Cooperate section makes clear that the West Sussex and Greater Brighton Strategic Planning Board had an agreement on spatial planning in January 2016 but this does not include how the unmet housing need in the area (stated at the time to be a shortfall of 1,700 dwelling per annum) will be met within the local authorities. The document (LSS2) says this strategy will be in place to narrow the gap between demand and supply “post 2025” but this Local Plan is not seeking to address that unmet need and in fact is stating that it cannot meet its own needs.
4. In para. 5.3 and 5.4 the Plan states that the Council will address this problem in a future Statement and that all the authorities continue to work together to deal with the issue and what the spatial implications are and to deal with this “in a timely way”. It is clear that this is not being dealt with as no clear progress has been made since the 2016 LSS2 and when this plan is approved there will be no

pressure for Chichester to help to find a solution. The stated constraint of the A27 could have been identified by the LSS to attract funding and to remove the blockage to help to meet the wider sub-regional need.

5. The Local Plan makes clear that large parts of the district are constrained (para. 2.27-2.29) and we agree that this could be the case but the result of that and the large unmet housing need, means that any site that can be developed sustainably, should be allocated in the plan and supported. As a result, we believe, Willowbrook Riding Stables should be allocated in the plan and not delayed for a future document that may, or may not, be produced.
6. The spatial strategy supports this approach as the site is technically in Southbourne Parish and the east-west corridor is supported as a location with comparatively good transport options, easy access to larger scale services, with minimized impact on the natural environment (para. 3.15).
7. We also do not think that it is clear when the Plan states that the southern plan area can only facilitate 535 dpa due to constraints with the A27 cited as the main reason (para. 5.2). However, the evidence base document “Chichester Transport Study” by Stantec specifically modelled 700 dpa in addition to the 535 dpa. This study makes clear that the 700 dpa was to consider whether the mitigation proposed would be able to meet a higher figure than the 535 dpa (para. 5.6.2). The conclusion clearly states:

**5.6.5** It is concluded that in the main, the 700 dpa (southern plan area) demands can generally be accommodated by the mitigation proposed for the 535 dpa core test although at the Portfield roundabout and Oving junction, capacity issues get worse with the 700 dpa demands, with additional mitigation being required. As no schemes have been designed to date, it would be advisable to retain some costs against for future works against Portfield Roundabout as a minimum.

8. The conclusions of the report state in para. 11.2.3 that if the figure of 700 dpa was used then the two junctions “may need to consider further mitigation.”
9. It appears that the justification for the 535 dpa figure that has been suppressed apparently due to the A27 is not correct and that a higher figure could have been used. Given the housing crisis we believe this should be explored further as the evidence seems to suggest that a figure between the 535 dpa and 700 dpa could be supported. It also follows that if more houses were permitted then there would be more money to pay for the mitigation and either reduce the unit cost or pay for more mitigation if it was found to be needed.
10. **Policy S1** states that sites will be allocated through a subsequent Site Allocations DPD but this doesn't give the certainty of delivery and we believe this policy needs to be more detailed as to when this will follow.

11. **Policy H3** “Non-Strategic Parish Housing Requirements” sets out numbers for Parish Councils to deliver but states the District Council will do this if demonstrable progress is not made but this is not defined. We believe a clear timeline should be given (i.e. two years after adoption of the Local Plan for the Neighbourhood Plan to be ‘made’). It also needs to be clear what would happen if the Council did not follow up with the Site Allocation DPD and a clear timeline.
12. The policy gives a figure of zero new houses for Southbourne through the non-strategic sites requirement as Southbourne has a figure within policy H2 as a strategic site within the broad location. However, this misses the point that the parish is large and the eastern edge is actually up against Hambrook and so development adjacent to Southbourne village would not be read in addition to that on the eastern edge. This is demonstrated by the fact our site is recommended for permission by officers as they agree the site is not harmful. We believe that Southbourne (and other parishes that have a figure of zero because they have a strategic figure) should also have a local parish figure. It is also true that smaller sites will deliver to a different timescale to strategic sites so both can be accommodated if the site is suitable.

#### Climate Change and the Natural Environment

13. As stated above, many of these policies are simply too dogmatic and detailed and we believe would benefit from being reconsidered and reduced to focus on ensuring harm does not result but the detail of that judgement either should lie in a separate document or be a discussion with the Council.
14. **Policy NE3** “Landscape Gaps between Settlements” is too broad and should be caveated that the gaps will only be protected if there is demonstrable harm. As currently written, there could be a long distance between settlements that technically diminishes the physical gap and strictly speaking could be argued to result in the perceived coalescence of settlements.
15. **Policy NE4** “Strategic Wildlife Corridors” needs to be rewritten as the policy starts off correctly with saying development will only be permitted if it does not have an adverse effect on the wildlife corridor. It therefore makes no sense to then caveat that with the two points that follow which adds in a sequential test (point 1) and largely repeats the first statement (point 2). Point 1 should be deleted as there is no need for a sequential test if there is no harm. The first part of Point 2 should be deleted as it is repetition, and the second half should just be added to the policy and seek the enhancement that it is fair to ask for.
16. The policy as currently written could be strictly applied that if any part of the site was within the wildlife corridor then it would be refused whereas the application could actually provide improvements to the wildlife corridor and significant enhancements.

We believe that the Local Plan needs some further thought before it can be made 'sound' and in particular the housing number needs to be reconsidered in light of the highway evidence but this seems to be possible and we would be happy to discuss this further with officers if that would assist.

Yours sincerely,



**Dr Chris Lyons**

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Director and Head of Southampton Planning