



Planning Policy,  
Chichester District Council  
East Pallant,  
Chichester  
PO19 1TY

[www.missiontownplanning.com](http://www.missiontownplanning.com)  
[alex@missiontownplanning.com](mailto:alex@missiontownplanning.com)  
Tel; 07538 151774

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17<sup>th</sup> March 2023

**BY EMAIL ONLY**

Dear Sir/Madam,

**Representation on Chichester District Council's emerging local plan and regulation 19 consultation.**

Mission Town Planning Ltd, have been engaged by a client to make representation to the emerging Chichester District Council Local Plan consultation closing on 17<sup>th</sup> March 2023.

We have been commissioned to make representations on the plan so far as it impacts sites that are of interest to my client, specifically with Hunston, and the site to the south of the village known as Land At Farmfield Nurseries, Selsey Road. The site was provisionally proposed for allocation with the Hunston Neighbourhood Plan, which was the only allocated site proposed under policy H1. This was for the provision of a minimum of 200 homes.

This in part was in response to the Chichester District Council Regulation 18 plan which was set out within proposed policy AL11, which will not specifying a site proposed an allocation within Hunston of a minimum of 200 dwellings.

**Representations**

These Representations are focused solely on matters of direct relevance to my client's land interest within Chichester District Council's authority.

We have set out these Representations by reference to the relevant chapter or subject heading in the proposed Local Plan along with reference to the specific policy and page

number where appropriate. While we note that the Council have used a web-based system, we have endeavoured to address those elements that are relevant to the site mentioned above.

The purpose of this representation is to comment solely in relation to the omission of allocation within Hunston.

As a starting point it is worth noting that the regulation 18 consultation identified a need of 12,478 dwellings over the plan period this being from 2016 to 2035. During the period from this regulation 18 consultation being undertaken, and now the regulation 19 consultation the Council have consistently been unable to demonstrate a five year housing supply, this currently standing at 4.74 years, with a requirement of 3,350 from 2022-2027.

The regulation 19 consultation has now reduced this number to 10,359 units. The reasoning for this is set out within Chapter 5 of the consultation, where it notes constraints particularly the A27 capacity as a barrier to allow for the requisite amount of growth meaning that the Council is below the requirements of the standard method.

The national planning position set out within the NPPF (National Planning Policy Framework) at paragraph 61 which states;

*To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.*

While the provisions of the emerging NPPF are noted, this was a consultation document and is not yet/ may not be planning policy.

From the submission while the constraint of the A27 is noted this is not beyond mitigation and the fact that Highways England are, and have sought contributions to rectify this would suggest that this would not constitute an exceptional circumstance. Moreover, the plan further states that it is a strategic objective to mitigate the impacts on the A27.

In the period between the preferred approach (reg 18) and this approach (reg 19) the plan notes that, there has been moderate growth, and again notes the constraints, although these remain ambiguous. It is noted that the moderate growth was still not sufficient to deliver a 5 year housing land supply.

Within the consultation plan, it is shown within Map B1 – Areas designated as Rural and Non Rural Area's that Hunston is within the non-rural area. Given this it seems perverse to then remove and form of allocation for housing within this designation urban area.

The issue then comes that the defined settlement boundary as per the Site Allocation DPD adopted 2019, would considerably restrict any housing growth when taken in context of the emerging plan and its policy on developments outside of the settlement boundary, i.e. within the countryside.

Such an approach to proposal reducing housing numbers following consistent under delivery and to allow no mechanism to allow for sites to be considered will simply fail to the housing people and families need. The over reliance on larger and strategic sites, which have been bought forward from previous plans shows the significant issues with their historic lack of delivery and indeed whether they should be consider within the plan in the first place.

I would urge the Council to consider its approach to housing delivery and its obligations to delivery much needed family housing. Every borough and district will have to contend with constraints, however there exists a statutory duty to deliver housing. The National Housing Federation "People in housing need 2021" <sup>1</sup>report summarises that;

- *8.5 million people in England have some form of unmet housing need.*
- *For 4.2 million of these people (around 1.6 million households) social rented housing would be the most appropriate tenure to address that need.*
- *This is around half a million more families than the 1.1 million households currently recorded on official waiting lists.*
- *Two million children in England (1 in every 5) are living in overcrowded, unaffordable or unsuitable homes.*

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<sup>1</sup> [https://www.housing.org.uk/globalassets/files/people-in-housing-need/people-in-housing-need-2021\\_summary.pdf](https://www.housing.org.uk/globalassets/files/people-in-housing-need/people-in-housing-need-2021_summary.pdf)

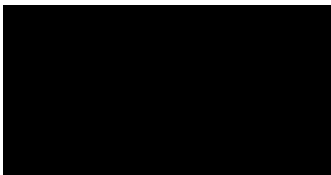
- *1.3 million of these children are in need of social housing, as this is the only suitable and affordable type of home for their families.*
- *Overcrowding is the largest problem nationally, affecting nearly 3.7 million people*

## Summary

I trust that these Representations are of assistance in considering the current drafting and submission of the Local Plan. My client would request that we continue to be engaged in the plan making process and we look forward to hearing from you with regard to the next steps.

If you require any further information in support of these representations, please do not hesitate to contact me.

Yours sincerely,



Alex King – Managing Director  
Mission Town Planning  
[alex@missiontownplanning.com](mailto:alex@missiontownplanning.com)  
Tel; 07538 151774