



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		Ian Johnson
Address		30 Carlton Crescent, Southampton
Postcode		SO15 2EW
Telephone		02380 633440
Email		ianjohnson@lukenbeck.com
Organisation (if applicable)	Seaward Properties	Luken Beck
Position (if applicable)		Managing Director

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:	Page 36	Policy Reference:	S4: Meeting Housing Needs
----------------------------	----------------	-------------------	--------------------------------------

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:

We are pleased to see that the Local Plan is progressing although we consider the approach to meeting the District's local housing need and the development strategy is 'unsound'. The policy requirement to deliver 12,350 dwellings over the Plan period (2016-2035) is based upon the Standard Method of assessment. The application of the Standard Method without sufficient adjustment to meet some of the needs of the adjoining authorities or the specific social and economic circumstances of the District increases the risk of failing to meet the full local housing need. The policy is therefore not considered to be positively prepared or consistent with national policy.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Paragraph 60 of the NPPF requires strategic policies to identify a minimum number of homes, through undertaking a standard method of assessment. The Planning Practice Guidance (ref. Housing Need Assessment, PPG) describes the standard method of assessment and states a 40% cap above the average annual housing requirement should be applied where existing planning policies are less than five years from their date of adoption. Whilst the purpose of the cap is to help ensure the minimum local housing need figure is deliverable, the PPG also states (ref. 007 Reference ID: 2a-007-20180913) that the cap does not reduce the housing need itself. The housing need is therefore greater within the District than is currently being planned for through the standard method of assessment.

The requirement for a more ambitious approach to housing supply is further supported by the disparity between the sum of local housing need assessment, calculated using the standard method amounting to c. 264,000 a year (ref. 2014 household projection figures) against the Government's commitment to delivering 300,000 homes a year by the mid-2020's (i.e. an annual shortfall of 36,000 homes).

In order to be consistent with the NPPF requirement to significantly boost the supply of homes and address the constraints of the 40% cap and limitations of the standard method it is clearly not the Government's intention for the identification of a minimum number of homes to be the automatic end point for Local Authorities when identifying a sufficient amount and variety of land in their emerging Local Plans.

The proposed policy wording is **not positively prepared, consistent with national policy or will it be effective** in delivering the District's full local housing need in sustainable locations, such as the Settlement Hubs and Service Villages. We therefore request the Council review the approach towards meeting the full local housing needs of the District and plan for an increased supply of housing over the Plan period, in particular within the early years of the Plan.

(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 (<i>print</i>):	Ian Johnson
Date:	07.02.19