



Representation Form

Local Plan 2021 – 2039 Publication Stage

Ref:

(For official use only)

The consultation on the Local Plan 2021 – 2039: Proposed Submission will run from 3 February 2023 to 17 March 2023. The document and more information on the consultation can be viewed on our website www.chichester.gov.uk/localplan

All comments must be received by 5pm on Friday 17 March 2023.

There are a number of ways to make your comments:

- Comment on the document on the internet using our online consultation website www.chichester.gov.uk/localplanconsultation **(Recommended)**
- Post a copy of this form to us at: Planning Policy Team, Chichester District Council, East Pallant House, 1 East Pallant, Chichester, West Sussex, PO19 1TY

How to use this form

Please complete Part A in full. Please note anonymous comments cannot be accepted, a full address including postcode must be provided.

Please complete Part B overleaf, using a new form for each separate policy or paragraph that you wish to comment on. Please identify which paragraph your comment relates to by completing the appropriate box.

For more information, or if you need assistance completing this form, please contact the Planning Policy Team by email at planningpolicy@chichester.gov.uk or telephone 01243 785166.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title

First Name

Last Name

Job Title

(where relevant)

Organisation

Address Line 1

2. Agent's Details (if applicable)

Line 2	<input type="text"/>	Chapel Street
Line 3	<input type="text"/>	Chichester
Line 4	<input type="text"/>	West Sussex
Post Code	<input type="text"/>	PO19 1DL
Telephone Number	<input type="text"/>	01243 - 534050
E-mail Address	<input type="text"/>	Jeremy Farrelly

Part B

Please use a new form for each representation that you wish to make. Please note anonymous comments cannot be accepted. Any personal information provided will be processed by Chichester District Council in line with the General Data Protection Regulations 2018. More information is available at: <http://www.chichester.gov.uk/dataprotectionandfreedomofinformation>.

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="x"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="x"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="x"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The dwelling requirement for the district as set out in Policy H1 of 10,350 dwellings between 2021 and 2039 equates to 575 dwellings per annum (dpa). This does not reflect the current Standard Method requirement of 763 dpa (or 683 dpa when an allowance of 125 dpa is made for the South Downs National Park area).

Furthermore, the housing needs of particular groups are not reflected in the current standard method requirement of 638 dpa. These include the following groups:

- Students – which creates a need for an additional 29 dpa;
- people who require affordable housing- which generates a need of 433 affordable dpa (based on this figure and the thresholds set out in draft Policy H4: Affordable Housing it would be necessary to deliver 1,083 homes per annum to meet affordable housing need in full); and
- the unmet housing needs of neighbouring authorities and/or authorities in the same sub-region, which at best are between 10,141 and 10,620 homes.

When the needs of students are added to the standard method figure the minimum need dwelling requirement would be 666 dpa or 11,988 dwellings over the 18-year plan period 2021-2039.

When the full affordable need of 1,083 dpa is factored in this results in a need for at least 19,494 dwellings over the plan period.

In addition to the above figures, there is also an unmet need for over 10,000 homes in related authorities over the plan period.

Based on the above there is clearly a need for significantly more homes than is suggested by the minimum standard method figure.

Whilst it is noted that there are long-standing highway capacity issues on the A27 Chichester Bypass and more intermittent capacity problems with Wastewater Treatment facilities in the southern part of the district, these could be resolved if the emerging Local Plan made provisions to improve their capacity through proper long-term planning.

This approach is supported by paragraph 22 of the NPPF which confirms that plan-making should respond to long-term infrastructure requirements; and by paragraph 059 Ref ID 61-059 of the Planning Practice Guidance (PPG) which requires local planning authorities and policies that set out infrastructure deficiencies and how these will be addressed.

Existing capacity problems on the A27 are referred to throughout the draft Local Plan and its evidence base. Paragraph 5.2.11 of the SA refers to the southern plan area (i.e. the east-west corridor and Manhood Peninsula) as being highly constrained by capacity on the A27 and to detailed discussions with National Highways and West Sussex County Council (WSCC) over the course of 2019-2022 that led to a resolution that there is capacity for no more than 535 dpa in this area. The background evidence does not, however, make it clear as to how the 535 dpa figure was arrived at or the implications/infrastructure improvements that would be required to accommodate a higher dwelling provision in this part of the plan area.

It is important to note the "*Chichester Transport Study - Local Plan Review Transport Assessment*" (January 2023) prepared by Stantec is mainly focused on testing a single Local Plan spatial scenario for the period to 2039. Section 5.6 confirms that in addition to testing the 535 dpa in the south of the plan area that a sensitivity test for the delivery of 700 dpa in this part of the plan area was also carried out. Paragraph 5.6.1 confirms that higher levels of Local Plan development would enable higher levels of developer contributions to be raised towards funding the required Local Plan mitigation; and paragraph 5.6.3 comments that generally the proposed Strategic Road Network (SRN) mitigation can accommodate, in the most part, additional increase in development to 700 dpa. This is reiterated in paragraph 5.6.5 where it concludes "*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*".

Paragraph 8.5 of the Reg 19 Plan comments that in 2021 National Highways confirmed that the A27 Chichester By-Pass major improvement scheme is included in the Road Investment Strategy Pipeline for the period 2025-30 (RIS3), but at this stage funding is not guaranteed. This situation is not uncommon as are many infrastructure projects which are considered necessary to support the emerging Local Plan. This is demonstrated by Table 3 of the Infrastructure Delivery Plan (January 2023). The fact that the funding has not yet been secured towards certain types of infrastructure, such as healthcare, should not be used as a reason to constrain the level of housing proposed in the emerging Local Plan. This approach also applies to transport infrastructure.

The approach of the Reg 19 Plan to impose limits on the amount of development over the Plan period because of existing infrastructure capacity issues is inconsistent with the objectives of national policy and could undermine the prospects of securing the funding necessary to improve infrastructure capacity. The approach of the emerging plan is therefore negatively worded as it has the effect of constraining the level of housing below the minimum level needed and does not accord with the PPG or the objectives of national policy. A better, and more positive approach would be to plan for the necessary infrastructure, which in turn will maximise the prospects of securing the required infrastructure instead of deferring it.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Based on the above it is clear that the Policy H1 requirement needs to be reconsidered and increased. This can be achieved if the Local Plan seeks to address infrastructure requirements including the capacity constraints on the A27 as required by paragraph 22 of NPPF.

In setting a revised housing requirement, the District Council must take into account the needs of particular groups (i.e. students and persons in need of affordable homes) and complete the Duty to Cooperate process by preparing a Statement of Common Ground in respect of the unmet needs of the sub-region and then consider how/whether the Local Plan can provide for some of these unmet needs.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing sessions(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To discuss more fully the nature of these representations and any changes of circumstance.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.