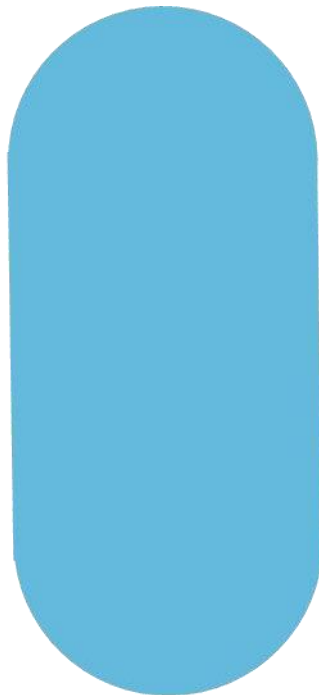
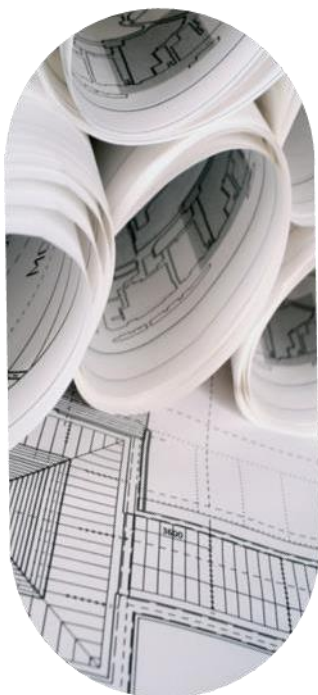




CHICHESTER LOCAL PLAN EXAMINATION MATTER 2 HEARING STATEMENT

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 2 relating to Chichester District Council's (CDC) 'Strategic Policies', specifically the proposed Plan period and the implications of this.

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 2: STRATEGIC POLICIES

- Q.12 The strategic policies of the Plan would cover the period 2021 to 2039. Given the anticipated adoption date of the Plan as set out in the LDS, the strategic policies would not look ahead over a minimum of 15 years from adoption as per NPPF paragraph 22. What is the justification for this, and is the Plan positively prepared in this regard?**
- 2.1 Para 22 of the NPPF is clear that strategic policies should look ahead over a minimum 15 years from the point of adoption. This reflects the need to anticipate and respond to long-term requirements and opportunities, including improvements in infrastructure.
- 2.2 The submission Plan identifies a Plan period of April 2021 – March 2039.
- 2.3 The Local Development Scheme 2024 – 2027 (published February 2024) identifies adoption of the Plan in Spring 2025. Even if this were to be March 2025, the Plan would only have a 14-year timeframe on adoption. This is clearly inconsistent with the requirements of the NPPF, and therefore an issue of soundness.
- 2.4 The Council's Response to the Inspector's initial questions, dated 01 August 2024 (CDC02) justifies the reduced Plan period on the basis the Plan at the time of Regulation 19 consultation (February – March 2023) would have been sufficient. However, this is incorrect as the Council would have been aware that the time required to review and consider Regulation 19 responses, complete its outstanding evidence base (inc. transport work), submit the Plan to the Secretary of State, for the Examination to commence and conclude, and to consult on any modifications (which the Council has already identified are required for soundness), would clearly have taken the process beyond a March 2024 adoption.
- 2.5 The proposed review mechanism (modification Policy M1 of SD10.01) is inadequate to fix this clear issue with soundness which the Council should have resolved prior to Regulation 19 consultation, or at least in the period between Regulation 19 and submission through its proposed modifications and as its evidence base continued to evolve.
- 2.6 We consider the Council's timescales for adoption are unrealistic, and inconsistent with experience elsewhere. As set out below, extracted from the Planning Inspectorate website, the average timescale from submission to adoption is in excess of 2-years.



Council	Plan Submission	Date found Sound	Adoption Date	Review / New Plan
Kensington and Chelsea	08/02/2023	05/07/2024	24/07/2024	Review
Maidstone	31/03/2022	08/03/2024	20/03/2024	Review
Bracknell Forest	20/12/2021	01/03/2024	19/03/2024	Review
Bassetlaw	18/07/2022	21/02/2024	29/05/2024	New
Greater Norwich Local Plan	30/07/2021	19/02/2024	28/03/2024	New
Greater Manchester	14/02/2022	14/02/2024	21/03/2024	New
Dartford	13/12/2021	05/02/2024	22/04/2024	Review
Waltham Forest	30/04/2021	08/01/2024	29/02/2024	Review

Table 1: Planning Inspectorate Monitoring Data – latest adopted Local Plans (As of Aug 2024)

- 2.7 On this basis, we consider adoption within the 2025/26 monitoring year is possible, albeit 2026/27 is more realistic.
- 2.8 Extending the Plan period to March 2042 will ensure the Plan, on adoption, looks ahead over a minimum of 15 years as required by the NPPF.
- 2.9 This will require the Plan to address an additional 3no. years of growth requirements, resulting in overall Plan requirement of 12,075 dwellings (on the basis of the ‘constrained’ 575dpa).
- 2.10 The housing trajectory data contained within the Council’s suggested modifications (April 2024, SD10.02) indicates a supply across the Plan period up to 2038/39 of 10,752 dwellings. Whilst no detail is provided identifying supply beyond this, the trajectory identifies housing delivery reducing from 2033/34 onwards.
- 2.11 The additional 3no. years of Plan period is therefore very likely to result in a significant supply gap which will necessitate additional sites to be identified in order to address shortfall and ensure a “sound” Local Plan is adopted.
- 2.12 On the basis of the current strategy, we consider the Plan is not “sound” as it is not consistent with national policy, is not positively prepared and would not be effective in addressing housing needs across the required Plan period.