



## 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		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

<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:	S5
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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](http://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 S5 - Parish Housing Requirements

1. Policy S5 indicates that a total of 500 homes are being allocated to small scale housing sites in the parishes to be identified through neighbourhood plans or a subsequent development plan document. Clearly there is government support for neighbourhood planning as a concept and as such we do not object in principle to this approach. Furthermore, if the extent of such allocations was genuinely 500 homes then we would also not take issue with it. However, Policy S5 is misleading as to the extent of allocations being passed to neighbourhood plans, and there is a lack of clarity and justification for the scale of some of the housing figures being attributed to different parishes. We expand on these issues below.

#### Parish Housing Distribution

2. Policy S5 is clear that the majority of the parishes are not being allocated any housing (presumably on the basis that they are not sustainable locations for development). The 500 homes referenced in the policy are focussed on just 8 of the parishes. However there is a lack of clarity and justification for the figures identified.
3. Loxwood and Birdham parishes, for example, are identified as providing 125 dwellings each whilst Westhampnett, located adjacent to Chichester City (the District's most sustainable settlement in accordance with Policy S2) is only due to provide 50 dwellings. As highlighted within our representations to paragraph 4.103 and Policy AL4, there is no further housing being proposed in Westhampnett Parish through any of the Local Plan Review's strategic allocations, as the 500 homes allocated to the Westhampnett / North East Chichester SDL were in the adopted Local Plan and all of these homes now have planning permission.
4. We are therefore unclear as to the justification for providing 2.5 times more housing at Loxwood and Birdham than at Westhampnett.
5. In addition, we are unclear why the parish of Wisborough Green is allocated with 25 homes but North Mundham is allocated for 50 homes. No explanation is provided.

6. The Council must provide clarity as to the logic and rationale behind these parish apportionments, having regard to its spatial strategy and the sustainability of the various locations.

#### Misrepresentation of the Scale of Parish Allocations

7. The title of Policy S5 is 'Parish Housing Requirements 2016-2035'. It would therefore generally be assumed that this policy identified the scale of development that the Council is allocating to the parishes to allocate for themselves by way of neighbourhood plans. However the policy is misleading as a number of parishes with an identified 'zero' allocation are in fact being required to allocate a significant amount of development under other policies. We accept that the policy does, by way of asterisks, indicate where parishes have a strategic allocation elsewhere in the Plan, but the presentation of this matter is misleading and unhelpful, giving the impression that only a small quantum of housing is being delegated to neighbourhood plans to allocate when in fact the amount of housing delegated to neighbourhood plans is very significant.
8. By way of example, Policy S5 indicates that no housing is allocated to the parish of Southbourne. But reference to Policy AL13 confirms that Southbourne Parish, by way of a revised neighbourhood plan i.e. exactly the same method as under Policy S5, is actually being asked to allocate a minimum of 1,250 additional houses – a phenomenal amount for a neighbourhood plan to address. The same applies to a range of other parishes where often very significant amounts of additional housing are allocated under other policies in the Plan. We address this further in our representations to Policy AL13 and others.
9. Whilst we understand that the Council is seeking to distinguish between strategic scale development and smaller scale developments, it is wholly misleading to present the extent of allocations delegated to the parishes as part of neighbourhood plans in this way.

#### Proposed Changes

10. In light of the above, the Local Plan Review should be amended to present allocations to parishes via neighbourhood plans in a clearer and comprehensive way that accurately reflects the extent of these allocations. In addition, clarity and justification should be provided to establish the rationale for the allocation of the different amounts of housing at the various parishes.