



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	Mr Jeff Ferguson	Paul White
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Organisation (if applicable)		
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, 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:

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 in relation to West Wittering:

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

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 West Wittering is properly classified as a service village in the hierarchy.

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.

In meeting need S4 includes a 'windfall small sites allowance' of 695 dwellings and a Parish sites allowance of 500 dwellings. They are both an important land supply component as they will help deliver completions on smaller sites and maintain housing supply in the short term before the larger strategic sites come forward. We welcome both.

With particular reference to windfalls, the glossary to the Plan defines them as sites which have not been specifically identified as available in the Local Plan process, normally comprising previously-developed sites that have unexpectedly become available. The revised NPPF2 (paragraph 84 and 117) is supportive of the re use of previously developed land in general including sites that are physically well-related to existing settlements where suitable opportunities exist. Paragraph 118 c) states that planning decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. Even in countryside locations paragraph 79 c) is supportive of new homes where development would re-use redundant or disused buildings and enhance its immediate setting.

We therefore propose the definition of windfall sites in the Local Plan glossary is clarified to make clear that they comprise previously developed sites that have unexpectedly become available within settlements and in rural areas outside a settlement boundary. This clarification would benefit the Local Plan in better meeting the 'consistent with national policy' test of soundness.

Policy S5 – Parish Housing Sites

Parish housing allocations comprise 500 dwellings and paragraph 4.26 of the Plan says they have been distributed amongst the settlements in accordance with their ranking in the settlement hierarchy.

However, we are concerned that the proposed distribution does not do this for West Wittering. For instance it is only allocated 25 units which under represents its service village ranking in the Hierarchy background paper of 6th largest of all settlements in terms of population with 16 facilities, second only to Bosham and Broadbridge with 21. We suggest that West Wittering should therefore take a greater share of housing than is currently proposed. A figure of 50-100 dwellings would be appropriate.

(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.

We also request the definition of windfall sites in the Local Plan glossary is clarified to make clear that they comprise previously developed sites that have unexpectedly become available within settlements and in rural areas outside a settlement boundary. This clarification would be in accordance with national policy in the NPPF2 and benefit the Local Plan in better meeting the 'consistent with national policy' test of soundness.

Policy S5 - The housing distribution amongst the parishes needs to be reconsidered for those settlements which score more highly in the settlement hierarchy background paper. We believe West Wittering is justified for more than 25 dwellings given its position in the hierarchy as the 6th largest settlement and second in terms of number of facilities. Up to 50-100 dwellings would be more appropriate.

A plan is attached showing land at Bramber Nursery West Wittering. This is a previously developed site and could come forward as a windfall opportunity if the revision to the definition of windfalls is agreed as above. If the change is not agreed, it could come forward as an allocated site in the emerging West Wittering Neighbourhood Plan and count against the 25 dwelling allocation in policy S5 or the higher figure proposed in these representations.

(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>):	Paul White
Date:	7 February 2019