



## 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		Paul White
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Organisation (if applicable)	Seaward Properties Ltd	
Position (if applicable)		

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:	S2, S4, S5, S24
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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:

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 Bosham 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. The preceding paragraph 4.25 says some large scale strategic development will be expected to be provided for through neighbourhood plans too.

At present the entire 250 housing allocation for Bosham parish is set out in policy AL7 as a strategic allocation to come forward at Highgrove Farm. There is a nil allocation for the parish in policy S5.

We object to this as it implies all new housing has to be found on new large strategic sites within the parish and overlooks the potential capacity for unidentified sites to come forward within and adjoining the existing built up area as a result of modest settlement policy boundary adjustments. We disagree that any site within the AONB of Bosham should be ruled out for development in principle.

There are existing previously developed sites in the AONB including land at the former Burnes Shipyard which adjoins the settlement boundary of Bosham. Its redevelopment for a modest scheme of dwellings would secure the removal of the existing unsightly buildings and bring net benefits to the appearance of the AONB. A simple settlement policy boundary amendment to include the boatyard would facilitate this. It could then either count against the ‘windfall allowance’ of 695 dwellings in policy S4 or towards a new parish allowance for small sites in S5. Any new parish allowance in S5 should show an equal reduction in the strategic site allowance in AL7.

### **S24 Countryside**

Policy S24 deals with countryside and settlement policy boundaries. Not all settlements however are proposed for a settlement policy boundary review in the Local Plan. Boundaries not included will be reviewed through a subsequent Site Allocation DPD or a Neighbourhood Plan Review.

According to the Local Development Scheme the Site Allocation DPD will not be adopted until July 2022 and the timetable for other Neighbourhood Plan reviews will vary.

We object to the way the settlement policy boundary reviews are proposed to take place in the Plan. We prefer an earlier boundary review now for all settlements in the Plan. A boundary amendment now could increase the supply of windfall sites in an urban area and reduce the requirement for new greenfield allocations in the later DPD or Neighbourhood Plan. A boundary amendment now could also secure benefits from redevelopment opportunities of previously developed sites especially where they abut an existing boundary and relate more to a built up area than the surrounding countryside.

However if boundary reviews of all settlements are not to be made in the Plan we would request policy wording to the last sentence of S24 be amended as follows:

**‘Defined settlement boundaries may be altered by a future development plan document and/or a**

neighbourhood plan. In the interim, where a boundary amendment is justified against the key requirements of the settlement boundaries background paper that should be regarded as a material consideration in connection with the submission of any planning application’.

(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 suggest 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. Both amendments would benefit the Local Plan in better meeting the ‘consistent with national policy’ test of soundness.

We propose a settlement policy boundary amendment to Bosham to include land at Burnes Shipyard.

Consideration should be given to an additional small site allowance Bosham in Policy S5. Whatever allowance is agreed, an equal reduction to the housing proposed in AL7 as a strategic allocation should be made.

Policy S24 should have additional wording as suggested above.

(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> ):	Paul White
Date:	7 February 2019