



## Representation Form

### Local Plan Review: Preferred Approach Consultation

The consultation on the Local Plan Review: Preferred Approach will run from 13 December 2018 to 7 February 2019. The document and more information on the consultation can be viewed on our website [www.chichester.gov.uk/localplanreview](http://www.chichester.gov.uk/localplanreview)

**All comments must be received by 11.59 pm on Thursday 7 February 2019.**

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/localplanreview](http://www.chichester.gov.uk/localplanreview) (**Recommended**)
- Complete this form on your computer and email it to us at [planningpolicy@chichester.gov.uk](mailto:planningpolicy@chichester.gov.uk)
- Print this form and post it 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](mailto:planningpolicy@chichester.gov.uk) or telephone 01243 785166.

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Is this the official view of the organisation named above? Yes  No

<sup>1</sup> Where provided, we will use Agent's details as the primary contact.

## 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>.

To which part of the document does your representation relate?

Page/ Paragraph Number:	Please refer to attached document	Policy Reference:	Please refer to attached document
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Do you support, object, or wish to comment on this policy or paragraph?  
(Please tick one answer)

Support

Object

Have Comments

Enter your full representation here giving details of your reasons for support/objection:

Please refer to attached document.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Please refer to attached document.

(Continue on separate sheet if necessary)

### Declaration

I understand that any comments submitted will be considered by Chichester District Council in line with this consultation and will be made publicly available on their website [www.chichester.gov.uk](http://www.chichester.gov.uk) and may be identifiable by my name or organisation, if provided.

Name ( <i>print</i> ):	Sarah Beuden, Savills (on behalf of Bloor Homes)
Date:	07/02/2019

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# Representations on the Chichester District Council Preferred Approach Local Plan

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Land West of Tangmere



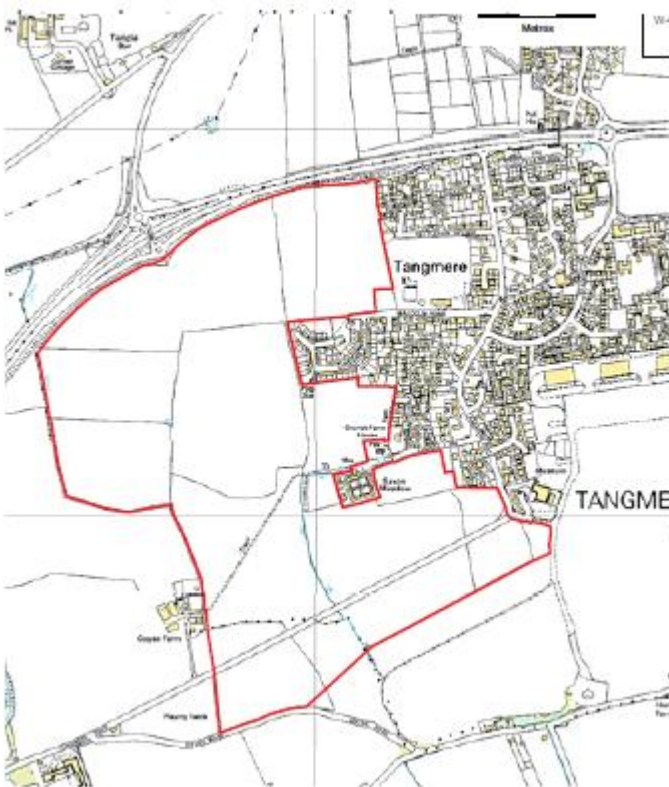
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## 1. Introduction

- 1.1. On behalf of our client, Bloor Homes ('Bloor'), Savills is responding to the Chichester District Council (CDC) Preferred Approach Local Plan, Regulation 18 Consultation, published December 2018.
- 1.2. This representation concentrates on Land West of Tangmere, which has been promoted through all previous stages of the Local Plan 2035 preparation. This site is included within the Preferred Approach Local Plan, in Draft Policy AL14.
- 1.3. The site, of approximately 73 hectares, currently comprises agricultural fields, and is bounded to the north by the A27. The proposal is for a residential-led development along with relevant infrastructure as well as community facilities, a school and open space.

**Figure 1: Site Location Plan - Land West of Tangmere**



- 1.4. The site has good access to the amenities within Tangmere, as well as the wider facilities in the area, as a result of the proposed main access via the A27.
- 1.5. Bloor, along with the other landowners, has been in detailed correspondence with the Council for a number of years, to progress this strategic development location, and fully support its continued inclusion within the emerging Local Plan documents.

- 1.6. For plan making, the Government, through the National Planning Policy Framework (NPPF)(2018), requires Local Authorities to plan positively, and seek new opportunities for development with sufficient flexibility to adapt to rapid change. These representations will review the proposed Draft Policies against the guidance contained within the 2018 NPPF, first looking at overall housing figures, before setting out comments in tabular form following the sequence of the Preferred Approach Local Plan.

## 2. Draft Policy S4: Meeting Housing Needs

- 2.1. Within the Preferred Approach Local Plan, Chichester District Council (CDC) has set out the housing provision across the plan period (2016-2035) within Draft Policy S4 and the supporting text.
- 2.2. This states that the Plan will make provision for an additional 12,350 dwellings over the plan period, equating to 650 dwellings per annum (dpa). According to the supporting text for the policy, this equates to the identified objectively assessed housing needs for the plan area, plus an allowance for accommodating unmet need arising from the Chichester District of the South Downs National Park.
- 2.3. In July 2018, the Government revised the National Planning Policy Framework (NPPF). This states that the policies contained within the Framework will be used in the Examination of Local Plans which are submitted after the transition period, which ends in January 2019. As a result, CDC's emerging Plan, which will be submitted for Examination after this time, will be assessed against the policies contained within this revised document, rather than the 2012 NPPF.
- 2.4. Through the adoption of the 2018 NPPF, the Government introduced a standardised methodology for the calculation of Objectively Assessed Needs (OAN) for the first time. This methodology seeks to provide one clear way of calculating OAN which can be used nationally, avoiding the discrepancies that previously arose through the creation of OANs within Strategic Housing Market Assessment (SHMA) Reports.
- 2.5. The Planning Practice Guidance, updated in September 2018, states: "*The standard methodology uses a formula to identify the minimum number of homes to be planned for, in a way which addresses projected household growth and historic under-supply*" (Para: 002, Reference ID: 2a-002-20180913, emphasis added).
- 2.6. Firstly, the projected average annual household growth over a 10 year period is used as a baseline, and this is then adjusted to take account of affordability using the workplace-based affordability ratios published by the Office for National Statistics (ONS). The standard methodology includes a cap which limits the increase in the minimum annual housing need figure that an individual authority can face, for example capping the figure at 40% above the average annual housing requirement set out in existing policies, if adopted in the last five years, or capping the figure at 40% above the projected household growth for an area.
- 2.7. In September 2017, when putting forward the first consultation on the standardised methodology, the Government published the OAN for each authority based on the proposed formula. For Chichester, this stated an OAN of 609 dpa.
- 2.8. Over the proposed Plan Period this equates to 11,571 dwellings.
- 2.9. It is recognised that the figure proposed in Draft Policy S4 is higher than the standard methodology OAN, however Bloor still wishes to object to this amount.

### Neighbouring Unmet Need

- 2.10. The 2018 NPPF places significant emphasis on working with neighbouring authorities to meet unmet need.
- 2.11. Chichester District is bounded by Havant, East Hampshire, Waverley, Horsham and Arun. There is also a proportion of the District which is located inside the South Downs National Park Area.
- 2.12. The South Downs National Park Authority (SDNPA) submitted its emerging Local Plan to the Secretary of State for Examination in 2018, with the Hearing sessions concluding in December. As part of this process, SDNPA agreed a Statement of Common Ground with CDC (signed April 2018), specifically focussing on unmet housing need. This Statement concludes an unmet need of 81 dpa for that part of Chichester District which falls within the National Park.
- 2.13. The proposed housing figure within Draft Policy S4 of 650 dpa shows that there will still be a shortfall of 40 dpa from the National Park which CDC has not accommodated.
- 2.14. However, as set out within the PPG, the standardised methodology should only be seen as a minimum number of homes to be planned for, and should be utilised as a 'starting point' for housing policies, rather than a cap or a maximum amount.
- 2.15. This is expressed within Paragraph 11b of the 2018 NPPF which states: "*Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met in neighbouring areas*" (emphasis added).
- 2.16. In addition, there is unmet need which can be seen in other neighbouring authorities which CDC appears not to have accommodated.
- 2.17. East Hampshire District Council (EHDC) is due to commence a Regulation 18 Draft Plan consultation in February 2019. This Draft document states that, in the area outside of the National Park, 10,456 dwellings will be provided between 2017 and 2036, equating to approximately 550 dpa (508.2 dpa from 2017 to 2028, and 608.2 dpa from 2028 to 2036). This is significantly lower than the standardised methodology OAN for EHDC of 617 dpa, indicating that there will be unmet need from East Hampshire which should be accommodated elsewhere.
- 2.18. Horsham District Council (HDC) is in the process of undertaking a Local Plan Review, however it has not published any significant housing evidence to date. The standard methodology OAN for Horsham equates to 974 dpa. This is significantly higher than the currently adopted housing policy which seeks approximately 800 dpa.
- 2.19. Furthermore, the 2017/18 Authority Monitoring Report (AMR) (January 2019) confirms that since the start of the current plan period in 2011, HDC has not consistently been able to achieve this figure, with total net completions currently equating to 5,540 dwellings, or an average of 791 dpa.
- 2.20. Although HDC's adopted housing trajectory indicates that monitoring years 2018/19 and 2019/20 will achieve over 1,000 net units, this falls away quickly, and by 2021/22 the Council is unable to meet the adopted housing target of 800 dpa, let alone the new standardised methodology OAN figure. Therefore,



CDC should look to include a buffer within its housing policies to accommodate the unmet need which is currently looking likely from neighbouring Horsham.

### **Employment Growth**

- 2.21. The September 2017 consultation, 'Planning for the Right Homes in the Right Places', published by the Government, notes that some LPAs may see a reduction in their housing needs compared to the existing approach, and this can be attributed to the proposed standardised methodology not making a specific adjustment to take account of anticipated employment growth.
- 2.22. The PPG 'Housing and Economic Development Needs Assessments' notes the relationship between job growth and location of housing, and states that where the supply of the economically active population (labour force supply) is less than the projected job growth, unsustainable commuting patterns may occur. One solution to address this problem suggested by the PPG is new housing.
- 2.23. It is therefore anticipated that, where a local planning authority has proposed employment growth, an uplift should be applied to the standard methodology to account for the subsequent housing growth that will be required to provide the labour force for these new jobs and to reduce any impacts of unsustainable commuting patterns. The PPG reiterates this and states that the Government is committed to ensuring that more homes are built, and therefore will be supportive of authorities who want to plan for more growth.
- 2.24. The Preferred Approach Local Plan contains 15 strategic allocations, most of which are residential led, however many also contain provision for employment land. Across the allocations, at least 26ha of employment land (Use Classes B1, B2 and B8) are proposed.

**Table 1: Employment Provision contained within Draft Policies of the Preferred Approach Local Plan**

<b>Draft Policy</b>	<b>Employment Provision</b>
AL1	6ha
AL2	4ha
AL5	9,300 sqm floorspace
AL6	33ha
AL13	TBC
AL15	2.4ha

- 2.25. This is in addition to Draft Policy DM9 which seeks to safeguard existing employment sites, and Draft Policy CM10 which allows new employment sites to be developed within existing settlement boundaries.
- 2.26. The PPG and the 2017 consultation are clear that the standardised methodology takes no account for proposed employment growth, yet the Housing Policies contained within the Preferred Approach do not appear to include any uplift to account for the substantial employment growth proposed in the Strategic Allocations.

- 2.27. The housing policies are therefore not positively prepared and would not be found sound at Examination.
- 2.28. It is recommended that, at this stage in the Local Plan preparation process, additional housing should be included within Draft Policy S4 in order to account for the significant proposed employment growth, and this could be achieved through increasing the number of dwellings proposed within Draft Policy AL14 Land West of Tangmere to 1,500 units.

### 3. Preferred Approach Local Plan: Other Draft Planning Policies

3.1. The comments on the relevant Preferred Approach Local Plan policies are set out below.

**Table 2: Detailed comments to the Preferred Approach Local Plan (December 2018)**

Location	Comment
<p><b>Local Plan Strategic Objectives, page 27</b></p>	<p>Bloor generally supports the Strategic Objectives of the Local Plan set out within the Preferred Approach, particularly in relation to increasing the housing supply; making provision for new dwellings of the right quality, location, type, size and tenure; and promoting the development of mixed, balanced and well integrated communities.</p> <p>It is questioned however whether Chichester District Council (CDC) has sought to increase the housing supply sufficiently to accommodate for unmet need and employment, as set out in Section 2 of this representation.</p>
<p><b>Paragraph 2.4.3.8 and Policy S2: Settlement Hierarchy</b></p>	<p>Bloor supports the recognition of Tangmere as one of the authority area’s significant settlement within the Section setting out the Characteristics of the Plan Area, and as a Settlement Hub within the Draft Policy S2 Settlement Hierarchy.</p> <p>The fact that the Authority only has five key settlements which are identified in this section supports the allocation of land within these areas, which should be seen as the most sustainable in the District. This in turn supports the allocation of Land West of Tangmere.</p>
<p><b>Policy S4: Meeting Housing Needs</b></p>	<p>As set out in section 2 of these representations, Bloor Homes considers that more consideration needs to be given to meeting the housing needs of neighbouring authorities and employment growth in calculating housing need, in order to ensure that housing needs are being met in full throughout the plan period (further details set out in section 2 above).</p> <p>In addition, paragraph 73 of the NPPF requires strategic policies on housing delivery to include a housing trajectory within the local plan, which should demonstrate how housing can be delivered over the plan period. This has not been included within the Preferred Approach, which makes it difficult to comment on anticipated housing delivery over the plan period.</p> <p>Bloor Homes consider that the Council's policies should recognise and support a phased approach to the delivery of strategic development sites, including that at Tangmere (ref: AL14) to enable early phases to come forward. This will enable allocated sites to contribute to the District’s housing needs earlier and throughout the plan period, thus demonstrating its effectiveness.</p>

Location	Comment
<p><b>Policy S6: Affordable Housing</b></p>	<p>The NPPF and PPG (2018) emphasise that role for viability assessment is primarily at the plan making stage to ensure that policies are realistic and that the total cumulative cost of policies will not undermine the deliverability of the plan (ref: 10-002 of the PPG). Further, the PPG states that it is the responsibility of plan makers in collaboration with developers to create realistic, deliverable policies and that policy requirements, particularly for affordable housing, should be set at a level that allows for the planned types of sites and development to be deliverable.</p> <p>Bloor Homes notes that the Council has not published its viability evidence to support this draft affordable housing policy. This goes against Government guidance and it is unclear as to how the Council has reached its proposed policy position and if this has taken into account, other policy requirements within the plan will impact on viability. Bloor Homes therefore objects to this policy in the absence of the viability evidence to support it.</p>
<p><b>Policy S12: Infrastructure Provision</b></p>	<p>Bloor Homes recognises that new developments within the District should provide the required supporting infrastructure, either through planning obligations or through the Community Infrastructure Levy (CIL). However, it is felt that Draft Policy S12 could include additional text to clarify the level of provision that would be required and should be supported with evidence to demonstrate that such provision would not undermine the deliverability of the plan. This is consistent with Government guidance, which states that it is the responsibility of plan makers in collaboration with developers to create realistic, deliverable policies and that policy requirements should be set at a level that allows for the planned types of sites and development to be deliverable.</p> <p>The policy should be clearer at Point 2 that this only relates to infrastructure which is required specifically to make the development acceptable in planning terms, and only can be required if they meet the test set out within the National Planning Policy Framework (NPPF) and the Community Infrastructure Levy Regulations 2010.</p> <p>Part 5 of the policy, which promotes the phasing of developments to co-ordinate with the delivery of infrastructure, facilities and services is supported.</p> <p>It is requested that the inclusion of “full fibre communications infrastructure” is removed from this Draft Policy, as this is reliant on wider sub-regional infrastructure, and may not be in the control of the developer or development site, meaning it would not meet the tests described above.</p> <p>Whilst the premise of the policy is supported, on the basis of the above, Bloor Homes currently objects to the wording of this policy.</p>
<p><b>Policy S24: Countryside</b></p>	<p>For clarity it is recommended that Policy S24 is amended to read:</p> <p><i>“Outside settlement boundaries <u>and allocations contained within this Local Plan as defined on the policies map</u>”</i></p>

Location	Comment
<p><b>Policy S32: Design Strategies for Strategic and Major Development Sites</b></p>	<p>Bloor Homes supports a master planned approach for Strategic and Major Development sites to ensure that they achieve the aspirations for development, as set out in the detailed allocations, in a coherent way and integrate with existing and neighbouring development. It is considered that the policy should be expanded to reference that Masterplans and/or the accompanying Design and Access Statement, should incorporate a Phasing strategy to demonstrate how Strategic and Major Development Sites can be delivered on a Phased basis, which is consistent with draft Policy 12.</p>
<p><b>Policy DM2: Housing Mix</b></p>	<p>Bloor Homes generally supports the provision of a range of housing types, sizes and tenures, which they seek to provide within their own developments to meet demand. However, it is considered that this policy, as drafted, is too prescriptive in terms of the mix and size of dwellings expected within each development and is likely to change over the plan period. In addition, it does not take into account more localised needs within specific settlements, where it may be identified that there may be a demand for a specific type or size of development. This too may change over the plan period. A Strategic Housing Market Assessment (SHMA) may be used as an evidence base to inform discussions and proposals regarding a specific site or development, but should not be translated into policy, which can become out of date due to shifts in market demands. This approach is supported by the NPPF, which recognises the need for policies to be sufficiently flexible to adapt to change (paragraph 11 of the NPPF).</p> <p>Part 6 of Policy DM2 states that: <i>“All housing should be designed to meet the National Described Space Standards (or any replacement standards)”</i>.</p> <p>The supporting text for this Policy identifies that the 2018 NPPF confirms that policies may make use of the national described space standards, but only where a need for such internal space standards can be justified. However, Paragraph 7.22 of the Draft Plan states: <i>“The Council will provide evidence as part of the revision of the Planning Obligations and Affordable Housing SPD”</i> (emphasis added). This indicates that the Council does not currently have the required evidence to justify the inclusion of these space standards through Policy DM2. Therefore, this should be removed from the draft plan.</p> <p>On this basis, Bloor objects to Policy DM2 as it is contrary to the NPPF because it is not flexible nor is it justified.</p>
<p><b>Policy AL14: Land West of Tangmere</b></p>	<p>Bloor largely supports the Draft Policy AL14 which seeks to allocate Land West of Tangmere for a residential-led development.</p> <p>However, as set out within the submission to the Housing and Economic Land Availability Assessment (HELAA) in September 2018, it is considered that the site can actually accommodate approximately 1,500 dwellings.</p> <p>Although the draft policy states a ‘minimum of 1,300 dwellings’ it is requested that this figure is increased to 1,500 in line with the HELAA submission.</p>

Location	Comment
	<p>This higher number of dwellings would assist in bolstering the Council’s housing land supply position through a site which has already been identified as sustainable and suitable for residential development. Furthermore, this will assist in delivering associated infrastructure that will benefit both existing and future resident.</p> <p>As per the comments on Policy S4, Bloor Homes consider that the Council’s policies for strategic development sites should recognise and support a phased approach to the delivery of such sites to enable early phases to come forward. This will enable allocated sites to contribute to the District’s housing needs earlier and throughout the plan period, thus demonstrating its effectiveness.</p> <p>With regard to this policy, Bloor also wishes to object to the details contained within points 2 and 8.</p> <p>Point 2 states that a range of types, sizes and tenures of dwellings will be required from the site, including specific provision “<i>to meet specialised housing needs including accommodation for older people</i>”.</p> <p>Bloor is not averse to providing specialised housing, where it is deemed to be appropriate. However, until the detailed masterplan is finalised, and a clearer indication is established of the level and cost of infrastructure that is to be provided, including the number, type and tenure of affordable housing, it will not be possible to confirm for definite that this specialist housing could be included or would be appropriate for the site.</p> <p>It is therefore recommended that this point is amended to read:</p> <p><u>“A range of types, sizes and tenures of residential accommodation, to be informed by the up-to-date housing needs of the Parish and the District at the time of application”</u></p> <p>This would also ensure that Policy AL14 remains in line with Policy DM2 which states that within the strategic allocations this specialised accommodation should be considered, but only where demand exists to meet a defined specialist need.</p> <p>Point 8 states that the development will be expected to conserve and enhance the heritage and potential archaeological interest of the village, surrounding areas, and World War II airfield, including “<i>the expansion or relocation of the Tangmere Military Aviation Museum</i>”.</p> <p>In May 2016, the Tangmere Parish Council adopted the Tangmere Neighbourhood Plan. This includes Policy 6 which relates to the expansion of the Military Aviation Museum into a neighbouring site to the north of the existing museum, in order to enable the facility to increase its scale of operations and visitor facilities.</p> <p>There is therefore no justification for why the expansion or relocation of the museum has been included in Draft Policy AL14, and this requirement should therefore be removed from the Draft Plan.</p>

Location	Comment
<p><b>Policy DM16: Sustainable Design and Construction</b></p>	<p>Bloor wishes to object to the requirement in Policy DM16 that at least 10% of energy from major developments should be supplied from renewable resources.</p> <p>It is recognised that future development should be energy efficient, and should seek to reduce greenhouse gas emissions where possible, however Parts 1-3 of this policy already look to go above and beyond the current Government targets contained within the Building Regulations and BREEAM.</p> <p>The 2018 NPPF recognises in Paragraph 153 that certain elements of a proposal may mean that it is not feasible or viable for a development to utilise decentralised energy supplies. However, this does not appear to be referenced within Policy DM16.</p> <p>It is therefore recommended that the policy is amended to read:</p> <p><i>“Where possible, suitable, feasible and viable, the energy supplied from renewable resources will be maximised”.</i></p>
<p><b>Glossary – Affordable Homes</b></p>	<p>The 2018 NPPF included a revised glossary which, for affordable homes, includes affordable housing for rent, starter homes, discounted market sales housing and other affordable routes to home ownership (e.g. shared ownership, relevant equity loans and other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy).</p> <p>There is no evidence provided by CDC why the Council wishes to deviate from these definitions, therefore the glossary of the Preferred Approach Local Plan should be updated to include the same definition of affordable housing as the NPPF, particularly in relation to Starter Homes which are a relatively new but growing tenure.</p>

## 4. Conclusion

- 4.1. This statement has provided representations to Chichester District Council's (CDC's) Regulation 18 consultation on the Preferred Approach Local Plan on behalf of Bloor Homes, and in support of the current Draft Allocation on Land West of Tangmere.
- 4.2. One of the most significant areas of concern that Bloor wishes to raise, is the proposed housing figures contained within the current iteration of the Draft Plan.
- 4.3. It is felt that the minimal uplift proposed on the Government's adopted standard methodology for objectively assessed need (OAN), is not sufficient for the District. This is especially in relation to unmet need from neighbouring authorities such as the South Downs National Park Authority and East Hampshire District Council.
- 4.4. Additionally, the Draft Plan proposes a significant amount of employment growth over the plan period, however the Government is clear that new job growth is not included as an uplift in the standard methodology. Therefore, Chichester is likely to see a situation where increases in the number of jobs within the District are not in line with housing increases, leading to unsustainable patterns of commuting and the potential for worsening affordability.
- 4.5. It is therefore recommended that the Draft Plan is updated to include a more significant uplift on the standard methodology OAN.
- 4.6. The proposed allocation on Land West of Tangmere could accommodate an additional number of dwellings, which could assist with providing this additional need. It is therefore requested for this residential-led allocation to be increased to a minimum of 1,500 new dwellings.



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