



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

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 (**Recommended**)
- Complete this form on your computer and email it to us at 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 or telephone 01243 785166.

PART A	Your Details	Agent's Details (if applicable ¹)
Full Name		Paul White
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Organisation (if applicable)	Chichester Grain Ltd	
Position (if applicable)		

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

¹ 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, AL13, S12
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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 of relevance to Southbourne:

Settlement Hierarchy (S2), Housing Need (S4), Parish Housing Sites (S5) Countryside (S24) and AL13 (Southbourne).

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. We agree that Southbourne is correctly identified as a settlement hub in the hierarchy background paper being the

3rd largest settlement behind Chichester & Selsey in terms of population and having 26 total facilities.

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.

Policy AL13 – Southbourne Parish

We support the allocation of land for a minimum of 1250 dwellings at Southbourne Parish and note from paragraph 6.89 that Southbourne Parish Council is preparing a revised neighbourhood plan for the parish which will identify potential development site(s). Whilst we accept that site selection will be a matter for the Parish rather than the District we prefer the principle of having more than one site to meet the strategic allocation as part of a dispersed strategy across the District. Spreading development over more than 1 site would assist short term housing delivery and minimise the long lead in times that the very large strategic sites are suffering in the current Key Policies Local Plan. The associated community infrastructure could still be delivered over more than 1 site in accordance with the Infrastructure Delivery Plan's requirements and the CIL levy.

Policy S12

We support policy S12 which refers to the Council's Infrastructure Delivery Plan (IDP). However the Local Plan Policy or the IDP itself should make clear, **for at least the first five years**, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development. This is not set out in either S12 or the IDP (paragraph 15.4) which specifically deals with the Southbourne allocation. Paragraph 15.4 of the IDP should in addition state that 'the parish is allocated for residential development of 1250 dwellings' rather than 'the site is...' in recognition that more than 1 location might be selected for the allocation.

With regard to site selection our client controls land at Chichester Grain, Priors Leaze Road just within the parish of Southbourne. The land comprises a little over 2ha and the attached plan shows it has capacity for around 50 dwellings with open space and landscape buffer planting. The access has been informed in light of advice from a highways consultant and an attached note shows that the land can be accessed for the proposed number of dwellings. Combined with other larger sites as part of a dispersed strategy, the 50 units could contribute to the Southbourne allocation and deliver a housing supply in the early part of the plan period with the larger sites with longer lead in times coming later.

(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 AL13 – the allocation of 1250 dwellings minimum to Southbourne Parish is supported but the allocation should be spread across more than one site. Spreading development over more than 1 site will assist short term housing delivery and minimise the long lead in times that the very large strategic sites are suffering in the current Key Policies Local Plan. This would not impact on infrastructure delivery because it would still be identified and phased in the IDP. Policy AL13 could therefore state ‘A site or a combination of sites will be allocated for development in the revised Southbourne Neighbourhood Plan....’

Policy S12 should be amended as explained above.

(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 and may be identifiable by my name or organisation, if provided.

Name (print):	Paul White
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Date:	7 February 2019
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