



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		Hywel James
Address	c/o Agent	5th Floor, Thames Tower, Reading
Postcode		RG1 1LX
Telephone		01182 149340
Email		h.james@nexusplanning.co.uk
Organisation (if applicable)	CEG	Nexus Planning
Position (if applicable)		Senior Planner

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:	Paragraph 4.22	Policy Reference:	
----------------------------	----------------	-------------------	--

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 see separate sheets below

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Please see separate sheets below

(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>):	Hywel James
Date:	05/02/2019

Chichester Local Plan Review - Regulation 18 Preferred Options Consultation

Paragraph 4.22

1. Paragraph 4.22 of the Local Plan Review states that:

"This Plan seeks to make provision for an additional 12,350 dwellings to be delivered during the period 2016-2035 in accordance with the findings of the Chichester Housing and Economic Development Needs Assessment (HEDNA). This reflects the identified objectively assessed housing needs of the plan area, plus an allowance for accommodating unmet need arising from the Chichester District part of the South Down National Park."

2. Given that the Plan will be submitted to the Secretary of State for Examination post 24th January 2019 it will be examined in accordance with the provisions of the NPPF 2018. Paragraph 60 of the NPPF is clear that:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach..." (our emphasis)

3. Accordingly, at face value, the references to a HEDNA and 'objectively assessed housing needs' are incorrect and misleading. Instead, the housing requirement in the Local Plan Review should be derived from a local housing needs assessment based on the standard methodology, and this should be clearly stated here.
4. Despite the confused references, it seems as though the HEDNA document is in fact a document that sets out how the standard methodology has been applied (correctly utilising the 2014-based household projections in accordance with the clear guidance provided by the government in the 'Technical consultation on updates to national planning policy and guidance' October 2018). The 12,350 additional dwellings identified for the period 2016 -2035 is consistent with the application of the standard method (whilst additionally accommodating unmet needs of 41dpa from the South Downs National Park).
5. However it is important to note that this standard methodology figure for Chichester is a figure capped at 40% above the average annual housing requirement in accordance with PPG ID. 2a-004.

Representations to paragraph 4.22 continued

As set out in further detail in our representations to Policy S4, this means that there are genuine needs for Chichester that are not being met by the application of this cap yet there seems to have been no consideration on whether delivering a higher number, closer to or meeting the standard methodology 'uncapped' figure, was achievable.

Proposed Changes

Amend the supporting text to Policy S3, including paragraph 4.22, to ensure that references are consistent with the language and approach required by the NPPF 2018 and the PPG.