

CHICHESTER LOCAL PLAN REVIEW 2035

PREFERRED APPROACH - DECEMBER 2018

RESPONSE FROM PERSIMMON HOMES (SOUTH COAST)



Introduction

Persimmon Homes welcomes the opportunity to comment on the Preferred Options Local Plan. Our submission is set out in two sections covering;

- Strategic Policies
- Development Management Policies

Summary of representation

It is our opinion that notwithstanding many policies which are positive, there remains fundamental issues speaking to the soundness of the plan which should be addressed prior to submission of the plan to the Secretary of State or indeed for a further round of public consultation prior to submitting the plan. These are;

1. Policy S4

The policy does not aim to meet established unmet need as set out in the West Sussex and Greater Brighton Strategic planning board (WS and GB SPB) Local Strategic Statement 2 (LSS2), which sets out an established unmet need of the wider sub-region approximately 1,700 homes per annum up to 2031. This is contrary to paragraph 60 of the NPPF.

2. Policy S3 and Policy S5

The Council has failed to make best use of the opportunity to maximise the opportunities to accommodate additional homes offered by other parishes within the east-west corridors. Furthermore, the council should explore the role significant development can play in providing additional facilities which would in turn move up some settlements which, due to a lack of facilities, are currently considered to be lower order settlements.

3. Revisions to Development Management policies to reflect national policy and Planning Practice Guidance.



STRATEGIC POLICIES

Housing needs

Policy S4: Meeting Housing needs

Overall housing need

Policy S4 sets out the identified housing needs to be met over the plan period based on the assessment set out in the Housing and Economic Needs Assessment (HEDNA). A review of the HEDNA reveals that this housing needs figure is based on the needs for Chichester alone (see paragraph 12.2 of the HEDNA). As per NPPF and PPG local plan housing requirements should not only seek to meet the Objectively Assessed Housing Needs for the plan area but consider the unmet needs of the wider HMA.

Unmet sub-regional housing need

For strategic planning purposes, Chichester District Council is part of the Coastal West Sussex and Greater Brighton Strategic Planning Board¹ (CWS & GB SPB). The CWS & GB SPB includes the Coast to Capital LEP, Brighton City Deal and Gatwick Diamond LEP. Chichester District is identified as a key growth area with 20% of the economic growth in the CWS & GB SPB upto 2031 anticipated within the district (NLP Economy Background Paper, May 2015).

The latest LSS was published in 2016 and is based on an objective assessment of housing need (OAN). The LSS (2016) set out an urgent need for the SPB to "... narrow the gap between the planned housing provision of 4,000 new homes per annum to the assessed needs of 5,700 within the sub-region..." (Strategic Objective 2, CWS & GB SPD LSS 2016). As of 2016, there existed an identified unmet need of approximately 1,700 dwellings per annum amounting to 27,200 much needed homes upto 2031. This is set in the context of a heavily constrained strategic planning area (see map 1 of the Preferred Options Local Plan). Of the local authorities within the CWS & GB SPB, Chichester, Arun, Horsham and Mid Sussex are the least constrained. Arun, Horsham and Mid Sussex, in reflection of their ability to accommodate additional growth, included significant uplifts within their respective local plans over and above their respective OANs.

In addition to the housing pressures within the CWS & GB region, further west is the Partnership for Urban South Hampshire (PUSH) spatial area. The PUSH area is made up of the two housing market areas (HMAs); Portsmouth (PUSH EAST) and Southampton (PUSH WEST). The PUSH EAST HMA includes Gosport, Portsmouth and Havant all of which are in commutable distance of Chichester District. In these areas alone, there is an established shortfall of approximately 8,000 dwellings against development needs.

For the new local plan to meet the Duty to Cooperate, the Council will need to demonstrate that it has considered accommodating the unmet needs of the wider sub-region and agree or disagree with its neighbours on the level of unmet need it can accommodate. The Council makes reference to the publication of Statements of Common Ground (SoCG) on a number of strategic issues, including housing, at a later date. The SoCGs are an essential determinant of the spatial strategy to be pursued and as such should be established prior to the "Preferred Options" stage of a local plan. In the absence of a SoCG on housing Policy S4 has clearly not been 'Positively Prepared' nor is it 'Effective' thus failing the tests set out in paragraphs 35 (a) and (c) of the NPPF.

¹ The Coastal West Sussex and Greater Brighton Strategic Planning Board (CWS&GB) SPB was established in 2012 by the authorities of Adur, Arun, Chichester, Worthing, Lewes, West Sussex County Council, Brighton & Hove City Council, and the South Downs National Park Authority. The CWS & GB SPB expanded in 2015 to include Mid Sussex and Horsham District councils. The board facilitates joint work on strategic planning priorities.

Policy S3 and Policy S5

Persimmon Homes welcomes the strategic distribution approach adopted by the Council of focusing the majority of the development growth within the City of Chichester and the wider east-west corridor. The company are however of the opinion that there is a missed opportunity in terms of the role lower order settlements within the East-West Corridor can play in meeting additional housing and development needs of the district and indeed the wider sub-region.

In light of the significant unmet need for the wider sub-region it may be more pertinent for the Council to explore the potential for the East-West corridor to help meet the unmet needs of the wider sub-region. Such an approach will build on the Council's sustainable strategy and help reduce any potential impacts of the additional development growth on the highway network.

Policy S24: Countryside

Persimmon Homes supports the wording of the policy which allows for settlement boundaries to be altered by subsequent Development Plan Documents and / or a neighbourhood plan. Such an approach will ensure that the plan once adopted will be able to rapidly adapt to changing circumstances.

DEVELOPMENT MANAGEMENT POLICIES

Policy DM2: Housing Mix

Bullet points 1 to 3

Persimmon Homes welcomes the Council's approach to the housing mix for future development.

Bullet point 4

Bullet point 4 of policy DM2 sets out a requirement for specialised housing to be considered on strategic development sites or site of 200 dwellings or more. While the principle of providing homes for specialist needs is laudable the Council should reconcile the policy requirement of bullet point 4 with that of policy DM1 which effectively seeks to secure the same policy aims.

Furthermore, specialist accommodation, in particular housing for the elderly, should be focused in highly sustainable locations such as local and district centres where there is a concentration of essential facilities and the social support network to enable any end users to live a long and fulfilled life. Moreover, specialist housing development is, by necessity, high density in its nature for operational reasons and as such is best suited to locations where higher density development would be in keeping. The wording for bullet point 4 should as such be reviewed in order to reflect the aims of policies DM1: Specialist Housing and DM3: Housing Density.

Bullet point 5

Bullet point 5 of policy M2 sets out a requirement for 3% of dwellings to be designed to Building Regulations Part M (4) Category 3. This is seemingly based on the identified need for 507 wheelchair accessible dwellings over the plan period as set out at para 12.9 of the HEDNA. The HEDNA breaks down this future requirement into a 60:40 split with 40 % of the requirement required to be affordable. On the open market customers are able to choose from a range of older persons' housing products.

Paragraphs 8.34 to 8.38 of the HEDNA effectively conclude that there is a higher need for wheelchair accessible homes in socially rented accommodation. As such the Council should be concentrating its policy efforts on securing accessibility standards for affordable dwellings where occupiers are limited in their choice of accommodation.

Bullet point 6

Policy DM2 bullet point 6 requires all new dwellings to be designed to Nationally Described Space Standards. A prerequisite to the adoption of the space standards are the following tests as set out in the Planning Practice Guidance (Paragraph: 020 Reference ID: 56-020-20150327).

“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- **need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
- **viability** – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- **timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”

Paragraph 7.18 of the Preferred Options Plan sets out the need for smaller units citing affordability issues as the primary reason for departure from the HEDNA requirement for the housing delivery to focus on 3 and 4-bedroom properties. The council has not undertaken an assessment of the justification for this requirement nor any assessment of the consequential impacts this is likely to have on affordability especially at the entry level price range. Instead at paragraph 7.22 the Council defers provision of this evidence on justification to the update of the Planning Obligations and Affordable Housing SPD (2016). Paragraph 7.5 of the Local Development Scheme (LDS) 2018 sets out that the timescales for the review of the Affordable Housing Planning Obligations SPD are unknown. Given the local plan timescales, the new plan is likely to be adopted prior to the review of the Affordable Housing and Planning Obligations SPD.

This in our view is an erroneous approach as the policy will effectively be based on non-existent evidence. On that basis the policy would fail the test of footnote 46 of the NPPF. Bullet point 6 should therefore be removed until such a time as the Council has produced the evidence to justify the requirement for NDSS and equally the viability evidence to indicate that the requirement of NDSS will not have a negative impact on affordability.

In addition to the above, the Council has not set out a transition period for the adoption of the space standards, thereby failing the third policy test.

Furthermore, notwithstanding the Council’s labelling of the policy requirement as a Development Management Policy it is in effect a strategic policy and deferring justification for a strategic policy to a non-strategic policy document is not a sound approach.

Policy DM8: Transport, Accessibility and Parking

Bullet point 4

Bullet point 4 sets out a requirement for development to incorporate the requisite infrastructure for charging plug-in and other ultra-low emission vehicles. Such infrastructure is essentially, within a residential setting, need only be a plug socket or after market plug-in charging point. On that basis the policy is essentially unnecessary for residential developments. The issue is however different for shared community facilities or non-residential development which by their nature would not have readily available private electricity supplies to enable charging of electric vehicles. As such the wording of bullet point 4 should be revised to reflect the need for charging points in non-residential development.

Bullet point 6

Bullet point 6 requires new development to provide adequate parking provision. For the avoidance of doubt the Council should include the parking standards as an annex to the Plan or make explicit reference to the relevant parking standards including the publication date.

Policy DM16: sustainable Design and Construction

Paragraph: 002 Reference ID: 56-002-20160519 of the Planning practice guidance sets out that,

Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans.

Bullet point 1

Bullet point 1 sets out a requirement for water consumption above and beyond those set out in Building Regulations. As set out above the need for these additional standards should be evidenced. The Council has not readily offered any evidence to justify the requirement for higher water efficiency. As such the bullet point 1 is not *justified* and would not meet the legal test of soundness.

Bullet point 6

See our response to Policy DM 2 bullet point 6.