

Chichester Local Plan 2021-2039

Examination Matter 4C: Housing

Statement on behalf of David Lock & Melanie Jenkins
September 2024

1.0 Introduction

- 1.1 This statement has been submitted by Berkeley Strategic ("Berkeley") on behalf of David Lock and Melanie Jenkins who own approximately 40 acres of land to the north of Chichester known as Raughmere Farm (Housing and Economic Land Availability Assessment site HLV0007).
- 1.2 This statement responds to Matter 4C: Housing, Questions 64-69 and 73-35.

2.0 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?

- 2.1 The housing requirement for the northern part of the plan area represents a justified response to the more rural nature and character of this part of the district.
- 2.2 Any increase in the housing requirement to meet the local housing need should be provided within the southern plan area, consistent with the Spatial Development Strategy of the plan.

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?

- 2.3 As has been confirmed within the Council's response to the Inspector's questions dated 1st August 2024 (CDC02), transport issues are the only reason why the local plan makes provision for a constrained housing requirement below the locally

assessed housing need. Transport related adverse impacts that significantly and demonstrably outweigh the benefits of providing for the objectively assessed housing needs can therefore be the only reason for pursuing the constrained housing requirement.

- 2.4 As set out in our hearing statements in relation to Matters 3 and 4A, we believe that the transport assessment over-states the highway impacts of the higher levels of housing growth tested (638 dpa and 700 dpa) and that highway improvements to mitigate the impact of these higher levels of growth could be viability delivered. Therefore, insufficient evidence has been provided to demonstrate that the transport related adverse impacts of these higher levels of growth significantly and demonstrably outweigh the benefits of the additional housing provision.

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?

- 2.5 It would be helpful to include these figures in Policy H1 so as to provide policy to support the implementation of the Spatial Development Strategy set out in Policy S1.

Q.67 Are the suggested MMs necessary for soundness?

- 2.6 Modification CM156 is important to confirm that constraints to the capacity of the A27 is the only reason for the council planning for a housing requirement below the need derived from the standard method.

3.0 Housing Land Supply

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?

Especially:

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?

- 3.1 The Policy H1 Table amendments included as Appendix 2 of the council's suggested modifications schedule (SD10.02) provides an updated housing land supply position.
- 3.2 This identifies, within part b, the known housing commitments which include 94 dwellings on outstanding 'made' Neighbourhood Plan allocations without planning permission.
- 3.3 Part c of the Table identifies the Non-Strategic Parish Housing Requirement of 310 dwellings (from Policy H3), less permissions granted of 62 dwellings (paragraph 3.28 of BP07), leaving a residual of 248 dwellings without planning permission in the supply.
- 3.4 To avoid double counting, this residual supply should be reduced to exclude the Neighbourhood Plan allocations without planning permission (94 dwellings) which are already included in the housing commitments (part b of the supply).

Q.69 Will there be a five-year supply of deliverable housing sites on adoption of the Plan?

- 3.5 Table 18 of BP07 sets out the latest 5 year housing land supply position and identifies a supply of 5.15 years at the anticipated date of adoption of the plan in 2024/25.
- 3.6 It is noted in paragraph 5.4 of BP07 that this position will be updated when data for the monitoring year 1st April 2023-31st March 2024 is available in Summer 2024. Given that 5.15 years of supply is a marginal position, if possible, this update should be provided to the examination for consideration at the hearings.

4.0 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?

- 4.1 Paragraph 5.7 of the submitted plan set out that the Parish housing requirements in Policy H3 have been set in accordance with the Local Plan settlement hierarchy, and

that it is intended that new housing should generally be directed primarily towards the larger, more sustainable settlements.

- 4.2 Lavant Parish is given a housing requirement of zero within Policy H3. This is presumably because the Parish contains no settlements which are specifically named in the settlement hierarchy, indicating the relatively rural character of the Parish with an absence of more sustainable settlements.
- 4.3 However, Lavant Parish is located adjacent to Chichester city, which represents the most sustainable settlement in the district and the focus for growth within the spatial strategy. There is therefore scope for sustainable development to take place on the edge of Chichester city and within Lavant Parish.
- 4.4 The HELAA identifies a number of sites within Lavant Parish which are located adjacent to the edge of Chichester city. These include site HLV0007 which is owned by this representor. While this site is identified in the HELAA as being “Discounted” due to noise issues associated with Goodwood Aerodrome, the site is in a highly sustainable location and provides a significant opportunity to bring forward a carefully designed scheme which mitigates the impact of aircraft noise.
- 4.5 To reflect this opportunity, and those provided by other sites within Lavant Parish identified in the HELAA, Policy H3 should be amended to make an allocation of housing to Lavant Parish.
- 4.6 It is noted that paragraph 5.9 of the submission plan states that housing sites for Chichester city will be allocated through the preparation of the development plan document and may include sites adjoining the Chichester city settlement boundary in neighbouring parishes. This approach is supported and may include sites within Lavant Parish. However, an allocation of housing should be made to Lavant Parish in this local plan so that, in the eventuality the development plan document does not come forward, there is recognition of this opportunity within the Local Plan which would then inform a future review of the Lavant Neighbourhood Plan.

Q.74 Is the statement in the last paragraph of the policy concerning what the Council would do in the event of demonstrable progress not being made in providing for the minimum housing numbers effective?

4.7 This paragraph sets out that if draft neighbourhood plans have not made demonstrable progress the council will allocate sites for development within a development plan document.

4.8 To be effective the paragraph should be explicit about what constitutes “demonstrable progress” so as to be unambiguous. For example, this could require draft neighbourhood plans being submitted for examination within 2 years of the local plan being adopted.

Q.75 What account was made of designated landscapes in determining the parish housing requirements?

4.9 This is not clear from the submitted information and so if for the council to answer.