

TOWN & COUNTRY PLANNING ACT 1990

SECTION 78

APPEAL BY SUNLEY ESTATES LTD

Land East of Broad Road, Hambrook, Chichester

Planning Application Number: 14/02138/OUT

Planning Inspectorate Reference: APP/L3815/W/15/3004052

SUMMARY PROOF OF EVIDENCE OF MARK HEWETT

HOUSING LAND SUPPLY

August 2015

1 My name is Mark Hewett and I am the Senior Partner of property consultancy Intelligent Land. Details of my qualifications and experience are included in my main Proof of Evidence. This Proof of Evidence has been prepared to respond to the five-year supply of housing land projected by the Council in Chichester District.

2 According to Chichester District Council's (CDC) latest published housing land supply assessment 'Chichester DC Assessment of Five Year Housing Land Supply Updated Position at 2 July 2015' the Council has adopted the Sedgefield methodology regarding historic shortfalls in housing delivery. CDC is also using a 20% buffer when calculating housing requirements, in accordance with Paragraph 47 of the NPPF. I agree that these calculation methodologies should be adopted in Chichester District.

3 My proof of evidence, therefore deals with the following key issues regarding housing land supply in Chichester District:

- Meeting the full objectively assessed needs for market and affordable housing.
- Assessment of supply sites upon which CDC is relying to meet the housing need.

4 I have considered the annual housing requirement adopted by the Council in their housing supply calculations. I have then compared this to up to date population forecasts produced by the Department for Communities and Local Government (February 2015), and the Council's own view of the full objectively assessed need. Whilst the adopted position is 435dpa, during the EiP (September to December 2014), the OAN was recognised as 505dpa. The Inspector discounted it to 435dpa, subject to early review. I have assessed housing supply in the District on both basis.

5 I have also considered housing supply matters and on the evidence available, I consider that some sites upon which CDC rely are not currently deliverable in accordance with the methodology in the NPPF and PPG for inclusion in a five year forecast and that in some cases the Council's delivery projections are over-optimistic.

6 In terms of housing delivery, the adopted Local Plan identifies some significant development constraints, including the upgrading of the A27 and a need to increase Waste Water Treatment Works (WWTW) capacity. These infrastructure works are required to create sustainable locations for planned, Strategic Developments Locations (SDL) around Chichester and are heavily relied upon by the Council to meet housing need over the plan period. Due

to the lengthy timescales of delivering the infrastructure improvements, the Council's draft Core Strategy proposed a reduction in the annual housing requirement below the identified objectively assessed need (OAN). The Core Strategy Inspector accepted this reduction on the basis that an early review of the plan should be undertaken.

7 The Local Plan forecast the completion of the WWTW in 2019 and CDC's phasing assumptions for housing delivery from the SDLs accorded with these timescales. The Council's view on phasing assumptions for the WWTW upgrade has now changed to 2017 and this is discussed further at Section 4 of this proof.

8 Due to the aforementioned infrastructure constraints in the District the Council put forward a case that the annual requirement should be reduced to 435 dwellings per annum. The Inspector overseeing the Key Policies EIP agreed, but this was subject to a review which was to be completed within 5 years.

9 The adopted annual housing requirement of 435 dwellings per annum is clearly below the OAN identified for the District. The Council has acknowledged this within the adopted Local Plan which makes the following important Statement at page 50 paragraph 7.17:

'Subject to Southern Water gaining Ofwat approval, the Tangmere Wastewater Treatment Works upgrade would be operational from 2019. For this reason, the proposed strategic allocations in the Chichester/Tangmere area are not expected to be deliverable until after 2019. To compensate for this, the Plan strategy seeks the early release of housing land in areas where wastewater capacity is available. Particular emphasis will be placed on the need to bring forward housing sites for development at the earliest opportunity.'

10 CDC is clearly heavily reliant on the planned SDLs delivering on time. Any slippage to programmed works or issues regarding delivery will have a negative consequence regarding CDC's ability to deliver either the adopted or the full objectively assessed need over the plan period. To off-set the reduced housing requirement and the risk of significant housing shortfalls, CDC, as set out in their approved Local Plan, should be releasing sites now, where WWTW capacity is available.

- 11 To obtain a full understanding of housing supply in the District I have undertaken site inspections of key supply sites. Following site inspections I apply a realistic housing delivery trajectory to sites where my opinion differs from CDC. My trajectories are based on my research into current housebuilder sales rates, Government guidance and my experience of the housebuilding industry.
- 12 The following sites are those with which my position on delivery differs from the Council's.
- a) **Fields North West of the Saltings Crooked Lane, Birdham (Site 2)** – The Council relies on the delivery of 15 dwellings from this site in the five year period 2015/20 whereas I conclude that this site will not deliver any dwellings in the 2015/20 period.
 - b) **Graylingwell, Chichester (Site 6)** – The Council relies on the delivery of 344 dwellings from this site in the five year period 2015/20 whereas I conclude that this site will deliver 260 dwellings in the 2015/20 period.
 - c) **Shopwyke, Chichester (Site 25)** – The Council relies on the delivery of 339 dwellings from this site in the five year period 2015/20 whereas I conclude that this site will deliver 75 dwellings in the 2015/20 period.
 - d) **Land South of Graylingwell Drive, Chichester (Site 64)** – The Council relies on the delivery of 130 dwellings from this site in the five year period 2015/20 whereas I conclude that this site will deliver 60 dwellings in the 2015/20 period.
 - e) **West of Chichester SDL, Chichester (Site 68)** – The Council relies on the delivery of 175 dwellings from this site in the five year period 2015/20 whereas I conclude that this site will deliver 90 dwellings in the 2015/20 period.
 - f) **Westhampnett/North East Chichester, Westhampnett & Chichester (Site 69)** – The Council relies on the delivery of 170 dwellings from this site in the five year period 2015/20 whereas I conclude that this site will deliver 45 dwellings in the 2015/20 period.
 - g) **Tangmere SDL, Chichester (Site 70)** – The Council relies on the delivery of 125 dwellings from this site in the five year period 2015/20 whereas I conclude that this site will not deliver any dwellings in the 2015/20 period.

- 13 The Council's current position at the time of writing this proof of evidence is that it can only demonstrate 5.27 years supply of housing land, based on the suppressed OAN of 435 dpa. On this basis a minimal surplus of 168 dwellings is produced.
- 14 The table at **Appendix MH01** is a Summary of the Five Year Housing Land Supply Position in Chichester District comparing the Council's position to my position. This analysis adopts the updated supply forecast from key sites that the Council provided to me on the 20th August 2015. These updated supply figures are provided at **Appendix MH07c**.
- 15 My assessment of the sites being relied upon by Chichester District is at **Appendix MH02**. This table compares my assessment of dwelling delivery with the Council's position. These supply positions are carried forward to the summary table at **Appendix MH01**.
- 16 Using my assessment of five year housing land supply and by adopting the suppressed requirement of 435dpa, a 20% buffer and recovering the shortfall to date within the five year period, CDC can demonstrate just 4.05 years out of 5, or 81% of requirement. On this basis the Council will have a housing shortfall of 595 dwellings by 2020. On the same basis and adopting the Council's opinion of dwelling delivery CDC are forecasting a 5.27 year supply of housing land out of 5, reflecting 105% of requirement, producing 168 surplus dwellings by 2020.
- 17 The position in Chichester District worsens, when calculations are adjusted to account for the full objectively assessed need. Using my analysis of supply the Council can produce 3.34 years of five, or 67% of requirement. This would mean that the Council would have a housing shortfall of 1,267 by 2020.
- 18 Using the Council's assessment of supply against the full objectively assessed need produces just 4.34 years of supply out of 5 or 87% of requirement, producing a shortfall of 504.