

Mr Mike Allgrove
Planning Policy Manager
Chichester District Council
East Pallant House
Chichester
West Sussex PO19 1TY

Our ref:
Your ref:

Date: 5 February 2019

Dear Mr Allgrove,

Chichester “Preferred Approach” Local Plan Regulation 18 Document

Horsham District Council welcomes the opportunity to comment on the Regulation 18 Draft “Preferred Approach” version of the Chichester Local Plan. Our comments focus on Policy S3 “Development Strategy”; Policy S4 “Meeting Housing Needs”; Policy S5 “Parish Housing Requirements 2016-2035”; Policy S7 “Meeting Gypsies, Travellers and Travelling Showpeople Needs”; Policy S8 “Meeting Employment Land Needs” and “Strategic Site Allocations”.

Policy S3 Development Strategy/ Policy S4: Meeting Housing Needs

Policy S4 deals with meeting housing needs in Chichester District between 2016 and 2035. Policy S4 states that Chichester will provide for at least 12,350 dwellings between 2016 and 2035. This equates to an annual target of 650 dwellings per year, which is slightly in excess of the current identified housing target of 609 dwellings per year, as set by the Government. Horsham District Council therefore supports strategic policy S4, as it seeks to meet the full identified housing need in Chichester District.

We do, however, have concerns over the “Proposed Strategic Locations/Allocations” target of 4,400, which is set out in the table in Policy S4. Policy S3 “Development Strategy” sets out the 14 proposed strategic development locations for Chichester District, which would make up the total strategic allocations target of 4,400 dwellings from Policy S4. Further detail on these individual sites is provided in the “Strategic Site Allocations” section of the draft plan (pages 95-133). First, the total number of dwellings identified in the strategic development locations in Policy S3 is 8,085. This number is significantly in excess of the 4,400 identified in Policy S4 and no explanation is given as to why the numbers differ. Second, the 14 strategic development locations identified in Policy S3 include 5 neighbourhood plan ‘housing allocations’ (totalling 2,550 dwellings). These are Policy AL8 East Wittering (350 dwellings); Policy AL9 Fishbourne (250 dwellings); Policy AL10 Hambrook (500 dwellings); Policy AL11 Hunston (200 dwellings) and Policy AL13 Southbourne (1,250 dwellings). Horsham Council would like to see further evidence that this number of neighbourhood plan sites can realistically be delivered within the identified timescales, given the inherent difficulties of both “making” neighbourhood plans and bringing forward development sites within these neighbourhood plans.

In addition to meeting Chichester’s identified needs, Horsham Council notes and welcomes the reference in paragraph 4.23 to the West Sussex and Greater Brighton Strategic Planning Board, and attempting to address the objectively assessed housing and other development needs within the wider West Sussex and Greater Brighton area. Horsham District Council considers it important that all districts and boroughs within the Strategic Planning Board area

work together to aim to meet as much of the longer term and unmet development needs of the wider sub-region as possible, through an accelerated work programme of Local Strategic Statement 3.

Policy S5 “Parish Housing Requirements”

Horsham Council notes and supports Policy S5, which allocates parish housing requirements for small sites between 2016 and 2035.

Policy S7 “Meeting Gypsies, Traveller and Travelling Showpeople Needs”

Horsham Council notes and supports Policy S7, which identifies a need for 91 additional permanent residential Gypsy & Traveller pitches and 28 additional plots for Travelling Showpeople, and states that where there is a shortfall in provision, a Site Allocation DPD will be prepared to allocate sites.

Policy S8 “Meeting Employment Land Needs”

Horsham Council notes and supports Policy S8, which sets out the identified employment floorspace requirement for 2016-2035 (231,835 sqm) and which seeks to meet it through an identified supply of 235,182 sqm.

I trust these comments are helpful. Horsham Council is keen to work with Chichester District Council in taking the Chichester Local Plan through to adoption. If you have any queries on these comments, please do not hesitate to contact one of my officers.

Yours sincerely



pp. Councillor Claire Vickers
Cabinet Member for Planning and Development

Cc Barbara Childs
Trevor Saunders
Catherine Howe