



## 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	<i>Elberry Properties Ltd</i>	<i>Kerry Simmons</i>
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Organisation (if applicable)		
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, AL3
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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 in relation to available land at Lansdowne Nursery and Sherwood Nursery, East of Chichester:

Settlement Hierarchy (S2), Housing Need (S4) and AL3 Land East of Chichester (Oving Parish)

### 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. In this regard we

agree with the principal of the strategic allocation at East of Chichester being the sub regional centre in the Plan.

#### **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. This might justify future additions to the identified strategic sites like AL3 should need have been under estimated.

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. This would include AL3.

#### **Policy AL3 – Land East of Chichester (Oving Parish)**

The East of Chichester development location is planned as an extension of Chichester City, south of the Shopwyke strategic development location, forming a new neighbourhood. The site is identified for 600 dwellings however paragraph 6.22 states that there may be potential to deliver a larger strategic development of 1000 dwellings.

The proposed strategic site allocation encroaches on Oving Parish and in the event the need for an extension to the allocation is accepted, the Council would be obliged to consider a further amendment to the settlement boundary to Chichester as it has done in connection with the policy AL2 Shopwyke Existing Strategic Site Allocation.

Our client has an interest in and controls land at Lansdowne Nursery and Sherwood Nursery; the two nurseries are located on Drayton Lane. Sherwood Nursery adjoins the eastern boundary of the proposed strategic site allocation AL3 and Lansdowne Nursery is on the opposite side of the road.

The nursery sites comprise disused buildings. The two available sites are too large to come forward as windfall sites and it is therefore our preference that they form part of a wider strategic allocation

master plan to provide additional flexibility in meeting additional housing and secure a positive contribution towards the delivery of 1000 dwellings within the strategic allocation.

On this basis we would point out that 3.8ha of land with a capacity of around 23-30 dwellings per hectare is available on land at Sherwood Nursery and Lansdowne Nursery. The land is not constrained by any access, infrastructure, biodiversity or landownership constraints.

We therefore invite CDC to consider the available sites for inclusion within the strategic site allocation as this would better comply with the 'positively prepared' test of soundness in meeting housing need, the 'effective' and 'consistent with national policy' tests of soundness.

(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 AL3 – Amend the boundary of the proposed strategic site allocation to include land at Sherwood Nursery and Lansdowne Nursery.

(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> ):	Kerry Simmons
Date:	7 February 2019