

Chichester District Council

Duty to Cooperate Statement

May 2014

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1. Introduction

- 1.1 Local Planning Authorities (LPAs) are required under Section 110 of the Localism Act (Annex 6, Ref 1.3) to engage with relevant local authorities and specified bodies on strategic matters through the preparation of development plan documents (DPDs) and other activities in connection with strategic matters which affect more than one area. Engagement on strategic matters should be *active, constructive and ongoing* throughout the plan preparation process and beyond into delivery and review, and should aim to maximise the effectiveness of cooperation on the local plan policies.
- 1.2 As part of the Examination process, LPAs must provide evidence demonstrating how they have met the legal requirements of the Duty to Cooperate and effectively addressed strategic matters in the plan. The National Planning Policy Framework (Annex 6, Ref 1.1) provides amplification as to what issues are likely to require strategic cooperation. It states that '*Local planning authorities will be expected to demonstrate evidence of having successfully cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination*' [Paragraph 81]. The National Planning Practice Guidance (Annex 6, Ref 1.2) provides further advice on meeting the legal requirements of the Duty.
- 1.3 This statement summarises the strategic activities of Chichester District Council and the outcomes in terms of impact on the local plan. Section 2 focuses on the activities that have been carried out on a joint basis with other LPAs in the Coastal West Sussex & Greater Brighton (CWS&GB) area, under the auspices of the CWS&GB Strategic Planning Board (see Section 2) which includes the LPAs of Adur, Arun, Brighton & Hove, Chichester, Lewes, the South Downs National Park and West Sussex County Council (see map in Annex 5). It also covers ongoing work between the CWS&GB authorities and those in the wider area to support delivery of strategic priorities, particularly housing. Section 3 focuses on strategic activities which are more specifically related to Chichester District Council and have not been part of the CWS&GB work programme.

2. Strategic Cooperation in Coastal West Sussex & Greater Brighton

2.1 Working across boundaries on strategic planning matters is not new territory for the CWS&GB Authorities. There is a long history of joint working through developing the South East Plan's Sussex Coast Sub-Regional Strategy and RPG9 before that. Following the demise of the South East Plan, the LPAs recognised at an early stage that there was a need for a new common approach to strategic planning (and investment) issues, which resulted in the preparation of a Local Strategic Statement (LSS). The following paragraphs set out the evolution of the LSS and the implications for local plans in the CWS&GB area and potentially in the wider area. Annex 3 provides further details of the details and timelines of key work strands that have influenced the LSS and local plans.

Developing a Local Strategic Statement

2.2 Initially the strategic response was delivered through work on developing an employment and infrastructure strategy, which was commissioned by the Coastal West Sussex Partnership (CWSP)¹ [Annex 6, Ref 5.1] in 2011. However, this raised issues of governance in terms of delivering the proposed 'place-based' approach, highlighting the need for more formal joint working arrangements to ensure a coordinated approach to strategic planning and investment priorities, particularly in relation to infrastructure.

Developing an Employment and Infrastructure Strategy

(Parsons Brinckerhoff, Feb 2012)

Recommendation 2: That an appropriate governance structure be established to develop the "Place Based" delivery plans and to coordinate plans across CWS.

Recommendation 3: That the governance arrangements ensure that the development of the "Place Based" proposals are understood and supported by the local business community, local planning authority, and local communities so that they receive a wide measure of understanding and support as specific schemes come forward for consultation and delivery.

2.3 In response to the recommendations, the CWSP and West Sussex County Council commissioned a study into potential new governance arrangements for CWS&GB, which included a review of existing working arrangements within the area but also in West Sussex more generally [Annex 6, Ref 2.1]. As a result, the LPAs agreed to establish a new Strategic Planning Board with its inaugural meeting held in October 2012 [Annex 6, Ref 2.4].

¹ Coastal West Sussex Partnership: <http://www.coastalwestsussex.org.uk/>

- 2.4 The Board is governed by Terms of Reference and a Memorandum of Understanding [Annex 6, Ref 2.2 and 2.3] which have been agreed by all the relevant authorities. It comprises lead councillors from each of the local authorities and the South Downs National Park Authority, usually those with a planning portfolio. The Board's remit is to:
- (1) identify and manage spatial planning issues that impact on more than one local planning area within CWS&GB; and
 - (2) support better integration and alignment of strategic spatial and investment priorities in CWS&GB, ensuring that there is a clear and defined route through the statutory local planning process, where necessary.
- 2.5 It is advisory only as decision-making remains with the individual 'legally' responsible bodies. However, critical to its success is the continuing close working relationship with the CWSP and the Coast to Capital Local Enterprise Partnership², particularly in relation to the LEP's priorities being developed in the Strategic Economic Plan. This is not only achieved through cross-representation on both the Board and Partnership but also in the joint working between the LPA officers and the Partnership's technical support groups.
- 2.6 In January 2013 the Board agreed that in order to fulfil its role, a new framework was needed to replace the Sussex Coast Sub-Regional Strategy and guide strategic planning decisions, and that this was to be in the form of a Local Strategic Statement (LSS) [Annex 6, Ref 3.2]. There was a clear commitment from all authorities to develop an LSS that had a direct influence on individual local plans but also highlighted the strategic challenges along the coast, with possible ways of addressing these.
- 2.7 It was also agreed that the LSS should be 'evidence-based' and deliverable, with significant importance attached to the need for a delivery plan [Annex 6, Ref 5.2]. A vital part of the evidence was a study undertaken by GL Hearn on behalf of the LPAs to assess the housing needs of the area and any potential barriers to delivery. The 'Duty to Cooperate Housing Study' [Annex 6, Ref 4.1], which provided a critical review of the objectively assessed needs for each LPA, concluded that the area is highly constrained due to the fact that it is tightly bound by the English Channel and the South Downs National Park, and that meeting the housing needs of the area will become increasingly challenging. It is intended that the results of this study will be updated at regular intervals, and monitored through the LSS monitoring framework.

² [Coast to Capital Local Enterprise Partnership: http://www.coast2capital.org.uk/](http://www.coast2capital.org.uk/)

- 2.8 The LSS [Annex 6, Ref 3.1] was developed between January and October 2013, building on key evidence, such as the GL Hearn study, and through stakeholder engagement [Annex 6, Ref 3.5]. The final version sets out a shared *vision*, four overarching *Strategic Objectives* and five *Spatial Priorities*, building on the ‘place-based’ approach recommended by Parsons Brinckerhoff. A Monitoring Framework and Delivery and Investment Framework are being developed to support its implementation and ensure local plan policies arising from the agreed strategic priorities remain viable and can be delivered.
- 2.9 There are a number of clear challenges highlighted in the LSS, particularly in relation to infrastructure, but also in terms of increasing pressures on land supply. The LPAs acknowledge this and are working together, through their own local plans and strategies to meet their objectively assessed needs as far as is possible in the short to medium term. They are also working closely with neighbouring authorities in the wider sub-region to consider what the longer term options are for meeting needs. This work is ongoing and will inform both the current and next round of local plan reviews and is governed by a clear commitment from all relevant authorities through an agreed memorandum [Annex 6, Ref 2.3]
- 2.10 As well as developing and managing the implementation of the LSS, the Board has an agreed work programme to help steer other, strategically important, planning matters including assessing the needs of Gypsies, Travellers and Travelling Showpeople³ [Annex 6, Ref 6.1-6.2]. Details of Board’s work programme are provided in Annex 1 and Annex 3 of this statement. This sets out the evidence demonstrating how the strategic cooperation has worked in practice, and what influence this has had on the local plans being prepared in the area.
- 2.11 There are also a number of other activities required as part of the plan making process to address different strategic issues which are not necessarily common across the CWS&GB area. A summary of these activities is contained in Section 3 and Annex 2 of this statement.
- 2.12 Strategic work will continue on an ongoing basis through the CWS&GB Strategic Planning Board’s work programme and through the monitoring and delivery of the LSS, both of which will be aligned to the individual local plan monitoring and delivery frameworks.

³ The CWS G&T work does not include Brighton & Hove or Lewes as they are undertaking similar work with other East Sussex Authorities.

3. Strategic Cooperation in Chichester District

Water management

- 3.1 The Water Quality Group, established in 2008, is made up of Chichester District Council, West Sussex County Council, Natural England, Southern Water, Environment Agency and Chichester Harbour Conservancy. The initial remit of the group was to assess the existing capacity of wastewater treatment works (WwTW) in the District in order to accommodate the proposed growth set out in the South East Plan.
- 3.2 In 2009 MWH were commissioned by the group to undertake a formal study to assess the potential capacity at wastewater treatment works, and deliver potential solutions to increase their capacity. The two main options considered appropriate for further investigation were upgrades to Tangmere WwTW, and Long Sea Outfall.
- 3.3 On advice from Southern Water with regard to certainty of Ofwat funding, it was considered appropriate to pursue the Tangmere WwTW upgrade. The group then carried out viability, feasibility and environmental work to ensure the upgrade could go ahead. The Southern Water business plan was submitted to Ofwat in December 2013, setting out the proposed upgrades to Tangmere WwTW, which are necessary to deliver the growth proposed in the Chichester Local Plan.
- 3.4 The Apuldram Wastewater Treatment Works discharges to the head of Chichester Harbour, an area which is internationally designated for wildlife. The group identified that installation of ultra violet treatment on the storm water leaving the works could significantly improve the quality of the flows released into Chichester Harbour during storms and at times of high ground water levels. The UV scheme is currently being installed at a cost of £2 million; the UV plant will be able to treat up to 300 litres of storm water per second, the equivalent of 528 pints every second. This has resulted in reducing environmental harm and a small increase in development that can drain to these WwTW.
- 3.5 The Position Statement on Wastewater and Delivering Development in the Local Plan [Annex 6, Ref 7.1] was adopted in January 2014 as the Council's position with regard to future planned growth and existing capacity at wastewater treatment works in the District, particularly relating to the Apuldram catchment.

Transport infrastructure

- 3.6 Jacobs were commissioned in 2011 to carry out a transport study of strategic development options and sustainable transport measures relating to the A27 Chichester Bypass [Annex 6, Ref 7.2]. The purpose of the study was to assess the effects on the highways network likely to arise as a result of potential options under consideration for the Local Plan, and to identify measures that could potentially mitigate these impacts.
- 3.7 This study was carried out through collaborative partnership working between Chichester District Council, West Sussex County Council, the Highways Agency, and the housing developers for the Tangmere, West of Chichester and Westhampnett/North East Chichester strategic development locations.
- 3.8 This partnership has aimed to seek a sustainable approach to development planning in and around Chichester, with particular reference to ensuring long-term sustainable and efficient operation of local transport networks. The Study findings (together with the supplementary junction testing undertaken by Parsons Brinkerhoff) demonstrate that the transport mitigation measures tested are achievable and viable, and potentially could be delivered in conjunction with housing development through the Local Plan.
- 3.9 West Sussex County Council and the Highways Agency each produced a position statement in March 2013 endorsing the transport study, and the mitigation measures proposed to support the development set out in the Chichester Local Plan.
- 3.10 The Highways Agency also responded to the Pre-submission Local Plan representation period stating the mitigation and smarter choices measures proposed by the transport study are likely to provide sufficient mitigation, so that residual cumulative impacts would not be severe. The Highways Agency is confident that the works on the A27 Chichester Bypass, required to support the development set out in the Local Plan, can be delivered.

Solent Disturbance and Mitigation Project

- 3.11 In response to concerns over the impact of recreational pressure on birds within protected areas in the Solent, the Partnership for Urban South Hampshire planning authorities, Chichester District Council and the Isle of Wight Council initiated the Solent Disturbance and Mitigation Project (SDMP) to determine visitor access patterns around the coast and how their activities may influence the birds.

- 3.12 The SDMP provided evidence to Natural England and the Local Planning Authorities that new development within 5.6km of the Solent coastline may have an adverse effect on the birds. The evidence was endorsed by Natural England, who wrote to the relevant local authorities advising that the likelihood of significant effect arising from new housing development cannot be ruled out.
- 3.13 A small planning sub-group has been set up, representing Natural England and all Local Planning Authorities within 5.6km of the Solent coastline. The group will be working on a legal planning framework to enable the implementation of the SDMP Phase 3 avoidance and mitigation strategy. The purpose of the approach is to deliver the phased introduction of initial short term management proposals including the sources of funding, and to establish a base for the development and implementation of a long term mitigation strategy. The SDMP authorities have agreed a common strategic approach to mitigating the potential cumulative impacts of recreational disturbance that would be generated by new development.

Green Infrastructure

- 3.14 West Sussex County Council organised a working group in June 2011 consisting of all West Sussex LPAs, including the South Downs National Park Authority, to create a county-wide green infrastructure strategy. The group met every three months until January 2013 to feedback on progress in the individual authorities, it is intended to continue to meet in an ad hoc manner if the need arises.
- 3.15 The group investigated links between individual green infrastructure strategies and means of ensuring cross-boundary links. The group agreed a common definition of green infrastructure to include in emerging Local Plans to show a cohesive planned approach. The group also had an agreement to share data, and carried out early consultation on proposed Local Plan policies to ensure a consistent approach.

Pagham Harbour Special Protection Area

- 3.16 A meeting was held with officers from Arun District Council to discuss a joint approach to mitigation at Pagham Harbour. Following discussions, it was decided that as Arun DC would be revisiting its Local Plan, joint evidence would not be available in time for the Chichester Local Plan.
- 3.17 The scale and location of development around the Manhood Peninsula was not felt to have a significant impact on Pagham Harbour, but there may be an

impact when combined with major development in Arun DC. It was agreed that this would be addressed by Arun DC when allocating sites for development around Pagham Harbour SPA. Chichester District Council has included mitigation measures in its local plan but will continue to work with Arun to ensure cumulative impacts are addressed.

Heritage

- 3.18 English Heritage is a statutory consultee in the Local Plan preparation process and therefore has been consulted at all stages of plan preparation. During the Local Plan Key Policies: Preferred Approach consultation in Spring 2013, English Heritage made a number of representations regarding policies, in particular Policy 15 West of Chichester Strategic Development Location. English Heritage had concerns relating to the strategic allocation because of the likely impact on the significance of the Chichester Entrenchments Scheduled Ancient Monument.
- 3.19 A meeting was held with Council officers and English Heritage to discuss potential amendments to the policy, and a further meeting took place between the Council's archaeology officer and the Inspector of Ancient Monuments for West Sussex. Following these meetings, the text of the plan was amended to clarify that there would be no development in the scheduled ancient monument. This was updated for the Further Consultation on the Preferred Approach in summer 2013.
- 3.20 Further comments were made by English Heritage on Policy 47 Heritage, and following discussions with the Council's Design and Implementation Team, revisions were made to the policy and supporting text.

Horticultural Development

- 3.21 Horticulture is a key employment sector on the coastal plain due to the climate making it one of the best areas in the UK for the growth of arable crops. The area supports an efficient and advanced horticultural and glasshouse industry.
- 3.22 For this reason the commercial horticulture industry has a significant presence in both Chichester and Arun Districts'. However the two Districts have different policy approaches. Chichester District identifies Horticultural Development Areas (HDA) where the industry is encouraged although if it can be demonstrated that development within an HDA cannot take place then criteria within the policy are applied. Arun District Council's policy approach is to use a criteria based policy.

3.23 Despite the different approaches the Councils have worked together to ensure that the criteria in the policies are broadly consistent with each other. A meeting was held (20 February 2014) at an officer level to discuss the approach and to agree that the different approaches were broadly compatible.

Gypsies, Travellers and Travelling Showpeople

3.24 In partnership with the Coastal West Sussex Authorities (Chichester, Arun, Adur Districts and Worthing Borough) and the South Downs National Park Authority (SDNPA), with support from West Sussex County Council, a Coastal West Sussex Authority Gypsy, Traveller and Travelling Showpeople Assessment (GTAA) (2012/13) was undertaken. Phase 1 of the GTAA identified the needs for pitches and plot provision within the study area. The preparation of the Phase 1 study involved joint working at an officer and Member level within the Coastal West Sussex Authorities, South Downs National Park Authority and West Sussex County Council.

3.25 Phase 2 of the GTAA involved the identification of potential sites in the Coastal West Sussex and South Downs National Park area. Again this involved joint working at an officer and Member level. During the Phase 2 Sites Assessment Study, a Stakeholder Workshop was held in November 2012 with key stakeholders, including representatives from adjoining Local Authorities and the Travelling community, to provide comments on/input into the broad locations for the search of sites and the appropriate criteria to be used to assess potential sites. Participants were also invited to suggest suitable sites for consideration.

3.26 More information on the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment can be found in Annex 3, Section 8.

Annex 1: Summary of Strategic Planning Activities in Coastal West Sussex and Greater Brighton

Strategic Planning Issue	Strategic Partners	Strategic Response*	Evidence **	Outcome
PART A				
Supporting sustainable Economic Growth	CWS &GB Authorities, SDNPA, CWSP, C2CLEP	<p>Oct 2012: Establish a Strategic Planning Board for CWS&GB to facilitate joint working on strategic matters.</p> <p>Oct 2013: Agree a joint strategic framework (LSS) to prioritise strategic spatial and investment priorities to help maximise opportunities for long term sustainable economic growth</p>	<p>CWS&GB Memorandum of Understanding <i>[Annex 6, Ref 2.3]</i></p> <p>CWS&GB LSS: Strategic Objective 1 – Delivering Sustainable Economic Growth <i>[Annex 6, Ref 3.1]</i></p> <p>CWS&GB LSS: Spatial Priority 2: Chichester City/Tangmere/Bognor Regis <i>[Annex 6, Ref 3.1]</i></p> <p>Developing an Employment and Infrastructure Strategy <i>[Annex 6, Ref 5.1]</i></p>	<p>Improvements to junctions on the A27 Chichester Bypass (Policy 8 Transport and Accessibility; Infrastructure Delivery Plan; Coast to Capital Draft Strategic Economic Plan December 2013)</p> <p>Support and facilitate delivery of infrastructure schemes identified in the Chichester area to provide wastewater treatment capacity for new development, and meet water quality objectives (Policy 9 Development and Infrastructure Provision; Infrastructure Delivery Plan)</p> <p>Improved surface water management, particularly around Bognor Regis and the southern part of Chichester, including the Manhood Peninsula (Policy 9 Development and Infrastructure Provision; Policy 42 Flood Risk; Infrastructure Delivery Plan; Coast to Capital Draft Strategic Economic Plan December 2013)</p>
Making provision for the objectively assessed housing needs of the	CWS&GB Authorities, SDNPA,	Oct 12: Establish a Strategic Planning Board for CWS&GB to facilitate joint working on strategic	CWS&GB Memorandum of Understanding	Established consistent methodology and evidence base for assessing housing needs across the Sussex

<p>area</p>	<p>CWSP, C2CLEP, Gatwick Diamond Authorities, EA, HCA</p>	<p>matters.</p> <p>Aug 2013: Working collaboratively with LPAs in wider sub-region, particularly Gatwick Diamond Authorities, to understand longer term development needs and what the opportunities are for meeting these outside CWS&GB.</p> <p>Oct 13: Preparation of a joint strategic framework (LSS) to:</p> <ul style="list-style-type: none"> • set out an agreed overall growth ambition for the area in terms of housing provision, ensuring that individual authorities aim to meet OANs as far as is possible without significant adverse impact on the environment, infrastructure and economy; • identify any potential shortfall over the OANs and agree a process for addressing this over the longer term. 	<p><i>[Annex 6, Ref 2.3]</i></p> <p>CWS&GB LSS: Strategic Objective 2 – Meeting Strategic Housing Needs <i>[Annex 6, Ref 3.1]</i></p> <p>CWS&GB LSS: Spatial Priority 2: Chichester City/Tangmere/Bognor Regis <i>[Annex 6, Ref 3.1]</i></p> <p>Coastal West Sussex Strategic Housing Market Assessment (SHMA) 2012 <i>[Annex 6, Ref 4.1]</i></p> <p>Housing Study (Duty to Cooperate) - Sussex Coast HMA <i>[Annex 6, Ref 4.2]</i></p> <p>Updated Demographic Projections for Sussex Coast HMA Authorities <i>[Annex 6, Ref 4.3]</i></p> <p>Assessment of Housing Development Needs Study – Sussex Coast HMA <i>[Annex 6, Ref 4.4]</i></p>	<p>Coast HMA</p> <p>Informed overall housing numbers and strategy in Local Plan, in particular:</p> <ul style="list-style-type: none"> • Policy 4 Housing Provision
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<p>Delivering strategic infrastructure priorities</p>	<p>CWS & GB Authorities, SDNPA, CWSP, C2CLEP, HA</p>	<p>Oct 12: Establish a Strategic Planning Board for CWS&GB to facilitate joint working on strategic matters and engage effectively with infrastructure enablers and providers.</p> <p>Mar 2013: Preparation of a Delivery and Investment Framework to align strategic priorities with funding opportunities, ensuring these are deliverable.</p> <p>Oct 13: Preparation of a joint strategic framework (LSS) to identify strategic investment priorities in transport and other infrastructure required to support delivery of strategic spatial priorities identified in LSS and LPS and to inform the priorities identified in the C2CLEP's Strategic Economic Growth Plan.</p>	<p>CWS&GB Memorandum of Understanding <i>[Annex 6, Ref 2.3]</i></p> <p>CWS&GB LSS Spatial Priority 2: Chichester City/Tangmere/Bognor Regis <i>[Annex 6, Ref 3.1]</i></p> <p>CWS&GB LSS: Strategic Objective 3- Investing in Infrastructure <i>[Annex 6, Ref 3.1]</i></p> <p>C2C LEP Strategic Economic Plan Coast to Capital Draft Strategic Economic Plan December 2013 <i>[Annex 6, Ref 8.1]</i></p> <p>Advice to Support the Development of a Delivery and Investment Framework <i>[Annex 6, Ref 5.2]</i></p> <p>CWS GVA Delivery and Investment Framework Final Report March 2013 <i>[Annex 6, Ref 5.3]</i></p>	<p>Informed Local Plan:</p> <ul style="list-style-type: none"> • Policy 9 Development and Infrastructure Provision <p>The content of the C2C LEP Strategic Economic Plan Coast to Capital Draft Strategic Economic Plan was submitted to Government.</p>
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Management of environmental resources	CWS&GB Authorities, SDNPA, EA, EN, Sussex Local Nature Partnership	<p>Oct 12: Establish a Strategic Planning Board for CWS&GB to facilitate joint working on strategic matters and engage effectively with other organisations and bodies with a role in managing environmental assets.</p> <p>Oct 13: Preparation of a joint strategic framework (LSS) to support the protection and management of key environmental assets that are valuable in terms of supporting sustainable growth and a high quality of life.</p>	<p>Memorandum of Understanding <i>[Annex 6, Ref 2.3]</i></p> <p>CWS&GB LSS: Strategic Objective 4 – Managing Environmental Assets and Natural resources <i>[Annex 6, Ref 3.1]</i></p> <p>CWS&GB LSS: Spatial Priority 2: Chichester City/Tangmere/Bognor Regis <i>[Annex 6, Ref 3.1]</i></p>	
Meeting the needs of Gypsies and Travellers	CWS Authorities, SDNPA and other West Sussex Authorities	<p>Joint assessment of needs and working together to identify a sufficient supply of suitable sites across CWS.</p> <p>Provision of transit accommodation</p>	<p>CWS Gypsies, Travellers & Travelling Showpeople Accommodation Assessment <i>[Annex6, Ref 6.1]</i></p> <p>Study into Transit Accommodation in West Sussex <i>[Annex 6, Ref 6.2]</i></p>	<p>Informed Local Plan:</p> <ul style="list-style-type: none"> Policy 36 Planning for Gypsies, Travellers and Travelling Showpeople <p>The redevelopment of the Westhampnett Depot site is to be used as a permanent transit site for West Sussex.</p>

*Further information on the Individual LPA decisions related to the LSS and MoU are contained in Annex 4

**Timelines for key decisions related to evidence are set out in Annex 3

Annex 2: Summary of Strategic Planning Activities in Chichester District

Strategic Planning Issue	Strategic Partners	Strategic Response*	Evidence **	Outcome
PART B				
Water Management	<ul style="list-style-type: none"> Environment Agency Southern Water Natural England Chichester Harbour Conservancy West Sussex County Council 	<p>Water Quality Group established in 2008 to look at the existing capacity at WwTW in the District, in order to accommodate the proposed growth set out in the South East Plan.</p> <p>MWH consultants commissioned to undertake a formal study, with Tangmere WwTW upgrade the preferred option.</p> <p>Viability, feasibility and environmental work carried out by the Water Quality Group to ensure upgrade could go ahead.</p> <p>UV treatment on storm discharges at Apuldram commenced as a result of the group looking at capacity across the District.</p>	Position Statement on Wastewater and Delivering Development in the Local Plan <i>[Annex 6, Ref 7.1]</i>	<p>Informed Local Plan:</p> <ul style="list-style-type: none"> Policy 4 Housing Provision Policy 5 Parish Housing Sites 2012-2029 Policy 12 Water Resources in the Apuldram Wastewater Treatment Catchment Policy 15 West of Chichester Strategic Development Location Policy 16 Shopwyke Strategic Development Location Policy 17 Westhampnett/North East Chichester Strategic Development Location Policy 18 Tangmere Strategic Development Location
Transport Infrastructure	<ul style="list-style-type: none"> Highways Agency West Sussex County Council Developers of strategic development locations 	<p>Jacobs were commissioned in 2011 to carry out a transport study of strategic development options and sustainable transport measures relating to the A27 Chichester Bypass</p> <p>Integrated package of measures proposed as a way to mitigate the impact of development on the</p>	Transport Study of Strategic Development Options and Sustainable Transport Measures <i>[Annex 6, Ref 7.2]</i>	<p>Informed Local Plan:</p> <ul style="list-style-type: none"> Policy 8 Transport and Accessibility Policy 13 Chichester City Transport Strategy Policy 15 West of Chichester Strategic Development Location Policy 17 Westhampnett/North

		<p>highways network, including improvements to A27 junctions, targeted investment in local transport infrastructure, and 'Smarter Choices' measures to promote sustainable travel choices.</p> <p>West Sussex County Council and the Highways Agency each produced a position statement in March 2013 endorsing the transport study, and the mitigation measures proposed to support the development set out in the Chichester Local Plan.</p>		<p>East Chichester Strategic Development Location</p> <ul style="list-style-type: none"> • Policy 18 Tangmere Strategic Development Location
Solent Disturbance and Mitigation Project	<ul style="list-style-type: none"> • Fareham BC • Eastleigh BC • Havant BC • Portsmouth CC • Solent Forum • New Forest National Park Authority • New Forest DC • Chichester Harbour Conservancy • RSPB • East Hampshire DC • Isle of Wight Council 	<p>The Solent Forum managed the Solent Disturbance and Mitigation Project to determine visitor access patterns around the coast and how their activities may influence the birds.</p> <p>Phase I collated and reviewed information on housing, human activities and birds around the Solent, and reviewed the potential impact of disturbance on birds.</p> <p>Phase II has involved a programme of major new data collection to (i) estimate visitor rates to the coast from current and future housing, (ii) measure the activities and distances moved by people on the shore and intertidal habitats, and (iii) measure the distances and time for which different bird species respond to</p>	<p>Solent Recreational Disturbance and Mitigation Study <i>[Annex 6, Ref 7.3]</i></p> <p>Interim Policy Statement on Development and Disturbance of Birds in Special Protection Areas and Identified Compensatory Habitats <i>[Annex 6, Ref 7.4]</i></p>	<p>Informed Local Plan:</p> <ul style="list-style-type: none"> • Policy 50 Development and Disturbance of Birds in Chichester and Langstone Harbours Special Protection Areas <p>Interim Policy Statement sets out a requirement for £172 per dwelling as mitigation measure.</p>

	<ul style="list-style-type: none"> • Test Valley BC • Southampton CC • Hampshire and Isle of Wight Wildlife Trust • Natural England • Winchester CC • Gosport BC 	<p>different activities.</p> <p>Phase III provides a suggested avoidance and mitigation strategy.</p> <p>The work was conducted by Footprint Ecology. Natural England, as part of the Project Group, wholly supports the project. The phase 3 report has two parts; one identifies a short-list of potential suitable mitigation measures, including “quick wins,” which could be delivered quickly and easily. The second part develops a strategy which responds to the evidence base and Natural England’s Position Statement.</p>		
Green Infrastructure	<ul style="list-style-type: none"> • West Sussex County Council • South Downs National Park Authority • Adur DC • Arun DC • Crawley BC • Horsham DC • Mid Sussex DC • Worthing BC 	<p>In 2011, WSCC organised a working group consisting of all West Sussex LPAs and SDNPA to look at county-wide GI.</p> <p>Definition of GI agreed for all authorities.</p> <p>Consultation on the proposed GI policies in each Local Plan to ensure consistency.</p>	Minutes available if required	<p>Informed Local Plan:</p> <ul style="list-style-type: none"> • Policy 52 Green Infrastructure • Appendix 1 Green Infrastructure
Pagham Harbour SPA	<ul style="list-style-type: none"> • Arun DC 	<p>A meeting took place 10 January 2014 to discuss concerns regarding different evidence base for Pagham Harbour SPA policies in the two authorities.</p>	Minutes available if required	<p>Informed Local Plan:</p> <ul style="list-style-type: none"> • Policy 51 Development and Disturbance of Birds in Pagham Harbour Special Protection Area

		<p>It was agreed that joint evidence would not be available in time for Chichester Local Plan, and that there was unlikely to be an impact from the proposed development on the Manhood Peninsula.</p> <p>If Arun DC were to allocate sites around Pagham Harbour in their emerging Local Plan, it was agreed the evidence would be looked at again.</p>		
Heritage	<ul style="list-style-type: none"> English Heritage 	Meetings and collaborative working with Council's Archaeology Officer and English Heritage to overcome concerns raised via Draft Local Plan Preferred Approach consultation.	Minutes available if required	<p>Informed Local Plan:</p> <ul style="list-style-type: none"> Policy 15 West of Chichester Strategic Development Location Policy 17 Westhampnett/North East Chichester Strategic Development Location Policy 18 Tangmere Strategic Development Location Policy 47 Heritage
Horticultural Development	<ul style="list-style-type: none"> Arun District Council 	Discussions with Arun District Council officers to ensure the criteria of the policies are broadly consistent.	Minutes available if required	<p>Informed Local Plan:</p> <ul style="list-style-type: none"> Policy 32 Horticultural Development

Annex 3: Coastal West Sussex & Greater Brighton Strategic Planning Board: Key Project Timelines

1. Establishment of CWS & GB Strategic Planning Board

February 2012: Emerging CWS Infrastructure and Employment Land Strategy recommends new governance arrangements to deliver strategic planning and investment priorities.

The draft of CWS Partnership commissioned study by consultants Parsons Brinkerhoff highlights the need for new governance arrangements to help implement the recommendations. LPAs involved in study also considering implications of the Duty to Cooperate and new ways of working. Study therefore commissioned from Catriona Riddell Associates (CRA) to consider existing working arrangements in CWS and the wider West Sussex area and options for future arrangements to support management of strategic planning and investment priorities.

26 April 2012: CWS&GB Officers' Meeting

Officers consider draft recommendations from CRA report.

27 June 2012: CWS&GB Authorities (Relevant Portfolio Holders and Officers) Meeting

LPAs consider the recommendations of the CRA report and agree to establish a new Strategic Planning Board with a remit to:

- (1) identify and manage spatial planning issues that impact on more than one local planning area within CWS&GB; and
- (2) support better integration and alignment of strategic spatial and investment priorities in CWS&GB, ensuring that there is a clear and defined route through the statutory local planning process, where necessary.

9 October 2012: First meeting of the CWS&GB Strategic Planning Board

The Board agree Terms of Reference and draft work programme, including development of a new strategic framework for the area. Formal members of the Board to include the LPAs of Adur, Arun, Brighton & Hove, Chichester, Worthing, South Downs National Park and West Sussex County Council. Lewes District Council invited to attend as 'observer'.

24 January 2013: CWS&GB Strategic Planning Board

Draft Memorandum of Understanding considered

18 July 2013: CWS&GB Strategic Planning Board

Final Memorandum of Understanding agreed

17 October 2013: CWS&GB Strategic Planning Board

Lewes District Council invited to be formal member of the Board.

2. Developing a Local Strategic Statement

24 January 2013: CWS&GB Strategic Planning Board

Scope for LSS agreed and CRA appointed to take forward preparation with officers.

27 March 2013: Workshop 1

Officers from each of the CWS&GB LPAs considered form and content of LSS. Representation from Gatwick Diamond Authorities unable to attend but telephone discussion took place prior to meeting to ensure comments and experience of GD Authorities in developing their LSS could be taken into account (feedback from discussion included in presentation).

23 May 2013: Workshop 2

Officers and councillors from the CWS&GB LPAs considered key issues for LSS, including links to Coast to Capital LEP's emerging Strategic Economic Plan.

24 June 2013: Workshop 3

Officers and councillors from the CWS&GB LPAs and key stakeholders (including Natural England, Environment Agency and Highways Agency) considered draft Strategic Objectives and Spatial Priorities for the LSS. Written comments from those attending invited including from representatives from C2C LEP and Sussex LNP who were invited but unable to attend.

18 July 2013: CWS&GB Strategic Planning Board

Draft LSS considered, particularly taking into account results of the GLH Housing Study.

14 August - 18 September 2013: Formal Consultation on Draft LSS and Draft Sustainability Appraisal

CWS&GB LPAs, other adjoining LPAs and key stakeholders invited to comment on the final draft LSS.

17 October 2013: CWS&GB Strategic Planning Board

Final LSS agreed.

30 October 2013: Letter from CW&GB SPB Chairman sent to LPAs and Partners

Letter to CWS&GB LPAs, adjoining LPAs and other key stakeholders sent to formally present the Local Strategic Framework and set out next steps.

November 2013 - January 2014: Individual CWS&GB Authorities formally agree LSS

Refer to Annex 4 for details.

24 January 2014: CWS&GB Strategic Planning Board

A Monitoring Framework and Delivery and Investment Framework are being developed as part of the work programme for the coming year.

3. Coastal West Sussex Strategic Housing Market Assessment (SHMA) 2012

February 2012: Project initiation

Project brief jointly prepared by CWS LPAs authorities. Purpose to update the Coastal West Sussex SHMA 2009, following published SHMA Practice Guidance.

4 March 2012: Appointment of GL Hearn to undertake study

8 March 2012: Inception meeting

Attended by GL Hearn, planning & housing officers from commissioning authorities

23 April 2012: Stakeholder workshop

GL Hearn presentation of initial findings covering policy context, definition of housing market area, housing stock & supply, market conditions & demand, affordability & housing need, future housing requirements. Invitees included LPA planning, housing & economic development portfolio holders, planning & housing officers, representatives from affordable housing providers, social landlords, private housebuilders & landowners, housing and economic development agencies

June 2012: Draft report circulated for discussion

September 2012: Draft final report produced

Incorporating officer comments on draft report.

15 October 2012: Chichester DC Member workshop

GL Hearn presentation of study findings to Chichester DC Members

November 2012: Final reports produced

Coastal West Sussex SHMA Main Report + Executive Summaries for individual LPAs

4. Housing Study (Duty to Cooperate) – Sussex Coast HMA

21 Feb 2012: Meeting of CWS Local Plan lead officers

Considered Duty to Co-operate requirements, particularly in relation to housing (the social and economic impacts of not meeting housing needs); scope for radical solutions post 2028, such as new settlements; need to link in to the rest of West Sussex; the need for MoU and position statement/strategy; and use of independent support to do the housing work.

23 May 2012: Meeting of CWS Local Plan lead officers

Strategic issues identified and the need to co-operate on housing provision. Agreed to appoint consultant to do housing study on behalf of the CWS Authorities, Brighton & Hove CC, Lewes DC and the South Downs National Park Authority. The study would identify theoretical housing needs and compare this to actual capacity.

October 2012: Study brief agreed and GL Hearn appointed

9 October 2012: CWS & GB Strategic Planning Board

The Board is informed of the housing work and further amendments are made to the brief.

11 January 2013: Adjoining authorities informed of the Study

Letter sent to other LPAs in West Sussex, and to the Planning departments at the Councils of Havant, East Hants, Waverley, Southampton, Portsmouth, Rother, Hastings (all within or close to the coastal housing market areas) and Wealden to inform them of the study and to ask for any housing information which may be of mutual benefit.

Jan 2013: Preliminary study submitted by G L Hearn.

1 Feb 2013: Officers' meeting

G L Hearn presented draft study (action points taken).

5 March 2013: Officers' meeting

Final comments made on draft study.

19 March 2013: CWS&GB Strategic Planning Board

Presentation of draft study findings by G L Hearn

June 2013: Adjoining authorities informed of draft study findings

Letter sent informing West Sussex LPAs and others close to the housing market areas (as above) about the study (with an intention to send the study when complete).

May 2013: G L Hearn appointed to up-date study

Study updated to take account of the 2011 Census and new population projection figures.

July 2013: Final study produced (following some further minor amendments (to the map))

17 Oct 2013: CWS&GB Strategic Planning Board

The Board agrees the Local Strategic Statement for the area which is informed by the Duty to Co-operate Housing Study.

5. Updated Demographic Projections & Housing Development Needs for Sussex Coast HMA Authorities

May 2013: GL Hearn commissioned to undertake update work

Work to provide an updated set of projections for housing requirements, replacing those in the SHMA, taking account of:

- 2011 Census
- 2011 Interim Sub-National Population Projections
- 2011 Household Projections (and headship rates within these)
- Revised ONS Mid-Year Estimates for 2002-10 (which take account of the Census)
- Latest Experian Econometric Forecasts (currently January 2013)

Draw updated projections together with the wider SHMA evidence, to provide an updated objective assessment of housing requirements.

Prepare a summary report drawing together the updated analysis, to be used as an appendix to the SHMA and Housing DTC Study.

June 2013: Draft updated figures circulated for comment

August 2013: Updated Demographic Projections report produced

October 2013: Updated assessment of housing development needs

GL Hearn produce draft updated assessment of housing development needs for Sussex Coast HMA and constituent local authorities based on the methodology set out in the draft National Planning Practice Guidance on Housing and Economic Development Needs Assessments (beta version published Aug 2013)

24 January 2014: CWS&GB Strategic Planning Board

Updated Demographic Projections reported to CWS&GB Strategic Planning Board

March 2014: Amended updated assessment of housing development needs

GL Hearn amend updated assessment of housing development needs taking account of officer comments and final published version of National Planning Practice Guidance on Housing and Economic Development Needs Assessments (published 7 March 2014)

April 2014: Final study report produced

6. Developing an Employment and Infrastructure Strategy

The Local Enterprise Partnership is developing a Strategic Economic Plan. This is relatively short term and reflects the contents of the emerging Local Plan.

7. CWS&GB Delivery and Investment Framework

24 January 2014: CWS&GB Strategic Planning Board

A Monitoring Framework and Delivery and Investment Framework are being developed as part of the work programme for the coming year.

8. Planning for Gypsies, Travellers and Travelling Showpeople

Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (Phase 1)

Opinion Research Services (ORS) and Peter Brett Associates (PBA) were commissioned by the Coastal West Sussex (CWS) authorities and the South Downs National Park Authority (SDNPA), with support from West Sussex County Council, to undertake a Gypsy and Traveller and Travelling Showpeople Accommodation Assessment.

The Assessment assisted the CWS Authorities and SDNPA to determine an appropriate level of pitch and plot provision for the area to inform the policies and proposals of their respective Core Strategies/Local Plans and related development plan documents. The Phase 1 GTAA has been 'signed off' by the respective CWS Authorities and SDNPA decision-making structure.

Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (Phase 2)

The CWS Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (Phase 2) was commissioned to meet the requirements of the National Planning Policy Framework (NPPF) 2012, the Planning Policy for Traveller Sites (PPTS) March 2012 and the 2004 Housing Act.

Having gained an understanding of need (Phase 1) the CWS authorities were then required to:

- Identify and update annually, a supply of specific, developable sites sufficient to provide five years' worth of sites against their locally set targets;
- Identify a supply of specific, developable sites or broad locations for growth, for years 11-15

This work has been undertaken and was signed off by the CWS Strategic Planning Board on 24 January 2014.

Study into Transit Provision in West Sussex

This study was undertaken by Opinion Research Services (ORS) on behalf of all the Chief Executives of West Sussex. The findings of the study have been discussed among the Leaders and the Chief Executives of West Sussex and they have all agreed to recommend to their Councils that they should enter into a West Sussex-wide multi-agency approach to managing Unauthorised Encampments (UEs). West Sussex County Council has agreed to be the lead authority for the multi-agency arrangements in respect of both the management of the transit site and enforcement activities. For this arrangement to be successful, a Transit Site, in public ownership and control, must be sited within the West Sussex County boundaries.

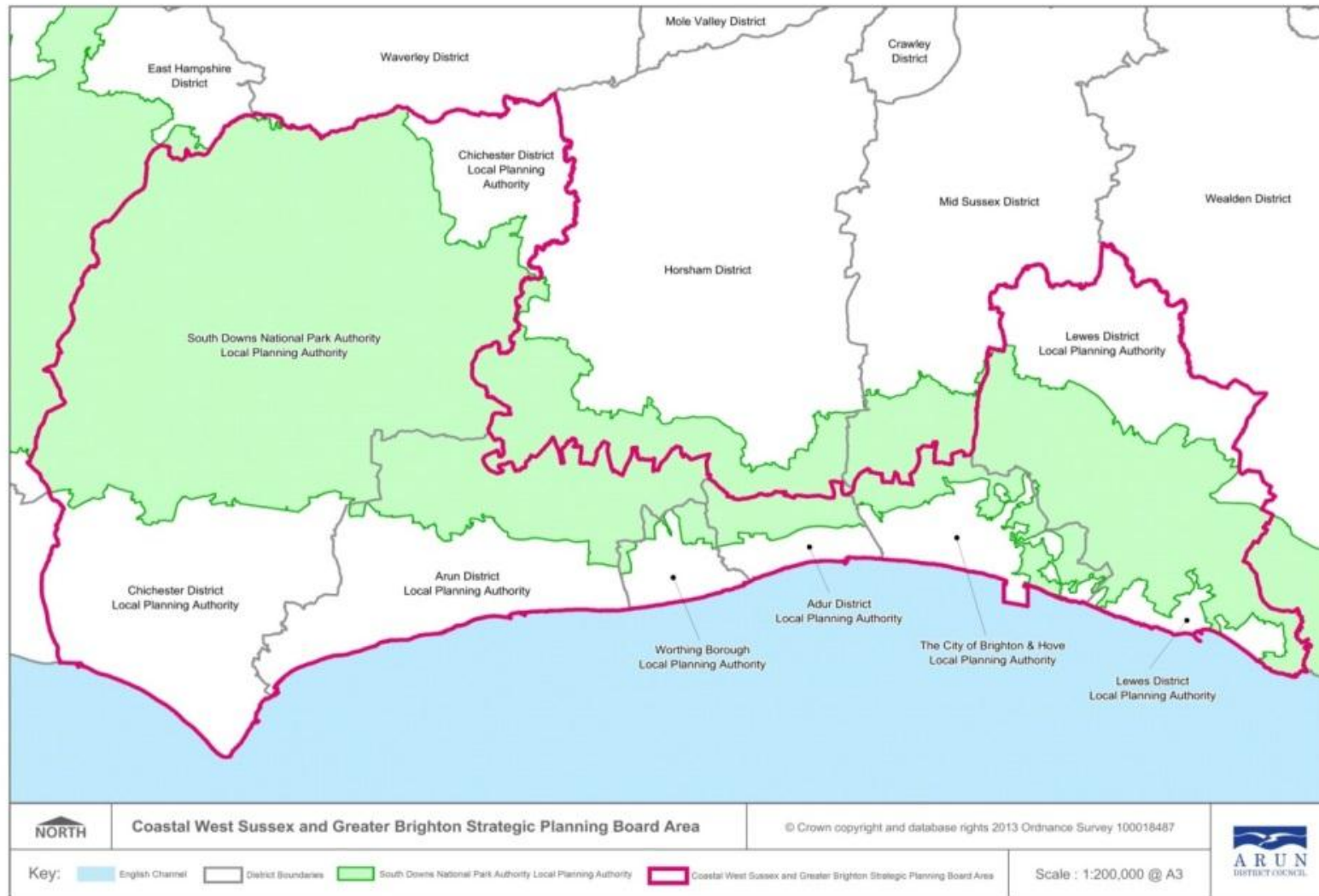
Officers of Chichester DC have been looking for suitable sites in which to locate a transit site for some time now and believe they have found an appropriate location at the Westhampnett Depot. The redevelopment of the Depot site has presented the Council with an opportunity to free up half an acre which could be used as a permanent transit site. It should be noted that no other suitable site across West Sussex has been identified for this purpose, despite an extensive search of Council land records and a public 'call for sites' associated with the Local Plan process.

Annex 4: Formal Endorsement of the Local Strategic Statement

Local Planning Authority	
Adur & Worthing	<p>Joint Strategic Committee: 3 December 2013 http://www.adur-worthing.gov.uk/media/media,119295,en.pdf</p> <p><u>Decision:</u> The Joint Strategic Committee:- (i) noted and approved the Coastal West Sussex and Greater Brighton Local Strategic Statement; (ii) noted and approved the Coastal West Sussex and Greater Brighton Memorandum of Understanding; (iii) noted and approved the Agreement for Joint Working between all Local Planning Authorities in West Sussex together with Brighton and Hove City Council, Lewes District Council and the South Downs National Park Authority.</p>
Arun	<p>Full Council: 8 January 2014 http://www.arun.gov.uk/mediaFiles/downloads/39125831/Minutes_080114_2014_Final.pdf</p> <p><u>Decision:</u> The Council</p> <p>RESOLVED - That the Coastal West Sussex and Greater Brighton Local Strategic Statement be adopted.</p>
Brighton & Hove	<p>Economic Development & Culture Committee: 23 January 2014 http://present.brighton-hove.gov.uk/mgconvert2pdf.aspx?id=67639</p> <p><u>Decision:</u></p> <p>RESOLVED – That the Committee approve the Coastal West Sussex and Greater Brighton Local Strategic Statement including the terms of reference and memorandum of understanding.</p>
Chichester	<p>Cabinet: 7 January 2014 http://www.chichester.gov.uk/utilities/action/act_download.cfm?mediaid=20980</p> <p><u>Decision:</u></p> <p>RESOLVED – That the Coastal West Sussex and Greater Brighton Local Strategic Statement (LSS) be accepted.</p>
Lewes	<p>Cabinet: 6 January 2014 http://cmispublic.lewes.gov.uk/Public/Meeting.aspx?meetingID=657</p> <p><u>Decision:</u></p> <p>Cabinet agreed to endorse the Coastal West Sussex and Greater Brighton –</p>

	Local Strategic Statement.
South Downs National Park	The LSS is not being taken through committee process because the statement tends to focus on areas outside of the Park
West Sussex County Council	The LSS was approved the Cabinet Member for Highways and Transport w/e 24 January 2014.

Annex 5: Map of Coastal West Sussex and Greater Brighton



Annex 6: References to Key Documents

1. National Planning Policy & Guidance

- 1.1 National Planning Policy Framework (2012)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf
- 1.2 National Planning Practice Guidance
<http://planningguidance.planningportal.gov.uk/>
- 1.3 Localism Act (2011)
<http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>

2. Coastal West Sussex & Greater Brighton Strategic Planning Board

- 2.1 Review of Governance and Working Arrangements in Coastal West Sussex (CRA, April 2012) <http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>
- 2.2 CWS & GB Strategic Planning Board: Terms of Reference
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>
- 2.3 CWS & GB Strategic Planning Board Memorandum of Understanding
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>
- 2.4 CWS & GB Strategic Planning Board: Notes of Meetings
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>

3. Coastal West Sussex & Greater Brighton Local Strategic Statement

- 3.1 Local Strategic Statement: Final version (Oct 2013)
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>
- 3.2 Local Strategic Statement: Scoping Paper (CRA, Jan 2013)
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>
- 3.3 Local Strategic Statement: Sustainability Appraisal
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>

- 3.4 Local Strategic Statement: Summary of Consultation Responses (Sept 2013) <http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>
- 3.5 Local Strategic Statement: Stakeholder Engagement Workshops – Workshop 1: 19 March 2013; Workshop 2: 23 May 2013; Workshop 3: 24 June 2013. <http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>
- 3.6 Letter from Cllr Ricky Bower, Chairman of CWS&GB SPB, 30 October 2013 <http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>
- 3.7 Local Strategic Statement: Monitoring Framework – work is progressing in producing the framework <http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>

4. Strategic Housing Provision

- 4.1 Strategic Housing Market Assessment (SHMA) 2012 – Coastal West Sussex (GL Hearn, Nov 2012) www.chichester.gov.uk/studies
- 4.2 Housing Study (Duty to Cooperate) – Sussex Coast HMA (GL Hearn, May 2013) www.chichester.gov.uk/studies
- 4.3 Updated Demographic Projections for Sussex Coast HMA Authorities (GL Hearn, Aug 2013) www.chichester.gov.uk/studies
- 4.4 Assessment of Housing Development Needs Study – Sussex Coast HMA (GL Hearn, April 2014) www.chichester.gov.uk/studies

5. Strategic Infrastructure and Employment Land

- 5.1 Developing an Employment and Infrastructure Strategy (Parsons Brinkerhoff, Feb 2012) <http://www.coastalwestsussex.org.uk/wp-content/uploads/2012/04/consolidated-strategy-and-appendix-1-2.pdf>
- 5.2 Advice to Support the Development of an Delivery and Infrastructure Framework (GVA, March 2013) <http://www.coastalwestsussex.org.uk/wp-content/uploads/2013/07/Coastal-West-Sussex-Strategic-Investment-Framework-GVA-Final-Report.pdf>
- 5.3 CWS GVA Delivery and Investment Framework Final Report March 2013 <http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>

6. Gypsies, Travellers & Travelling Showpeople

- 6.1 Gypsies, Travellers & Travelling Showpeople Accommodation Assessment (Part 1 & 2) <http://www.chichester.gov.uk/gypsiesandtravellers>
- 6.2 Study into Transit Provision in West Sussex
<http://www.chichester.gov.uk/gypsiesandtravellers>

7. Chichester District Council

- 7.1 Position Statement on Wastewater and Delivering Development in the Local Plan
www.chichester.gov.uk/planningpolicy
- 7.2 Transport Study of Strategic Development Options and Sustainable Transport Measures (March 2013) www.chichester.gov.uk/studies
- 7.3 Solent Recreational Disturbance and Mitigation Study (2012)
http://www.solentforum.org/forum/sub_groups/Natural_Environment_Group/Disturbance_and_Mitigation_Project/
- 7.4 Interim Policy Statement on Development and Disturbance of Birds in Special Protection Areas and Identified Compensatory Habitats (2014)
<http://www.chichester.gov.uk/index.cfm?articleid=22455#interim>

8. Coast to Capital Local Enterprise Partnership

- 8.1 Strategic Economic Plan <http://www.coast2capital.org.uk/strategic-objectives/strategic-economic-plan#sthash.djQhWH9g.dpbs>

Annex 7: Summary of Strategic Cooperation with Neighbouring Authorities

Actions taken under the Duty to Cooperate – Arun District Council

Liaison meeting with Arun District Council, 14 November 2012

- The draft Memorandum of Understanding (MOU) was discussed. It was felt that the MOU needed to be more positively worded.

Liaison meeting with Arun District Council, 16 January 2013

- In the longer term ADC and CDC would need to tie their transport studies together. This needs to be discussed with WSCC and Highways Agency. There is a need to apportion the mitigation measures between the two local authorities.

CDC comments on draft Arun Local Plan, 28 May 2013

- Chichester DC considers that the strategy for housing development in the Arun Local Plan should be evidenced on the conclusions of the joint housing studies carried out through the Coastal West Sussex Strategic Planning Board. CDC would be concerned if the Plan were to set a housing target substantially lower than the officer recommendation of 580 dwellings/year, as this is already close to the minimum level necessary to meet Arun's own objectively assessed needs, without taking account of the potential requirement to meet housing shortfalls from local authorities elsewhere in the Coastal West Sussex area. We consider that a lower level of housing provision would be likely to increase the pressure for housing in neighbouring areas, including in Chichester District where planning to meet our own identified housing needs is already very challenging.
- Should Arun Council resolve to agree the approach recommended by the Local Plan Sub-Committee (or adopt a similar approach designed to reduce housing provision below that recommended in the officer report), we consider that the resulting Plan would be likely to fail to meet the Duty to Cooperate requirements and NPPF tests of soundness when submitted for examination.

Liaison meeting with Arun District Council, 30 May 2013

- ADC councillors have requested a full review of the SHMA as they believe that the underlying ONS data is flawed. They believe that by year 6 they will be able to prove that the higher housing numbers are not required. The Council have accepted that 580 homes on average over the Plan period might be sound, and have opted for a 15 year plan that delivers 455 homes for the first six years, and this will then be increased if deemed to be necessary as part of a review.

Liaison meeting with Arun District Council, 18 September 2013

- The Arun Local Plan remains paused until the final review of the SHMA has been reported to Arun councillors. The next Local Plan sub-committee will meet on 31st October and decide how to take matters forward.

Email from ADC Policy & Conservation Manager to CWSSPB members, 30 October 2013

- The SHMA validation exercise report validates the genesis and findings of the SHMA and the updates that which were carried out by GL Hearn. It also provides additional

information migration and provides a narrative that is perhaps a bit clearer and more transparent than elements of the GL Hearn reports.

Email from ADC Policy & Conservation Manager, 29 November 2013 – Invitation to Local Plan Advisory Group on 2 December 2013

- The Local Plan Advisory Group was set up in 2011 to enable Officers from outside Arun District Council to influence the development of the Plan. CDC officers attended on a number of occasions.

Liaison meeting with Arun District Council, 20 February 2014

- ADC was told that their plan would pass the DtC. No other authorities have asked ADC to meet their unmet needs. As the latest published figures indicate that the Chichester Plan is failing to meet its objectively assessed need, CDC will need to formally approach ADC to request whether Arun District can assist in meeting CDC's shortfall.

Duty to Cooperate meeting, 10 April 2014

- This meeting was the culmination of a series of meetings under the DtC at officer level with the need to involve members to confirm the content of this engagement before submission. CDC Local Plan proposes a figure of 410 dwellings per annum, with an assumption of 70 dwellings being delivered in the SDNPA. The figures were derived from the shared evidence on housing needs by the Coastal West Sussex authorities.
- CDC explained that a range of constraints meant the housing figures could not increase without environmental harm, despite not being able to meeting full objectively assessed need. CDC queried whether, given the unmet needs in the Chichester plan area, Arun would be able to assist. As both authorities have difficulties meeting objectively assessed needs and have similar constraints, ADC confirmed it was unlikely any unmet need could be met in Arun. It was also agreed that it would not be a sustainable approach for the unmet needs from Brighton, Adur and Worthing to be met in Chichester District.
- ADC preferred option is a strategic site at Barnham/Eastergate. The draft plan was to be considered at a Council meeting on 30 April 2014. Given the substantial development proposed at Tangmere in the CDC plan, the potential for a new school in the locality could help with provision of school places in Arun as well. ADC suggested development in Tangmere could link to Barnham train station, improving the sustainability of the Tangmere SDL.
- The potential impact of residential and horticultural development in ADC and CDC leading to coalescence of Chichester and Bognor Regis was discussed. The ADC plan contains a strategic gap policy, and the CDC plan has a policy seeking to retain the identity of settlements. The approach to horticultural development areas in the CDC plan focuses such development in specific areas. The ADC plan has a criteria-based policy to horticultural development, but there was no conflict between the two policies.
- It was agreed that the Coastal West Sussex and Greater Brighton Strategic Planning Board was the appropriate mechanism for a partnership approach to resolving unmet housing needs. The benefits of continuing cooperation were recognised, and further meetings would take place when the respective plans had progressed.

Consultation Responses

Preferred Approach (March - May 2013)	Further Consultation (July - September 2013)	Pre-Submission (November 2013 - January 2014)
No representations made	<ul style="list-style-type: none"> • Concern over the housing figures relating to the South East Plan shortfall, significant transport and the cumulative impact on the historic environment as a whole. • Inconsistency in the CDC and ADC policies relating to Pagham Harbour zone of influence. • Concern over the removal of requirement for 3ha of employment land at Westhampnett/North East Chichester SDL. Reasons for the removal are unclear. 	<ul style="list-style-type: none"> • Plan is sound & legally compliant • ADC recognises the challenges CDC has in meeting its objectively assessed need. • ADC is unable to assist with meeting any unmet need.

Comments were received on an informal consultation on the draft Local Plan on 4 February 2013. These comments were fairly comprehensive and taken into account when further work was undertaken prior to the consultation in spring 2013 on the draft Local Plan Key Policies: Preferred Approach. A meeting took place on 10 January 2014 to discuss the differing policies relating to Pagham Harbour, where it was agreed that the evidence base is different for the two authorities and would not result in any problems.

Arun District Council receives CDC Development Plan Panel agendas and minutes, and representatives have given presentations to CDC Members on the status of the Arun Local Plan. This is an open opportunity for CDC's nearest neighbours to cooperate.

Actions taken under the Duty to Cooperate – East Hampshire District Council

Email from CDC to EHDC Principal Policy Planner, 26 September 2012

- The Local Plan housing target has not yet been agreed by Members, although the intention is to meet as a minimum the annual housing requirement as set out in the South East Plan. Email sent in response to DtC query from EHDC regarding proposed housing provision and shortfall in neighbouring authorities.

Email from CDC Executive Director to EHDC Shared Service Manager (Planning Policy), 26 October 2012

- Chichester District will be unable to assist in meeting unmet housing need from outside its area. Email sent in response to DtC request from EHDC during their Local Plan examination to ask whether CDC were able to meet their unmet housing need. EHDC also confirmed it would be unable to meet any unmet need in Chichester District.

Rural economy meeting, 28 January 2013 – Hampshire County Council, East Hants District Council, Havant Borough Council

- Agreed to look at a more formalised Hampshire - West Sussex (districts, counties, Park) approach to DtC once EHDC SHMA is received, early April. Officer-based discussions first looking at evidence received and governance models (including members) possibly based on WSPB/PUSH; also invite Waverley/Surrey if they wish.

Duty to Cooperate meeting, 28 October 2013 – Hampshire County Council, East Hants District Council, Havant Borough Council, Waverley Borough Council, SDNPA, Surrey County Council, Winchester City Council, WSCC

- Discussion over the need to establish a new formal forum to demonstrate DtC, or Memorandum of Understanding. Opportunities for joint working to reduce resources whilst providing excellent examples of effective DtC. Discussion of strategic priorities for each authority that could have cross-boundary impacts.

Duty to Cooperate meeting, 1 April 2014

- This meeting was the culmination of a series of meetings under the DtC at officer level with the need to involve members to confirm the content of this engagement before submission. CDC Local Plan proposes a figure of 410 dwellings per annum, with an assumption of 70 dwellings being delivered in the SDNPA. The figures were derived from the shared evidence on housing needs by the Coastal West Sussex authorities.
- CDC explained that a range of constraints meant the housing figures could not increase without environmental harm, despite not being able to meeting full objectively assessed need. Both discussed the challenge of balancing the need for growth against localism, and the constraints that ruled out available land for development.
- EHDC referred to the Inspector's report stating that their Plan was sound, following the identification of addition sites following the initial examination. An exercise was undertaken to identify sufficient land to meet new objectively assessed need figures, balanced with the concerns of the South Downs National Park.

- Further discussion focused on settlements along the joint boundary. Issues of common interest were within the South Downs National Park area, where mechanisms exist at an officer level for discussion.
- The benefits of continuing cooperation were recognised, and further meetings would take place when the respective plans had progressed.

Consultation Responses

Preferred Approach (March - May 2013)	Further Consultation (July - Sept 2013)	Pre-Submission (Nov 2013 - Jan 2014)
No representations made	No representations made	There is no scope in East Hampshire to meet any of Chichester's unmet housing need.

East Hampshire District Council did not respond to earlier informal consultations on the Draft Local Plan: Key Policies.

Actions taken under the Duty to Cooperate – Guildford Borough Council

Duty to Cooperate meeting, 26 February 2014 – Guildford Borough Council, Waverley Borough Council, Mid Sussex District Council, Elmbridge Borough Council, Mole Valley District Council, Spelthorne Borough Council, Hart District Council, Rushmoor Borough Council, Woking Borough Council, Runnymede Borough Council, Surrey County Council, Tandridge District Council

- Main issue discussed was the London housing numbers shortfall being pushed out to the surrounding areas. CDC has small villages adjacent to this area, where little development is planned. The South Downs National Park separates the rest of Chichester District from the area in question. It was agreed that the attendees would be separated into smaller groups for future meetings, in order to discuss individual elements to be reported back to the full group.
- A draft Memorandum of Understanding was put forward for the group. All were asked to suggest amendments before the next meeting, to be organised in June 2014.

Actions taken under the Duty to Cooperate – Havant Borough Council

Email from HBC Planning Policy Team Leader to CDC Executive Director, 8 October 2012

- Havant Borough Council is committed to meeting the 6,300 requirement set out in the adopted Local Plan (Core Strategy), and nothing more at this point. It is unlikely that HBC would review their housing need for some time after adoption of the site allocations document, due to be adopted December 2013.

Liaison meeting with Havant Borough Council, 11 December 2012

- Havant wanted reassurance that the level of development proposed at Southbourne would not have an adverse impact on the access to the A27 in their Borough, and about the need to agree the available wastewater headroom capacity available to each authority at the Thornham wastewater treatment works.

Rural economy meeting, 28 January 2013 – Hampshire County Council, East Hants District Council, Havant Borough Council

- Agreed to look at a more formalised Hampshire - West Sussex (districts, counties, Park) approach to DtC once EHDC SHMA is received, early April. Officer-based discussions first looking at evidence received and governance models (including members) possibly based on WSPB/PUSH; also invite Waverley/Surrey if they wish.

Duty to Cooperate meeting, 28 October 2013 – Hampshire County Council, East Hants District Council, Havant Borough Council, Waverley Borough Council, SDNPA, Surrey County Council, Winchester City Council, WSCC

- Discussion over the need to establish a new formal forum to demonstrate DtC, or Memorandum of Understanding. Opportunities for joint working to reduce resources whilst providing excellent examples of effective DtC. Discussion of strategic priorities for each authority that could have cross-boundary impacts.

Infrastructure meeting, 14 November 2013 – Havant Borough Council, Hampshire County Council, West Sussex County Council

- Key output of recent meeting at CDC with HCC, HBC and WSCC - that there are no strategic cross boundary transport issues but HCC do want to be involved in detailed Transport Assessment scoping stage of sites affecting the A259 (e.g. Southbourne). CDC don't believe there is capacity to accommodate higher housing figures in Chichester Plan area unless major infrastructure needs are sorted out, including wastewater and transport.

Duty to Cooperate meeting, 22 April 2014

- This meeting was the culmination of a series of meetings under the DtC at officer level with the need to involve members to confirm the content of this engagement before submission. CDC Local Plan proposes a figure of 410 dwellings per annum, with an assumption of 70 dwellings being delivered in the SDNPA. The figures were derived from the shared evidence on housing needs by the Coastal West Sussex authorities.
- CDC explained that a range of constraints meant the housing figures could not increase without environmental harm, despite not being able to meeting full objectively assessed need. Reference was made to the significant allocation of 350 homes in Southbourne

Parish that would be identified through the neighbourhood plan. CDC queried whether, given the unmet needs in the Chichester plan area, Havant would be able to assist.

- Although HBC have a five year supply, developers are not delivering existing planning permissions. The updated SHMA commissioned by the Partnership for Urban South Hampshire (PUSH) meant that there would be no scope to accommodate any of Chichester's unmet need as any spare capacity may be needed to deal with the increased housing need in PUSH. Environmental constraints and the impact of recent flooding would make it difficult for HBC to accommodate any unmet need from other authorities.
- CDC referred to officer meetings involving West Sussex and Hampshire County Councils, HBC and CDC to discuss infrastructure issues around development in Southbourne. There were no major issues with highways or education, but there may be decreased capacity for children from Havant Borough to access schools in West Sussex. HBC confirmed they had no problem with this, and that HCC would need to improve schools to make them more attractive for residents.
- It was agreed that there was no need for a Memorandum of Understanding or Statement of Common Ground. The benefits of continuing cooperation were recognised, and further meetings would take place when the respective plans had progressed.

Consultation Responses

Preferred Approach (March - May 2013)	Further Consultation (July – Sept 2013)	Pre-Submission (Nov 2013 - Jan 2014)
<ul style="list-style-type: none"> • It will be particularly important to assess the impact of this level of development in Southbourne on the A259 and the A27 in Havant Borough • Growth in Westbourne needs to be carefully planned to maintain the undeveloped gap between Emsworth and Westbourne and thus prevent coalescence between the two settlements. • HBC pleased that CDC is proposing to meet its identified need through the Local Plan. HBC reiterated that if this were to change, HBC is unable take any unmet need because of the advanced progress of their own Local Plan and environment and infrastructure constraints. 	<p>No representations made</p>	<ul style="list-style-type: none"> • Plan will be unsound if CDC cannot state where unmet need will be met, as it is not compliant with NPPF or positively prepared due to not meeting objectively assessed need. There is no capacity in the physical constraints of HBC to meet any unmet housing need from Chichester. • It is agreed that the District Council has worked cooperatively and constructively with the Borough Council over the years. • Reference should be made to headroom at Thornham WwTW • Growth in Southbourne and Westbourne may put pressure on schools just over the County boundary in Hampshire, and therefore developer contributions may be sought for additional school places. • Growth in Westbourne needs to be carefully planned to maintain the undeveloped gap between Emsworth and Westbourne and thus prevent coalescence between the two settlements. • HBC is concerned that policy 28 will

		allow edge and out of centre retail development that may have an adverse impact on the vitality and viability to town centres both within Chichester District and Havant Borough.
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Havant Borough Council did not respond to earlier informal consultations on the Draft Local Plan: Key Policies.

Hampshire County Council has raised the issue of transport assessments in relation to development at Southbourne on a number of occasions. Officers from WSCC have done further work on traffic modelling assumptions and came to the conclusion that no further modelling is required prior to the respective Local Plans going to examination.

Actions taken under the Duty to Cooperate – Horsham District Council

Duty to Cooperate meeting, 11 June 2013

- Main issue under DtC is the reliance of some of Chichester's northern villages upon infrastructure in Billingshurst. In particular, there are impacts on secondary education and use of the railway station car park. HDC confirmed it would not expect CDC to meet any unmet housing needs, but would not be able to take any shortfall from neighbours either due to the sensitive rural nature of its villages. Agreed that CDC and HDC would need to have a statement of common ground in due course.

Workshop 1: Sub Regional Planning: Duty to Cooperate, 23 July 2013 - Incorporating Strategic Issues into Local Plans

- Alignment of evidence bases in the Coastal West Sussex, East Surrey and South London SHMAs is desired. There is a need for shared evidence base with agreed methodologies. Need for effective engagement with the LEP.

Duty to Cooperate meeting, 26 September 2013 HDC meeting its objectively assessed need and some of the wider need of the Gatwick Diamond in recognition of Crawley being unable to meet full objectively assessed need. Horsham intends to make comments on the Coastal West Sussex Local Strategic Statement to the effect that the CWS authorities should explore every possibility for meeting their housing needs before approaching adjoining SHMAs for assistance. Horsham has received the Brighton and Hove Statement of Common Ground, and is in discussion with Mid Sussex and Crawley about whether to sign it.

Coastal West Sussex response to Horsham Draft Preferred Strategy, 29 November 2013

- "In conclusion, whilst the draft Preferred Strategy is welcomed, there is a concern that the Plan has not demonstrated sufficient evidence to date of co-operation with coastal authorities, under the new duty to co-operate, especially on the strategic issue of housing provision. The neighbouring coastal Councils would welcome being part of a joint approach/strategy on housing provision with Horsham District and other relevant local authorities as your draft Plan progresses."

Workshop 2: Sub Regional Planning: Duty to Cooperate, 9 January 2014

- Presentation from the LEP

Workshop 3: Sub Regional Planning: Duty to Cooperate, 4 March 2014

- Presentation from PAS on the DtC. Group session 1 – How can authorities support economic growth and housing provision in the context of the Duty to Cooperate? Group session 2 – Identify key actions including those relating to evidence, timetables and decision-making processes. What mechanisms are required to take actions forward?

Duty to Cooperate meeting, 11 April 2014

- This meeting was the culmination of a series of meetings under the DtC at officer level with the need to involve members to confirm the content of this engagement before submission. CDC Local Plan proposes a figure of 410 dwellings per annum, with an

assumption of 70 dwellings being delivered in the SDNPA. The figures were derived from the shared evidence on housing needs by the Coastal West Sussex authorities.

- CDC explained that a range of constraints meant the housing figures could not increase without environmental harm, despite not being able to meeting full objectively assessed need. Reference was made to the sensitivity in landscape terms of the north eastern part of the district. CDC queried whether, given the unmet needs in the Chichester plan area, Horsham would be able to assist.
- HDC advised that there was some capacity within Horsham's housing provision figure to assist neighbouring authorities with some unmet need. It would be for CDC to demonstrate where the unmet needs were derived from, i.e. the rural north east or Chichester city, and articulate how provision in Horsham could help meet those needs.
- HDC referred to the PAS facilitated DtC workshops that had been hosted by Horsham, and the recent DtC Statement and letter that had been sent to CDC. CDC confirmed there would be a response, including some additions to the evidence base.
- The benefits of continuing cooperation were recognised, and further meetings would take place when the respective plans had progressed.

CDC response to Horsham Duty to Cooperate Plan, 28 April 2014

- Confirmation that the Horsham DtC Plan covers the main strategic issues. Suggestions of amendments to be made with regard to the governance structure of the Coastal West Sussex and Greater Brighton Strategic Planning Board, and further amendments to information on CDC evidence base.

Consultation Responses

Horsham DC has not responded to any consultations on the Chichester Local Plan, formal or informal, at any stage.

Actions taken under the Duty to Cooperate – South Downs National Park Authority

Liaison meeting, 3 August 2012

- SDNPA thought that the joint evidence based study was a good idea in order to provide robust evidence around our duty to cooperate and to show how we are working jointly to meet housing needs across the housing market area.

Liaison meeting, 9 November 2012

- Both local planning authorities are members of the Coastal West Sussex Planning Board, and have worked jointly on the SHMA, and are contributing to the work being undertaken by GL Hearn to pull all the evidence together including that relating to constraints.

Duty to Cooperate meeting, 5 February 2013

- The SDNPA considers the 16% split as CDC's portion of the SE Plan figure for the rest of the District as a reasonable estimate. However, it is too early for the SDNPA to say what their housing requirement will be in the part of Chichester within the National Park. This is down to timing issues as the SDNPA are at a very early stage in the preparation of their plan, and that they won't be in a position to have this information until they reach their Preferred Option stage in January 2015.

Duty to Cooperate meeting, 28 October 2013 – Hampshire County Council, East Hants District Council, Havant Borough Council, Waverley Borough Council, SDNPA, Surrey County Council, Winchester City Council, WSCC

- Discussion over the need to establish a new formal forum to demonstrate DtC, or Memorandum of Understanding. Opportunities for joint working to reduce resources whilst providing excellent examples of effective DtC. Discussion of strategic priorities for each authority that could have cross-boundary impacts.

Duty to Cooperate meeting 6 February 2014

- Presentation by SDNPA officers to CDC members on the SDNPA Local Plan.

Duty to Cooperate meeting, 12 March 2014

- This meeting was the culmination of a series of meetings under the DtC at officer level with the need to involve members to confirm the content of this engagement before submission. CDC Local Plan proposes a figure of 410 dwellings per annum, with an assumption of 70 dwellings being delivered in the SDNPA. The assumption of 70 dwellings per annum did not seem unreasonable, but could not be signed up to by the SDNPA as it would need testing through their own local plan process. All agreed the need for and benefits of continuing cooperation but until the SDNPA plan is further advanced it would not be possible to identify a more specific housing figure for delivery within the Chichester District part of the National Park.
- CDC explained that a range of constraints meant the housing figures could not increase without environmental harm, despite not being able to meeting full objectively assessed need. The impact of development in the east-west corridor at on the setting of the SDNPA could be mitigated, but any increase in housing numbers could have a significant adverse impact. SDNPA accepted development in the east-west corridor but

would be concerned if numbers were to increase, in particular at the Westhampnett/North East Chichester SDL. SDNPA could support CDC in not increasing density of development in the area between Chichester and Emsworth.

Duty to Cooperate meeting, 8 May 2014

- Presentation by CDC officers to SDNPA members on the CDC Local Plan

Consultation Responses

Preferred Approach (March - May 2013)	Further Consultation (Jul – Sept 2013)	Pre-Submission (November 2013 - January 2014)
<ul style="list-style-type: none"> • Where district-wide information is referred to it should be highlighted that the information is not available at the plan area scale. • The Westhampnett development area would require more scrutiny at masterplanning stage to address potential visibility issues from views within the SDNP. 	<p>No representations made</p>	<ul style="list-style-type: none"> • Plan is sound & legally compliant • Minor modifications suggested for clarity of Plan area. Would like a specific recognition that housing will be confined to the south of Westhampnett/NE Chichester SDL. • The shortfall in objectively assessed need will not be able to be made up within the SDNP. CDC will need to demonstrate how it has engaged with neighbours to make up the shortfall in accordance with DtC.

SDNPA did not respond to earlier informal consultations on the Draft Local Plan: Key Policies.

The South Downs National Park Authority has a standing invitation to CDC Development Plan Panel, and representatives have given a series of presentations to CDC Members on the status of the SDNPA Local Plan. This is an open opportunity for CDC's nearest neighbours to cooperate. Quarterly officer level meetings take place with the SDNPA to discuss common issues.

Actions taken under the Duty to Cooperate – Waverley Borough Council

Letter from CDC to WBC Planning Policy Manager, 28 May 2012

- Answered questions regarding DtC/cross boundary issues set out in an earlier letter sent by WBC.

DtC meeting at Waverley Borough Council, 21 March 2013

- It was agreed that a 'Statement of Common Ground' be prepared as the way forward, to demonstrate that both authorities have properly considered the Duty to Cooperate. This would be drafted by Waverley, and would state that no strategic cross-boundary issues were raised by either local planning authority.

Statement of Common Ground between Waverley and Chichester, 14 May 2013

- Waverley Borough Council is not seeking to meet any of its housing needs through development within Chichester district, nor has Chichester District Council asked Waverley to make provision for housing to meet needs arising in Chichester district.

Letter from CDC to WBC Principal Planning Officer, 25 June 2013

- CDC declines to take part in the new SHMA being prepared by Waverley Borough Council, as Chichester is covered by the Coastal West Sussex Strategic Housing Market Area. The findings of both SHMAs should be shared between the authorities.

Waverley Strategic Housing Market Assessment Stakeholder Event (15 August 2013)

- Attended by representative of CDC. The purpose of the event was to seek comments on the proposed methodology for the Assessment including the approach to identifying the Housing Market Area.

Duty to Cooperate meeting, 28 October 2013 – Hampshire County Council, East Hants District Council, Havant Borough Council, Waverley Borough Council, SDNPA, Surrey County Council, Winchester City Council, WSCC (CDC: MA)

- Discussion over the need to establish a new formal forum to demonstrate DtC, or Memorandum of Understanding. Opportunities for joint working to reduce resources whilst providing excellent examples of effective DtC. Discussion of strategic priorities for each authority that could have cross-boundary impacts.

Letter from CDC to WBC Planning Policy Manager, 7 January 2014

- Provided links to CDC Local Plan evidence base following an earlier telephone conversation. Confirmed a DtC meeting would be set up shortly.

Duty to Cooperate meeting, 27 March 2014

- This meeting was the culmination of a series of meetings under the DtC at officer level with the need to involve members to confirm the content of this engagement before submission. CDC Local Plan proposes a figure of 410 dwellings per annum, with an assumption of 70 dwellings being delivered in the SDNPA. The figures were derived from the shared evidence on housing needs by the Coastal West Sussex authorities.

- CDC explained that a range of constraints meant the housing figures could not increase without environmental harm, despite not being able to meeting full objectively assessed need. Reference was made to the sensitivity in landscape terms of the north eastern part of the district.
- WBC commented that their constraints are similar to CDC, with the additional constraint of green belt. Recent extensions to the AONB and Special Protection Area designation constrain growth around Farnham and Haslemere.
- Both recognised the difficulties in meeting their respective objectively assessed need for housing. It was agreed that as the South Downs National Park lay between the two authorities, it would not be a sustainable solution for unmet housing needs to be met in the other district/borough. It was agreed that the north eastern part of the CDC plan area is inappropriate for increased levels of development due to landscape, transport/sustainability and proximity to the South Downs National Park.
- The need for a Memorandum of Understanding was considered, which could include issues such as infrastructure, and the agreement that neither authority could provide for unmet housing needs within each other's district/borough. As most gypsy and traveller movements were along the coast there were no significant cross-border issues.
- The benefits of continuing cooperation were recognised, and further meetings would take place when the respective plans had progressed.

Consultation Responses - Waverley did not respond to earlier informal consultations on the Draft Local Plan: Key Policies.

Preferred Approach (March - May 2013)	Further Consultation (Jul – Sept 2013)	Pre- Submission (Nov 2013 – Jan 2014)
<ul style="list-style-type: none"> • Ask that CDC take into account the potential cumulative impact of the development planned in the northern part of the district • Requested that CDC and WBC officers continue to work together, to give careful consideration to any potential cross-boundary impacts arising from the scale and location of development in the northern part of the district, in addition to housing proposed in the National Park • Sought reassurance that the level of housing now being planned in Chichester is justified and will not create pressure for additional homes outside Chichester, including on Waverley 	No representations made	No representations made*

*Representations were made after the closing date and have not been formally accepted:

Policy 4: Housing Provision

The Council has noted that Chichester District Council does not consider that it can meet the full objectively assessed housing need in a sustainable way (paragraph 7.7 of the Plan). It appears that the most up to date figure for need is 529 homes a year, but that the Plan seeks to deliver approximately 410 a year. It is acknowledged that some of this shortfall is expected to be delivered in that part of the District within the National Park. If there is a shortfall then this could put pressure on other boroughs/districts to accommodate more

housing. Therefore, it will be necessary to demonstrate through the Examination the robust evidence to justify this position.

Policy 5: Parish Housing Sites and Policy 25: Development in the North of the Plan Area

The Council has previously commented on the proposal to deliver a total of 339 dwellings in the northern part of the District, adjacent to Waverley Borough. It is understood that these will be provided on a number of small sites, including sites to be identified and delivered through Neighbourhood Plans. The Council would like to reiterate its previous comment that account is taken of the potential cumulative impact on local infrastructure arising from the overall amount of development planned for the northern part of the district.