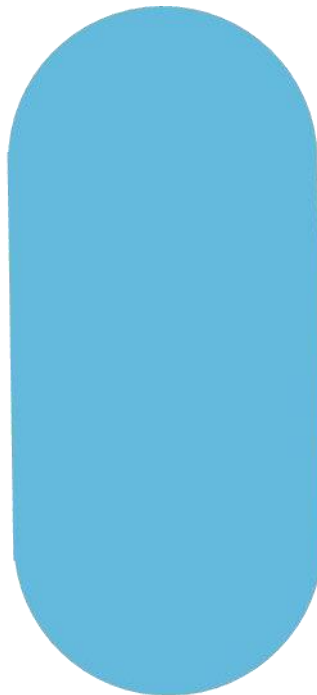




# CHICHESTER LOCAL PLAN EXAMINATION MATTER 6 HEARING STATEMENT

PREPARED ON BEHALF OF GLEESON LAND

September 2024





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## 1. INTRODUCTION

1.1 This Matter Statement has been prepared on behalf of Gleeson Land in respect of Matter 6 relating to Chichester District Council's (CDC) proposed area policies and allocations.

1.2 Gleeson Land has interests in the District across 3no. sites, as set out below, and have submitted representations at earlier stages of Plan preparation through Regulation 18 and 19 consultations:

- Land west of Clay Lane, Fishbourne – SHLAA ref. HFB0018a;
- Land south of Scant Road (West), Hambrook – SHLAA ref. HCH0024; and
- Land South of Lagness Road, Runcton, not previously submitted for consideration but subject to an Outline application being submitted in October 2024.

1.3 More detail on these sites is provided in our response to Matter 3.

1.4 This Matter Statement responds to the Inspectors' questions and have been considered in the context of the tests of 'Soundness' as set out at Para 35 of the NPPF (December 2023). These require that a Plan is:

- Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.



## 2. MATTER 6: AREA POLICIES AND ALLOCATIONS

**Issue: Are the proposed policies and allocations justified, effective and consistent with national policy?**

2.1 Re-iterating our comments provided in response to Matter 3, we consider the Plan and evidence base has unjustifiably discounted Fishbourne as a “more sustainable” Strategic Development Location in Policy S1.

2.2 In doing so, the Plan includes no area policies or allocations for this sustainable settlement.

2.3 Fishbourne should be recognised as a ‘more sustainable’ location where additional growth can and should occur. In doing so, the Plan should direct further growth to this location and include specific housing allocations through Chapter 10 of the Plan to achieve this.

### **Policy A12 Chidham and Hambrook**

**Q.233 Is there clear evidence that the site would not be developable in terms of the NPPF?**

2.4 The strategy being proposed by the Plan is unclear. Policy A12 identifies that a minimum of 300 dwellings are to be delivered in Chidham and Hambrook, through the adoption of a new Neighbourhood Plan. However, the housing trajectory contained within the Council’s suggested modifications (SD10.02) identifies no further delivery through this policy across the Plan period. Instead, 3no. sites are identified within the parish which have been granted consented since 01 April 2024, totaling 230 dwellings.

2.5 This should be clarified, including where these sites are relied upon within the supply and any residual requirement for the Plan.

2.6 Given the sustainability of the villages, we consider the Plan should continue to make provision for further growth. However, this should be Local Plan-led and not as part of a Neighbourhood Plan for which there is less certainty. This is further explored below.

**Q.240 What would happen if the site were not allocated through the Neighbourhood Plan?**

2.7 As set out in our response to Matter 4C, this is a risk to the Council’s strategy for meeting housing needs and results in a Plan which is not justified.

2.8 The latest update on the front page of the Parish Council’s Neighbourhood Plan website states:

***The Parish Council has been informed by Chichester District Council that the area of the parish (Chidham, Hambrook and Nutbourne East), in their preferred approach will be required to take by 2035 a minimum of***



***500 dwellings and a two-form entry primary school with supporting facilities and infrastructure.***

***The parish council was further informed that if the parish council did not take decisions as to where these dwellings and other facilities should be placed, then the District Council would take the decision for us.***

***While we can object, and will possibly do so, the advice we have received is that any objection will simply fail.***

- 2.9 As part of the consultation on its approach to its new Neighbourhood Plan the Parish Council published the results of parish survey work in October 2021 for which Question 1 asked:

***The first draft of the Chichester District Council Local Plan required 500 houses to be built in the parish. The Parish Council believes this figure is too high and inappropriate for the Parish and should be reduced because there is insufficient infrastructure, as identified by Chichester District Council. The NPSG are delaying a decision on land allocation until there is clarity from Chichester District Council on housing numbers. Do you support the approach by the Chidham and Hambrook Neighbourhood Plan Steering Group?***

- 2.10 97.6% of responses supported the above position of the Parish Council.
- 2.11 It is understood no progress is currently being made on the new Neighbourhood Plan, awaiting the outcome of the Local Plan process. However, it is clear the Parish Council / Neighbourhood Plan Steering Group are not favourable to the housing requirements for the parish.
- 2.12 We consider there to be no justified reason for why housing allocations for Strategic Development Locations be deferred to another plan-making process. This is a significant risk to the achievement of meeting housing needs in full across the Plan period and does not result in an effective strategy for doing so.
- 2.13 The Council has through its own evidence base assessed the suitability and deliverability of sites around Chidham and Hambrook. It has identified circa. 1,250 potential homes which could come forward on HELAA suitable sites.
- 2.14 The Council should have therefore come to its own conclusions on where housing should be delivered, thus providing more certainty as to how and when housing needs would be met locally, thereby speeding up the delivery in these locations.



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2.15 In light of our comments elsewhere, including in respect of the housing requirements, we consider Chidham and Hambrook represents a positive opportunity for further addressing housing needs of the District through site specific allocations.