



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		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

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, AL10
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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) Countryside (S24) and AL10 (Chidham & Hambrook Parish).

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 Chidham/Hambrook is correctly identified as a service village in the hierarchy. However the table in

the Policy S2 refers to Hambrook/Nutbourne and yet the list of Parish housing sites in policy S5 refers to Chidham & Hambrook parish. Policy AL10 also allocates 500 dwellings to Chidham and Hambrook parish.

For consistency, we'd suggest that Chidham and Hambrook parish is used throughout.

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.

Policy AL10 – Chidham & Hambrook Parish

We support the allocation of land for a minimum of 500 dwellings at Chidham & Hambrook Parish as a sustainable extension or extensions to the existing built up area of Chidham and Hambrook. We note from paragraph 6.68 that Chidham and Hambrook Parish Council is preparing a neighbourhood plan for the parish which will identify potential development site(s) to meet the allocation. We support the principle of having more than one site to meet the strategic allocation of 500 dwellings. Spreading development over 2 or more sites will assist short term housing delivery and minimise the long lead in times that the very large strategic sites are suffering in the current Key Policies Local Plan.

In this regard, Seawards owns and controls approximately 11.5 ha of land at Cox's Barn Farm, Broad Road, Hambrook. The site has a capacity of around 300 dwellings minimum and a draft development proposal has already been forwarded to the Parish for consideration in its Neighbourhood Plan Review. A copy of the development proposal accompanies these representations for information.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Policy S2 – Chidham & Hambrook parish should be referred to throughout.

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.

Policy AL10 – the allocation of 500 dwellings minimum to Chidham & Hambrook Parish is supported but the allocation should be spread across more than one site. Spreading development over 2 or more sites will assist short term housing delivery and minimise the long lead in times that the very large strategic sites are suffering in the current Key Policies Local Plan.

(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