



By Email

Our ref: Chichester LP2021-2037/Reg. 19

Your ref: HDC/CDCLP Reg. 19 March 2023

Date: 16 March 2023

Dear Sir/Madam,

Re: Chichester Local Plan 2021-2039 – Proposed Submission Publication Consultation

Thank you for consulting Horsham District Council on the Chichester Proposed Submission Local Plan 2021-2039. We are grateful for the opportunity to be able to comment on your emerging plan. Overall, we consider that the plan has positively sought to balance the provision of future needs with other wider objectives in a manner that contributes to achieving sustainable development. I would also take the opportunity to reaffirm Horsham District Council's (HDC's) commitment to continued dialogue under the Duty to Cooperate and joint working between our two councils. We have a number of comments on the Proposed Submission Chichester Local Plan 2021 to 2039 to make on individual policies which we have set out below:

Policy S1 Spatial Development Strategy

We **support** this policy in principle, but **consider it is not justified as stands**. We note the spatial distribution in the plan period is split into three areas: East – West Corridor, the Manhood Peninsula, and North Plan area (which is the only part of Chichester district which directly adjoins Horsham district). HDC acknowledges Chichester District Council's position that it is not able to meet its entire identified local housing need of 638 dwellings per annum, given the constraints associated with the required upgrades to the strategic road network in order to facilitate growth, potential environmental constraints and wider infrastructure restrictions. It is understood that National Highways requires a cap on growth due to the limited capacity of the A27. The proposed housing supply target is therefore 575 dwellings per annum.

HDC acknowledges and welcomes that significant effort has been put into identifying development capacity in a way that reflects the principle of positive planning. Nevertheless, the NPPF and PPG set a high bar for 'leaving no stone unturned' in respect of meeting development needs. We support that planned growth is directed to sustainable locations where access to local services and access to transport links are easier to access than remote rural areas. It is acknowledged Chichester City is the most populous settlement in the district as well as being most sustainable. We support that growth and future development should be focussed in the East-West Corridor, and in particular in or close to the City, first and foremost. We also acknowledge wider infrastructure deficiencies will need to be addressed in strategic locations before they can accommodate more growth.

We support your continued dialogue with National Highways to support improvements to the strategic road network and note a Statement of Common Ground (SoCG) will be published and updated as part of a continuous dialogue with National Highways. The SoCG is important as part of the **justification** for a lower housing supply figure and should transparently demonstrate why the constraints on the A27 will not allow higher growth in the East West corridor, in order to evidence that maximum housing needs have been achieved in the City and East West Corridor. This evidence is needed for HDC to inform its own DtC position with Chichester District Council (CDC).

Chichester District is planning below the standard methodology housing target and has therefore asked HDC if it can accommodate some of Chichester's unmet housing need. HDC has confirmed that we are not in a position to accommodate Chichester's unmet development needs because of our own water neutrality constraint. Furthermore, the primary housing market for Horsham District is the Northern West Sussex HMA, whose development needs are substantially driven by the Gatwick sub-region, and it is this HMA that would be prioritised with respect to meeting unmet development needs.

As a partner in the Sussex North Water Neutrality grouping also impacted by this constraint, CDC jointly owns the relevant evidence, and our two authorities share an ongoing commitment to work on this as our Duty to Cooperate dialogue continues. As ever, the latest position with regards to Water Neutrality and the impact on the delivery of housing and other development needs can be set out in a Statement of Common Ground (SoCG) between our two Councils.

Policy NE16 Water Management and Water Quality

We **support** this policy which is clear in its encouragement of efficient use of water as part of good management framework.

Policy NE17 Water Neutrality

Water neutrality is a significant issue affecting both our districts. Horsham District Council **supports** this policy which is derived from the joint work undertaken by Chichester District Council, Horsham District Council and Crawley Borough Council. We look forward to continued working with CDC on the development of the implementation scheme, in order to deliver the JBA Water Neutrality Assessment study. This will ensure all new development is in conformity with the Habitat Regulations and can demonstrate water neutrality.

Policy H1 Meeting Housing Needs

As outlined earlier in this response, we acknowledge that land supply in Chichester is constrained, and that CDC meeting the full housing requirement within its administrative boundary during the plan period up to 2039 would be challenging. Horsham District is not however in a position to accommodate any of Chichester District's unmet housing need because of water neutrality and, looking forward, the need to prioritise meeting unmet needs within our primary housing market: the Northern West Sussex HMA.

Policy H2 Strategic Locations/Allocations 2021 -2039

A significant proportion of CDC's housing supply will be delivered through strategic allocations. Loxwood (220 dwellings) is identified as a strategic allocation and will come forward through the local plan process, with some allocations anticipated to be delivered through local neighbourhood plans. Given the challenges that face Neighbourhood Planning groups in the preparation and delivery of Neighbourhood Plans, (which can potentially delay the delivery of these allocations), we support the identification of strategic sites in the Local Plan, programmed for delivery earlier in the plan period.

As the delivery of strategic allocations requires significant infrastructure planning, including cross-boundary issues relating to the road network, education, healthcare and community facilities, Horsham District Council welcomes continued dialogue with the relevant stakeholders, to ensure development at strategic locations such as Loxwood are delivered in a timely manner

and adhere to sustainable development principles. We have some specific concerns relating to strategic allocation policy A15: Loxwood which we have set out under that policy.

Policy H11 Meeting Gypsies, Travellers and Travelling Showpeople's Need.

We note your position and your requirement to provide a number of pitches and plots for the travelling community during plan period. We support your policy position for intensification of existing pitches. Horsham District can't at this point in time accommodate any of CDC's unmet Gypsy, Traveller and Travelling Show people requirement as we are required to first address our own shortfall, and our evidence demonstrates that this alone will be challenging.

We have a body of evidence to support our position and we will continue to share our evidence with you as our Duty to Cooperate dialogue continues over the coming months. As ever, the latest position regarding Gypsy, Traveller and Travelling Showpeople will be set out in the Duty to Cooperate Statement of Common Ground between our two Councils.

Policy A15 Loxwood

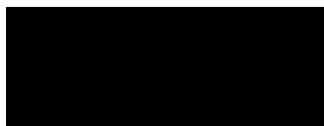
We **support** this policy as it will contribute to meeting Chichester District's unmet housing need, but **consider it is not justified as stands** and that **its effectiveness could be improved**. The five villages in the north of the Plan area (Kirdford, Wisborough Green, Loxwood, Ifold and Plaistow) are classified as Service Villages in the emerging Chichester Local Plan. They provide a reasonable range of basic facilities (e.g. primary school, convenience store and post office) to meet the everyday needs of local residents, or are villages that provide fewer of these facilities but that have reasonable access to them in nearby settlements. Loxwood is the strategic site identified to accommodate 220 dwellings over the plan period.

The nearby settlement of Billingshurst, in Horsham District, is considered to be the nearest main settlement to the villages identified above. Given the limited facilities available / or to be provided as part of the Loxwood allocation, it is considered that new residents are likely to be reliant at least some key facilities in Billingshurst, potentially including the GP surgery, the railway station (and rail user car park), The Weald secondary school and sixth form, the library and the retail and community facilities, including the leisure centre. Within Horsham District, there are potential proposals for strategic scale extensions to Billingshurst / new settlements relatively close to Billingshurst. Whilst no decisions have been made with respect to our local plan, housing growth delivered through our own local plan will create potential impacts on existing infrastructure which is already under significant pressure. We therefore require clear evidence

that potential cumulative impacts on settlements in HDC have been considered as part of the proposed allocations. We would ask that CDC works collaboratively with HDC and other stakeholders to ensure future pressures on infrastructure in Horsham District is appropriately addressed. Consequently, we seek further clarification in Policy A15: Loxwood to emphasise the importance of collaborative working between stakeholders to mitigate against the potential cumulative impact of development.

I do hope these comments are helpful. I would like to emphasise that they are made in anticipation of further constructive dialogue between our authorities, and with an expectation that matters on which we have flagged concern can be readily addressed, and quite possibly eliminated through our Duty to Cooperate discussions. Should you require any further detail or information in regard to this response please don't hesitate to contact a member of my Strategic Planning team.

Yours sincerely,



Councillor Liz Kitchen
Cabinet Member for Planning and Development