

Examination of Chichester Local Plan

Vail Williams LLP Hearing Statement obo Deerhyde Ltd

Matter 4c: Housing

Issue: Is the proposed approach to housing development positively prepared, justified, effective, and consistent with national policy?

Local Housing Need

Q.60 Is there any substantive evidence to demonstrate that it would be appropriate to plan for a higher housing need figure than the standard method indicates in this case as per advice set out in the PPG (Paragraph: 010 Reference ID: 2a010-20201216)

Given that the Council is promoting a strategy which underprovides the level of housing that it has identified already, not accounting for any changes to the Standard Method, it is clear that the Council should plan for a higher housing requirement. The Council's own HEDNA points to 638 per annum and the currently proposed housing provision of 575 per annum (in the Draft Local Plan) will not meet the [current evidenced] need. This is before the proposed changes to the Standard Method are implemented, which will increase the housing target by almost double.

Whilst it is noted that the delivery of large-scale sites can result in the delivery of large numbers of new homes, it is apparent that such developments take considerable time to work their way through the planning system to an approval and even then are only at outline stage. The delivery of new homes is therefore reliant on the Council to efficiently determine reserved matters applications and, thereafter, discharge of conditions, to allow a swift implementation of planning applications and a timely start on site for the delivery of housing. It is also reliant on the necessary infrastructure being facilitated to serve the developments in a timely manner such as roads, schools, healthcare provision etc.

The allocation of small and medium sites (ie. not reliant on strategic sites) within the housing mix are invaluable in delivering housing quicker and potentially in places, perhaps outside the main settlements, which would allow new housing to be accessible to all which is one of the key facets of the NPPF.

This approach would assist with maintaining delivery of housing where existing allocations are either stalled or progressing slowly through the planning system or have simply been delayed in coming forward for perhaps other commercial reasons.

The plan is over reliant on strategic sites, as detailed at Policy H2 (which provides further detail following the Spatial Strategy set out at Policy S1) which would provide 7,195 houses. This is a significant reliance on the strategic sites to deliver 75% of the overall housing target and much of them are predicated on the works to the A27 being completed in order to make them acceptable. This is now in doubt and it is noted that works to the A27 (and other highway works) are absent

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from the Statement of Common Ground between CDC and WSCC which shows that this issue is yet to be resolved.

The shortcomings of this approach will be further exposed if the new standard method is adopted in the revisions to the NPPF which will increase housing requirements still further and importantly the ability to discount housing requirements is removed. This will be a material consideration in the examination of the draft plan, as it will expose the Council's housing strategy to further scrutiny.

Furthermore, the above housing provision is predicated on the ability to identify mitigation for the impacts on the European environmental designations (including nutrient neutrality), allowing for Biodiversity Net Gain and addressing highway implications and negotiating the planning system.

Policy H1 Meeting Housing Needs

The housing requirement

Q.64 Policy H1 Meeting Housing Needs sets a housing requirement for the full plan period 2021 – 2039 of at least 10,350 dwellings. This is below the local housing need for the area as determined by the standard method. The justification for the proposed provision of 535 dpa in the southern area has been considered under Matter 4A Transport. Is the proposed figure of 40 dpa in the northern part of the plan area justified?

As detailed above, with the increase in the housing requirement for Chichester in the revised Standard Method Calculations which will nearly double the requirement, a significant number of additional sites will be required, of various sizes, to facilitate delivery of the housing needed.

In that regard, all sizes of settlements (not just Chichester) will need to facilitate developments, including Selsey and the Manhood Peninsula. The allocation of further (smaller than strategic) sites on the Manhood Peninsula will be essential in delivering the required housing numbers.

The Council should review its strategy to accommodate the majority of housing around the principal settlement of Chichester and direct more housing to the 'Tier 2' settlements including Selsey.

Further work should be undertaken to investigate the feasibility of an alternative housing strategy with a more equitable split of housing numbers throughout the hierarchy of settlements.

It is clear that the requirement will need to be accommodated in the District as neighbouring authorities are not in a position to take any numbers and the ability to propose a lower requirement is about to fall away.

Policy H1 is therefore not **justified** in light of the recent direction of travel of Government policy.

Housing land supply

Policy H1 Meeting Housing Needs sets out the broad sources of supply to meet the housing requirement. Housing land supply will be provided by the Plan, the existing site allocation DPD, a new DPD and Neighbourhood Plans. The Plan therefore is not singly providing for all the supply in the plan period, though it is setting the overall housing requirement.

This is a strategy that has been used by many councils over time. Given that CDC is unable to demonstrate it can accommodate the predicted housing need in the District with the current strategy, further work and evidence is required to demonstrate how the current or higher housing requirement can be accommodated in the District. This could be in the form of a further Call for Sites which may differ from the latest (2021) HELAA given the Government's more positive direction of travel towards housing delivery (ie. More sites may be promoted).

The use of a Site Allocations DPD will be useful in providing the detail of sites available with policy guidance on constraints, planning obligations etc but this will add further delay to the delivery of allocated sites given the length of time that it will take to draft and undertake the necessary consultation on such a document.

Q.68 Are the components of the overall housing land supply set out in Policy H1 (as updated in BP07 Housing supply background paper) justified? Specially: Is footnote 29 as set out in the submitted Plan regarding Site Allocation DPD allocations correct given that policies of that plan are not to be superseded by this Plan? What is the compelling evidence that windfall sites will make the anticipated contribution to housing land supply over the plan period?

Whilst a reliance on windfall sites is welcomed to provide some flexibility in housing provision, it provides no certainty on the level of deliverable sites, particularly at a level required to deliver the current and prospective housing numbers. A much larger proportion of windfall sites will be required to deliver housing requirements (given constraints of delivery of strategic sites and lack of allocation of smaller sites) which could result in longer time to deliver consents, particularly if permission is not granted locally.

Policy H3 Non-Strategic Parish Housing Requirements 2021 – 2039

Q.73 What is the justification for the parish housing requirements set out in Policy H3?

There appears little sense in the parish housing requirements set out in Policy H3. It does not seem to reflect the Settlement Hierarchy set out in policy S2 in that no dwellings are allocated in those parishes / settlements in 'Tier 2' which could increase the supply of housing close to settlement hubs. Conversely, some development is proposed at the smaller Service Villages of Boxgrove, Fishbourne, Kirdford, North Mundham, Paistow and Ifold, Westbourne and Wisborough Green. This is at odds with Policy S2 where the majority of development should be located within tier 1 and 2 settlements.

The policies are therefore not **justified** or **effective**. In summary, it is considered that the proposed housing land provision is not '**Consistent with national policy**' (current or emerging) as the proposed provision does not enable the delivery of sustainable development. It is considered that the proposed plan is contrary to the NPPF paragraph 16a, 16b, 16c, 16d and paragraph 20a.