



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
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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:		Policy Reference:	AL9
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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:

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

Policy AL9 - Fishbourne Parish

1. As set out in our representations to Policy S4, the Local Plan Review does not provide any flexibility with respect to the supply of housing. Thus, each of the identified strategic locations and allocations are required to deliver in full, and in a timely manner, in order for the Plan to meet its identified requirement (which itself is significantly lower than the actually identified need for housing in the District).
2. Further to our representations to Policy S5, we have significant reservations in terms of the proportion of the overall housing supply that is proposed to be delegated / deferred to parish neighbourhood plans. Indeed, contrary to the impression given by Policy S5 (which indicates that just 500 homes are allocated to the parishes), it is in fact the case that of the proposed District-wide supply, 2,500 homes are delegated to neighbourhood plans (by Policies AL8 – AL11 and AL13), with a further 500 homes required to be allocated by neighbourhood plans on non-strategic sites (see Policy S5). This places an extremely high reliance on neighbourhood plans to deliver the majority of genuinely new housing allocations in the District.
3. This is a very high risk strategy given the uncertainties associated with, and resources available to, neighbourhood planning. However, this risk is exacerbated by the fact that Policy S4 provides no flexibility in terms of housing supply, requiring all allocated housing to be delivered in full, and in a timely manner, to meet even the minimum housing number identified.
4. Policies AL8-AL11, and AL13 are included within the Plan under the overarching heading 'Strategic Site Allocations' (our emphasis). However this is misleading as none of these policies make any strategic site allocations. Instead, they simply allocate a (significant) housing number to each parish to be allocated by the relevant neighbourhood plans. Accordingly, other than the scale of the housing numbers in these policies, the approach is no different to that set out in Policy S5.
5. The National Association of Local Councils ("NCLA") report titled: 'Where Next for Neighbourhood Plans' (October 2018) identifies that neighbourhood plans generally take 2-3 years to produce, with 5 years not being unusual. This is also our experience. This means that any housing that is expected to be provided through neighbourhood plans cannot reasonably be relied upon during at least the first five years of the Plan (the lack of a housing trajectory in the Plan means that it is

not possible to determine when the Council relies on housing delivery from neighbourhood plan allocations - see our representations to Policy S4).

6. The Fishbourne Neighbourhood Plan 2014-2029 was made in March 2016 (and subsequently subject to a minor modification in November 2016). It allocates two sites to deliver 65 dwellings within the neighbourhood plan period. Policy AL9 of the Local Plan Review requires the production of a revised neighbourhood plan to allocate at least a further 250 dwellings – a significantly higher number than was previously the case. There is no evidence to suggest that Fishbourne Parish Council has considered potential housing sites capable of cumulatively accommodating a minimum of 250 further dwellings. Moreover, it is unclear whether the Parish Council has agreed to accommodate such a significant level of growth within the Parish, and actively seek to deliver it through a revised neighbourhood plan.
7. For these reasons we question the deliverability of 250 homes at Fishbourne through a neighbourhood plan process, particularly given the scale of other neighbourhood plan allocations also relied upon elsewhere in the District to meet the Council's minimum housing requirement.