

Chichester Local Plan Examination

Main Modifications consultation

Response from
Barratt David Wilson Homes

May 2025

1. Introduction

- 1.1 This representation on the Chichester Local Plan Main Modifications consultation 2025 is from Barratt David Wilson Homes (BDW). It relates to the following proposed main modifications:

<i>MM Ref</i>	<i>Policy</i>	
MM6	S1	Spatial Development Strategy
MM31	H1	Meeting Housing Needs
MM32	H2	Strategic Locations/ Allocations 2021 – 2039
MM33	H3	Non-Strategic Parish Housing Requirements 2021 – 2039
MM40	H11	Meeting Gypsy and Traveller and Travelling Showpeople’s Needs
MM11	NE4	Strategic Wildlife Corridors
MM23	NE15	Flood Risk and Water Management
MM75	A11	Highgrove Farm, Bosham

- 1.2 BDW’s concerns with the Main Modifications (MM) can be broadly categorised as:

- Undermining of delivery;
- Loss of flexibility and restrictions on housing numbers;
- Lack of commitment to addressing housing shortfalls and bringing forward an urgent Local Plan Review;
- Potential introduction of unreasonable additional burdens with no viability evidence to support this.
- Lack of clarity and certainty

Overall, the soundness of the above identified modifications is questioned.

- 1.3 The remainder of this representation looks at each of the above modifications in detail setting out why they are not considered to be sound and where relevant, suggesting changes to the MM to improve soundness,

2. MM6 - Policy S1 Spatial Development Strategy

Specific details of modification that are of concern

2.1 Areas of concern relate to modifications to the policy:

Policy S1 – Spatial Development Strategy

Amend Criteria 3-

~~3. Where opportunities arise, supporting the villages and rural communities in the North of the Plan Area.~~

Delete last sentence.

~~To ensure that the council delivers its housing target, the distribution of development may need to be flexibly applied, within the overall context of seeking to ensure that the majority of new housing is developed in accordance with this Strategy where appropriate and consistent with other policies in this plan. Any changes to the distribution will be clearly evidenced and monitored through the Authority Monitoring Report.~~

Remove footnote 16.

~~16See Appendix H for detail on saved Site Allocation DPD~~

Additional sentence at end of Policy.

Additional housing allocations, if required, will be made through the Site Allocation DPD (or review of the Local Plan).

Why modification is considered unsound

2.2 Modification MM6 states:

“Additional housing allocations, if required, will be made through the Site Allocation DPD (or review of the Local Plan).”

The commitment to bringing new sites forward either through DPD or Plan review is considered essential and is welcomed. However, this modification is considered vague, fails to provide certainty, is not positively prepared and effective. Consequentially, it is not considered sound.

2.3 The adopted plan was expected to take 5 years to review to address housing shortfalls. Disappointingly, this review process is still not complete some 10 years after adoption and BDW consider housing shortfall remains a serious issue for this plan. The emerging Plan will not deliver the full Local Housing Need and falls vastly short of the new LHN figure derived from the December 2024 Standard Method.

- 2.4 In light of this, it is considered that relying on a Site Allocations DPD or a review of the local plan to bring forward additional housing allocations at some unspecified time in the future (if required) does not provide certainty on four counts:
- i. Whether additional allocations will be needed in the plan period,
 - ii. How under-delivery would be assessed and what process would be used to address this.
 - iii. What the triggers would be for initiating the process to address the shortfall.
 - iv. What will determine whether a site allocations or local plan review will be used.
- 2.5 A site allocations route would be undertaken in the framework and constraints of the 2021-2039 Local Plan which does not reflect the new directions set out in the December 2024 NPPF and the Labour Government's ambition to deliver 1.5 million homes. This dated Local Plan would then constrain the allocations that could come forward, especially if the decision to make additional allocations was made a number of years after the Plan was adopted. This would limit delivery and could hold back a holistic and strategic review of the plan. Flexibility and speed would be compromised if reliance was placed on first bringing forward a SA DPD and then, at some time in the future, a local plan review was commenced.
- 2.6 This modification is not effective and is not seen as positive planning. It will not identify when housing shortfall triggers have been reached and will not enable that shortfall to be quickly addressed. Furthermore, it indicates a lack of commitment to bringing much needed new sites forward either through a DPD or a Plan review. As such, the modifications and the Policy are considered unsound.

Requested change to MM

- 2.7 To make the Plan and Policy S1 sound, MM6 should be amended to:
- Provide for a firm commitment to an immediate and urgent local plan review. The supporting text to the policy and the Local Development Scheme (LDS) should also be amended to reflect this commitment.
 - Specify in the Policy S1 the triggers that would be used for assessing when the Plan was underdelivering and the firm timetable and mechanisms for addressing this shortfall.

3. MM31 - Policy H1 Meeting Housing Needs

Specific details of modification that are of concern

3.1 Areas of concern relate to modifications to policy and explanatory text.

Policy H1 Meeting Housing Needs

Text, table and footnotes are replaced with new text:

The housing requirement for the plan area is to provide for at least 11,484 dwellings (638 dwellings per annum) to be delivered in the period 2021/22 – 2038/39 stepped as follows:
575 dpa for the years 2021/22 to 2029/30
701 dpa for the years 2030/31 to 2038/39.

New Table :

Table XX Housing Supply

Housing supply
<p><u>Part of the housing requirement will be met through:</u></p> <ul style="list-style-type: none"> • <u>2,326 completions since 1 April 2021; and</u> • <u>5,257 commitments as at 31 January 2025. This includes planning permissions, allocations brought forward from the 2015 Local Plan and extant allocations from the Site Allocation DPD 2014-2029 and 'made' Neighbourhood Plan allocations.</u> <p><u>This leaves a residual of 3,901 dwellings which will be met through new strategic site allocations in Policy H2, windfall sites and from subsequent development plan documents:</u></p> <ul style="list-style-type: none"> • <u>Southbourne Allocation DPD in accordance with Policy A13; and</u> • <u>sites allocated through neighbourhood plans or a future Site Allocation DPD in accordance with Policies H3, A2, A12, and A15</u> • <u>sites allocated through the Site Allocation DPD or a review of the Local Plan (whichever is sooner).</u>

Why modification is considered unsound

3.2 The commitment to bringing new sites forward either through DPD or Plan review is considered essential. However, this modification is considered vague, fails to provide certainty, is not positively prepared and effective. Consequentially, it is not considered sound.

3.3 The current adopted plan was expected to take 5 years to review to address housing shortfalls. Disappointingly, this review process is still not complete some

10 years after adoption and BDW consider housing shortfall remains a serious issue for this emerging plan. The 2021-2039 Plan will not deliver the full Local Housing Need and falls vastly short of the new LHN figure derived from the December 2024 Standard Method.¹

- 3.4 Furthermore, it is noted that the Council's latest LDS (March 2025) indicates that the timetable for a review of the Local Plan will be set out once the new Plan system is in place. Given that Governments can take many years to get new planning approaches in place, it is considered essential that Chichester commit to an urgent and immediate review of the plan now.
- 3.5 In light of the above, it is considered that relying on a Site Allocations DPD or a review of the local plan to bring forward additional housing allocations at some unspecified time in the future (if required) does not provide certainty on four counts:
- v. Whether additional allocations will be needed in the plan period,
 - vi. How under-delivery would be assessed and what process would be used to address this.
 - vii. What the triggers would be for initiating the process to address the shortfall.
 - viii. What will determine whether a site allocations or local plan review will be used.
- 3.6 A site allocations route would be undertaken in the framework and constraints of the 2021-2039 Local Plan which does not reflect the new directions set out in the December 2024 NPPF and the Labour Government's ambition to deliver 1.5 million homes. This dated Local Plan would then constrain the allocations that could come forward, especially if the decision to make additional allocations was made a number of years after the Plan was adopted. This would limit delivery and could hold back a holistic and strategic review of the plan. Flexibility and speed would be compromised if reliance was placed on first bringing forward a SA DPD and then, at some time in the future, a local plan review was commenced.
- 3.7 This modification is not effective and is not seen as positive planning. It will not identify when housing shortfall triggers have been reached and will not enable that shortfall to be quickly addressed. Furthermore, it indicates a lack of

¹ Chichester's Local Housing Need numbers under the revised Standard Methodology have increased by 72% (760 to 1307)

commitment to bringing much needed new sites forward either through a DPD or a Plan review. As such, the modifications and the Policy are considered unsound.

- 3.8 Modification MM31 also propose removing the supply table from the Policy and inserting a new Housing Supply table in the supporting text. It is suggested, that to be sound, the table should form part of the policy.
- 3.9 The new table reads as policy and states that the residual of 3,901 dwellings is to be partially to be met 3 separate sources – windfalls, sites allocated through Neighbourhood Plans and sites allocated through the Site Allocations DPD or a review of the local plan (whichever is sooner).
- 3.10 No timetable is given for delivering the Neighbourhood Plan allocations or those coming through DPD's. There are no identified trigger points for initiating urgent action if delivery of the residual 3,901 dwellings is not forthcoming. The wording is vague, fails to provide certainty and lacks urgency and focus on ensuring delivery. It is also not clear whether this is supporting text or policy. As such the proposed modification is considered to not be effective or represent positive planning and is contrary to National Policy. As such, it is considered unsound.

Requested change to MM

- 3.11 To make the Plan and Policy H1 sound, MM31 should be amended to:
- Include the table as policy and not as explanatory text;
 - Provide for a firm commitment to an immediate and urgent local plan review. The supporting text to the policy and the Local Development Scheme (LDS) should also be amended to reflect this commitment.
 - Specify in the Policy H1 the triggers that would be used for assessing when the Plan was underdelivering and the firm timetable and mechanisms for addressing this shortfall.

4. MM32 - Policy H2 Strategic Locations/ Allocations 2021 – 2039

Specific details of modification that are of concern

4.1 Areas of concern relate to modifications to policy.

Policy H2 Strategic Locations/ Allocations 2021 – 2039

Delete para 4

~~*If draft neighbourhood plans making provision for at least the minimum housing numbers of the relevant area have not made demonstrable progress, the council will allocate sites within a development plan document in order to meet the requirements of this Local Plan.*~~

New final paragraph

In order to demonstrate the delivery of the housing requirement, in instances where work on a neighbourhood plan stalls, the plan is turned down by the community at the referendum stage, or the parish council hands back the allocation of housing to the council, sites will be identified and a review of settlement boundaries will be undertaken by the council in the Site Allocation DPD or review of the Local Plan (whichever is sooner).

Why modification is considered unsound

- 4.2 MM32 proposes to amend Policy H2 to allow for the possibility of using the forthcoming Site Allocations DPD or a review of the Local Plan to address delivery issues if Neighbourhood Plan work stalls.
- 4.3 As drafted MM32 is considered vague, fails to provide certainty and is not positively prepared or effective in dealing with neighbourhood plan under-delivery. Consequentially, it is not considered sound.
- 4.4 The current adopted plan was expected to take 5 years to review to address housing shortfalls. Disappointingly, this review process is still not complete some 10 years after adoption and BDW consider housing shortfall remains a serious issue for this emerging plan. The 2021-2039 Plan will not deliver the full Local Housing Need and falls vastly short of the new LHN figure derived from the December 2024 Standard Method.
- 4.5 The Council's latest LDS (March 2025) indicates that the preparation of the Site Allocations DPD is expected to commence in 2026 with adoption in summer/autumn 2027. A timetable for a review of the Local Plan will be set out once the new Plan system is in place.

- 4.6 There are no specific triggers with timetables identified in the Policy for identifying neighbourhood plan under-delivery or robust mechanisms for addressing this type of under-delivery quickly. Furthermore, it is not how under-delivery occurring in the later parts of the plan will be addressed given the uncertainty over the timings of the SA DPD and Local plan review timetables.
- 4.7 As currently drafted, MM32 is considered weak, unable to achieve its delivery objectives and not considered to be robust or sound. The policy and supporting text should be amended to enable flexible amendments to housing numbers
- 4.8 It is noted that MM33 (relating to Non Strategic Parish Housing Requirements) is proposing to amend the supporting text to allow for minor amendments to housing numbers. This flexibility should also be built into Policy H2 as an early mechanism to deal with neighbourhood plan under-delivery in the District. This would be able to be implemented prior to either the production of a Site Allocations DPD or a Local Plan Review and would be a powerful mechanism to maintain and add to housing delivery in the district.

Requested change to MM

- 4.9 To make the Plan and Policy H2 sound, MM32 should be amended to:
- Provide for a firm commitment to an immediate and urgent local plan review. The supporting text to the policy and the Local Development Scheme (LDS) should also be amended to reflect this commitment.
 - Specify in the Policy H2 the triggers that would be used for assessing when neighbourhood planning was underdelivering and the firm timetable and mechanisms for addressing this shortfall.
 - Amend the Policy to allow for minor amendments to housing numbers on strategic allocation sites which could be used during the development Management process.

5. MM33 - Policy H3 Non-Strategic Parish Housing Requirements 2021 – 2039

Specific details of modification that are of concern

- 5.1 Areas of concern relate to modifications to policy and explanatory text.

New para after 5.8

Extant permissions for 5 dwellings or more within each parish since 1 April 2021 are deducted from the requirement, the net number for each parish, as at 31 January 2025, is set out in the table at paragraph XX.

Policy H3 Non-Strategic Parish Housing Requirements 2021 – 2039

Small-scale housing sites **Housing allocations** will be identified to help provide for the needs of local communities in accordance with the parish housing requirements ~~set out below~~ **minus extant permissions for 5 dwellings or more within the parish since 1 April 2021**. Suitable sites will be identified either through neighbourhood plans or subsequent development plan document. Note that a '*' against a parish name indicates that a strategic allocation/ broad location for development is identified or strategic location for development is made as set out in Policy H2.

Parish Housing Figure Parish Housing Requirement (gross) Figure
 Apuldram 0 Birdham 0 Bosham* 0 Boxgrove 50 Chichester City* 0 Chidham and Hambrook* 0 Donnington 0 Earnley 0 East Wittering 0 Fishbourne 30 Funtington 0 Hunston 0 Itchenor 0 Kirdford 50 Lavant 0 Loxwood* 0 33 Lynchmere 0 North Mundham 50 Oving* 0 Plaistow and Ifold 25 Selsey 0 Sidlesham 0 Southbourne* 0 Tangmere* 0 West Wittering 0 Westbourne 30 Westhampnett* 0 Wisborough Green 75 Total 310

If draft neighbourhood plans making provision for at least the minimum housing numbers of the relevant area have not made demonstrable progress the council will allocate sites for development within a development plan document in order to meet the requirements of this Local Plan.

In order to demonstrate the delivery of the housing requirement, in instances where work on a neighbourhood plan stalls, the plan is turned down by the community at the referendum stage, or the parish council hands back the allocation of housing to the council, sites will be identified and a review of settlement boundaries will be undertaken by the council in the Site Allocation DPD or review of the Local Plan (whichever is sooner).

Why modification is considered unsound

- 5.2 MM33 is considered to be lacking clarity and fails to provide for housing delivery. As such it is not considered to be justified and effective.

- 5.3 MM33 has deleted a number of Parishes from the table and states that some flexibility may be allowed for minor amendments to housing numbers for individual Parishes. This flexibility is to be welcomed but it is not clear whether this relates to all Parishes within Chichester District, or to just those listed as having non-strategic housing requirements. Additionally, it is not clear what is meant by “minor amendments”.
- 5.4 MM33 also amends Policy H3 to state that Parish housing allocation numbers set out in the table will be reduced by extant permissions granted since April 2021 for 5 dwellings or more in each Parish. There are 2 concerns with this amendment:
- It is not clear whether this restriction applies to all Parishes or just those remaining in the table after the strategic allocations have been removed. Given historic and future housing shortfalls and under-delivery, a precautionary and pro-active approach should be taken to both strategic and non-strategic Parish numbers.
 - Extant permission are not always built out, or can take many years to be brought forward. Only schemes that have been completed and delivered since April 2021 should be considered in terms of the overall housing requirement numbers. This would ensure that delivery across the District is not compromised.

Requested change to MM

- 5.5 To make the Plan and Policy H3 sound, MM33 should be amended to:
- Clarify the ability to flexibly adjust housing numbers relates to all Parishes, or just those listed in the table
 - Specify in the Policy H3 the triggers that would be used for assessing when the Plan was underdelivering in terms of neighbourhood plans and the firm timetable and mechanisms for addressing this shortfall.

6. MM40 - Policy H11 Travellers - Meeting Gypsies, Travellers and Travelling Showpeoples' Needs

Specific details of modification that are of concern

6.1 Areas of concern relate to modifications to policy and explanatory text.

Para 5.62

Given the high level of need within the plan area the council has had to utilise a wide range of options for meeting this need. This entails providing pitches on the strategic housing allocation sites, supporting increases in the density of pitches on existing authorised sites which have been assessed as being acceptable in principle for additional pitches, and allowing pitches to come forward on a case-by-case basis. ~~The council will also consider allocating additional pitches via the forthcoming Allocations DPD~~

New para after para 5.66

The provision of pitches on strategic allocations should be considered from the outset as part of the masterplanning process, ...

Policy H11 Meeting Gypsy and Traveller and Travelling Showpeoples' Needs

...

In addition to the site allocations within this Local Plan, in the event of any non-allocated housing sites coming forward for development **in the Southern plan area**, accommodation for Gypsies and travellers (whether they meet the Planning Policy for Traveller Sites definition or not) should be provided on development sites of 200 homes or more whilst there remains an identified need in the plan area. 3 pitches should be provided for every 200 dwellings proposed. Off-site provision in lieu of the required pitches can be provided as an alternative, subject to compliance with the criteria set out above.

...

Why modification is considered unsound

- 6.2 MM40 is unclear and appears to be adding additional burdens which are unjustified. Consequentially, it is not considered sound.
- 6.3 The explanatory text in MM40 proposes that the provision of pitches on strategic allocations should be considered from the outset (new para after para 5.66). This implies that all strategic allocations will be required to provide for Gypsy and Traveller pitches. However, MM40 also proposes that this requirement only relates to Southern plan areas. As currently drafted MM40 is confusing and unclear.

- 6.4 The additional burden of providing for pitches on strategic allocations is identified via a new paragraph in the supporting text, rather than through Policy 11. The status of this wording is therefore uncertain as to whether it carries the full force of policy or is guidance.
- 6.5 Furthermore, it is not clear whether this requirement relates to:
- all strategic allocations in the emerging plan, whether or not they contain specific wording relating to Traveller provision in the site specific requirements, or
 - just new strategic allocations that may come through a Site Allocations DPD; or
 - just allocations in the emerging plan that have references to Traveller provision in the site specific requirements plus any new strategic allocations coming through a SA DPD; or
 - all strategic allocations in the emerging plan, whether or not they contain specific wording relating to Traveller provision in the site specific requirements plus any new strategic allocations coming through a SA DPD.
- 6.6 The requirement to provide traveller pitches on strategic sites is a significant additional burden and is considered unjustified. BDW have been unable to find an evidence where this added requirement has been assessed in terms of viability, both individually and in combination with existing and other new burdens being introduced through the MM's. It is noted that the viability assessment was last updated in 2023. Furthermore, there is no evidence of assessment of the ability of sites to accommodate traveller pitches in terms of capacity without undermining the number of non traveller units that can be provided. This policy change is untested and likely to also act as a brake on development for the strategic sites, undermining delivery of both general and specialist housing.

Requested change to MM

- 6.7 To make the Plan and Policy H11 sound, MM40 should be amended to:
- Clarify whether Gypsy & Traveller pitches on strategic sites applies to all strategic sites in excess of 200 units or just those in the southern area;
 - Ensure that the explanatory text and policy are consistent;
 - Update the viability work to test whether this proposed policy change is acceptable, both individually and in combination with other existing and proposed burdens.
 - Deal with Gypsy & Traveller provision through a specific Traveller DPD.

7. MM11 - Policy NE4 Strategic Wildlife Corridors

Specific details of modification that are of concern

7.1 Areas of concern relate to modifications to policy.

Policy NE4 – Strategic Wildlife Corridors

Development **proposals** will only be permitted **where they can demonstrate they** it would not lead to an adverse effect upon the ecological value, function, integrity and connectivity of the strategic wildlife corridors, **and protect and enhances its features and habitats.**

~~Development proposals within strategic wildlife corridors will only be granted where it can be demonstrated that:~~

- ~~1. There are no sequentially preferable sites available outside the wildlife corridor; and~~
- ~~2. The development will not have an adverse impact on the integrity and function of the wildlife corridor and protects and enhances its features and habitats.~~

~~Development proposals outside, but in close proximity to the strategic wildlife corridor will be acceptable where it can be demonstrated that:~~

- ~~a) The development will not have an adverse impact on the integrity and function of the wildlife corridor; and~~
- ~~b) The proposal will not undermine the connectivity and ecological value of the corridor.~~

All proposals for new development (with the exception of householder applications) within or in close proximity to wildlife corridors should take opportunities available in order to extend and enhance those corridors.

Why modification is considered unsound

- 7.2 MM11 is considered unclear and has the potential to add significant burdens for developers. As currently drafted it is considered unjustified, onerous and unsound.
- 7.3 In the Submission Plan Policy NE4 seeks to manage development within and in close proximity to the Strategic Wildlife Corridors. MM 11 has removed reference to development “outside but in close proximity” to the corridors and instead states that “Development proposals will only be permitted where they can demonstrate they would not lead to an adverse effect...”
- 7.4 The proposed supporting text and policy wording and removal of the geographic context (“in close proximity”) has the consequential effect of expanding the impact of the Strategic Wildlife Corridor across the entire district. On this basis,

all development in Chichester District will be required to assess the impact on the strategic wildlife corridors and demonstrate they will not lead to adverse effects even when they are very distant from them. This would be a significant, and in many cases unnecessary, added burden. BDW can find no evidence that the viability of such a policy change has been tested, either individually or in combination with the existing burdens and the proposed new burdens being introduced by the MM's.

- 7.5 If the Council does intend for this policy to cover the entire Chichester District this should be clearly set out in the policy and the Validation Local List amended to reflect this.

Requested change to MM

- 7.6 To make the Plan and Policy NE4 sound, MM11 should be amended to:
- Provide clarity by including a clearly defined and limited geographic area where development proposals would need to assess impacts on the corridor and demonstrate no harm.
 - Provide certainty in relation to the strategic wildlife corridors.
 - Update the viability work to test whether this potential proposed policy change is acceptable, both individually and in combination with other existing and proposed burdens.

8. MM23 - Policy NE15 Flood Risk and Water Management

Specific details of modification that are of concern

8.1 Areas of concern relate to modifications to policy.

Policy NE15 – Flood Risk and Water Management

Elsewhere, new development should be set back at least 8m from fluvial watercourses **(including when within culverts)** and 16 m from tidal watercourses to allow easy access for maintenance and repair.

Why modification is considered unsound

8.2 MM23 has the potential to add significant burdens for developers. As currently drafted it is considered unjustified, onerous and unsound.

8.3 The requirement to set back development 8m from fluvial watercourses when they are in culverts is considered unjustified and onerous. Such spaces can be accessed from the ends of the culverts for repairs and maintenance. In addition, it is not clear whether development needs to be set back 8m either side of the culvert giving a corridor of 16m.

8.4 Either 8m or 16m, this would be an excessive requirement with the potential to significantly reduce the developable area of a site to accommodate what is likely to be small watercourses passing through an underground structure. This has the potential to reduce site viability and add a significant burden, especially when considered in conjunction with other burdens potentially being introduced through these modifications.

8.5 BDW can find no evidence that the viability of such a policy change has been tested, either individually or in combination with the existing burdens and the proposed new burdens being introduced by the MM's.

Requested change to MM

8.6 To make the Plan and Policy NE15 sound, MM23 should be amended to clarify that NE15 does not require an 8m setback for fluvial water courses when in culverts. Policy text would then read

Elsewhere, new development should be set back at least 8m from fluvial watercourses **(excluding when within culverts)**

- 8.7 Update the viability work to test whether this proposed policy change is acceptable, both individually and in combination with other existing and proposed burdens.

9. MM75 - Policy A11 Highgrove Farm, Bosham

Specific details of modification that are of concern

9.1 Areas of concern relate to modifications to policy.

Policy A11 Highgrove Farm, Bosham

Approximately 13 hectares of land at Highgrove Farm, Bosham is allocated for a residential led development comprising:

- **Approximately** A ~~minimum~~ of 245 dwellings, including ~~4~~**12** suitable serviced plots to provide self/custom build housing;

Why modification is considered unsound

9.2 MM75 amends Policy A11 to reduce flexibility and add additional burdens. This will undermine delivery and is not considered justified or effective. As such it is considered unsound.

Loss of flexibility around housing numbers

9.3 The modification effectively caps development at Highgrove Farm at 245 dwelling units in the Plan period by removing replacing “minimum” with “approximately” in the policy. The previous flexibility to accommodate significant additional housing requirements has been removed rendering the site (and wider plan) unable to adjust to changing situations in terms of need, site availability, viability and other opportunities and challenges.

9.4 Given historic and future housing shortfalls and under-delivery, a pro-active approach should be taken to ensure that delivery is not compromised. Solidifying the Highgrove Farm numbers to 245 units for the remainder of the plan period on an important strategic allocation is considered unambitious and short-sighted. Overall, the changes are not considered to be justified or to represent positive planning.

Self build numbers

9.5 MM75 proposes to increase the self/custom build numbers on the strategic Highgrove Farm site from 4 to 12. The increase of an additional 8 units on this site is not evidenced and is considered unjustified. The increased requirement is not based on engagement and dialogue with the landowner/developer and appears to be an arbitrary decision to increase self/custom build units on this site to meet overall plan needs without reference to viability and specifics.

- 9.6 If applied, this increase represents a significant additional burden for the developer and could undermine viability and delivery of the site. The plan has a weak approach to delivery. The unjustified significant increase to self/custom build on High Grove Farm re-inforces this perception. This additional burden, in combination other introduced in the modifications and the cap on housing numbers could undermine delivery of this site and wider plan objectives relating to growth.

Requested change to MM

- 9.7 To make the Plan and Policy A11 sound and maintain delivery, MM75 should be amended as follows:

... A **minimum of** 245 dwellings, including ~~4~~ 12 suitable serviced plots to provide for self/custom build housing; ...