



## 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.

<b>PART A</b>	Your Details	Agent's Details (if applicable <sup>1</sup> )
Full Name		Kris Mitra
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Email		kris@genesistp.co.uk
Organisation (if applicable)		DG Phillips (Bosham) Ltd
Position (if applicable)		

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:		Policy Reference:	S2, S4, S24 & Settlement Boundary Map SB1 (Chichester)
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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:

The 'tests of soundness' for Local Plan preparation are set out in paragraph 35 of the NPPF2. They require the 2016-35 Local Plan to have been:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

We will deal with the tests more thoroughly in the next Submission Plan but at this stage our headline comments cover the following policies:

Settlement Hierarchy (S2), Housing Need (S4), Countryside (S24) and the settlement boundary marked on Proposed Settlement Boundaries SB1 (Chichester).

### Policy S2 – Settlement Hierarchy

The Settlement Hierarchy background paper provides justification for the hierarchy in Policy 2 of the Local Plan. It forms the basis for the proposed distribution of growth by distinguishing between those settlements considered to be the most sustainable having the best range of facilities and accessibility from those with the least. Most development is focused on the former and development to meet local needs or no development whatsoever on the latter. Chichester is defined as the Sub Regional Centre where the majority of development should be focused (paragraph 4.16).

### **Policy S4 – Meeting Housing Needs**

The identified housing need has been informed by GL Hearn's Chichester Housing and Economic Development Needs Assessment (January 2018)

The Assessment confirms the objectively assessed need (OAN) is capped at 40% above the adopted housing requirement. The Local Plan was adopted on the basis of approximately 435 dpa. Capping the OAN to 40% above the adopted figure gives Chichester a housing need of 609 dpa. The Plan actually provides for 12,350 dwellings over a 19 year period equivalent to 650dpa to meet the 609dpa plus 41dpa which are unable to be met within the District part of the National Park.

Whilst we understand the need assessment has been carried out in accordance with the standard method set out in PPG we suggest it has potential flaws as the 435dpa in the adopted plan already fails to meet need. It should also consider the un-met needs of other adjoining authorities not just the National Park.

Out of the total 12,350 dwellings, 4,400 or 35% are proposed as new strategic allocations. Given this significant reliance on large sites and the potential longer lead in times for housing delivery we therefore suggest the plan includes a trajectory for them especially as this would better comply with Paragraph 73 of the NPPF2.

In meeting need S4 includes amongst other matters known commitments comprising sites allocated within the adopted local plan but without planning permission (1,950) and strategic sites allocated (4,400) some of which have the benefit of planning permission. The identified long lead times for housing delivery would appear to be further compounded by the failure of sites allocated within the adopted Local Plan to come forward (1,950) as set out in S4. We consider that further housing allocations should be made to address the potential for under-delivery of housing over the plan period and to address the shortfall on the OAN highlighted above.

### **S24 Countryside**

Policy S24 deals with countryside and settlement policy boundaries. Not all settlements however are proposed for a settlement policy boundary review in the Local Plan. Boundaries not included will be reviewed through a subsequent Site Allocation DPD or a Neighbourhood Plan Review. According to the Local Development Scheme the Site Allocation DPD will not be adopted until July 2022 and the timetable for other Neighbourhood Plan reviews will vary.

We object to the way the settlement policy boundary reviews are proposed to take place in the Plan. We prefer an earlier boundary review now for all settlements in the Plan. A boundary amendment now would address the potential under-delivery of housing arising from a failure of existing site allocations coming forward and also the potential under-supply identified in the OAN. A boundary amendment now could also secure benefits from redevelopment opportunities of sustainable sites especially where they abut an existing boundary and relate more to a built up area than the surrounding countryside.

### **Settlement Boundary Map SB1 (Chichester)**

In order to more accurately reflect the status of strategic site allocations, the settlement boundary map for Chichester (SB1) should be amended to show the strategic allocation (AL1) to the west of Chichester. This site has the benefit of planning permission already. The settlement boundary should

be appropriately drawn to reflect the extent of the proposed settlement extension. It is illogical and misleading for some strategic site allocations to be shown and for others not to be. In order to address the potential under-delivery of housing we propose the allocation of approximately 9ha of land north of Brandy Hole Lane as shown on the attached plan. The site is capable of accommodating between 200-250 dwellings. Such an allocation would be contiguous with the revised Chichester settlement boundary and would form a clear edge to the settlement on the north side of Brandy Hole Lane. Access to the site can be achieved from Plainwood Close or Brandy Hole Lane and would link visually with the wider strategic allocation to the south of Brandy Hole Lane. All access points are within the ownership of the land owner.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Policy S4 - The Plan needs to include a housing trajectory of the strategic allocations to assist future monitoring of housing delivery as suggested by paragraph 73 of the NPPF2.

Policy S4 needs to be reviewed to take account of the potential for allocations within the adopted local plan not coming forward. The way to achieve this would be to consider further allocations. In any event, given the potential for the long delivery timeframe associated with Strategic Allocations, it is considered prudent that further housing allocations such as those on land north of Brandy Hole Lane and to the west of Plainwood Close should be made as shown on the attached plan. Such an approach would address the shortfall in housing and ensure that a 5-year supply of housing is maintained.

S24 & Settlement Boundary Map SB1 (Chichester) – The extent of the countryside area including the land north of Brandy Hole Lane the subject of these representations should be removed from the countryside designation and the settlement boundary extended to include the proposed site and Strategic Allocation site to the west of Chichester. This will provide a clearer and identifiable boundary encompassing the extent of the strategic allocation site and demonstrate that the rounding off proposed to the north of Brandy Hole Lane will be an appropriate extension of the settlement.

(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> ):	Kris Mitra
Date:	7 February 2019