



Chichester Local Plan Examination statement

Matter 7A: Parish Housing Sites Policies 5/6

September 2014

Chichester Local Plan Examination statement

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This statement has been produced as part of the examination of the Chichester Local Plan. It answers the Inspector's questions relating to matter 7A.

Any queries about the report should be sent to the programme officer:

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- 1. Are the indicative numbers for the Parish Housing Sites based on robust and up to date evidence?**
 - 1.1. Yes. As explained in the Council's responses under Matter 2, the main focus for major housing delivery in the Local Plan are the Strategic Development Locations (SDLs), with strategic housing also to be provided at the settlement hubs. The parish housing sites are aimed at providing small scale housing development, serving predominantly local needs.
 - 1.2. The parish housing numbers closely reflect the settlement hierarchy set out in Policy 2 of the Plan, which is based on the existing characteristics of settlements and their intended role through the Plan period. Detailed assessments of the key characteristics and development potential of the settlements in the Plan area are provided in the Settlement Capacity Profiles (CD-75). This brings together the key evidence supporting the settlement hierarchy and parish housing numbers set out in the Plan. Information is provided for each parish and the main settlements within the parish, including socio-economic characteristics, recent and planned housing development, settlement character, landscape capacity, development constraints, and potential site availability based on the Strategic Housing Land Availability Assessment (CD-16). For each parish, the Settlement Capacity Profiles (CD-75) sets out conclusions for Local Plan policy, presenting a summary of future development potential, the categorisation of the parish settlement(s) in the settlement hierarchy, and the indicative level of housing to be provided through the Local Plan.
 - 1.3. The Council's assessment of the potential and capacity for housing development in each parish was refined through the Parish Housing Numbers consultation (CD-99a), which sought the views of parish and town councils (and other key stakeholders) on the proposed indicative parish housing numbers that the Council was proposing for inclusion in the Plan. The parish numbers were expressed as a range, with the intention that precise housing numbers should be refined through neighbourhood plans and/or a Site Allocations DPD. In response to comments received during the consultation (CD-99b), some amendments were made to the parish numbers taken forward into Local Plan Policy 5. Most notably, it was decided to specify a single indicative housing figure (rather than a range) for each parish.
 - 1.4. The Council considers that the evidence and justification for the parish housing numbers remains robust. The source(s) of information that underpin the parish level assessments are set out in the 'Methodology' section in the Settlement Capacity Profiles (CD-75). In all cases, the information was based on most recent available data source. Key datasets include the 2011

Population Census, the annual development monitoring survey (updated to 1 April 2013), the Chichester DC Community Facilities database (which is updated on an on-going basis), and the most recently published rail and bus timetables. The information on development constraints and infrastructure is drawn from background studies undertaken to support the Local Plan and comments from relevant statutory agencies and infrastructure providers.

- 1.5. Since the publication of the Settlement Capacity Profiles in October 2013, some of the information relating to settlements may have changed to a limited degree (e.g. revisions to public transport services). In addition, the Council has published an updated 2014 Strategic Housing Land Availability Assessment (CD-16) which presents amended information about potential site availability. However, there is no new evidence sufficient to justify amending the settlement hierarchy or parish housing numbers.

2. Are neighbourhood plans or a Site Allocations Plan capable of delivering housing in the parishes in accordance with the housing trajectory?

- 2.1. Yes. As a general principle, the Council is strongly committed to promoting neighbourhood planning, which enables local communities to take the lead in planning the future development of their parish and gives them a positive role in the plan-making process. The Council has strongly encouraged parishes to prepare neighbourhood plans and this is reflected in the fact that the District currently has one of the highest levels of neighbourhood plan designations (i.e. 20) nationally.
- 2.2. As noted in the response to Matter 7A/1 above, the largest proportion of housing will be delivered at the four major Strategic Development Locations (SDLs) which are allocated in the Local Plan. However, a significant proportion of housing is to be identified through neighbourhood plans or a Site Allocations DPD, comprising 550 homes to be provided at the settlement hubs and 775 homes to be delivered on parish sites elsewhere.
- 2.3. In preparing the Local Plan, the Council initially started work on a Core Strategy, which would have set the overall development strategy and housing numbers and identified broad strategic locations. It was intended to follow this with a Site Allocations DPD which would allocate non-strategic housing sites. Following publication of the NPPF in March 2012, the Council considered including non-strategic allocations in a single Local Plan document. However, this would have required substantial extra work which would have delayed adoption of the Local Plan. In addition, a number of parish councils indicated a preference to identify sites through neighbourhood plans and were keen to make an early start on neighbourhood plan preparation. In these circumstances, the Council

concluded that non-strategic sites could be brought forward as quickly through neighbourhood plans as through the Local Plan, and that this approach would be likely to win stronger local support.

- 2.4. Due to the wastewater capacity constraints preventing housing development at the SDLs prior to 2019 (except at Shopwyke), the Local Plan housing trajectory requires the majority of the non-strategic housing sites to be brought forward prior to 2019. To help ensure this, the Council wrote to all parish councils in September 2013 explaining the need for early delivery of housing and requesting information on their intended timetables for neighbourhood plan preparation. A copy of the letter is provided in Appendix 7AA.
- 2.5. The majority of parishes identified for housing development in the Plan have adopted a positive approach to neighbourhood planning, accepting the need for some housing development and recognising that early adoption of neighbourhood plans will give them greater control over the location and character of new development. To date, only a very small number of parishes have found difficulty identifying housing sites to meet the Local Plan requirements. Several parishes have reached or are close to the submission (Regulation 16) stage. In addition, a significant quantity of housing has already gained planning permission ahead of neighbourhood plans. The majority of parishes identified for housing in the Local Plan now have one or more sites with planning permission, and several parishes have already met or exceeded their Local Plan housing targets (see response to Matter 7A/5 below).
- 2.6. As detailed in the responses under Matter 5, the Council remains confident that housing delivery is currently on course to meet the Local Plan trajectory. The Council therefore considers that its approach of seeking to bring forward non-strategic housing primarily through neighbourhood plans is working well and has achieved a high level of local community support.

3. Does the Plan provide a clear strategy for managing and monitoring housing development and delivery in the Parishes?

- 3.1. The monitoring of housing development and delivery in the parishes is identified in the Local Plan (CD-01) Appendix G Monitoring Framework. Annual monitoring of housing development and general monitoring of neighbourhood plans will form part of the Council's Authority's Monitoring Report and Five Year Housing Land Supply reports.
- 3.2. The Council is committed to preparing a Site Allocations DPD which will allocate housing sites if required in parishes where housing sites have not

come forward and neighbourhood planning work has not progressed. This is set out in paragraphs 7.28 and 7.31 of the Local Plan.

3.3. Monitoring of housing development and delivery is on-going, and a table showing the latest progress on Local Plan housing delivery is presented in Appendix 7AB. The Council is currently updating its housing data as part of the annual monitoring process, incorporating information from the West Sussex County Council housing land survey with a 1 April 2014 base date. The Council expects to finalise the updated housing figures in September 2014, prior to the Local Plan examination.

4. What is the justification for the threshold of 6 dwellings for reducing the requirement for additional housing in a Parish?

- 4.1. The Local Plan housing provision already includes a windfall allowance for small housing sites of less than 6 net dwellings. The justification for including a small sites windfall allowance is addressed in the Council's responses under Matter 5: Housing Supply. As set out in paragraphs 3.15-3.20 of the Housing Implementation Strategy (CD-48), the allowance is based on average housing completions (excluding residential gardens) on small sites during the past decade (2003-2013).
- 4.2. Effectively, this means that housing sites of under 6 dwellings are already accounted for in the Local Plan provision figures. Therefore, to avoid the possibility of double counting, sites of less than 6 dwellings gaining planning permission will not be counted against the parish requirement. The Local Plan (paragraph 7.29) addresses this point and the Council's amended wording put forward as proposed main modification **M36** clarifies the explanation¹.

5. What is the relationship between the FAD (Facilitating Appropriate Development) Study Oct 2012 and the neighbourhood plans? Is there a clear definition/cut off mechanism for recording development brought forward under FAD and that which will be identified in the neighbourhood plans?

- 5.1. Yes, the housing provision requirements set out in the Plan relate to the period 2012-2029 and therefore 2012 is the base date for counting additional housing sites that have come forward. This applies to both the parish housing requirements in Policy 5 and the strategic housing provision at the settlement hubs in Policies 20, 23 and 24. Planning permissions of 6

¹ [Schedule of Proposed Main Modifications to the Pre-submission Local Plan](#): Page 3

or more dwellings that have been granted since the 2012 base date are considered to have contributed towards meeting the Local Plan housing targets, subject to the following parameters:

- For parish housing numbers (Policy 5), all planning permissions of 6+ net dwellings have been counted against the parish targets, including both FAD sites and rural exception sites.
 - For the settlement hubs (Policies 20, 23 and 24), planning permissions have only been included where the sites clearly contribute to the wider policy requirements for strategic development set out in the relevant policies (this has included planning permissions at Park Farm, Selsey; Beech Avenue, Bracklesham; and Garsons Road, Southbourne, all of which will deliver 50 or more dwellings).
- 5.2 As a result of planning permissions granted, the outstanding provision required at the settlement hubs has reduced by 170 homes from the original target of 550 homes to 380 homes. The required provision from parish housing sites has reduced by 294 homes from the original target of 775 homes to 481 homes (figures correct to end of July 2014).
- 5.3 It should be noted that in several parishes, the Plan housing requirements have already been met or exceeded due to housing that has come forward since 2012 (for example 112 homes have gained permission in Donnington, 77 homes in Chidham & Hambrook, and 70 homes in Birdham). In these parishes, there is no further requirement to identify additional housing in neighbourhood plans. In other parishes, where part of the Plan provision has already been met through sites permitted, the requirement for housing in the neighbourhood plan has been reduced accordingly.

Chichester Local Plan Examination: Matters & Issues

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| Appendix 7AA – Page 1 | Letter from Chichester DC Director of Homes and Community to Parish Councils dated 27 September 2013 re 'Housing supply to be identified through neighbourhood plans'. |
| Appendix 7AB – Page 4 | Local Plan Housing Delivery – Settlement Hubs & Parish Housing Numbers (August 2014 update) |

If calling please ask for:

Our ref:

Your ref:

AJ/JMP

27 September 2013

Dear Parish Council Chairman,

Re: Housing supply to be identified through neighbourhood plans

Cllr Heather Caird, Leader of the Council and the Development Plan Panel have agreed that I should write to you with reference to housing supply in Chichester District and the timetable for production of your neighbourhood plan. I am sure that you are aware of the need for the Local Planning Authority to have an up to date local plan and to be able to demonstrate a 5 year housing land supply in order to be able to successfully retain control of planning decisions and to defend unallocated sites against speculative applications for residential development.

As part of the Local Plan process, the Council has to produce a Housing Implementation Strategy, which will form part of the evidence base to be considered by the Planning Inspector conducting the examination of the Local Plan in early summer next year. This includes a housing trajectory which shows delivery on sites in the early part of the plan period within the parishes, before the strategic sites at Chichester and Tangmere go live in the last ten years of the plan period (being dependent on the improvement to the waste water treatment works at Tangmere). The approach within Chichester District has been to embrace localism and for the site identification process in the parishes to be through neighbourhood planning.

The Council will need to be able to demonstrate to the Inspector that delivery on the parish sites during the first 5 years is realistic. To help us with this I would be grateful if you could fill in the attached sheet giving details of your timetable for the production of a neighbourhood plan. The crucial dates are the stage you have reached now and the stage you expect to have reached by next summer (when the Local Plan examination is expected). Please bear in mind that the timetable will be put in front of the Planning

Parish Council Chairman

Inspector and therefore it must be realistic and it is extremely important that you meet the milestones in the timetable. The Council will need to advise the Inspector of the contingency arrangements to mitigate any lack of delivery through the parish plan process. Whilst the immediate likely result would be the loss of sites through planning by appeal, I would expect that the Council would have to allocate sites within its site allocations document if they are not identified in neighbourhood plans. Should this happen we would hope to agree the sites with the parish council.

I would be grateful for a response by the 15th October as we will need to feed this into the Housing Implementation Strategy which will form part of the evidence base supporting the Local Plan, due to be considered by Cabinet and Council in October.

I thank you in anticipation of your response.

Yours faithfully,



Amanda Jobling
Director of Home and Community

Neighbourhood Plan Progress

Can you please fill in the date when you think you will reach the stages of your Neighbourhood Plan set out in the table below. Please add any additional comments or highlight any potential issues that may delay you at each stage. It is appreciated that there is some overlap between the stages.

The District Council will look to set a timetable for the stages after the pre submission consultation that are its responsibility. We will provide you with a timetable including these stages once it is completed. We will look to update the timetables on a quarterly basis.

Neighbourhood Plan key stage	Date completed / anticipated	Additional comments
1. Evidence base complete		
2. Public consultation complete		
3. Draft plan written	/	
4. Pre submission consultation		

Can you please provide additional details on the stage of the plan you are currently working on:

If you have reached the third stage highlighted above can you please include details of the sites you are considering for housing:

Can you please send your response to Tom Bell, Neighbourhood Planning Officer, Housing Delivery Team, Chichester District Council, East Pallant House, Chichester, West Sussex, PO19 1TY tbell@chichester.gov.uk,

Matter 7A - Appendix 7AB

Local Plan Housing Delivery – Settlement Hubs & Parish Housing Numbers (August 2014 update)

Parish	Local Plan indicative housing target	Housing with planning permission	Additional housing identified in neighbourhood plans ¹	Remaining housing to be identified	Progress on housing delivery
Settlement Hubs					
East Wittering	100	50	0	100	1 site already granted planning permission for 50 dwellings. Parish council at early stages of preparing Neighbourhood Plan.
Selsey	150	50	230	0	1 site already granted planning permission for 50 dwellings. Neighbourhood Plan is currently subject to pre-submission (Reg 14) consultation and identifies land for a further 230 dwellings. NP publication (Reg 16) expected in Nov 2014 with NP referendum in Feb 2015.
Southbourne (village)	300	70	230	0	1 site already granted planning permission for 70 dwellings. Neighbourhood Plan has completed pre-submission (Reg 14) consultation and identifies land for an additional 230 dwellings in Southbourne village. NP publication (Reg 16) to take place in Aug 2014 with NP referendum in Feb 2015.
Sub-total	550	170	460	100	
Other Parishes					
Birdham	50	70	0	0	3 sites already granted planning permission totalling 70 dwellings
Bosham	50	0	0	50	Parish council is preparing Neighbourhood Plan and currently working on site selection. NP publication (Reg 16) expected in Jan 2015 with NP referendum in May 2015.
Boxgrove	25	0	0	25	Parish council at early stages of preparing Neighbourhood Plan.
Chichester	150	26	0	124	2 sites already granted permission totalling 26 dwellings. City Council has indicated that it is not proceeding with a neighbourhood plan at present. Housing delivery likely to be achieved through windfall opportunities.

Parish	Local Plan indicative housing target	Housing with planning permission	Additional housing identified in neighbourhood plans ¹	Remaining housing to be identified	Progress on housing delivery
Chidham & Hambrook	25	77	0	0	4 sites already granted planning permission totalling 77 dwellings
Donnington	50	112	0	0	1 site already granted planning permission for 112 dwellings
Fishbourne	50	25	25	0	1 site already granted planning permission for 25 dwellings. Neighbourhood plan has completed publication (Reg 16) stage and identifies land for 40 additional dwellings. NP referendum expected in Oct 2014.
Hunston	25	18	0	7	1 site already granted planning permission for 18 dwellings. Parish council at early stages of preparing a Neighbourhood Plan.
Kirdford	60	0	60	0	Neighbourhood plan formally made in July 2014 and identifies land for at least 60 dwellings to be phased over Plan period.
Loxwood	60	17	43	0	Neighbourhood plan passed referendum in July 2014 and identifies land for a minimum of 60 dwellings - 1 site already granted planning permission for 17 dwellings.
Lynchmere	10	0	0	10	Parish council at early stages of preparing Neighbourhood Plan.
North Mundham	25	40	0	0	2 sites already granted planning permission totalling 40 dwellings.
Plaistow & Ifold	10	0	0	10	Parish council at early stages of preparing Neighbourhood Plan.
Southbourne (elsewhere)	50	0	50	0	Neighbourhood Plan has completed pre-submission (Reg 14) consultation and identifies a site for 50 dwellings at Nutbourne (West). NP publication (Reg 16) to take place in Aug 2014 with NP referendum in Feb 2015.
West Wittering	50	50	0	0	1 site already granted planning permission for 50 dwellings.
Westbourne	25	0	0	25	Parish council at early stages of preparing Neighbourhood Plan.
Wisborough Green	60	25	0	35	1 site already granted planning permission for 25 dwellings. Parish council is preparing neighbourhood plan and currently working on site selection. NP publication (Reg 16) expected in Nov 2014 with NP referendum in March 2015.
Sub-total	775	460	178	286	

Parish	Local Plan indicative housing target	Housing with planning permission	Additional housing identified in neighbourhood plans ¹	Remaining housing to be identified	Progress on housing delivery
TOTAL	1,325	630	638	386	

Note:

¹ Includes housing sites allocated in draft neighbourhood plans that have reached the Submission (Regulation 16) stage.