



Chichester Local Plan 2021 -2039  
Examination

**Matter 4C Housing  
Hearing Statement**

September 2024



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## 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)?

- 1.1.1 Gladman considers that this is largely for the Council to respond to and justify, however there is evidence to suggest that there is need for a higher level of housing provision in order to address affordability issues in the District.
- 1.1.2 Gladman is aware of the infrastructure constraints set out by the Council, in particular in relation to capacity of the A27 and the cost of improvements required. Gladman recognises that these constraints have determined the level of housing provided in the emerging plan.

### **Unmet needs of neighbouring areas**

Q.61 Is there any substantive evidence that the Plan should be accommodating unmet need from neighbours, and if so, would it be sound to do so?

- 1.1.3 Gladman considers this is primarily for the Council to consider, however it is notable that a number of surrounding authorities in West Sussex have made it clear they are not able to meet their needs, for example, adjoining Havant Borough Council, Horsham District Council and Adur and Worthing Councils.

### **Affordable Housing need**

Q.62 Is there any substantive evidence to demonstrate that there should be an adjustment to the minimum housing requirement to help deliver affordable housing with regard to the PPG (Paragraph: 024 Reference ID: 2a-024- 20190220), and if so, would that be effective?

1.1.4 There is evidence to suggest that affordability is a significant issue in the District, however in light of the infrastructure constraints identified, Gladman recognises that a balance needs to be struck in terms of number of homes which can realistically be delivered.

### **Housing needs of different groups in the community**

Q.63 Is the Plan positive prepared in assessing and reflecting in its policies the size, type and tenure of housing needed for different groups in the community as per NPPF 62?

1.1.5 Gladman has no comment to make in relation to this question.

### **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?

1.1.6 Gladman does not agree with the approach taken whereby the housing requirement is broken down in relation to different parts of the district – the figure identified should apply to the whole district. In the context of the recently published Draft National Planning Policy Framework (NPPF) (July 2024), plans will need to be reviewed immediately in order to accommodate updated housing requirement figures.

Q.65 Would the adverse impacts of the Plan not providing for objectively assessed housing needs significantly and demonstrably outweigh the benefits of doing so when assessed against the policies in the NPPF taken as a whole? That is to say is the overall housing requirement justified?

1.1.7 Gladman considers that this is for the Council to justify.

Q. 66 Paragraph 5.2 of the Plan sets out that the housing requirement would be made up of 535 dpa in the southern area and 40 dpa in the northern area. These figures are not included in Policy H1. Is this effective?

1.1.8 Gladman considers the housing requirement for the entire district should be detailed within Policy H1 rather than breaking this down into requirements for sub-areas in order for it to be fully effective.

Q.67 Are the suggested MMs necessary for soundness?

1.1.9 A modification should be made to Policy H1 to refer to the specific number of dwellings per annum for the whole plan area rather than breaking this down into figures for the northern and southern plan areas.