

Chichester Local Plan 2021-2039

Hearing Statement on behalf of

Barratt David Wilson Homes, Martin Grant Homes & Crownhall
Estates

Relating to 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: 2a -010-20201216)?

Response

1. We believe there is substantive evidence to support a higher housing figure in the form of the Council's own highway evidence.
2. As a starting point, there is clear evidence of unmet need from adjoining LPA's, evidenced by the Local Strategic Statement (LSS) for the sub region, Whilst highlighting the issues, this document only considers options for the affected LPAs between 2030-2050 and doesn't assist in the first 5 years of

this Plan period. This unmet needs figures will only set to worsen with the introduction of the new standard housing methodology, albeit this is not a matter to consider under this Examination. However, not dealing with the current shortfall will only make the step change in housing delivery required more challenging. The District have the ability to assist neighboring authorities, who previously addressed unmet need for Chichester following the adoption of their current Local Plan.

3. As set out in our response on matters 1 and 4A, the Plan constrains housing based on highway constraints, but its own evidence tests a higher housing figure of 700 dpa for the southern plan area. In this case, the strategic infrastructure proposed by the Council to improve the A27 can accommodate a growth figure of 700 dpa and additional funding from this level of development in the southern plan area would help support its delivery.
4. In terms of the northern villages, no clear constraints or harm resulting / identified from higher growth figures in the northern plan area, save for water neutrality. However, this is a matter that is capable of being addressed by the development industry. The Council have not attempted to assist with a strategic solution, unlike adjoining authorities such as Horsham and Crawley, which have their whole District's constrained by water neutrality. Notwithstanding, Horsham are progressing a plan that meets its housing need, despite the water neutrality constraint.

Policy H2. Strategic Location/ Allocation 2021 – 2039

Q.71 Were the proposed strategic housing locations/allocations selected on the basis of an understanding of what land is suitable, available and achievable for housing in the plan area using an appropriate and proportionate methodology, and are there clear reasons why other land which has not been allocated has been discounted?

Response _____

5. We do not believe that the allocations were positively prepared given that it was constrained by a flawed evidence base, so not all sites have been appropriately considered.
6. The Council do not appear to have prepared a clear site selection methodology. Accordingly, there is no clear evidence or conclusions on

why sites ruled in or ruled out prior to the submission of the Plan for Examination. This is not a matter that can be considered retrospectively, which appears to be the case, with the introduction of the Housing Topic paper – 2024, introduced post submission for Examination.

7. In terms of the evidence base influence, the SFRA heavily influenced strategic housing locations, with the Manhood Peninsula area ruled out on the basis of potential future flood risk, which is reported in the SFRA. Our clients consultants have prepared a technical note in respect of the SFRA, highlighting significant errors in modelling data and subsequently the SFRA suggests extensive flooding, which is not considered to be accurate. The Technical Note is submitted alongside this statement.