

HMPC Ltd

Chichester Local Plan 2021 - 2039

The Goodwood Estates Company Ltd

Matter 4C

Housing

The Goodwood Estate Limited – Respondent 7922

HMPC Ltd- Agent 112

Inspectors' Questions

Issue	Is the proposed approach to housing development positively prepared, justified, effective and consistent with national policy?	
	Housing needs of different groups in the community	Question 62
Policy 7	Rural and First Homes Exception Sites	Questions 82 and 83
Policy 9	Accommodation for Agricultural, Horticultural and other Rural Workers	Question 88

1. Introduction

- 1.1 The Estate has provided a concise and comprehensive response to the Council's proposed modifications.
- 1.2 The Goodwood Estates Ltd has agreed a Statement of Common Ground (SoCG) with Chichester District Council and this has been presented to the Examination.
- 1.3 This statement provides responses to the specific questions of the Inspectors, in respect of matters raised through our representations to the Local Plan, and in our responses to the Council's proposed modifications.

2. Question Responses

Issue **Is the proposed approach to housing development positively prepared.....**

The Estate is not a housing developer but is a major economic driver within the District. It is conscious of the general shortage of new housing within the UK and of the differing degrees of shortage within the local area. It is also aware of the very real importance of protecting those components of an area that contribute positively to its economic vitality; not just active businesses, but the environment within which they operate and from which many derive support. This includes importantly, the local environment, landscape and heritage, factors which contribute positively to the character of an area and make it distinct.

Within Chichester District the factors which existed to found the City and its region remain important today and that heritage and character contribute to its economic success. It would be completely wrong, short-sighted and dangerous for the local plan to bend to the whim of land promoters and allow development driven by the generic factors of housing numbers alone (irrespective of how such promotions might be presented with shallow justifications of 'other benefits'). There is no doubting need, but to be sustainable housing growth must be balanced against other equally important factors that underpin the economic, environmental and social well-being of the communities that reside there. The proposed spatial strategy is essential in this respect.

The spatial strategy, addressed under Matter 3 of this Examination, is supported by the Estate as are the very real concerns set out in paragraph 5.11. Uncontrolled housing promotion on the limited pretence that the next urban extension represents sustainable development (as again evidenced through this local plan examination) is itself unsustainable and ultimately damaging.

It is important (in part response also to Q.75) the plan identifies key elements that make the area special and undermine its economic and environmental success for long term protection. The plan as currently drafted seeks to do that, but by its own time restraints, must adopt a view that is too short-term in respect of the protection of long-term essential elements. Paragraph 5.11 therefore becomes increasingly important in considering proposals that go beyond the plan's spatially planned housing provisions.

Housing needs of different groups in the community

- Q.62 The Estate is not a housing developer but it has a long tradition of providing housing for persons and families working on the Estate or have reason to live within it. The Estate retains a significant housing stock, which it must maintain, but it is insufficient to meet its needs. That tradition continues despite the character and operations of the estate having changed significant over recent decades.

To provide accommodation for staff close to the Estate through the open market is prohibited by costs and the shortage of supply in rural areas. The Estate is looking to the plan to facilitate a continuation of the tradition by providing a presumption in favour of small-scale housing developments in appropriate areas across the Estate, either to meet the immediate needs of its staff, or to provide much needed local and affordable housing for local people within or adjoining existing settlements.

As much of the Estate, apart from the Motor Circuit and Aerodrome and smaller areas around Boxgrove, Westhampnett and Westerton, lies within the South Downs National Park, similar submissions to that authority are being made through the review of its local plan.

For the greater part the Estate is looking to provide small scale developments (windfall) on sites within or adjoining existing villages, hamlets and building groups. This will involve building conversions as well as new build opportunities. This is not speculative development but development in response to a demonstrable need (the Estate will retain freehold ownership) and we are looking to the local plan to offer its support.

The local plan cannot influence or rebalance the increase in house prices as beloved by owner and politician alike, but it can make very clear policies to allow exceptions where need is proven and to impose restrictions on such property through successors in title.

Policies H7 and H9

Q.82, 83 and 88 Much of the Estate's accommodation need could be considered as Rural or exception sites. We would be happy to see our requirement so defined. Our requirement is for small unit numbers and we have no objection to the 30 limit imposed on exception sites.

Modification relating to Criterion 4 of Policy 7 is supported (CM171)

Policies H1 and H3

Q.60-75 Beyond its need to provide housing to meet its staffing requirements, the Estate is not suitably placed to comment upon the District Need requirement. It has however, commented upon the spatial strategy which does have implications for Estate interests and also potentially as a supplier of land for housing.

The Estate has no intention of releasing land and reducing its size. The Estate is looking at opportunities to bring back land into Estate ownership rather than release it. Where it is believed there might be wider benefits arising from the release of land for development, the Estate prefers to retain the freehold and control the form and content of any development, to ensure it is sustainable and appropriate for the location; an approach that is completely opposite to the aims and objectives of land promoters.

Many landed estates have sold off land to support the delivery of housing, particularly around urban areas, but this is not the situation at Goodwood where the Estate lies some distance from the edge of the Chichester built-up area. The Estate's approach is to protect the countryside setting which underpins its businesses and respond actively to developments which encroach its boundaries and pose a threat to its continued economic viability, through which it continues its sound stewardship of land (of such importance to be included within the National Park) and the economic vitality of the District.

As stated under Matter 3, the Estate is supportive of the Council's spatial strategy which provides an appropriate balance between the need for new housing and the District's ability to accommodate that need sustainably. Representations to this examination by landowners and land promoters, for the greater part, provide a generic approach to housing delivery (driven in greater part by housing numbers rather than spatial policy to deliver housing in less than satisfactory locations) and the authority is right to impose restrictions through this strategy.

We suggest there is further capacity which could be explored within the southern and western parts of the District, and also within existing smaller settlements (including those within the National Park) without destroying character, encroaching important environmental assets or compromising infrastructure provision.

The Inspectors are correct in their omission from the Examination (ID.04 paragraph 21) the consideration of individual 'omission sites.' If there is found to be a deficit in the housing need calculation, it is for the

planning authority to review its allocations in response to the spatial strategy, and not for individual interests to promote inappropriate land for generic housing reasons.

We highlight the comments of respondents 7854 and 7398 as typical examples, and also because they seek to release further land for development which risks a significant adverse impact on Estate business. Impacts with wide reaching and long standing adverse economic consequences for the local, regional and National economies that go far beyond the very limited, and transient benefits claimed.

With reference to these representations (March 2023) the argument and conclusions are predictable and could be made in respect of any site within this district, and are easily transferable to other locations. Frequently there are demands for the release of additional housing land (including the respondents own omission site) by claiming the Council's requirement should be a minimum (with the implication other sites must be released) but without providing any true assessment within those representations of the capacity of the district to accommodate that additional development without harm.

Only transport is referenced in terms of capacity constraints by this promoter (environmental and social elements are ignored) and the implied suggestion that the provision of more houses will assist in making house prices more affordable is farcical. It is well known that the provision of new housing in any area will not result in a reduction in housing prices locally. The new housing will inevitably take its lead from existing prices and being new, attract a premium. There simply are not enough houses within the local market place to influence the laws of supply and demand to an extent where house prices will fall through the provision of 165 additional units. That will only be influenced by National fluctuations, but in desirable areas such as Chichester and adjoining National Park, with its environmental and heritage benefits, such effects will be limited.

Q.73-75

As stated through our representations and as repeated in these follow up responses to the Inspectors' matters and questions, it is important the plan identifies key elements that make the area special and underlie its economic and environmental success for long term protection. These are important elements of the spatial strategy which enable the District to be sustainable. If anything, the plan as currently drafted adopts a view that is too short-term in respect of the protection of long-term essential elements. Consequently, policies now included should be framed in a manner that allows them to be carried forward to subsequent plans to ensure essential elements are protected.

It is disappointing that no modification to overcome the purposeful misinterpretation of the policy to resist small scale or infill development, both by decision makers (through 'in-principle objection arising from a policy silence on the matter) or neighbourhood plans (where from experience in this district the objective is to preserve the status quo and avoid change). Clarification should be given that the Policy is spatially strategic in nature and that individual sites in location outside of preferred strategic locations will continue to be treated on individual merit. Policy H3 should not be interpreted as a reason to resist all development proposals in non-strategic locations.