



8<sup>th</sup> July 2020

Our Ref: KC/17.166

Planning Policy Team  
Chichester District Council  
East Pallant House  
1 East Pallant  
Chichester  
PO19 1TY

**Sent via email**

Dear Sir/Madam,

**Chichester District Council's Interim Housing Policy Statement Consultation**

I am writing on behalf of my client, Hallam Land Management Limited (Hallam). Hallam control land to the west of Southbourne, which is suitable for residential development consistent with the adopted Local Plan's Development Strategy and Settlement Hierarchy.

An objective in the Local Plan is to increase housing supply by making provision for new homes in the right quality, location, type, size and tenure. The Council is in the position, at the present time, where it cannot demonstrate a five-year housing land supply and housing requirement in their adopted local plan is now more than 5 years old and as such considered out of date under paragraph 11 of the PPF. Consequently, in order to meet this objective the Council requires additional housing land to be granted planning permission.

In this context, the Interim Housing Policy Statement (IHPS) is welcomed by Hallam. The primary focus of the IHPS is on the delivery of housing across the District. Similarly, it will provide a policy framework to guide consideration and determination of planning applications within the overarching strategy in the Local Plan.

In particular, the IHPS will enable the delivery of smaller development sites during this period in appropriate and sustainable locations. This is considered wholly appropriate when the overall nature of housing supply in the District is considered and will contribute towards the housing objective referred to above.

**Housing Requirements**

As stated at para 1.3 of the consultation document the Local Plan will be considered out of date as of the 15<sup>th</sup> July 2020. The new housing requirement figure within the IHPS is 628 dwellings per annum, previously the Local Plan stated 435dpa. When using the Standard Method calculation in this instance, the adjustment factor is greater than 40% of the local housing need figure, therefore is capped at 40%

above the household growth, and thus the outcome is calculated at over 700dpa. Although this includes the South Downs National Park, it is unclear as to how the Council have come to the figure of 628dpa. The full evidence of this figure should be published.

### **Housing Supply**

For the reasons given above we support the approach taken by the Council to boost the housing supply through the adoption of this IHPS and Hallam agree this is a positive and proactive measure.

The requirement for sites to not be dependent on significant infrastructure, and to be able to come forward in a timely manner allows for this IHPS to make genuine contribution to housing supply across the District.

The use of outline planning applications during this period is considered acceptable to ensure the larger of the small sites are still able to be brought forward to continue in delivering the necessary level of housing supply. It would be of use to understand what size of development the Council are considering to be a small site, so that potential planning applications can come forward for a range of sites, all within the 'small' category. Thus, aiding in the delivery of housing across all areas of the District.

The basis of an outline planning permission in establishing the principle of development on a particular site is still a wholly relevant approach and will assist landowners in making investment decision that they might not otherwise make if only full planning applications were required. Although the IHPS states sites should commence within 2 years, it is not considered that outline planning applications should be removed from this process. The outline planning applications will have the ability to demonstrate how the developments can meet the requirements of the IHPS and should be kept as a key process within bringing forward potential development sites.

The requirement for sustainable and appropriate sites is also welcomed, to ensure that during this interim period suitable sites are continued to be delivered in accordance with the settlement hierarchy. It is agreed that there should be a strong focus on smaller sites, as these are the sites that will be able to deliver housing in the short term.

The criteria set out at para 6.2 is a reasonable approach to identifying the key considerations that the Council require for these planning applications during this interim period to deliver good quality development. The use of existing policies and identified evidence to support each criterion is welcomed and will assist the decision maker in having to consider submitted planning applications. The criteria will allow applications to demonstrate the suitability of the proposed schemes, for example criteria 3 requires the impact of development on the edge of settlements to be assessed through the submission of a Landscape and Visual Impact Assessment. This is considered appropriate, as it will demonstrate how there are suitable edge of settlement locations for residential development which can aid in the delivery of much needed housing.

After consideration of these criteria, it is important to recognise that the presumption in favour of sustainable development is engaged because of the shortfall in housing land supply, this leans towards granting planning permission unless the proposed development conflicts the two limbs of sub paragraph d of para 11 of the NPPF.

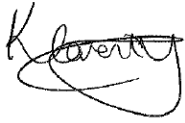
### **Summary**

Hallam support the adoption of an IHPS to bring forward development sites to aid in the delivery of housing. We would reiterate that the inclusion of outline planning applications to come forward during this interim period will aid in the, much needed, delivery of housing.



I trust this letter provides useful comments on the Interim Housing Policy Statement for Chichester District Council, if you have any questions please do not hesitate in contacting me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Kate Coventry', with a large, stylized flourish underneath.

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