



KIRDFORD PARISH COUNCIL'S RESPONSE TO

**Chichester District Council's Consultation
Draft Interim Policy Statement for
Housing Development**



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1. Introduction

1.1. Troy Planning + Design has been commissioned to prepare and submit a response to Chichester District Council's (CDC) consultation on its Draft Interim Policy Statement for Housing Development (IPS) on behalf of Kirdford Parish Council (referred to as 'KPC').

1.2. We trust this document provides CDC with a succinct outline of KPC's key points in relation to the IPS document.

Housing Need and Supply

1.3. KPC recognises that CDC has a duty to undertake a Local Plan Review which is underway. Paragraph 33 of the National Planning Policy Framework (NPPF)¹, states that *"relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future"*.

1.4. Paragraph 2.3 of the IPS states: *"This statement aims to provide interim guidance which will apply until the Council considers it has a five year supply of housing in line with Government guidance"*. It is unclear whether CDC has concluded that it does or does not have a five-year supply of housing. In any case the IPS should be accompanied by an 'Annual Position Statement' on supply as set out in the NPPF (see paragraph 74) which states that *"A five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement which:*

- a) has been produced through engagement with developers and others who have an impact on delivery, and been considered by the Secretary of State; and
- b) incorporates the recommendation of the Secretary of State, where the position on specific sites could not be agreed during the engagement process."

1.5. Ideally an Annual Position Statement on housing land supply would have been available for comment as part of this consultation for useful input by all parties. It would be helpful for CDC to indicate if it will indeed prepare, consult and publish an Annual Position Statement' and what the timing will be.

1.6. The IPS outlines a housing delivery figure of 628 dwellings per annum (dpa), compared to the previously adopted Local Plan figure of 435 dpa and 650 dpa in the emerging Local Plan. It is unclear from the IPS consultation document where the figure of 628 dpa is derived from apart from the single reference to the Government's 'standard methodology'. The only evidence referred to in the IPS is (see Paragraph 4.9) is the Housing and Economic Land Availability Assessment (HELAA), the Strategic Flood Risk Assessment, the Water Quality Study and the Infrastructure Delivery Plan. We understand the HEDNA (2018) to be the most recent evidence on housing need published by CDC however this is not referred to in the IPS which leaves a significant level of uncertainty and ambiguity as to where the consultee should look for further reading on how the figure of 628 dpa has been arrived at.

1.7. We note that the HEDNA (2018) uses the PPG's three-step process for assessing local housing need using the 2014 based household projections. It would be extremely helpful for CDC to set out

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

clearly how it has arrived at its proposed figure of 628 dpa. Given this has not been provided to consultees, it is not possible to respond to the appropriateness or otherwise of the housing figure proposed by CDC. We provide commentary below on how the housing figure has been arrived however this is a speculative exercise and should be clearly set out by CDC to avoid consultees having to speculate.

1.8. The IPS states that the approach used to assess housing need (in cases where local plans have been adopted more than 5 years ago) derives from the Government's standard methodology, which follows the principle that *"calculating local housing need provides a minimum number of homes to be planned for"*².

1.9. Furthermore, it appears that the defined housing delivery figure of 628dpa does not align with CDC's existing evidence base, as the Housing and Economic Development Needs Assessment (August 2018)³ states that *"capping the OAN to 40% above the adopted figure gives Chichester a housing need of 609 dwellings per annum."* This reduced housing need figure (609dpa) is also referenced throughout the District Council's Housing Background Paper (2019)⁴.

1.10. Based on the justifications provided within the Housing Background Paper (2019), it is noted that an additional 41 dwellings per annum (over the period 2016-2035) would be added to the HEDNA housing need figure (609dpa), to *"accommodate the majority of the unmet need arising from that part of Chichester District which is located within the South Downs National Park"*. This is set within the context that (with regard to the South Downs National Park) *"given the particular characteristics and responsibilities of national parks, the standard method should not be used in such instances"*.

1.11. Taking into account the above, Policy S4 (Meeting Housing Needs) of Chichester's Local Plan Review 2016-2035: Preferred Approach stipulates that there is a total supply of 12,478 dwellings 2016-2035 over the Plan Review period, equating to 657 dwellings per annum. This figure generally aligns with the HEDNA figure (609dpa) with the additional unmet net arising from the South Downs National Park (41dpa).

1.12. With reference to the above, it is unclear why an annual housing need figure of 628 dwellings per annum has been outlined within the IPS. As such, KPC seeks further clarity on this matter to ensure that an accurate housing need figure has been assessed.

1.13. Given such a significant proposed change to the previous housing target, CDC should have consulted on this matter earlier and allowed more time to consider responses instead of leaving the close of the consultation two working days before the introduction of a new housing target that represents a step-change in housing delivery each year for the District.

Impact of Covid-19 and Brexit

1.14. Whilst KPC appreciates that there is a degree of uncertainty regarding the UK's housing market given the current Covid-19 pandemic and Brexit, it is clear that there has been a disregard for the potential implications of both Covid-19 and Brexit within the IPS. As such, the IPS and its supporting evidence should refer to paragraph 33 of the NPPF, which states that (our emphasis) *"reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy."*

² <https://www.gov.uk/guidance/housing-supply-and-delivery> (Paragraph: 001 Reference ID: 68-001-20190722, Revision Date: 22 July 2019)

³ <http://www.chichester.gov.uk/CHttpHandler.ashx?id=33647>

⁴ <http://www.chichester.gov.uk/CHttpHandler.ashx?id=31220>

1.15. Recent research⁵ suggests that national net additions to housing stock (based on the 2008 recession recovery rate) could slump to just 160,000 completions in 2020/2021, and 150,000 completions in 2021/2022, compared to 244,000 completions in 2019/2020.

1.16. In terms of housing demand and wider market signals, research⁶ shows that in June 2020 *“there is currently an ongoing release of pent-up demand, which may trigger a spike of housing transactions in England over summer 2020”*. The research adds that *“uncertainty around values and rising unemployment will add to lender caution, particularly when lending at higher loan to value and loan to income ratios. The risk of a ‘hard Brexit’ at the end of the year may weaken business appetite to recruit more staff, slowing any rebound in employment”*.

1.17. Given the degree of uncertainty of both Brexit and Covid-19, there have been recent calls to review and replace the PPG’s standard methodology⁷ to ensure that the approach adopts a realistic assessment of housing need. In light of this, it seems that the draft IPS and the evidence supporting it may be based on outdated assumptions regarding the UK’s future economic development and growth and hence housing need assumption. Therefore, KPC suggests that CDC revisits its HEDNA, to ensure that future growth policies are achievable and deliverable, as per paragraphs 33 and 67 of the NPPF⁸.

Kirdford Parish

1.18. Paragraph 4.5 of the IPS states that *“sites should be sustainably located in relation to existing settlements, with access to the facilities and services that are generally likely to be required by new residents. Policy 2 of the CLPKP, and emerging Policy S2 of the LPR, sets out the settlement hierarchy which will inform consideration of any proposed site”*.

1.19. KPC notes that Kirdford is classified as a “service village” in Policy S2 of the Local Plan Review, which is defined as *“a village where there is an opportunity to provide development based on the strategy of dispersing development across the plan area in conjunction with land being available in suitable locations.”* This aligns with the adopted CLPKP, which regards Kirdford as a “service village”, (areas which will be the focus of new development and facilities, including ‘small scale housing developments’).

1.20. KPC questions the settlement hierarchy classification for Kirdford, as key infrastructure and facilities are lacking and Kirdford with no GP surgeries or primary schools within the parish (as referenced in Appendix 1 of the Settlement Hierarchy⁹). The clear lack of infrastructure and services within Kirdford make it an unsustainable location for growth. This is further evidenced by the recent withdrawal of the public bus and local minibus services.

1.21. We note that the IPS¹⁰ rightly seeks to prioritise progress on delivery of known committed sites and we support this approach to demonstrating it has adequate housing supply. However, we consider the wording of point 2 of Paragraph 2.4 of the IPS to be at odds with many of the provisions set out in in Section 6 of the IPS document. It states that CDC will be *“inviting developers to intensify and speed up development, on sites already underway”*. Firstly, this wording is at odds with the NPPF which does not once use the word ‘intensify’. If CDC seeks to retain Paragraph 2.4 in the IPS we question whether ‘inviting

⁵ https://cached.offlinehbpl.hbpl.co.uk/NewsAttachments/RLP/Importance_of_Housing_in_Exit_PlanA04.pdf

⁶ https://www.savills.co.uk/research_articles/229130/301028-

[0?utm_source=ExactTarget&utm_medium=Email&utm_term=5266012&utm_content=7837369&utm_campaign=Residential+Forecasts+-+160620+-+LC+%26+LB](https://www.savills.co.uk/research_articles/229130/301028-0?utm_source=ExactTarget&utm_medium=Email&utm_term=5266012&utm_content=7837369&utm_campaign=Residential+Forecasts+-+160620+-+LC+%26+LB)

⁷ <https://www.planningresource.co.uk/article/1681454/covid-19-crisis-cause-housing-delivery-plunge-one-third-planning-consultancy-predicts>

⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

⁹ <http://www.chichester.gov.uk/CHttpHandler.ashx?id=31017>

¹⁰ IPS Paragraph 2.4

developers to intensify and speed up development' is an appropriate measure for CDC to take. Intensification suggests more and higher density development for schemes already consented as being acceptable in planning terms. Does CDC realistically consider it appropriate to approach developers asking if they can add more housing? Apart from being inappropriate, in practical terms this may in itself stall development whilst the developer redesigns, reconsults and resubmits a revised planning application. We would suggest that CDC reconsiders this provision in the IPS or if it is retained that the wording is drastically revised.

1.22. Given the current pandemic and very uncertain housing market, we also question whether it is appropriate to invite developers to 'speed up development' (point 2 of Paragraph 2.4 of the IPS). Would an invitation from CDC result in a faster delivery of development? We would suggest that more would be needed in order to increase delivery rates than a simple invitation. Indeed, in Kirdford the applicants / developers of 'Land on the East Side of Plaistow Road' for a 54-dwelling scheme (planning reference: 19/00086/FUL) were granted consent and were successful (despite KPC's objections) in removing the condition which required a phased delivery of the scheme in 2019. Despite receiving consent for the scheme and for removal of the condition it is understood that the developer CALA Homes is seeking a purchaser for the site as they presumably do not think it is viable. This demonstrates that Kirdford does not require more housing as the 54 dwelling allocated scheme which has planning consent has not yet commenced and further housing schemes directed towards Kirdford would further hinder the site's delivery. This example also demonstrates that whilst the IPS states¹¹ that it expect applicants "to show they intend to develop sites promptly so that dwellings will begin to be delivered within a short period [up to maximum of 2 years]" and that a condition will be included with this provision, developers can seek to remove or amend conditions regarding timing and phasing as was the case recently in Kirdford.

Interim Housing Policy Statement (Section 6 of IPS)

1.23. Turning to the proposed Interim Housing Policy Statement starting at Section 6 of the IPS, it is currently unclear as to how the "Relevant policies" for each criterion have been selected from the CLPKP and LPR. Should the applicant and other parties disregard other policies that are for instance not listed? Whilst it does state "Relevant policies include" could be viewed as misleading when other policies within the CLPKP and LPR may still be relevant but are not listed.

1.24. For instance, Policy S5 (Parish Housing Requirements 2016-2035) of the LPR is not identified as a relevant policy under criterion 2 (the scale of development). KPC considers that this policy should be referred to in the IPS. This Policy in the LPR correctly requires no housing requirements for Kirdford Parish for the reasons set out in our response under the heading "Kirdford Parish".

1.25. We question the wording in 6.2 of the IPS (first paragraph) which states that the "criteria set out what the Council considers good quality development" (our emphasis). As we understand it the IPS is concerned with providing guidance on what CDC considers to be appropriate development in terms of pattern, scale and quality in order to make sufficient provision for its development needs and infrastructure whilst conserving and enhancing the natural built and historic environment. This does appear to be the purpose of the IPS however in its current form does not provide much needed clarity for applicants, local councils, decision-makers and other stakeholders to enable the facilitation of delivering such objectives.

¹¹ Paragraph 4.3

Conclusion

1.26. We trust that the points we have provided in our response to the IPS consultation to be constructive to CDC. We would welcome the opportunity to discuss in further detail and hope that CDC carefully considers our suggested changes to the IPS and our requests which include:

- Request for an update to the housing evidence base;
- Request for further consultation on the IPS (and its evidence base); and
- Request for clarity from CDC on its attended approach for an Annual Position Statement on housing supply.