

Client	Welbeck Strategic Land IV LLP		
Project	Chichester Local Plan		
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Author	S Sykes	Checked	H James



These representations have been produced by ECE Planning on behalf of **Welbeck Strategic Land IV LLP** in response to the Inspectors' Matters, Issue and Questions on Chichester District Local Plan Examination. The statement addresses Matter 4C.

Matter 4C: Housing

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

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?

The Framework and National Planning Practice Guidance (PPG) provide clear guidance on how local housing needs should be assessed and when it may be appropriate to exceed the baseline housing figure generated by the standard method.

The Framework (Paragraph 61) states that local authorities should use the standard method as the starting point for assessing their local housing need (LHN). However, this is not an upper limit.

One of the primary justifications for exceeding the standard method figure is the housing affordability crisis in Chichester. The Framework (Paragraph 60) emphasises the Government's objective to significantly boost the supply of homes, particularly in areas with high demand and affordability pressures. Chichester District faces significant housing affordability challenges, as noted in the Housing Need Background Paper (July 2024). The area has seen house prices rise significantly faster than local incomes, leading to increased pressure on the housing market.

The PPG (ID: 2a-024-20190220) indicates that local authorities should consider adjusting their housing targets upward where affordability is a significant issue. Planning for a higher housing figure could help alleviate some of the affordability pressures by increasing the supply of homes, particularly affordable housing. The standard method calculation, while useful as a baseline, does not adequately account for the acute affordability crisis in Chichester, and the Council has not provided sufficient justification for why it has not pursued an uplift in housing numbers to address this issue.

While the Council cites infrastructure constraints, particularly around the A27, and environmental concerns (such as flood risk and nutrient neutrality) as reasons for limiting housing growth, it has not provided robust evidence that these constraints are insurmountable. The Framework (Paragraph 11b) emphasises that local authorities should seek to meet housing needs in full unless specific constraints justify a lower figure. However, the Framework also stresses that local authorities should be proactive in mitigating constraints rather than simply using them to justify reduced housing delivery.

The Framework encourages local authorities to take a strategic approach to planning, ensuring that infrastructure and housing are delivered in tandem. The Council has not demonstrated that it has fully explored these mitigation strategies, and it has not made a compelling case for why its housing target remains significantly below the HEDNA recommendation of 638 dwellings per annum (dpa).

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?*

The Framework and the PPG place significant emphasis on the duty to cooperate, requiring local authorities to work together to meet housing needs across boundaries (Framework Paragraph 24). Chichester District is under pressure from neighbouring authorities, including the South Downs National Park Authority (SDNPA) and Horsham District Council, to help accommodate their housing shortfalls. Environmental and policy constraints limit their ability to deliver sufficient housing, and there is an expectation that Chichester should play a role in addressing these unmet needs.

The PPG is clear that local authorities must actively collaborate to accommodate unmet needs from areas that are severely constrained, such as national parks.

Chichester District is better positioned than the SDNP to meet housing demand. In particular, the Manhood Peninsula presents an opportunity to accommodate some of these unmet needs. The Council, however, excludes significant new allocations in the Peninsula, citing environmental constraints.

The Manhood Peninsula is relatively free from the nutrient neutrality requirements that limit development in other parts of the district, such as the east-west corridor. Therefore, increasing housing delivery in East Wittering and other settlements could contribute significantly to meeting both local needs and unmet needs from neighbouring authorities, particularly the SDNP. This would align with the Framework's requirement to achieve sustainable development and demonstrate effective cooperation across administrative boundaries. The Council's current strategy of dismissing the Peninsula's potential for growth does not constitute sound planning, given its failure to accommodate unmet needs despite the Peninsula's development capacity

While Chichester faces its own challenges, particularly related to infrastructure and environmental constraints, there are opportunities for the district to accommodate more housing—especially in the Manhood Peninsula—to help meet these unmet needs.

1. **Manhood Peninsula Potential:** The Manhood Peninsula offers underutilised areas where housing growth could be sustainably delivered. Although concerns about flood risk and nutrient neutrality have limited development, areas like East Wittering, which is in Flood Zone 1, provide viable options for housing. The Peninsula could accommodate more homes without significantly impacting the local environment. This would help relieve pressure on constrained areas, such as the east-west corridor around the A27.
2. **Infrastructure Improvements:** Addressing housing needs in the Manhood Peninsula can also alleviate the heavy reliance on the congested A27 corridor. By improving public transport links and local road networks within the Peninsula, development can proceed without exacerbating infrastructure issues in other parts of the district. Furthermore, focusing on areas with existing infrastructure, like East Wittering, allows housing to be delivered with fewer environmental impacts.
3. **Balanced Spatial Strategy:** A more balanced approach to spatial planning would enable Chichester to accommodate unmet needs from neighbouring authorities. By focusing growth in less constrained areas like the Peninsula, the district can meet local and cross-boundary housing demand without overburdening its infrastructure. This would also align with Framework guidance, which encourages sustainable development in areas with available capacity and lower constraints.

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?*

The Council's housing target of 10,350 dwellings does not reflect the scale of affordable housing need identified in their Housing Need Background Paper (July 2024), which highlights a significant affordability gap across the district.

The Framework advises that local authorities should seek to increase housing supply where it can support the delivery of affordable housing. The Council's Plan fails in this regard, as it does not propose a higher housing target to ensure that enough affordable homes are delivered. The Manhood Peninsula is particularly relevant to this issue. As noted in the Council's Housing Distribution Background Paper, this area experiences lower levels of housing development than the east-west corridor due to perceived environmental and infrastructure constraints. However, the Manhood Peninsula, especially East Wittering, has the potential to deliver more affordable homes.

The PPG (Paragraph: 024) allows for an adjustment to the minimum housing requirement if it can be demonstrated that it would help deliver affordable housing. In this case, an upward adjustment to the overall housing figure, with a focus on the Manhood Peninsula, would directly address the affordability crisis in the district. The Manhood Peninsula is not subject to the same infrastructure constraints as the A27 corridor, and the demand for affordable housing in this area is substantial, particularly given the aging population and the need for downsized homes.

By failing to allocate more housing in East Wittering, the Council is missing a critical opportunity to deliver affordable homes in a sustainable location, which contradicts the Framework's goal of ensuring that housing policies meet the needs of different segments of the community. Therefore, we argue that there should be a substantial adjustment to the housing requirement to reflect the need for more affordable homes, with the Manhood Peninsula playing a key role in this delivery.

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 Framework taken as a whole? That is to say, is the overall housing requirement justified?*

The Framework places great emphasis on meeting the full, objectively assessed housing need (OAHN) to support sustainable development (Paragraph 11b). The Council's current housing target of 10,350 dwellings falls well below the OAHN identified in the Housing and Economic Development Needs Assessment (HEDNA 2020), which recommended 638 dwellings per annum (dpa). The decision to adopt a lower housing figure is based on constraints such as transport infrastructure (the A27) and environmental concerns (flood risk and nutrient neutrality). However, the Council has not demonstrated that the adverse impacts of meeting the full OAHN would significantly outweigh the benefits.

The adverse impacts of failing to meet the OAHN are significant and could lead to severe consequences for the district's housing affordability and economic vitality. The Council itself recognises the district's growing affordability gap, particularly in rural and coastal areas, where house prices continue to rise faster than wages. Failing to provide enough housing will exacerbate affordability issues, limit access to homes for young families, first-time buyers, and key workers, and increase overcrowding and homelessness. This will ultimately lead to a less resilient local economy, as businesses struggle to attract and retain workers due to the lack of affordable housing.

On the other hand, the adverse impacts cited by the Council—such as infrastructure and environmental constraints—have not been sufficiently proven to be insurmountable. The National Planning Practice Guidance (PPG) (ID: 2a-004-20201216) is clear that while constraints can be considered, they should not automatically reduce housing figures unless there is compelling evidence that mitigation is impossible. In the case of the A27 transport infrastructure, the Council has not demonstrated why infrastructure improvements cannot be pursued in tandem with increased housing delivery, nor has it provided detailed plans for alternative transport strategies. Similarly, in areas like the Manhood Peninsula, the Council's reliance on extreme long-term flood risk projections does not justify its exclusion of housing in areas like East Wittering, which remains in Flood Zone 1.

Furthermore, the Framework stresses the importance of a sustainable spatial strategy, which balances growth across the district. A failure to provide enough housing in sustainable locations, such as the Manhood Peninsula, while over-relying on the east-west corridor, creates significant infrastructure pressures and undermines the long-term sustainability of the Plan.

In summary, the adverse impacts of not meeting housing needs—including worsening affordability, economic decline, and increased housing inequality—outweigh any infrastructure or environmental constraints cited by the Council. The Plan's housing requirement is therefore unjustified and should be increased to meet the full OAHN.