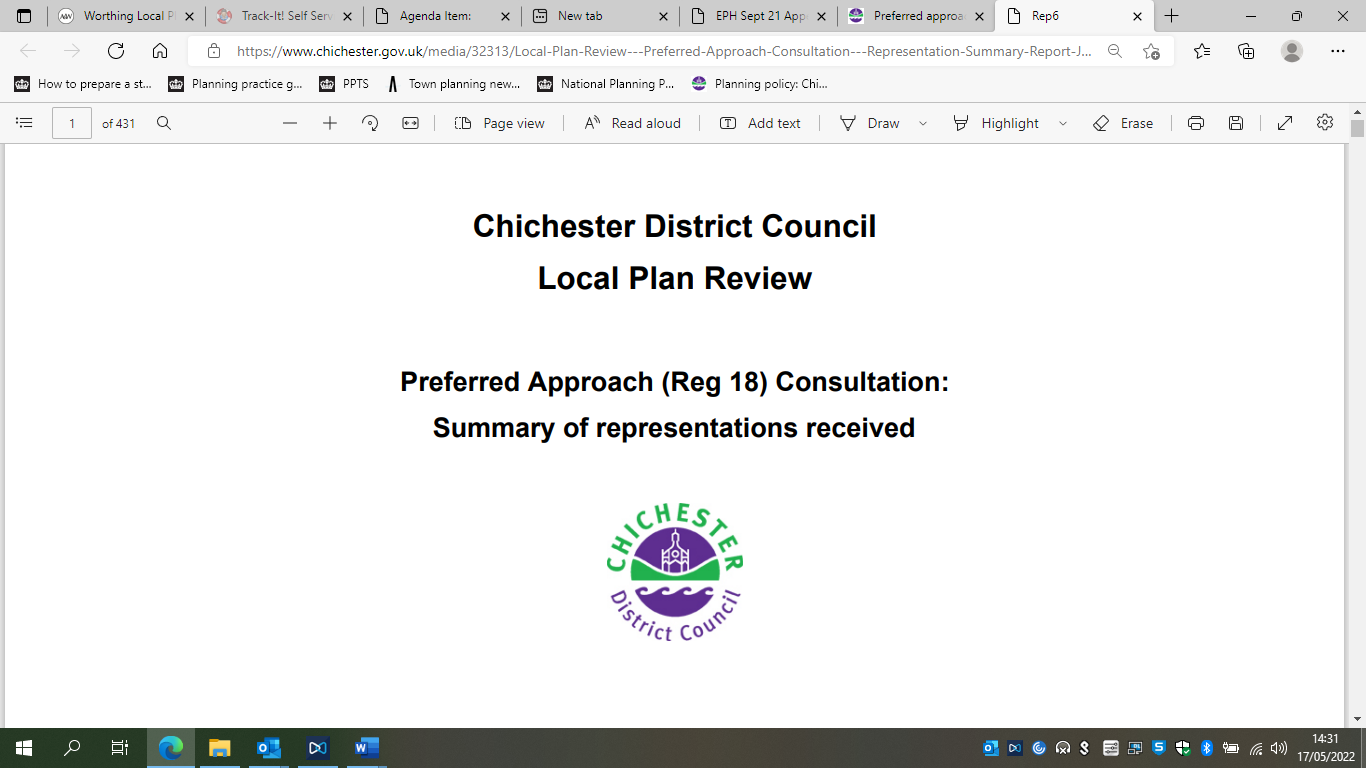
**Chichester District Council**

**Local Plan**

**Housing Density**

**Evidence Study**



[**www.chichester.gov.uk**](http://www.chichester.gov.uk/) April 2024

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# Introduction

* 1. The purpose of this paper is to provide and explain evidence that demonstrates and justifies the policy position within the Chichester District Council Proposed Submission Local Plan 2021-2039 with regards to housing density. The study entails an extensive statistical review of recently consented development and establishes average existing densities within the most sustainable parts of the Plan Area. A number of case studies have also been conducted in order to gain a more nuanced understanding of density considerations.

# National Policy Context

2.1 The National Planning Policy Framework (NPPF) requires planning policies to support development that makes efficient use of land by achieving appropriate densities. Paragraph 129 of the NPPF specifies that, where there is an existing or anticipated shortage of land for meeting identified housing needs it is especially important that planning policies avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances:

1. Plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;
2. The use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range.

2.2 The recent insertion of a new paragraph to the NPPF (paragraph 130) qualifies density policy by recognising that significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area. It requires such consideration of character to be articulated and evidenced through an authority-wide design code which is adopted or would be adopted as part of the development plan. Government anticipates that the NPPF changes will help local authorities to meet local housing need through gentle densification (of our urban cores) while having due regard to local character and the community’s wishes and concerns[[1]](#footnote-1). As the CDC proposed submission Local Plan reached regulation 19 consultation prior to 19 March 2024, paragraph 130 need not apply, but it is considered prudent to consider the heightened emphasis of the NPPF in the context of housing density to ensure character is appropriately recognised.

2.3 Most recently, the Government has opened consultation[[2]](#footnote-2) on proposed strengthening of national planning policy in relation to brownfield development, exploring options including giving significant weight to the benefits of delivering as many homes as possible and taking a flexible approach to applying policies or guidance relating to internal layouts and daylight requirements, and the potential application of a presumption in favour of sustainable development on previously developed land as part of the Housing Delivery Test in some circumstances. Whilst at an early stage, this consultation signifies renewed emphasis on the importance of making effective use of brownfield land within urban locations, which is further considered within the study.

2.4 Planning practice guidance (PPG) concerning the effective use of land advises local planning authorities to take account of a range of considerations in establishing appropriate densities in a particular area. It lists tools that can assist, including:

* Accessibility measures such as distances and travel times to key facilities, including public transport stops or hubs;
* Characterisation studies;
* Environmental and infrastructure assessment;
* Assessments of market or site viability.

2.5 Paragraph 35 of the PPG relating to housing and economic needs assessment advises that brownfield and other under-utilised urban sites should be prioritised for residential development, and on these sites density should be optimised to promote the most efficient use of land. This is to ensure that homes are built in the right places, to make the most of existing infrastructure, and to allow people to live nearby the services they rely on, making travel patterns more sustainable.

# Local Policy Context

3.1 The adopted Local Plan 2014-2029 upholds a flexible approach to housing density, recognising the importance of balancing the need to make effective use of land with the characteristics of the surrounding built up area (paragraph 17.5). The Plan states within the supporting text that densities of 35 dwellings per hectare are considered broadly appropriate on most greenfield and brownfield development across the district. It recognises, however, that higher densities may be sought in urban areas where sites are better served by public transport and have access to a range of services and facilities (para. 17.6). Policy 33 confirms that planning permission will be granted for new residential development where it can be demonstrated that the scheme provides an appropriate density of development, determined by its immediate context, on-site constraints, the type of development proposed and the need to provide an appropriate mix of dwellings.

3.2 Text surrounding the proposed submission Local Plan P3 Density Policy supports a design-led approach to achieving optimal appropriate density for sites, which considers the context and character of the site and local area, access points, the capacity of local infrastructure and the characteristics of the surrounding area. It does recognise, however, the need for development to make the most efficient use of land and to achieve higher densities than those found historically within much of the Plan Area. It reflects that the expectation of a minimum of 35 dwellings per hectare is significantly greater than the densities currently seen more widely across the Plan Area.

3.3 Policy P3 Density does not require a minimum density, specifying instead that optimum densities are determined via a design-led approach that identifies site capacity once all constraints are taken account of. It is expected that particular attention is given to:

* The site context and character of the surrounding area, including nearby heritage assets or important landscape;
* The use of appropriate innovative design solutions to achieve higher densities whilst achieving high-quality place making;
* The desirability of achieving higher densities in urban areas;
* Current and future level of accessibility by walking, cycling and public transport;
* The need to achieve high-quality design;
* The need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers; and
* The capacity of surrounding infrastructure.

3.4 This approach is an evolution of the previously ‘Preferred Approach’ for Policy DM3: Housing Density, which specified development proposals for a minimum average net density of 35 dwellings per hectare will be supported, except at accessible urban locations with good transport links and good access to services, where higher densities will be encouraged, and at locations adjacent to sensitive locations (i.e. nationally designated areas of landscape, historic environment or nature conservation protection) where a lower density may be appropriate. It is suggested the currently proposed approach, responding to representations received at the Regulation 18 consultation stage, offers more flexibility by removing the minimum 35 dph as a policy requirement, and in terms of balancing the efficient use of land with a wide range of other constraints.

* 1. Responses to the Regulation 19 proposed Submission Local Plan consultation were varied, with some representations suggesting the expectation of a minimum of 35 dph was inappropriate for the Plan Area’s rural context or to enhance biodiversity, and that it required further explanation and justification. Other respondents supported the 35 dph minimum figure, commenting that it was not high, and encouraging higher densities in the most accessible locations. Whilst several representations supported the design-led approach of the policy and hence the decision not to require a specific density, they suggested reference could be made to densities varying according to site specific circumstances, such as where transport and service access was good. This background evidence paper responds to these representations, by explaining the policy approach and how it relates to existing Plan Area densities and constraints, as well as further considering optimal densities within sustainable and accessible areas.

# Local Spatial Profile

4.1 Chichester is classified as a largely rural local authority district, with between 50-79% of its population residing in rural areas[[3]](#footnote-3). The Plan Area (excluding the South Downs National Park) is less rural than the broader district, however, although its precise composition is not quantified. The Plan Area is described within the proposed submission Local Plan as being split into three areas (The East-West Corridor, the Manhood Peninsula, and the North of the Plan Area), with Chichester City being the main settlement, and four other settlements (East Wittering and Bracklesham, Selsey, Southbourne and Tangmere) accommodating a range of facilities and services. The A27 is noted to run east-west through the Plan Area, and the presence of rail links along the South Coast and to London from Chichester City is also recognised. Key characteristics of the Plan Area include the Chichester Harbour National Landscape, the setting of the National Park, and Chichester’s historic city centre.

4.2 Policy S1 of the proposed Local Plan describes the spatial development strategy, which includes focusing the majority of planned growth on Chichester city as the most sustainable location, and within the East-West Corridor. The city’s possession of a wider range of shops, services and employment opportunities than other settlements reduce the need to travel to alternative facilities. Outside the city and its closest settlements, it is proposed that development will focus on the two settlement hubs within the east-west corridor of Tangmere and Southbourne, benefiting from comparatively good public transport and easy access to higher order services such as those available in the city. Tangmere and Southbourne are recognised to have a good range of local facilities, with Southbourne additionally benefiting from rail connectivity. The locations of Bosham, Nutbourne and Fishbourne are identified as being capable of additional growth as service villages with rail connectivity.

4.3 Policy S2 of the proposed Local Plan establishes a settlement hierarchy for the location and scale of new development to address local needs whilst taking account of transport and the level of services available to settlements, as well as natural, historic, social and cultural environments. Supporting text recognises that generally, larger settlements have better facilities and are able to accommodate higher levels of growth without adversely impacting character. It is stated, however, that Selsey and East Wittering within the Manhood Peninsula have more constraints than other settlements. The Local Plan lists these constraints in terms of significant areas at risk from coastal erosion and flooding, environmental designations, poor road accessibility, problems of traffic congestion, and a high reliance on Chichester city for employment and other key services (which is problematic in light of the highlighted highway constraints and associated limited sustainable transport options).

* 1. The north of the Plan Area is described as predominantly rural with few sizeable settlements. Accessibility to services and facilities is a particular issue for this area. The Local Plan proposes only limited growth as a consequence.

# Methodology

## Stage 1: Recently Permitted Densities

5.1 The first stage of the study was to establish the current status of housing development density within the Plan Area, analysing permissions data as well as GIS mapping to understand how recently approved development relates to the adopted policy approach. An objective of the analysis was to identify trends in the last 5 years (using data for the period 2018-2022).

### Calculating Densities

5.2 The PPG recognises that different measures of density can be used to help make effective use of land. For the purposes of this study, dwellings per hectare (dph) was identified as an appropriate means of measuring density, being a readily determined and comparable measure. Other measures, such as bedspaces per hectare, were discounted as unsuitable as baseline data was not available or able to be accurately collated.

5.3 Housing density can be determined from a site’s gross or net area. For this study, gross site area is defined as the total land area within the development ‘red line’ and cited within an application for planning approval. The gross site area is recognised to include land for the provision of widely serving infrastructure, services and green/open spaces, as well as for housing development. The definition of net site area is more limited to land available for dwellings and their directly associated features such as private gardens, car parking and access roads. Net site area is used to calculate net density, being less variable than gross density, enabling comparison of a range of development scales, including larger sites where more land is required for uses other than housing, such as schools, landscape buffers and recreational space.

5.4 Unless cited within the planning application, net site area was calculated from gross site area using assumptions consistent with those applied within the Local Plan Stage 1 Viability Assessment, namely applying a land area adjustment for larger developments. In this study developments of five or more dwellings attracted a 15% reduction from the gross site area, while development of 100 or dwellings received a 30% reduction to account for the provision of infrastructure and services.

5.5 In addition to the land area adjustment, land required for open space on-site provision was deducted from the gross site area, calculated using the Open Space Cost Calculator derived from development thresholds defined within adopted Local Plan Policy 54 Open Space, Sport and Recreation, and in accordance with the detailed standards and methodology set out in the Planning Obligations and Affordable Housing SPD. A general assumption was applied for all dwellings within the study to be considered as 3-bedroom, providing an average number of occupants of 2.3 people per dwelling, consistent with Infrastructure Delivery Plan (IDP) methodology.

### Comparison Criteria

5.6 The following criteria were considered and compared within the study:

* Development scales: small (<10 dwellings[[4]](#footnote-4)), medium (≥10<50), large (≥50<200) and strategic (≥200),
* Greenfield and previously developed sites;
* Housing mix (proportion of houses and flats within a scheme)
* Adherence to the settlement hierarchy: sub-regional centre, settlement hubs, service villages, rest of plan area (ROPA)
* Proximity to settlement boundaries: within, adjacent to or within<400m, ≥400m
* Accessibility to transport (train stations) and services (retail centres): proximity (<400m, 400-800m, ≥800m) and walking and cycling time (<10mins, >10mins)

5.7 The criteria were chosen to enable investigation of how density is affected by the nature of the proposed development, the site context and surrounding character, and its accessibility, in accordance with the PPG. The development scales chosen are consistent with the development parameters described within the proposed Local Plan. Planning applications analysed included reserved matters applications, as well as outline and full applications. Applications concerning developments within strategic development locations were classified as such, including when permitted phases were for less than 200 dwellings, recognising the overall context of the development to allow accounting for associated infrastructure requirements. The comparison of greenfield and brownfield sites allows for exploration of whether previously developed sites are being optimised for development, with the investigation of different development types, including change of use and non-residential redevelopment adding further nuance. Examination of housing mix ensures the differences in densities for predominantly flatted or housing developments, and their surrounding context such as an urban environment, is recognised.

5.8 The consideration of developments within various settlement locations enables scrutiny of densities within Chichester City, Selsey Town and other urban locations including those defined as settlement hubs and service villages within the Local Plan. Proximity and active travel time to train stations is considered a reasonable measure of accessibility to public transport, while the accessibility of other services is indicated by proximity and walking or cycling time from retail centres (as defined for Chichester, Selsey and East Wittering and Bracklesham). The parameters were selected in response to TCPA guidance[[5]](#footnote-5), which recognises research indicating 20 mins is the maximum time that people are willing to walk to meet their daily needs, representing an 800-metre walk from home to a destination, and back again (400 metres or 10 mins each way).

## Stage 2: Existing Densities

5.9 The second stage of the study was to determine the average density of residential development within towns and cities in the Plan Area, as well as other locations considered well served by public transport. This was to ensure that the scope to raise densities within sustainable locations was properly considered, as reflected in both the submission Local Plan and national policy. For the Plan Area, the presumption would be for the study to encompass Chichester City, and the towns of Selsey and East Wittering. As described within the local spatial profile, the significant constraints affecting development within the Manhood Peninsula were considered to provide strong justification to exclude Selsey and East Wittering from this stage of the study. This approach is supported by the findings of the Sustainability Assessment (SA), which recognises that flood risk means that options for further growth in these locations are very limited, and that tidal flood risk in particular has a significant bearing on the consideration of reasonable growth scenarios. It also notes traffic congestion as an accessibility issue in terms of private car travel and bus connectivity.

5.10 Locations considered well served by public transport were identified as those with a train station, comprising Chichester city, Southbourne, Fishbourne, Chidham and Hambrook (Nutbourne) and Bosham (Broadbridge). The inclusion of these locations is justified by the SA which supports growth within easy walking distances of some or all stations located along the A259 corridor. Of these settlements, Southbourne is noted to be higher order, and to also have the benefit of good connectivity to Havant and Portsmouth. Fishbourne is also considered to benefit from proximity to Chichester.

5.11 While not considered to be well-served by public transport as lacking their own stations, the settlements of Tangmere and Westhampnett were judged to have generally good transport accessibility, being close to junctions of the A27. In addition, the SA recognises Westhampnett to be sufficiently close to Chichester city to benefit from its public transport and infrastructure. Connectively to Chichester was also noted to include a good quality cycle route. The potential of Tangmere in terms of service accessibility recognised commitment to the delivery of significant new community infrastructure associated with its development as a strategic urban extension, minimising the need to travel from this higher order settlement. On this basis, the potential options for densification of these locations have also been explored.

5.12 Existing densities were determined via GIS analysis of the built environment within settlement boundaries, as well as within polygons drawn to represent areas within 5- and 10-minutes walking distance from train station and retail centres, as applicable. Density figures were calculated from the number of residential properties within the defined areas with non-residential properties excluded from the analysis on the basis of a property classification attribute from Ordnance Survey addressing data. Open routing and QGIS software were used to generate isochrones or distances contours, enabling the calculation of travel distances and times.

5.13 The potential to understand existing residential densities by determining the height of residential developments was explored, which could have enabled comparison with recent approved development scales and forms. Information on building heights was not readily available however and determined to be beyond the scope of this study. There is potential for this to be explored in the future. This is considered further within the conclusions.

## Stage 3: Case Studies

5.14 The objectives of the third, case study stage, are two-fold; first, to verify the density figures calculated within the first stage of the study for approved development, and second, to gain a more in-depth, wide-ranging insight into site-specific constraints and considerations impacting development densities. This is a more qualitative process, drawing on a range of documents submitted and produced as part of the process of the determination of planning applications. The case studies selected were predominantly from those developments permitted in Chichester parish, recognising the general sustainability and accessibility of the location. A recent development within Southbourne was also studied, recognising need to appreciate density considerations in this higher order sustainable location to inform future allocations and proposals within the Broad Location for Development (BLD). A total of seven developments were chosen, ranging from small to strategic in scale, comprised of varying housing mixes, and including greenfield and brownfield sites, as well as different sites or phases within the same strategic development location to enable comparisons.

5.15 Calculated net densities, varying from approx. 150 dph to 25dph, were compared with developer-submitted and officer cited figures. Furthermore, the approach of developers to density (where demonstrated within submitted design and access statements, planning statements or similar) as well as density consideration within decision-making (illustrated within officer reports) was assessed. This included the identification of particular constraints impacting density, such as prevailing character, transport and service accessibility, landscape and open space provision requirements, and market drivers. Finally, residential amenity was scrutinised in detail, involving determination of whether permitted developments complied with Nationally Derived Space Standards (NDSS) as well as consideration of noise, light and privacy impacts. The dimensions of 2-bedroom flats and 3-bedroom houses were analysed as a representative sample of dwelling type, informed by the findings of the Council’s recent Residential Space Standards Background Evidence paper.

# Analysis

6.1 Analysis of the planning application and permissions data for the years 2018 to 2022, shows that the average net density for schemes permitted within the Plan Area is approximately 41 dwellings per hectare. This figure is determined from the analysis of 212 developments, comprising a total of 3288 dwellings (see Appendix A for raw data). It is higher than the 35 dph figure cited as broadly appropriate for development within the adopted Local Plan. Indeed, the average gross density of recently permitted developments is calculated as approx. 37 dph, exceeding this expected minimum density.

### Development Scale

6.2 The comparison of average densities according to development scale identified a generally directly proportional relationship between the size of the development in terms of the numbers of dwellings, and the net density of the scheme, as illustrated by Figure 1 and Table 1. An exception to this is densities for large and strategic developments, when the latter achieve slightly lower net densities than the former. The graph shows more limited variance in average gross densities in relation to development scale. This difference in averages demonstrates the effects of applying land area and open space provision adjustments when calculating net densities, as described within the methodology. Overall, the results suggest higher densities are achievable on land available for dwellings within larger schemes.

Figure

6.3 It is prudent to note that the applied adjustment factors may introduce minor inaccuracies in terms of calculated average net densities versus actual average net densities. This could result in the average net density calculations being overinflated when accounting for collective non-housing on-site provisions, especially for larger schemes. This matter is considered further within individual development case studies. Notwithstanding this potential, it should be recognised that both gross and net average densities for all development scales exceed the recommended minimum density expectation of 35 dph, providing evidence to suggest the expectation represents an achievable and therefore reasonable minimum, attainable for small to strategic development schemes alike.

Table 1

|  |  |  |
| --- | --- | --- |
| **Development Scale** | **Average Gross Density** | **Average Net Density** |
| Small (<10 dwellings) | 36.45 | 37.45 |
| Medium (≥10, <50 dwellings) | 39.12 | 48.42 |
| Large (≥50, <200 dwellings) | 40.72 | 57.17 |
| Strategic (≥200 dwellings or part of SDL) | 40.21 | 55.64 |

### Previously Developed Land and Development Types

6.4 Data relating to greenfield and previously developed sites demonstrates differences in average net density, with overall averages of approximately 36 dph and a 43 dph respectively (see Figure 2). The achievement of higher densities on brownfield sites is likely to be a result of multiple factors, including their location within urbanised areas enabling higher density development consistent with the established context, and/or development through conversion or change of use of existing non-residential buildings with capacity for high residential densities. Differences between average net densities for various development types are further illustrated by Figure 3. This shows that developments resulting from conversion and changes of use have higher densities than new development.

Figure

Figure

### Housing Mix

6.5 Analysis of densities for developments with varying dwelling mixes identified an average density of 28 dph where developments were predominantly (more than 50%) houses, in comparison to 84 dph for developments which were predominantly comprised of flats. Further analysis, illustrated by Figure 4, identified that 38% of predominantly housing developments were permitted for greenfield sites, compared with 21% of predominantly flatted developments. This demonstrates a relationship between the two variables, in that higher density developments comprised of a high proportion of flats are more typically permitted on previously developed land.

Figure

### Settlement Hierarchy and Proximity to Settlement Boundaries

6.6 Analysis indicates density delivery adheres to the settlement hierarchy, with an overall average net density of 66 dph being achieved in Chichester City, the sub-regional centre, and 48 dph within the settlement hubs (East Wittering and Bracklesham, Selsey, Southbourne and Tangmere). Average densities within service villages and the ROPA were below the recommended 35 dph minimum, at approx. 27 and 24 dph in these more rural and less accessible locations (see Figure 5).

Figure 5

6.7 In terms of proximity to settlement boundaries, the most conducive location for higher densities was determined to be within the settlement boundary (SB), with an average net density of 50 dph (see Figure 6). An overall average net density of 39 dph was achieved by development outside of but adjacent or near to the settlement boundary. 61% of developments within this category were new developments on greenfield land. By comparison, both within the SB and further afield (in the ROPA) only approx. 30% of the developments were greenfield sites.

Figure 6

### Transport and Service Accessibility

6.8 Reflecting the adopted policy approach that higher densities may be sought where sites are better served by public transport and have access to a range of services and facilities, average densities demonstrated an inversely proportionate relationship to distances from train stations and retail centres (illustrated by Figure 7). A high average net density of 96dph was calculated for recently approved developments within 400m of the Plan Area’s stations (51dph within 800m), while 74dph was the average net density for developments within 400m of retail centres (56dph within 800m).

Figure 7

6.9 It is recognised that ‘crow-fly’ distances may not reflect the reality of travel station accessibility. By comparison, average net densities within 5 and 10 mins walk of stations were lower, calculated to be 90dph and 42dph respectively. This may be indicative of fragmented access, including by the rail corridor itself, increasing travel times to stations.

6.10 The comparison of train station and retail centre walking and cycling times revealed that average densities of developments within 10 mins walk or 5 mins cycling from train stations were lower than equivalent times for retail centres, and than might be expected from the general pattern of inverse proportion (see Figures 8 & 9). This may be reflective of the established context, with residential development more conventionally transitioning from urban centres to suburban scale development, especially within Chichester city, but being less predictable in relation to the transport hubs where development opportunities may be limited by existing non-residential uses or open space, or other constraints. This is explored further later in the study.

Figure 8

Figure 9

### Comparison of Existing Built Densities with Recent Development Densities

6.11 GIS data analysis enabled the determination of average existing densities within the settlement boundaries of locations identified as settlements considered accessible to public transport (train), or with good general transport access (see Appendix B for raw data). As recognised within the proposed submission Local Plan, these densities were found to be considerably below the recommended minimum of 35 dph, ranging from approx. 18 dph (Chidham and Hambrook) to 27 dph (Tangmere) – see Figure 10. The statistics are provided as approximations only, however, as whilst non-residential properties were excluded from the total number of properties for which densities were derived, the total areas determined were inclusive of land used for purposes other than housing, such as commercial and industrial buildings and open space.

Figure 10

6.12 The GIS data was compared to average densities for development recently approved within the same settlement boundaries, calculated from the data from 2018-2022 (see Figure 11). The average densities of recent developments within Chichester, Fishbourne and Tangmere exceeded both the existing built densities calculated for these locations, as well as the expected minimum of 35dph. In the case of Chichester in particular, the recent average net density was determined to be 68 dph, compared with 21 dph for the existing built environment. It is therefore suggested that the existing density figure for Chichester reflects the presence of significant non-residential building infrastructure, including retail and commercial premises, and large areas of open space.

Figure 11

6.13 GIS analysis focused on average existing built densities in close proximity to Bosham, Chichester, Fishbourne, Nutbourne and Southbourne train stations. As illustrated by the maps within Appendix C, with the exception of Chichester, areas within 10 mins walking distance from train stations extended beyond the settlement boundaries into the countryside (and in several instances the Chichester Harbour National Landscape) where development is limited. This provides an explanation as to why built densities within reasonable walking distance of train stations are lower than average densities within the settlement boundary (see also Figure 12).

Figure 12

6.14 For Chichester, the area of the city within 10 mins walking distance of the train station is 150ha, compared with approx. 770ha within the settlement boundary. The station is located to the south of the city centre, and is surrounded by commercial and industrial development, as well as green open spaces. By contrast, the retail centre is surrounded by a denser built environment comprising commercial and residential uses. Average existing residential densities were significantly greater in areas within close walking distance of the retail centre as compared with the train station (Approx. 180% denser within 5 mins walking distance, and approx. 170% denser within 10 mins) (see also Figure 13).

Figure 13

## Case studies

6.15 In-depth case study analysis (see Appendix D) of seven approved developments within the Plan Area compared study calculated densities (see Methodology and Appendix A) with those stated in application information or officer reports (where available). It was revealed that the study densities, determined by applying land use adjustments and open space provision assumptions, in the majority of cases provided higher density figures than those cited within permitted applications. In several instances, the calculated density figure was considered to represent densities most accurately on site, however. The observations highlight the absence of a single source of density information that can be considered wholly reliable. It is suggested that the average net densities determined consistently within the study can be considered to provide reasonable and broadly applicable approximations of density.

6.16 Key insights derived from the case studies reflect consideration of living standards and residential amenity associated with higher density housing, including potential noise impacts associated with pre-existing neighbouring uses, and the availability of daylight/sunlight. The analysis of compliance with Nationally Described Space Standards (see Appendix E for raw data) revealed that higher density developments, including those on previously developed and constrained sites, met the standards, regardless of this not being a policy requirement to date. This is consistent with the findings of CDC’s separate Residential Space Standards Background Evidence Paper which concluded that housing density was unlikely to be limited by proposed adoption of NDSS. Developers, in the majority of instances, need not increase Gross Internal Areas (GIAs) of dwellings to ensure compliance, rather improve internal design elements to ensure an appropriate standard of amenity for future residents. It should be noted that the overall density study does not include dwellings achieved via the exercise of permitted development rights, including for change of use from non-residential. Permitted development legislation currently requires the provision of adequate daylight and for NDSS to be met, although this is subject to change.

6.17 Protecting the historic environment of Chichester City, including its Conservation Areas, was a key consideration within several case studies but revealed to not necessarily be a constraint, with densification considered to enhance the surrounding historic context in one instance (19 Southgate). Two distinct developments within Chichester City North were also studied, noting Historic England’s recognition of previous development within the strategic location as an exemplar in terms of its delivery of increased residential density within an historic context. The use of characterisation studies to inform zoned density ranges within masterplans was highlighted, informing different approaches to density in each case. It was observed that delivery of a higher density scheme within a less constrained greenfield site further from historic assets resulted in a more standardised, less innovative design, with arguably related impacts on its successful consideration of amenity and landscape.

6.18 Within the context of a greenfield urban extension (West of Chichester), a residential architectural design strategy and quantum of development parameter plan informed a range of densities and building forms as well as layouts considered appropriate to varied topographical characteristics and surrounding landscape. In particular, the need to lessen densities close to the edge of the new settlement in response to landscape sensitivities was recognised. The opportunity for higher density forms to provide focal points and signify transitions in terms of land use from residential to mixed development area within the broader development area was also a key design consideration.

* 1. The impact of market factors on the realisation of densities was reflected in several case studies. Proposals were altered in response to changes in the market, driving need for smaller, family houses and enabling higher densities to be approved. Most notably, a proposal to deliver a housing mix entirety comprised of affordable homes was permitted, enabling high densities to be realised via an innovative design-led approach to the redevelopment of a site (49-51 Fishbourne Road).
  2. Finally, the consideration of density for a development outside Chichester City, within a settlement hub well-served by public transport, was explored. Despite the sustainability of the urban location (Southbourne), overriding constraints limited density to below the Plan Area average and the minimum 35dph guideline. Key considerations included landscape and conformity with the prevailing character of the settlement. The potential opportunity to further explore gentle densification in relation to existing development via the forthcoming Southbourne allocation DPD was recognised within the analysis.

# Conclusions

7.1 A key finding of the analysis is that the adopted policy approach, which entails a flexible approach to density within the relevant policy but supplemented by a 35 dph guideline within the supporting text, has enabled the approval of developments with an overall average net density of 41 dph, exceeding the 35 dph guideline and therefore generally avoiding homes being built at low densities across the Plan Area. The detailed findings demonstrate that densities above 35 dph are achievable for all scales of development, and for greenfield as well as brownfield sites, illustrating the broad applicability of the proposed minimum expectation, continued from the adopted approach.

7.2 The results reflect the approval of higher housing densities within urban areas, averaging 66dph within the sub-regional centre, and 48dph within settlement hubs. In addition to these locations, application sites identified as being well-served by public transport, specifically within a 5- or 10-minute walk from a train station, were determined with average densities of 90dph and 42dph respectively. This demonstrates the deliverability of higher density developments within sustainable locations without the use of additional minimum density standards specifically for city and town centres.

7.3 Case studies have been conducted in order to gain an in-depth understanding as to whether proposals are providing appropriate densities for the immediate context, in keeping with the character of the surrounding area. This includes examples of the use of characterisation studies to inform the agreement of master planned density parameters within strategic developments, enabling the application of a flexible density range, rather than a more rigid single standard. The proposed Local Plan policy continues to require that particular attention is given to context and character considerations as part of the optimisation of development densities, ensuring flexibility on a case-by-case basis in order to strike an appropriate balance between increasing densities, while also responding appropriately to constraints.

7.4 There may be opportunities to take a more specific and ambitious approach to densities in the future, particularly in relation to highly sustainable locations. Such an approach should be supported by extensive contextual analysis and detailed design requirements. Consequently, this is likely to be most appropriately tackled for the Plan Area via the future design coding process.

1. [Government response to the Levelling-up and Regeneration Bill: reforms to national planning policy consultation - GOV.UK (www.gov.uk)](https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/outcome/government-response-to-the-levelling-up-and-regeneration-bill-reforms-to-national-planning-policy-consultation) [↑](#footnote-ref-1)
2. [Strengthening planning policy for brownfield development - GOV.UK (www.gov.uk)](https://www.gov.uk/government/consultations/strengthening-planning-policy-for-brownfield-development/strengthening-planning-policy-for-brownfield-development) [↑](#footnote-ref-2)
3. [Local\_Authority\_Districts\_ranked\_by\_rural\_and\_rural-related\_populations\_with\_Rural\_Urban\_Classification.pdf (publishing.service.gov.uk)](https://assets.publishing.service.gov.uk/media/5a7f88aaed915d74e622b0c1/Local_Authority_Districts_ranked_by_rural_and_rural-related_populations_with_Rural_Urban_Classification.pdf) [↑](#footnote-ref-3)
4. Replacement dwellings were excluded from the study [↑](#footnote-ref-4)
5. 20-Minute Neighbourhoods (March 2021), TCPA. [20MN\_Main.qxd (tcpa.org.uk)](https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf) [↑](#footnote-ref-5)