

Mr R Duggua  
Town Clerk  
Chichester City Council

If calling please ask for:

Via email: [clerk@chichestercity.gov.uk](mailto:clerk@chichestercity.gov.uk)

Our ref:

Date: 26 November 2020

Dear Mr Duggua

The purpose of this letter is to advise the City Council of progress to date with the Local Plan Review.

Over the summer we have progressed the Local Plan Review against a background of uncertainty with national planning policy. You will be aware the Government published two concurrent consultations containing proposals for changes to the planning system which, if implemented, would have implications for how plans are prepared and the housing numbers Local Planning Authorities will have to address. That uncertainty is ongoing and the national press reported last week that the Government is rethinking the approach to the proposed changes to housing numbers. However on balance, given the Council's current lack of a five year supply of housing land and consequential uncertainties for communities, the current aim is to expedite the plan to the proposed submission consultation (Regulation 19) stage as quickly as possible.

In early October the Housing and Economic Land Availability Assessment (HELAA) was published on the Council's website, setting out an initial assessment of land promoted to the Council for development. In early November the Housing and Economic Development Needs Assessment (HEDNA) was published, setting out an assessment of development needs of the Plan area. These studies have contributed to and informed our work so far and further evidence studies will be published over the coming months and parish councils will be advised as and when that happens.

Work to date and representations received to the *Preferred Approach* Plan have highlighted a number of key issues for the Local Plan Review. These include the capacity of the waste water treatment infrastructure which serves this area, environmental concerns including nitrates in Chichester Harbour, the need for significant investment in the A27 to mitigate the impacts of development, and the need to secure the necessary funding for infrastructure. To enable those issues to be tested further, the Council is progressing with a revised distribution of housing and employment development (compared to that set out in the *Preferred Approach* Plan) to test through the evidence base.

It is possible that the outcomes of further testing, or other changes in circumstances, indicate a further change in approach is required. However, it is only through testing a revised distribution that important matters such as infrastructure requirements can be

finalised. It should also be noted that the findings of that testing may necessitate a change to the level, distribution, or timing of development.

The intention is for this work to be undertaken between now and Spring next year. If the evidence indicates that the impacts of development can be satisfactorily addressed, and the Council is satisfied that the outcomes can form the basis of a sound plan, then the intention would be to proceed to a formal consultation on the proposed submission plan.

This work will inevitably have an impact on many of you and on the work that parishes are undertaking in relation to new and revised neighbourhood plans. Therefore, while the District Council's plan-making process is not complete, I am now writing to inform you of the proposed revised distribution of development so that you may consider the implications for your community and parish. Taking into account the need for development set out in national planning policy, the availability of land, and other evidence as set out on the Council's *Local Plan Review Evidence* webpage, the revised distribution we are testing includes a proposed level of development of 300 dwellings for your parish.

Based on the information we have received from you to date, the working assumption therefore is that your parish will bring forward a neighbourhood plan identifying sites (of five or more dwellings) to deliver this level of development for the period 2019-2037. Any sites or schemes which already have planning permission, allocated in the existing Local Plan or a "made" Neighbourhood Plan as at 1 April 2020 would not count towards this figure. Nor would development on sites of less than five dwellings, as they count towards the "windfall" figure for the Local Plan Review and so cannot be double counted.

I should also confirm that in addition to this figure, the proposed revised distribution includes testing an additional 150 homes at the site West of Chichester (site AL1 in the *Preferred Approach Plan*) and 350 homes at Southern Gateway (site AL3 in the *Preferred Approach Plan*).

The Council has previously asked parishes with a proposed level of development of over 200 homes to progress their neighbourhood plans and undertake an initial regulation 14 consultation before the Chichester Local Plan Review was submitted for Examination, currently envisaged for late Spring 2021. As the figure for your parish is over this threshold, I am now requesting you progress work on your plan in a timely manner in accordance with the relevant guidance. I appreciate certain aspects of local engagement and initial consultation work is more difficult to achieve in the current circumstances.

It would therefore be helpful to us if you would give an indication as to when you consider the parish will have completed sufficient initial evidence work and local

consultation to provide a regulation 14 version draft neighbourhood plan. This will help us understand the dependencies between the Local Plan Review and Neighbourhood Plans as we formally review our Local Plan Timetable over the coming weeks.

Should parish councils decide they do not wish to bring forward housing allocations in their neighbourhood plans, the intention is that the Council will finalise the development strategy in the Local Plan Review and allocate remaining sites through a subsequent Site Allocations Development Plan Document.

I hope this letter has made it clear that substantial uncertainty remains and there may be a range of factors which necessitate a change in the emerging development strategy. We have carefully considered the merits of advising parish councils of this emerging work while it is not yet finalised. However, on balance it is considered more important to enable parish councils to proceed with preparing neighbourhood plans rather than continuing to wait over a further extended period of time for the strategy to be tested.

I attach a schedule setting out the proposed revised distribution being tested, which is being provided to Parish Councils so they can understand how the Plan is progressing. Given all the above, it is not the Council's intention to undertake consultation on the current proposed revised distribution at this stage. The Proposed Submission Plan will of course be the subject of full public consultation in due course.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Toby Ayling', written in a cursive style.

Toby Ayling  
Divisional Manager  
Planning Policy

## Proposed Revised Distribution of Housing Development for Testing

Proposed sites in revised allocation for testing	No of dwellings
West of Chichester (AL1)	1,750
Land at Shopwyke (AL2)	585
Land East of Chichester (AL3)	940
Land at Westhampnett/NE Chichester (AL4)	500
Southern Gateway (AL5)	350
Highgrove Farm, Bosham (AL7)	250
Land West of Park Farm, Selsey	264
Land West of Tangmere (AL14)	1,300
Drayton Lane, Oving	300
Maudlin, Westhampnett	300
Proposed parish allocations in revised allocation for testing	
Birdham	200
Boxgrove	100
Chichester City	300
Chidham and Hambrook (AL10)	400
Fishbourne (AL9)	40
Hunston (AL11)	300
Kirdford	70
Loxwood	125
North Mundham	150
Plaistow & Ifold	15
Southbourne (AL13)	1,250
Westbourne	50
Wisborough Green	40

Where appropriate, previous reference numbers for proposed allocations in the *Preferred Approach* Plan are set out in brackets.