

SENT BY EMAIL  
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## CHICHESTER LOCAL PLAN – MAIN MODIFICATIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the main modifications of the Chichester Local Plan
2. HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which include multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

### MM31

3. HBF welcomes the amendment to H1 which established the housing requirement a 638 dwellings per annum (dpa). However, we do not consider the use of the step trajectory to be appropriate. The Council should have been planning for 638 dpa from the start of the plan being prepared and as such additional allocations are necessary in order to ensure that a step trajectory is not required and more homes are built at the start of the plan period. Pushing back delivery as is proposed in this modification is not consistent with paragraph 60 of the NPPF and the need to boost housing supply and HBF do not consider it to be justified.
4. The additional clarity in the plan period is welcomed but the HBF continues to consider the period to be inconsistent with national policy. Firstly, the start date of the plan is not consistent with the approach taken to assessing housing needs. At the time the regulation 19 consultation took place at the start of 2023 the assessment of housing needs used a base period of 2022 to 2032 and an affordability ratio for 2021. However, it took over a year to submit the local plan for examination and requiring the standard method to be updated to take account of any new data. This calculation used a base period of 2024 to 2034 and an affordability ratio for 2023 and as such the start date for the plan should be 2023/24 and not 2021/22.
5. The standard method is designed to reflect past levels of delivery and then looks ahead from the point at which it applied. It is a forward-looking assessment of housing needs. As outlined above, this can be seen in the base period over which household growth is estimated, which commences on the year in which local housing needs are calculated, as well as the affordability adjustment which uses the most up to date affordability ratio. Therefore, from the point at which it is calculated the assessment of housing need using the standard method takes

account of what has happened in previous years that will have impacted on that affordability data. This is specifically recognised in PPG with paragraph 2a-011-20190220 stating that “*The affordability adjustment is applied to take account of past under-delivery*”. Logic would therefore suggest that if the affordability adjustment is being used as proxy to take account of under supply it must also be there to take account of any oversupply in that market. It is clear that successive Governments consider the past supply of homes to be linked to the cost and affordability of housing and made it a key element of the standard method and as such the period over which housing needs are planned should start from the point at which the most up to date local housing needs assessment is undertaken prior to submission.

6. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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